

LOCAL GOVERNMENT IMPLEMENTATION OF JUSTICE40-COVERED FEDERAL PROGRAMS

*Identifying Early Lessons and
Areas for Improvement*

Capstone Workshop In Applied Earth Systems Policy Analysis

Portland
Source: Google Images, Hand Luggage Only

Columbia University

LAND ACKNOWLEDGMENT

“The Leni-Lenape and Wappinger people lived on this land before and during colonization of the Americas. We recognize these Indigenous people of Manhattan, their displacement, dispossession, and continued presence. We are reminded to reflect on our past as we contemplate our way forward to support Indigenous people and other marginalized communities of this land and advance our commitment to justice.”

Source: Columbia University

OUR TEAM

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Baltimore Skyline

Source: Google Images



Project

EXECUTIVE SUMMARY

HIGHLIGHTS:

- Cities use existing or newly created mapping tools and platforms to identify marginalized groups in their localities. Many of these tools are used in conjunction or as an alternative to the federal CEJST mapping tool, overlaying local data sets that reflect unique city-specific features. Officials are concerned that the federal mechanism to define a community as disadvantaged under the CEJST tool has embedded shortcomings in different city contexts. Cities currently use CEJST primarily as a criteria-checking exercise for Justice40 applications, making the tool more representative of the areas that are eligible for funding, rather than a precise indication of where environmental justice communities are located.
- Local governments and officials often encounter significant barriers, including administrative capacity limitations, lack of staff with technical grant writing experience, and inter-agency coordination issues. Programmatic funding available for Justice40 initiatives through grants however, is not seen as a widespread issue. Cities widely view the amount of funding under Justice40 as transformational, with the administrative capacity to spend the funds being a challenge.

- Effective community engagement strategies between the six cities vary. However, cities often rely on pre-existing relationships with well established community-based organizations (CBOs) for Justice40 project collaborations, instead of partnering with lesser known (and often less resourced), smaller CBOs. This raises concerns about inclusivity, especially when new and smaller CBOs are being sidelined from participating in Justice40 initiatives.
- Despite challenges with government distrust and staffing shortages, there are numerous success stories. City officials from Dayton, Baltimore, and Portland highlighted positive examples of community-driven projects, such as directing funds towards installing electric vehicle charging stations in low-income neighborhoods (Dayton) and financing community-responsive grants for clean energy and infrastructure (Portland), demonstrating how federal support can drive meaningful local environmental projects.
- The report provides strategic recommendations for both state and federal governments, which include allocating merit-based awards to streamline grant applications and reduce administrative burdens for city governments, dedicating additional time to responding to the needs of city officials, extending timelines for grant applications, providing additional funding for administrative capacity, creating more flexibility within CEJST, and running technical assistance programs for city officials and CBOs.



Downtown Detroit

Source: Anna Bunting, University of Michigan

CONTEXT

The following report was prepared as part of a capstone project for Columbia University's Master of Public Administration in Environmental Science and Policy degree program. It seeks to elucidate the World Resources Institute (WRI)'s goal of supporting local governments in effectively harnessing the potential benefits of the Justice40 Initiative—an executive order aimed at rectifying the historical underinvestment in marginalized communities through targeted federal environmental, climate, and energy policies.

Combining a systematic literature review with interviews with both career professionals and city staff who lead the current implementation of environmental justice programs across the country, the following research offers a critical examination of how the Justice40 Initiative has benefited and challenged local governments.

Specifically, the report draws on qualitative interviews with local government officials and staff across six strategically selected cities—Baltimore, MD, Albuquerque, NM, Portland, OR, Dayton, OH, Birmingham, AL, and Detroit, MI. Interviews were conducted with 14 city officials and four environmental justice experts to support an analysis of the successes, barriers, and best practices in the local implementation of Justice40 programs with the aim of answering the four research questions:

GUIDING QUESTIONS

1 How are local governments navigating federal guidelines related to Justice40?

2 How are local governments collaborating and partnering with their historically marginalized communities, including community-based organizations, local grassroots leaders, faith-based organizations, and others?

3 What are the key barriers being faced by local governments in implementing Justice40-covered programs? What is working well and leading to positive change?

4 What can the federal and state governments do to help governments reach their goals? How can local governments do things differently to leverage this historic opportunity?

SECTION 1: LITERATURE REVIEW FINDINGS AND GAPS: CHALLENGES IN 2024

The literature review revealed that there is a lack of information regarding the operational challenges city governments face, the role of partnering organizations in Justice40 implementation, the standardization of evaluation metrics, and strategies for leveraging federal support. The lack of information covering these areas made these key areas to address in the interviews. Secondly, there are various implementation and community engagement strategies used across federal, state, and city levels, leading to the unequal distribution of resources, misunderstanding of federal funding structures, and insufficient government guidance documents. Lastly, there are concerns around how “disadvantaged communities” (DACs) are identified and defined by the federally mandated CEJST tool. CEJST is critiqued for not fully capturing all indicators of environmental injustice, particularly around race. A lack of clear criteria around community engagement requirements also makes compliance with federal guidelines difficult.



Figure 1: Understanding the Needs of a Community through Meaningful Public Engagement

Source: U.S. Department of Transportation

SECTION 2: ANALYSIS OF THE FOUR GUIDING QUESTION

Navigating Federal Guidelines

Local governments are using both the federal CEJST and custom local mapping tools to define and identify disadvantaged communities more accurately. While CEJST offers a uniform standard, there are concerns about its effectiveness due to its reliance on census tracts rather than actual community boundaries and its binary classification of disadvantaged status. For the majority of the six cities studied, CEJST's broad thresholds have resulted in large areas of each city being qualified as disadvantaged, making it unclear which communities are most vulnerable. This has led cities to seek greater flexibility and local customization in these federal tools, to better align with the unique characteristics and needs of their communities. Furthermore, city officials emphasized a desire to receive more guidance and education on federal resources aiming to help officials better navigate the often complicated application process under compressed timeframes.

Key Barriers to Implementation

Local governments face significant challenges in administrative capacity, impacted by budget constraints, staffing shortages, and varying levels of expertise within city departments. The complexity of federal grant applications and the need for technical expertise in grant writing are major hurdles, limiting the ability of cities to secure and implement funding for Justice40 programs effectively. Additionally, there are issues with inter-agency coordination and effectively engaging all underserved communities, which can hinder the comprehensive implementation of programs.

Collaboration with Marginalized Communities

Cities are employing a range of strategies to engage with historically marginalized communities, though administrative capacity issues often limit these efforts. Many local governments rely on established relationships with CBOs for engagement and partnership. The greater capacity and experience of larger CBOs can result in the potential overlook of smaller or less established groups for partnership. This approach raises concerns about the inclusiveness of engagement processes and the equitable distribution of benefits. Efforts to broaden community inclusion often face obstacles such as staffing limitations and reliance on pre-existing networks.

SECTION 2: ANALYSIS OF THE FOUR GUIDING QUESTION

Leveraging Justice40 Benefits

City officials and experts suggest that expanded technical assistance, strengthened community engagement, and improved inter-agency coordination could help cities more effectively leverage Justice40 benefits. Allowing communities to identify the issues most relevant to them, and reversing the traditional model of solutions being imposed by governments, will help foster better community relations, while creating frameworks and platforms from continuous interagency coordination will improve the efficiency of projects aiming to support communities. Furthermore, using resources such as the Environmental Protection Agency's (EPA) Thriving Community Technical Assistance Centers (TCTACs) could enhance local capacities for grant management and community engagement. Recommendations for the federal government include providing clearer guidelines on grant applications, extending application timelines, and including provisions for administrative funding to support ongoing implementation efforts.

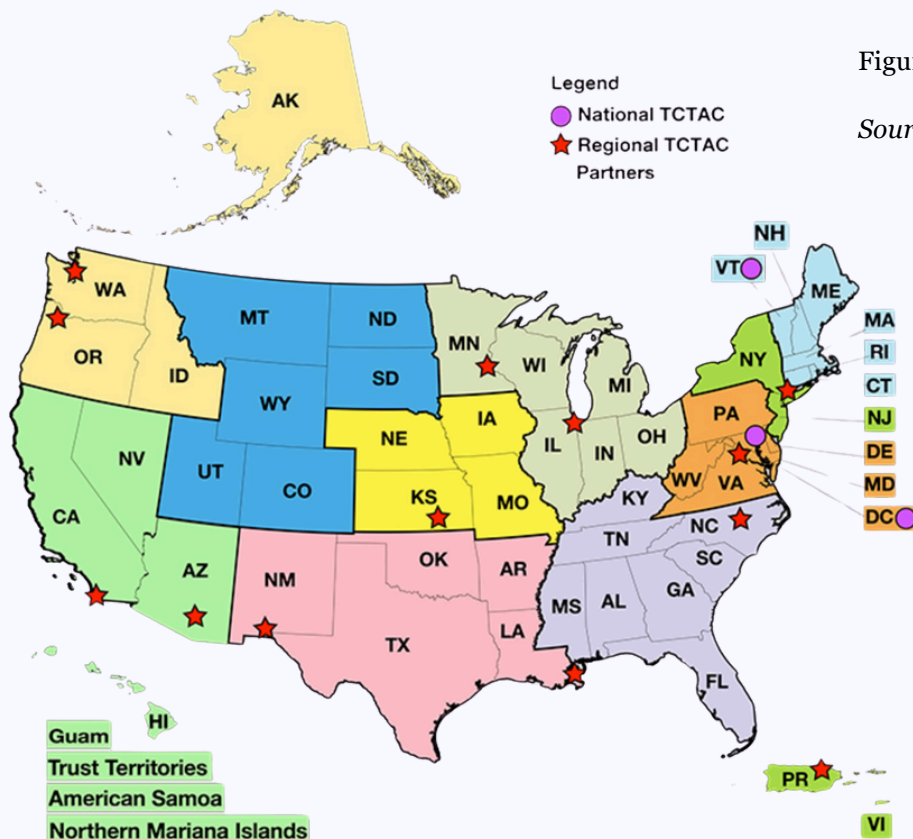


Figure 2: EPA TCTACs Map

Source: EPA

SECTION 3: OPTIMIZING IMPACT THROUGH STRATEGIC RECOMMENDATIONS FOR WRI

Improve Data Collection and Measurement

It is recommended that WRI partner with federal agencies to refine data collection methods for defining DACs beyond CEJST's current scope. The goal is to develop a unified platform that would enable cities to provide regular feedback on the accuracy of DAC designations and data, fostering better communication and more precise targeting of initiative benefits.

Enhance Community Engagement

WRI is recommended to support cities in devising tailored community engagement strategies. This includes leveraging high-traffic city events for data collection to reduce administrative burdens and widen resident participation demographics. Additionally, WRI can aid in the creation of protocols for recording community inputs comprehensively.

Assess and Support Technical Assistance Programs

WRI is positioned well to evaluate technical assistance programs such as EPA's TCTACs and Department of Energy's (DOE's) Regional Energy Democracy Initiative (REDI). Insights from these assessments can guide cities in accessing and utilizing additional support structures where needed, which can be crucial in effectively leveraging technical assistance, education, and community benefits.

Create a Space for Local Officials to Engage and Share Best Practices

It is recommended that WRI facilitate the exchange of experiences among city officials nationwide by establishing online or in-person forums. This initiative would encourage the sharing of strategies and collaborative problem-solving, thereby enhancing the implementation of community-led climate initiatives.

Introduction

Documenting, understanding, and acting upon the disproportionate environmental burdens that certain communities face is critical when addressing the climate crisis. Environmental justice is a term used to describe the phenomenon that in the United States, and around the world, people who are low-income, Black, Indigenous, Latinx, and Asian tend to live in spaces where environmental hazards, extreme natural and human-made disasters, and environmental degradation occur more frequently [1]. For decades, environmental justice has not been considered in political decision-making, despite the inextricable ways in which race and class have implications for the environmental burdens that communities face [1]. As such, addressing and advancing the principles of environmental justice through robust policy is crucial. The following report aims to contribute an analysis of the challenges and opportunities that municipal governments face in leveraging the benefits of the Justice40 Initiative. Through a series of interviews with 14 city officials and four experts, the report seeks to answer four research questions listed in the project description.



Birmingham, AL

Source: Google Image

GUIDING QUESTIONS

- 1 How are local governments **navigating federal guidelines** related to Justice40?
- 2 How are local governments **collaborating and partnering with their historically marginalized communities**, including community-based organizations, local grassroots leaders, faith-based organizations, and others?
- 3 What are the **key barriers being faced by local governments** in implementing Justice40-covered programs? **What is working well** and leading to positive change?
- 4 What can the **federal and state governments do to help city governments** reach their goals? How can local governments do things differently to leverage this historic opportunity?

Justice40 Overview

The Justice40 Initiative was introduced by the Biden-Harris Administration in 2021 under Executive Order 14008, “Tackling the Climate Crisis at Home and Abroad.” Justice40 aims to ensure that 40% of the benefits of certain federal investments support historically marginalized communities facing disproportionate impacts of climate change, pollution, and other environmental hazards [2]. More information about the Justice40 federal guidelines can be found in the “Appendix” section.

Justice40 covers federal grants, loans, and direct payments across seven key sectors: combating climate change, promoting clean energy and efficiency, enhancing clean transportation, providing affordable and sustainable housing, tackling legacy pollution, improving clean water and waste systems, and supporting training and workforce development in the aforementioned key areas [2]. In support of initiatives across these different dimensions, the Biden Administration also launched three additional pieces of legislation:

7

sectors

518

federal
programs

40%

benefits

3

supporting
legislations

Supporting Legislation

1

American Rescue Plan Act (ARPA)

The 2021 American Rescue Plan Act (ARPA) provides immediate economic relief in response to COVID-19, offering support to working families, extending unemployment benefits, reducing health insurance costs, aiding small businesses, and increasing tax credits for children and dependents [3]. It aligns with the Justice40 initiative by targeting aid to minority and marginalized groups disproportionately affected by economic and environmental challenges [3].

2

Bipartisan Infrastructure Law (BIL)

The 2021 Bipartisan Infrastructure Law (BIL) addresses legacy environmental issues such as pollution from Superfund and brownfield sites, abandoned mines, and areas which lack clean water access [4]. It also invests in emission reduction, water infrastructure improvement, climate resilience, and sealing abandoned oil and gas wells, focusing on aiding communities affected by environmental and health crises [4].

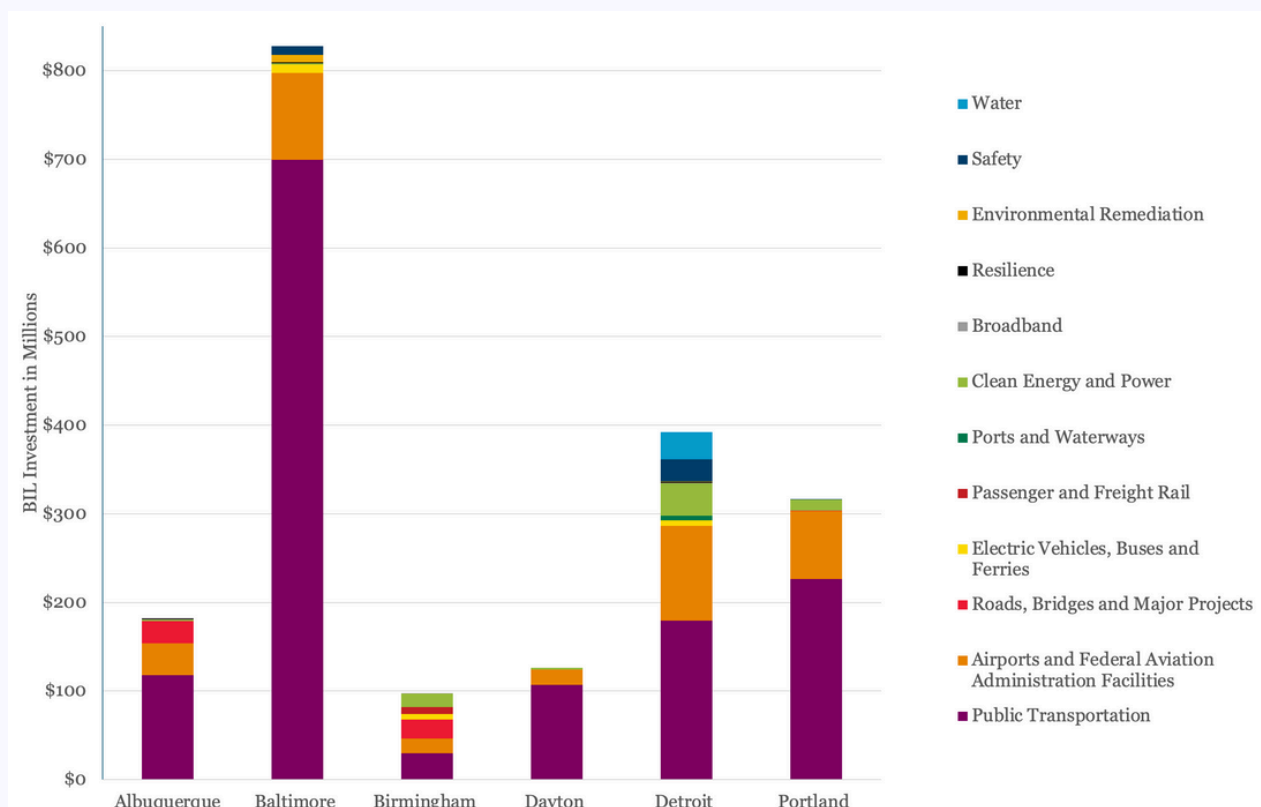


Figure 3: BIL Funding Per City by Category, Source: National League of Cities, 2023

Supporting Legislation

3

Inflation Reduction Act (IRA)

The Inflation Reduction Act (IRA) of 2022 is the largest government investment in addressing climate change in US history. The legislation allocates approximately \$369 billion to climate and energy programs, aiming to rejuvenate the economy by benefiting working families and historically neglected communities [5][6]. Through a variety of grants and subsidies, the IRA reduces energy costs, promotes environmental justice, and fosters a sustainable economic growth model.[5] It also introduces environmental justice grant programs to enhance public health, minimize pollution, and address environmental disparities [5].



United States White House

Source: Google Images

OUR CLIENT

The World Resources Institute

The World Resources Institute is a global nonprofit working to meet people's essential needs, protect and restore nature, stabilize the climate, and build resilient communities. WRI-US' newest program, People-Centered Transitions, focuses on environmental justice, equity, and the just transition—to better understand how the energy transition impacts people and communities that have been marginalized, underserved, and disproportionately burdened by pollution and climate change.

MISSION

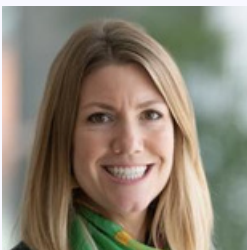
WRI is a global think tank with the aim to “move society to provide for the needs and aspirations of current and future generations” in advising government officials on implementation through their research.



WORLD
RESOURCES
INSTITUTE

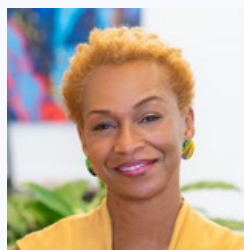
Headquartered in Washington DC, WRI's work spans over 50 countries.

People-Centered Transitions Team



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PROJECT DESCRIPTION

As part of a capstone project for Columbia University’s Master of Public Administration Environmental Science and Policy degree program (MPA-ESP), a team of 11 graduate students completed this report in collaboration with WRI People-Centered Transition Team. The purpose of this project was to develop a deeper understanding of how local governments can better leverage the potential benefits of the Justice40 Initiative, a piece of U.S. legislation that seeks to confront and address decades of underinvestment in marginalized communities.

Through interviews with local government staff who are working on Justice40-covered federal grant programs across the country, as well as a systematic review of current literature on this topic, **this report seeks to shed light on the following questions:**



PROJECT OBJECTIVES

This report provides answers to the four key questions provided by WRI. The report will inform WRI's policy recommendations and program strategies to ensure that the targeted benefits of all programs under the Justice40 initiative reach those most in need. The following analysis provides the client with a nuanced understanding of the operational landscape around the Justice40 initiative at the local government level. This knowledge is essential for WRI's People-Centered Transitions Team, as it illuminates where local governance support for Justice40 covered programs is most needed, how cities can improve community engagement, and provides insights into best practices and key barriers. The report's analysis will further the People Centered-Transition Team in their effort to ensure optimal delivery of Justice40 benefits to communities that are most in need.

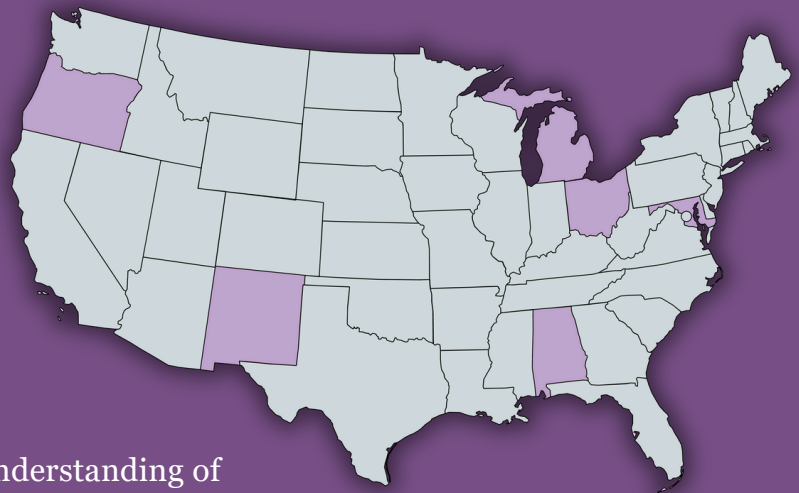
PROJECT STAKEHOLDERS

Municipal officials from Albuquerque, New Mexico; Portland, Oregon; Baltimore, Maryland; Birmingham, Alabama; Detroit, Michigan; and Dayton, Ohio were interviewed to gain insights into the local challenges and opportunities that Justice40 presents.

The experts helped inform the team's understanding of the current obstacles and opportunities of Justice40, leading to the development of interview questions.

The city officials' local experience in administering federal programs covered under Justice40 provided the team with qualitative data to answer the four research questions from a city-level perspective. **Specifically, data from interviews has been collated to outline the current barriers to the implementation of Justice40, how these challenges can be mitigated, and what local solutions are needed to ensure that benefits from Justice40 are reaching targeted communities.**

Figure 4:
Our Study States



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REPORT METHODOLOGY

In collaboration with WRI, the MPA-ESP team developed a framework for conducting research and an analysis to inform an up-to-date understanding of how Justice40 implementation is working on the ground. The MPA-ESP team methodology consisted of two main components: 1) conducting a literature review, and 2) carrying out interviews with Justice40 experts and city officials. The team then synthesized findings from both into this report and several in-person presentations which are provided in the conclusion.



Figure 5: Project Timeline

Cities Approach:

Rationale and Selection Criteria

WRI proposed two different approaches to select interview candidates. Approach 1 was a city-based research approach, while Approach 2 focused on a Justice40 program-led approach.

Approach 1

City-Based

Approach 2

Justice40 Program Based



The MPA-ESP team selected the city-based approach for several reasons. First, it allowed for clear comparison of environmental justice communities across geographies, and second, it allowed the data to be controlled for variances in political context and governance issues. The six cities, chosen in collaboration with WRI's People-Centered Transition team, include Albuquerque, NM; Baltimore MD; Birmingham, AL; Dayton, OH; Detroit, MI; and Portland, OR.

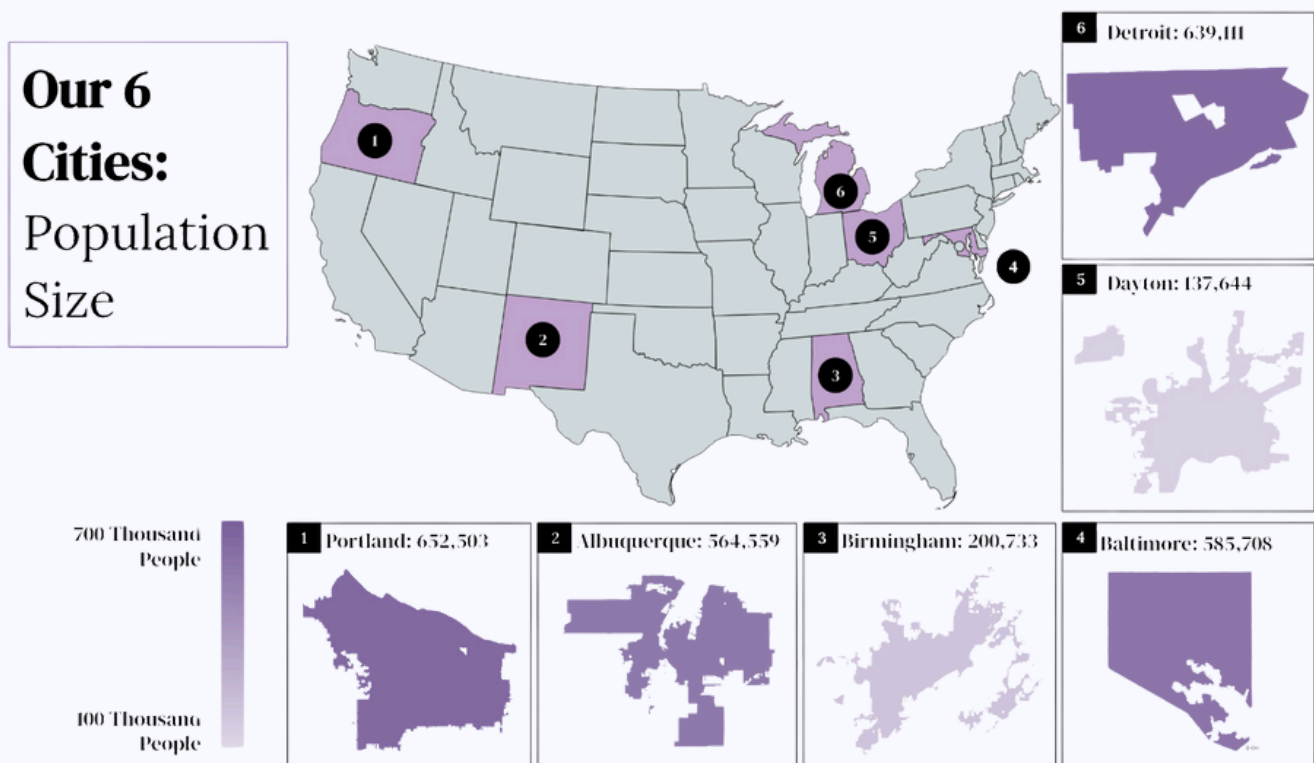
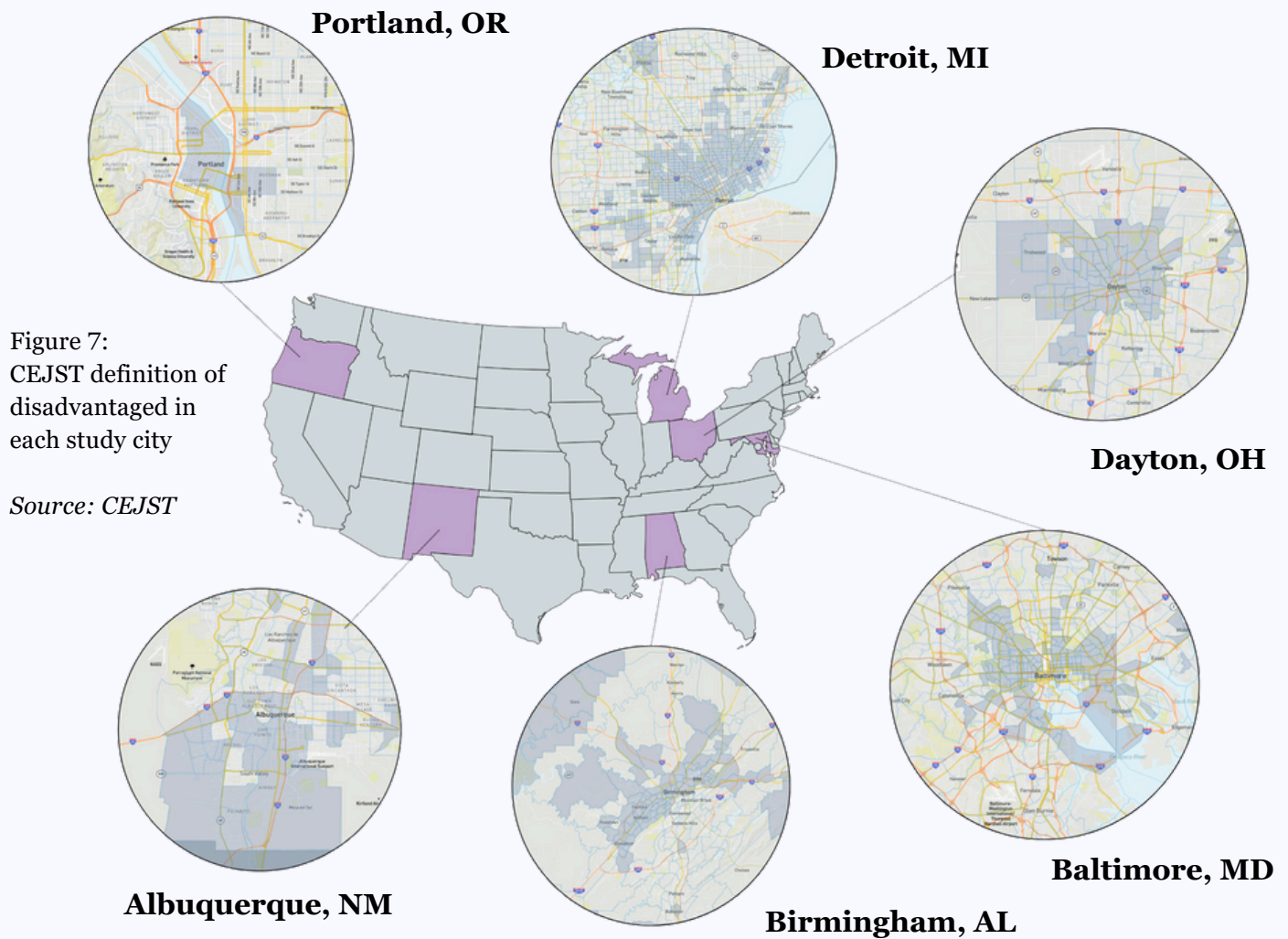


Figure 6: Population size of each study city
Source: U.S. Census Data



The six cities were selected to represent a range of geographies, political contexts, and population sizes, to allow the final recommendations to be broadly applicable to other cities. Therefore cities such as New York and New Orleans, which have unique attributes not commonly found across the US (such as very large population size in New York City and a complex political environment in New Orleans) were not selected for this study.

Then, an analysis of how local agencies interlink, manage resources, and engage with community development was conducted. Similarities and differences between geographies, demographic breakdown, and democratic versus republican leaning politics, led to varied observations from a range of environmental justice communities within diverse urban settings. These observations were then used to create a series of data visualizations and context-rich recommendations focusing on local governance barriers and solutions, as well as implementation strategies and recommendations within specific jurisdictions.

MPA-ESP Team Approach

In order to maximize time, resources, and efforts, the MPA-ESP consultants split into two teams to complete the final deliverables.

Literature Review Team

The Literature Review Team was responsible for researching the available resources on Justice40 implementation. The team used a systematic literature review with keyword searches in academic databases and government archives to construct a timeline of environmental justice in the United States. Then, a content analysis of Justice40 documents and related literature was conducted to identify common implementation tools and challenges. Similarly, a comparative analysis of policy documents from different government levels was completed to highlight differences in implementation and funding mechanisms. Lastly, a critical review of academic critiques and policy analyses was used to outline the key issues within Justice40 legislation.



Interview Prep Team

The Interview Preparation Team was responsible for conducting preliminary research on the demographics, political landscape, environmental justice issues, and currently funded Justice40 initiatives in the six cities of focus. A descriptive analysis was first performed, using census data, environmental reports, and government documents to summarize demographics, political landscape, and Justice40 initiatives in the six focus cities. Then, stakeholder outreach was conducted to identify and connect with interview candidates across the cities of focus. The team further developed a model of interview questions derived from experts interviews, the literature review and background research that was organized in key subject areas



Interview Approach

The MPA-ESP team did two rounds of interviews:

1. Interviews with 4 national scholars, practitioners, and environmental justice experts.
2. Interviews with 14 representatives from 6 cities.

ENVIRONMENTAL JUSTICE EXPERTS

To complement the literature review and to inform the development of interview questions for city officials, the following scholars, practitioners, and environmental justice experts were consulted to gain perspective on the advancement of environmental justice initiatives and regulations at the local, national, and global scales



Michael Dexter

Director of Federal Programs, Southeast Sustainability Directors Network

With a background that includes working at the EPA, Dexter has honed his expertise in sustainability policy and program implementation. His contributions offered the MPA-ESP team a comprehensive view of the challenges associated with Justice40 implementation, the dynamics of community partnerships, and the distribution of federal funding, enhancing discussions with city officials.



Dr. Sheila Foster

Professor, Georgetown University & Columbia University

Dr. Sheila Foster is a distinguished educator, legal scholar, and author, holding positions at Georgetown University and as a visiting professor at Columbia University. Her pivotal work in environmental justice lays a crucial foundation for understanding its impact on communities. Dr. Foster shared her profound knowledge on community partnerships and engagement, coupled with insights into federal support mechanisms for Justice40 processes.

“I think we are just now coming to define climate justice.....there's a history of the way in which we've ended up that goes way back.....we need to follow the processes of disinvestment and dispossession to understand the impacts we're seeing now and who they are impacting, in order to inform the city about the best ways to approach”

- Sheila Foster





Matthew Stephens-Rich

Director of Technical Services , Electrification Coalition

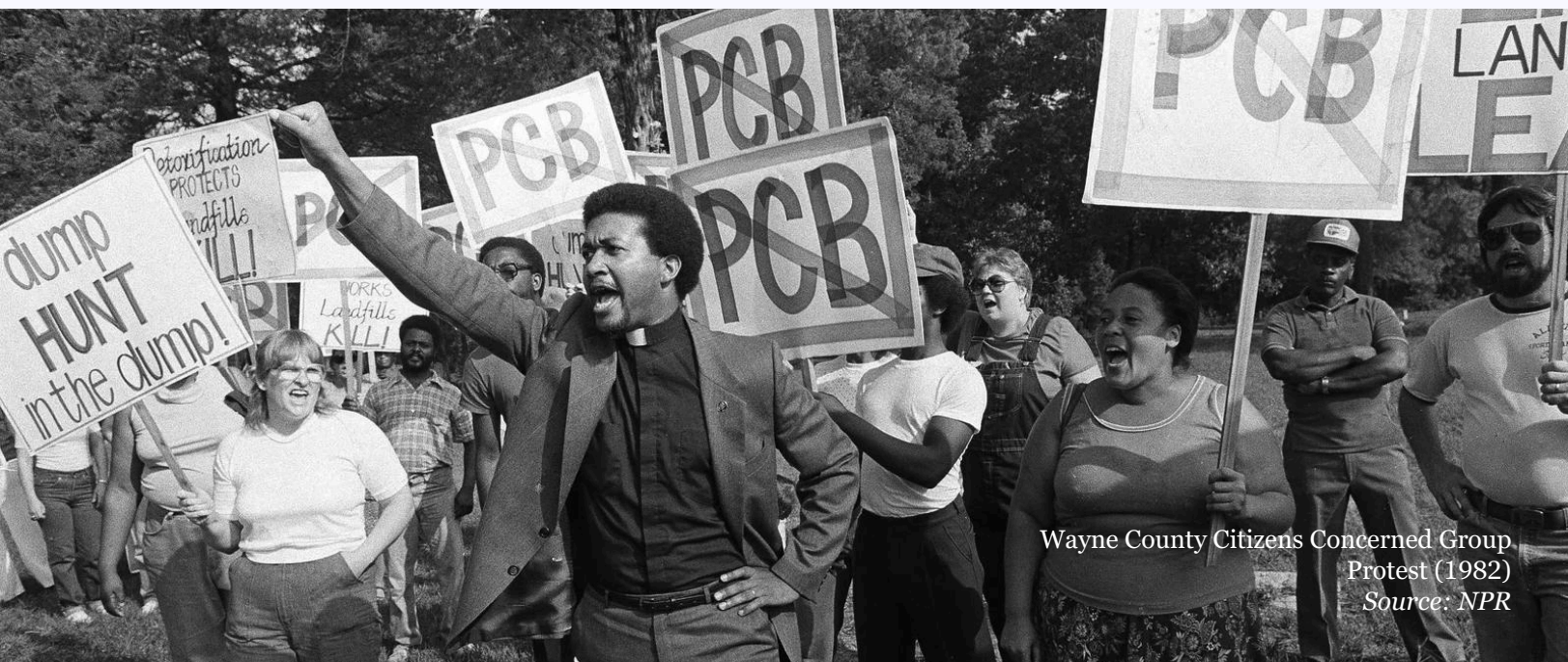
Matthew Stephens-Rich, the Director of Technical Services at the Electrification Coalition, shared his deep understanding of local and regional grant programs designed to increase electric vehicle (EV) adoption. His expertise informed the MPA-ESP team how Justice40 has influenced grant application processes, for example, the additional criteria of Community Benefit Plans (CBPs) – which has prompted administrators to reconsider the community impacts of their programs. His insights informed the formulation of questions asked later to city officials on co-developing plans with communities.



Gabriel Watson

Data Science and Applications Lead, Environmental Policy Innovation Center (EPIC)

Gabe Watson is currently the Data Science and Applications Lead at the Environmental Policy Innovation Center (EPIC), where his expertise in data and mapping tools informs his environmental justice work at community, state, and federal levels. Watson provided the MPA-ESP team with specific insights on how to enhance data utilization to more accurately reflect community experiences. He also emphasized the importance of addressing existing challenges in data usage prior to engaging with city officials.



Wayne County Citizens Concerned Group
Protest (1982)
Source: NPR

Literature Review Findings and Gaps:

Challenges in
Implementation in
2024

SECTION 1



Detroit Skyline
Source: Baltimore Magazine

Summary

A literature review was conducted throughout the month of February in 2024 to gain a deeper understanding of Justice40’s implementation and challenges, identify gaps in the available Justice40 literature, and to determine any previously published findings related to the four research questions evaluated. Published reports and scholarly articles on the intricacies of federal screening tools, implementation strategies of federal agencies, and city-specific demographic information for the six chosen cities, were closely examined. In doing so, gaps in existing research were identified and organized according to the four guiding questions provided by WRI. This information was then used to formulate relevant and original interview questions for city officials.

Identified Literature Gaps

The available literature on Justice40 lacks a detailed analysis on the challenges city governments face in terms of navigating federal guidelines, standardizing success metrics and indicators, partnering with local organizations, and best practices for enhancing federal support. Additionally, insights into inter-agency cooperation to support the implementation of Justice40 within cities was found to be missing.

Operational and Inter-agency Barriers:	The publicly available literature lacks detailed analysis on the challenges city governments encounter in aligning with Justice40 guidelines, such as administrative capacity, technical expertise, and financial constraints. Additionally, insights into municipal inter-agency cooperation for implementing Justice40 within cities are missing, leaving a gap in understanding collaborative efforts and associated challenges.
Role of Partnering Organizations:	The literature does not adequately address how public-private partnerships, involving government relationships to private companies or NGOs, integrate community input into Justice40 initiatives. This omission highlights a gap in understanding the involvement and impact of these organizations in program execution.

Success Metrics and Indicators:

There is a notable absence of standardized metrics for evaluating the effectiveness of Justice40 initiatives at the local level. This gap makes it difficult to determine which strategies are successful and why, hindering the ability to assess the initiative for potential future improvements. More broadly, there are also few unified resources which detail best practices or which analyze the successes and challenges of Justice40 programs across the country.

Strategies for Leveraging Federal Support:

Despite existing literature on the roles of federal and state governments in supporting municipal goals, specific strategies or recommendations for city governments to enhance federal support are lacking. This gap suggests a need for more targeted guidance on leveraging federal resources effectively

Legislative and Implementation Concerns:

Initial assessments across several stakeholder groups, including non-profit and for-profit organizations, have identified the need for improved clarity in legislation and policy design, reporting metrics, implementation, and defining environmental justice communities with specific concerns regarding the criteria for defining marginalized communities through CEJST [7] [8] [9]. The tool's methodology has been criticized for not fully capturing key indicators of environmental injustice, such as race, which could limit program eligibility and effectiveness [8]. The variation in Justice40's implementation across different governmental levels points to a need for standardized guidelines and metrics [7][10] [11] [12] [13]. The absence of federal guidance on evaluating program success has left states and cities to navigate implementation challenges independently, affecting overall initiative coherence and impact [7] [9] [11] [13].

Federal, State, and City Implementation:

At the federal level, Justice40 grants are administered through 514 programs across various agencies, each with unique implementation practices [14]. This decentralization has resulted in varied approaches to stakeholder engagement and program evaluation [15] [16] [17]. State responses to Justice40 have been influenced by political affiliations, with Democratic states more inclined to adopt the initiative's recommendations [18] [19]. At all levels, there are improvements that can be made in how each level of government interacts with one another to successfully implement Justice40 initiatives [20]. However, the main challenge at the local level is the absence of clear success metrics, leading to uncertainties about program alignment with community needs [20]. City implementation highlights the importance of accurate data and effective tools for both program evaluation and community engagement, as well as the need for resources and capacity to effectively implement environmental justice initiatives [21] [22]. Cities must navigate the complexities of aligning municipal policies with Justice40 objectives, often without adequate support or guidance [23] [24].

The literature review provided the MPA-ESP team with a better understanding of Justice40 implementation from the perspective of technical experts, legal scholars, and federal agencies, which then informed the development of interview questions posed to officials from the six cities analyzed. Anonymous interviews were conducted over the course of March and April 2024. Interviews with city officials provided data which informed the answers to the four research questions. See the following figure for information on how our guiding questions and literature review informed our interview questions to city officials.

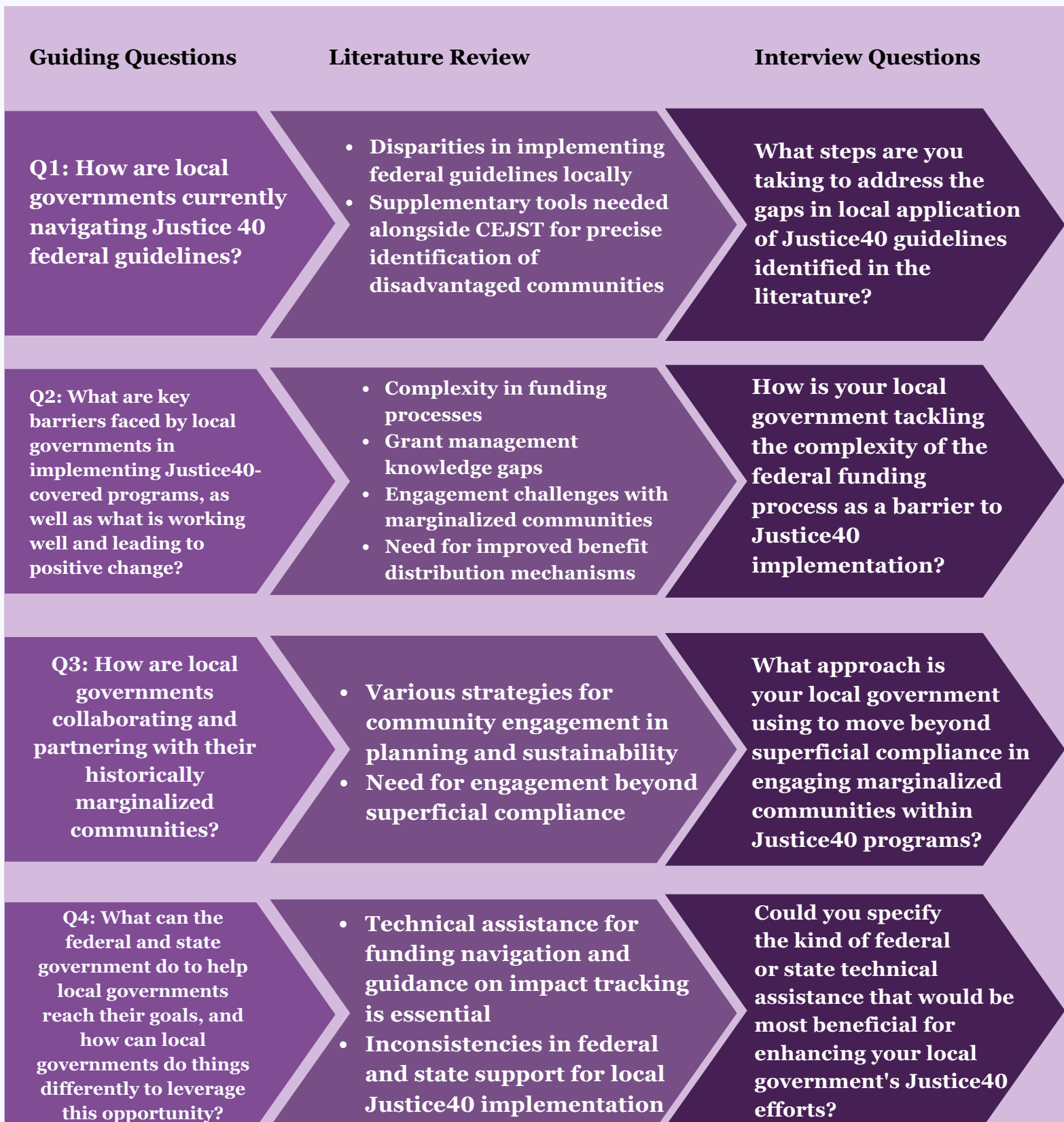


Figure 8: How the research questions informed the literature review and interview questions

Local Government Trends and Analysis

SECTION 2



The Río Grande
Source: New Mexico Magazine

Question #1 Overview

How are local governments are navigating federal guidelines related to Justice40?

1

Local definitions and mapping tools enable a better understanding of communities' challenges but are not standardized across cities

2

The broader definitions of EJ to cities has enabled numerous grant opportunities

3

The awareness and knowledge of federal frameworks and opportunities ranged across interviews

Question 1: How local governments are navigating federal guidelines related to Justice40?

Summary

The funds available under Justice40 to support city projects are largely considered unprecedented. According to local city officials, federal funds can successfully support programs in federally defined disadvantaged communities across the six cities studied. However, identifying and securing funds for administrative purposes poses significant challenges to city offices. The federal CEJST, which defines marginalized communities, employs a broad definition based on 34 federal indicators. As a result, many areas within each of the six cities studied are classified as disadvantaged, qualifying them for Justice40 funding; however, this is not the case in every city.

The broad classification used by CEJST have prompted cities to rely on their own, more detailed local mapping tools, or to create new tools better tailored to their communities. Additionally, some officials who were interviewed were not aware of CEJST, particularly those who are not directly involved with grant applications. This situation underscores the need for further education around the mechanism and effective use of CEJST.

Recap

Four Guiding Questions:

How local governments are navigating federal guidelines related to Justice40?

What are key barriers faced by local governments in implementing Justice40-covered programs, as well as what is working well and leading to positive change?

How are local governments collaborating and partnering with their historically marginalized communities, including community-based organizations, local grassroots leaders, faith-based organizations, and others?

What can the federal government (and also states) do to help local governments reach their goals, and how can local governments do things differently to leverage this historic opportunity?

Federal Funds and Justice40 Guidelines: Defining Disadvantaged Communities

Across all six cities, there is consensus that leveraging Justice40 guidelines to access federal funds is useful in achieving equity and sustainability goals and directing investment to marginalized communities. Federal

guidelines require cities to define their DACs using CEJST, which can then streamline the process for grant applications in ensuring programs reach these communities. In Baltimore, Birmingham, and Dayton for example, officials stated that many communities in their respective localities are currently classified as “disadvantaged” under federal

guidelines, thereby making compliance with Justice40 guidelines relatively straightforward. In Dayton, one official estimated that 87% of their tracts are considered disadvantaged by the CEJST definition.

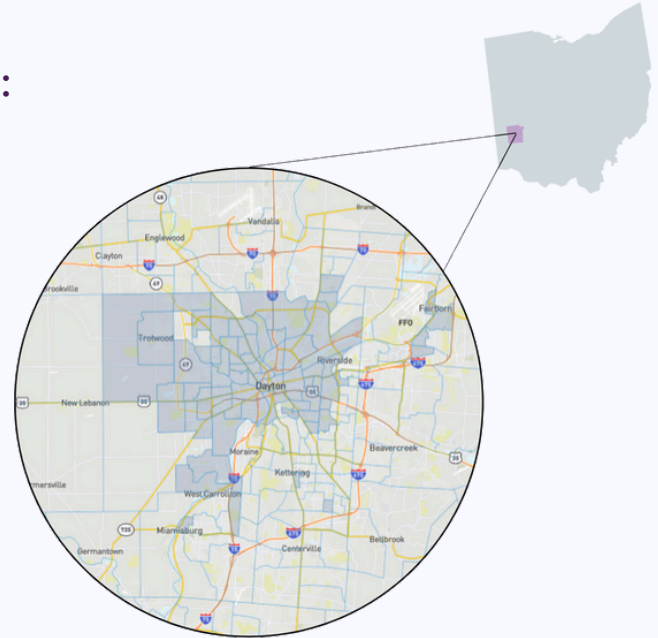


Figure 9: CEJST definition of disadvantaged communities in Dayton
Source: CEJST

On the other hand, concerns have been raised around the federal definition of “disadvantaged communities” as defined by CEJST. Specifically, the term is broad and encompasses a variety of conditions and metrics. In Albuquerque, it was said that the classification of a community as “disadvantaged” overlooks a community’s assets, features that are equally important when determining where projects should be implemented.

The broad definition used by CEJST has made the tool limited in its usefulness for many local governments, outside of applying for Justice40 grants. This is exemplified by the pattern of local governments creating their own local mapping tools, a pattern found in all six cities studied. Locally designed and informed mapping tools can often better define environmental justice communities for local needs. This is because these tools often overlay additional local data layers, encompassing the unique and evolving features of neighborhoods, as opposed to just displaying data found in census tracts. While CEJST helps direct that federal programs are benefiting communities deemed disadvantaged by federal standards, it’s often not the main resource cities rely on to identify these areas.

Local officials familiar with the intricacies of federal grants recognize CEJST's role in meeting Justice40 requirements. Yet in Dayton and Birmingham, interviews with several high-level city officials revealed that some are unaware of CEJST entirely, despite their involvement in equity-focused initiatives. Instead, these officials often turned to local metrics for evaluating equity. Cities with their own mapping tools – as in Baltimore, Albuquerque, Portland, Detroit, and Dayton – tend to favor these tools over CEJST when deciding what areas to prioritize for Justice40 programs. The mapping tools used by these five cities range both in terms of the time period in which they were created (some being before and others being after the launch of Justice40) and in terms of representing the municipal or state level.

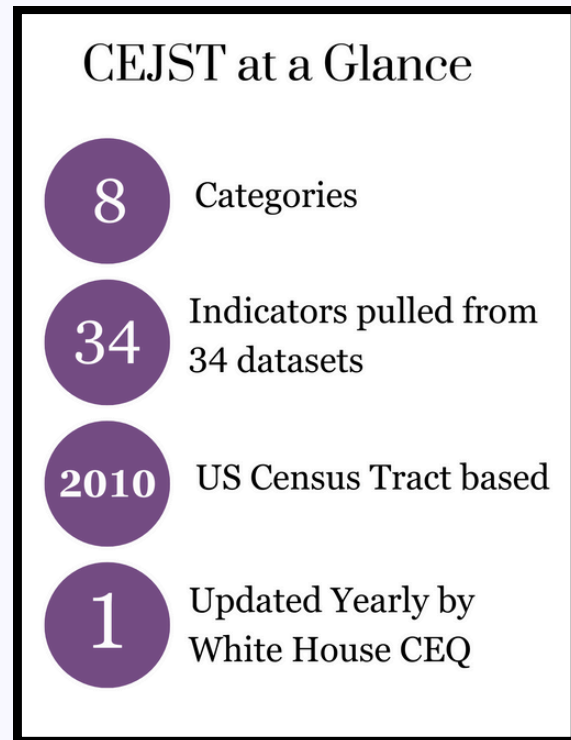


Figure 10: Climate and Economic Justice Screening Tool at a glance

The local tools described by officials in Dayton, Albuquerque, Portland, and Baltimore are similar in that they all encompass additional metrics that are omitted from CEJST, such as race, homeownership, city council districts, community planning areas, libraries, museums, and cultural centers, to name a few. In Albuquerque and Portland, several city agencies teamed together to create specific local mapping tools, demonstrating collaborative efforts. In Albuquerque, the city's Planning Department collaborated with the Office of Equity and Inclusion shortly after the launch of Justice40 to create their mapping tool, and in Portland, prior to the announcement of Justice40, the Bureau of Transportation and the Bureau of Parks, Recreation, and Urban Forestry had published both an equity mapping tool and a series of maps identifying areas that could benefit most from tree planting programs, integrating indicators including race and languages spoken. However, the mapping tool used most often by officials in Detroit is not city-specific, rather, they use the Michigan-wide state tool known as MiScreen. Detroit's city Office of Sustainability also utilizes an existing internal dashboard to supplement MiScreen and to track community engagement efforts, though the metrics are not yet publicly accessible.

CEJST can be beneficial if no alternative mapping tools exist. However, it is evident that in cities that do have specific maps showing local assets and additional indicators not included in the federal CEJST mapping tool, these maps are the predominant and preferred tool used to identify and define communities.

Enhancing CEJST: Local Innovations and Challenges

In all six cities, an analysis of the use and efficacy of the CEJST revealed several commonalities as well as distinct challenges.

A recurring theme in the data from interviews with city officials is the difficulty of using static mapping tools like CEJST to accurately reflect the dynamic nature of Environmental Justice communities. Cities like Portland and Albuquerque highlighted that their communities and neighborhoods change rapidly over time and CEJST relies on data from static census tracts which are only redrawn every ten years, therefore not capturing these changes, nor do they reflect the cultural, historical, and social identities that define neighborhoods. Census reliant tools could become quickly outdated, leading to misrepresentation and ineffective resource allocation.

Another shared concern is the reliance on binary thresholds within CEJST, which can result in neighborhoods being improperly categorized due to the introduction or removal of a single large entity that skews its metrics. Tracts are identified as disadvantaged if they meet more than one burden threshold and the associated socioeconomic threshold. Tracts are identified as not disadvantaged if they do not meet any burden thresholds or at least one associated socioeconomic threshold. This is a specific point of contention for Portland officials. In Portland, some historically-environmental justice neighborhoods have recently been categorized as non-environmental justice (and vice versa) and were ineligible for funding because of a large entity skewing neighborhood metrics. Portland officials gave the example of a community center in a historically black neighborhood that was applying for an energy efficiency grant, but because a new large business had increased the average income of the area, the neighborhood was not categorized as a Justice40 area under CEJST and thus was not eligible for funding. Dayton, on the other hand, points out that almost their entire city is composed of DACs, which dilutes the focus on areas that might require more urgent attention. This indicates a need for more nuanced approaches in specific cities that can provide a spectrum of categorizations rather than binary categorizations.

While CEJST was designed to help identify DACs, most cities interviewed use it simply as a criteria-checking exercise for Justice40 applications. In this way, the tool is more representative of the areas that are eligible to receive funding, rather than a precise indication of where environmental justice communities are actually located. There are, however, exceptions to this critique; Birmingham and Detroit reported that census tracts do indeed align with historically identified environmental justice communities. In addition, cities provided various pieces of information on misalignment with White House Center of Environmental Quality (CEQ) information about CEJST, or expressed overall unfamiliarity of the tool. For example, a Portland official commented that some of their government’s underlying assumptions about the tool may be incorrect, and officials in Detroit and Birmingham reported feeling that they knew where to do equity work without necessarily needing to use CEJST at all. At the same time, some officials cited that the federal government can be flexible with the CEJST categorizations. An official working on Portland’s EV charging program said that he was able to convince the federal government to site EV charging infrastructure outside of a CEJST area after he explained why the proposed site would still benefit marginalized communities. These findings suggest that more information about CEJST, the flexibility of CEJST categorizations, and how cities should provide feedback to the White House CEQ for its scheduled yearly updates, need to be communicated to local officials and taken into consideration by the federal government.

City	CEJST	Supplementary Mapping tool (Agency Published)	Supplementary Mapping Tool (City or State Created)	Historical or Qualitative Data Metrics
Portland, OR	✓		✓	
Albuquerque, NM	✓		✓	
Detroit, MI	✓	✓	✓	
Dayton, OH	✓	✓	✓	✓
Baltimore, MD	✓		✓	✓
Birmingham, AL	✓			✓

Figure 11: Mapping Tool Use across our cities for defining disadvantaged communities (DACs)

Source: Research Interviews

“I wanted to compliment CEJST with a map that captured assets and could also be searched by census tract. I think we could do much more with mapping.” - Albuquerque City Official

Responses and solutions to these challenges vary, as cities have adopted supporting methodologies for DAC identification. Several supplementary mapping tools were referenced by the cities studied, including EPA’s EJScreen tool, the MiEJScreen, and the Maryland Department of the Environment Environmental Justice Screening tool, as well as city-adopted tools independently created by their Sustainability Office staff or City GIS departments. For example, Albuquerque and Portland have sought to address their challenges by developing additional criteria or complementary indicators and mapping tools that take into account community assets and race. Albuquerque's interactive mapping tool shows significant public facility locations like city parks, community centers, and recreation areas (to name a few), pulling data from the Social Vulnerability Index to display important public facilities in respect to Justice40. Dayton prefers a local mapping tool that uses neighborhood specific indicators such as access to health insurance, access to internet, high school graduation rate, and population over 65, creating a local Community Resilience Index for their Equity Map. This helps the city to better understand which communities experience the most environmental justice issues, suggesting a desire for more localized control over how communities are defined and addressed.

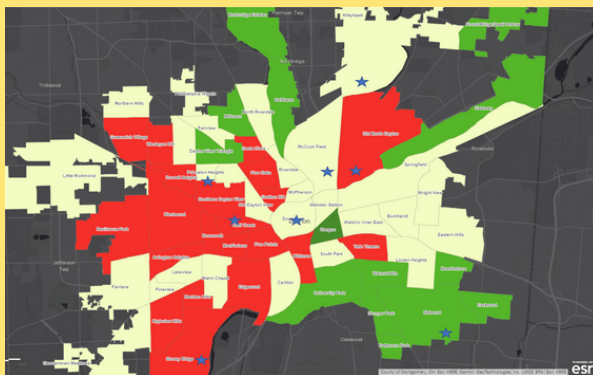


Figure 12: Dayton Equity Map
Source: Dayton Sustainability Office

Indicators Used to Identify Community Concerns

1. Total population
2. Average household size
3. Population over 65
4. Medium household income
5. Medium household age
6. Vacant property
7. High school graduation rate
8. Bachelor degree
9. Graduate degree
10. minority population
11. unemployment
12. Access to health insurance
13. African American population (separate from minority)
14. Access to internet
15. Access to car

The key takeaways from interviews with officials and literature review findings underscore a need for flexibility and local customization in federal tools like CEJST. While a federal framework can provide a starting point, it should be adaptable to allow local governments to define and respond to the needs of environmental justice communities more effectively. Analysis of these trends from these interviews suggests that tools need to be living entities with continuous updates and inputs from local data to truly be reflective and useful. Moreover, the emphasis on mapping community engagement and strengths, as highlighted by Albuquerque, suggests that EJ tools would benefit from incorporating both qualitative and quantitative data, considering local knowledge and community-driven solutions as vital components for environmental justice efforts.

Monitoring Community Engagement Under Federal Guidelines

The analysis found that local governments are using diverse strategies to align with the Justice40 guidelines pertaining to community engagement requirements, both in program research, development, and application process. While designed to benefit communities, oftentimes, adhering to engagement requirements can actually be a burdensome process for residents. For instance, there is a contractual obligation to develop a Community Benefit Plan (CBP) to qualify for any BIL or IRA funding opportunities or loan applications. In some communities, like in Albuquerque, officials have said that community members are complaining about being asked to provide unpaid feedback to help develop these benefits plans, as filling out surveys or questionnaires can take a lot of time. This further impedes the ability for city officials to foster good relationships with community members for which they seek to engage with over the long term.

The interviews also examined if city officials currently use federal resources (such as federal and state information sessions, or online resources like those provided on grants.gov) which aim to make the application process easier to navigate. Baltimore officials have found both state and federal information sessions “very helpful” and have stated that they “should be continued.” However, officials also emphasized the need for greater clarity in regard to how grant funding may be used. Specifically, officials from Baltimore and Detroit have asked questions in the past regarding the possibility of using Justice40 grant funds to cover administrative costs, without receiving answers or feedback. Officials from Dayton, Albuquerque, and Baltimore also noted that they did not receive feedback on grant applications when applications were declined and funds were not awarded. These officials emphasized the desire to receive post-application feedback even when grants are declined, as a means to improve future applications.

Question #2 Overview

What are key barriers faced by local governments in implementing Justice40-covered programs? What is working well and leading to positive change?

1

Budget restrictions on staff and in some cases high vacancy rates present challenges for cities, which are compounded by short application windows

2

There are varying levels of technical ability needed for different federal grants, complex grant guidelines and often small pools of staff that have the expertise needed for these grants.

3

State governments have not been cooperative depending on the city and state relationship and policy alignments. Some officials expressed needing more support from the federal government on implementation

4

Officials often found the funding levels historic but had concerns about implementing the funding.

Question 2: What are key barriers faced by local governments in implementing Justice40-covered programs, as well as what is working well and leading to positive change?

Summary

Local governments face a variety of challenges in administrative capacity such as federal budget restrictions, staffing vacancies, and differing levels of expertise within city offices. There are also barriers associated with effectively engaging underserved and marginalized communities. Furthermore, coordination between agencies and within state governments have proved challenging, and in some cases, these inefficiencies inhibited the implementation of programs such as in Dayton. **While in general federal funds under Justice40 have presented numerous new opportunities for local governments and are leading to positive change, concerns remain in regards to how cities can most effectively leverage and implement those funds in their communities.**

Availability of Staff and Expertise

The availability of staff and expertise can significantly impact the success of Justice40 projects by city governments. Many city officials, including those from Baltimore, find themselves in a constant battle to comprehend the nuanced, often complicated, federal funding guidelines. **This challenge stems from a general lack of specialized training in federal grant management, and is in some cases exacerbated by the inability of officials to access EPA/DOE technical centers that provide grant assistance.** For instance, city officials in Dayton highlighted that despite a strong commitment to developing technical resources such as mapping tools, the sustainability team is constrained by its small size of three people with current funding limiting their technical capabilities. Additionally, an attempt by Dayton city officials to contact an EPA technical center for support was unsuccessful due to the center's high demand.

The lack of staff in city offices also impacts how streamlined local governments can be when navigating the Justice40 grant application process. High vacancy rates in some city governments directly impede their ability to pursue federal grants effectively. For example, some community outreach agencies in Baltimore face up to 40% vacancy rates, significantly disrupting their ability to communicate with communities to gather input prior to grant applications. Similarly, the city of Detroit reported that high-vacancy rates compromised their “on the ground capacity at the local level for municipalities,” something that an official noted “there is a real need for,” as some communities in Detroit are distrustful of government programs. Furthermore, many federal grants for Justice40 projects come with strict timelines for expenditure. This results in surmounting pressure on cities, such as Portland, to spend a large amount of money in a short time period, which cannot be managed effectively without enough staff to implement the projects.

The design of Justice40 guidelines is such that grant allocation is largely focused on the implementation of the project. This has impacted on city offices in Detroit, where interviewed staff mentioned their inability to access funds to cover administrative costs, specifically for positions requiring expertise in grant management. The lack of administrative funding also resulted in the same set of staff working on numerous projects and partnerships simultaneously, leaving less staff members available to work on

the ground and in communities. In some cases, pooling support from state-level grants has been helpful to overcome this barrier. Baltimore, for instance, is anticipated to benefit from another round of funding due to a new cooperative purchasing contract that the city completed in collaboration with an EV charging vendor.

Birmingham Success Story

The city of Birmingham has made a concerted effort to tailor its resources to meet the specific needs of its diverse communities. The city created a Community Resource Department and devised strategic plans to address the challenges of its 99 neighborhoods. After identifying local needs, the city then focused on mapping grant opportunities, many of which are related to transportation, to align with the Justice40 initiative and to maximize funding impact. The city has successfully secured numerous Justice40 grants and other funds to meet its environmental justice objectives. However, due to the city's limited capacity to manage and support ongoing projects, it has paused applying for additional grants. Currently, Birmingham is still implementing the ARPA funds it received in 2021.

Coordination Gaps Between Federal, State, and Local Agents

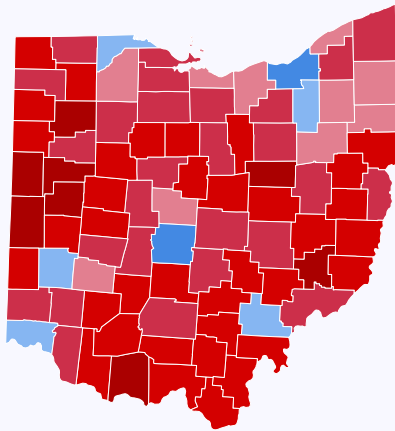


Figure 13: Ohio 2020 election results by county
Source: Google Images

“We enjoy very little coordination or benefit from the state. So that would be a good start, especially because a lot of tax benefit type programs around energy efficiency are being channeled through the states.”

- City Official in Birmingham



State politics and policies can threaten a city's financial stability, impeding their ability to implement federal programs like Justice40. In Dayton, changes in state legislation have reduced its funding capacity. One official described how during their time working for the city, the state had altered the formula used to distribute the Local Government Fund, shifting financial support from cities such as Dayton to smaller townships and suburbs. This change resulted in a significant reduction in Dayton's annual budget. Additionally, the elimination of estate tax, restrictions on speeding camera revenues, and the expiration of COVID-19 related financial waivers at the state level has led to substantial revenue losses for Dayton which impair their administrative capacity for managing Justice40 grants. When seeking assistance, the state advised Dayton's city officials to cease requests for further support, leaving the city to manage its financial problems alone. With the depletion of federal ARPA funds, Dayton currently faces major budgetary challenges that could affect its public services and its ability to secure federal funding.

Competition between local agencies within cities makes it difficult to secure Justice40 funding effectively. City officials in Baltimore highlighted the challenges of competition city agencies when applying for state and federal level grants. As mentioned by city officials in Baltimore, while agencies strive to submit competitive proposals, there is no control over whether other city departments and institutions are applying for the same federal funds. This can foster a competitive environment, even among different areas within city governments, potentially diluting the strength or focus of each individual application.



Figure 14: Challenges identified within our 6 cities of focus

Source: Research Interviews

Additionally, the broader challenge of securing funding amid uncertain federal budget resolutions can abruptly alter available funding streams. This environment requires a strategic approach to grant applications, focusing on projects that align closely with the city's needs and priorities, and ensuring that efforts to secure funding are coordinated (both internally within offices and across agencies too) to avoid competition and to maximize the potential for success.

Inter-agency coordination was highlighted as a key pillar to the success of implementing several programs in Birmingham, according to an official who was interviewed. One example highlighted was the collaborative effort between Birmingham's Office of Sustainability and Birmingham's Transportation Department to integrate Justice40 into new grant applications, including those from BIL funds and the Consolidated Rail Infrastructure and Safety Improvements (CRISI) program. In Dayton, the Sustainability Office often co-writes grants with other departments. For example, the Tree Equity Grant from the US Forestry Service in collaboration with the Forestry Department, and Brownfields Development Grant in collaboration with the Economic Development Department. This has fostered interagency collaboration, and opportunities for program funding that might not have been accessible without such collaboration. Similarly, in Detroit, the Office of Sustainability has been pursuing IRA grants "as a group" alongside other cities in Michigan and the state, demonstrating effectiveness coordination.

What is going well, and what is *not* a barrier?

Interestingly enough, in four of the six case study cities, access to federal grant funding was not a major barrier. Birmingham, where 75% of neighborhoods are identified as DACs, reported no difficulty in securing government funding (and even philanthropic funds). Albuquerque, Dayton, and Portland similarly mentioned that eligible communities were entitled to large pools of grant funding. **Instead, officials in Albuquerque and Portland discussed the challenge of having to *spend* federal or state funding, as these funds cannot be used to address administrative capacity challenges.** An official at the Portland Community Energy Fund (PCEF) — which is not a Justice40 initiative but funded through a 1% surcharge on large corporations doing business in the city — mentioned that they had more funding than they could manage and administer, and feared that if they also applied for more, they would be in a similar situation with too much funding to administer. Albuquerque officials also cited concerns of having a reservoir of unspent money.

However, this trend is not generalizable to all cities. Baltimore officials highlighted that access to federal funding is indeed a limitation and that city agencies sometimes competed with each other for federal funding.

“So we have a range of challenges in this particular moment and it's funding related. But not in the way that you might think. The funding challenge is that ***we have a lot more funding*** than was initially anticipated.”

- City Official in Portland



Source: Google Images

Success Story

Albuquerque pushes past internal expertise and capacity issues to submit grant proposals on time. After struggling to meet grant deadlines, with limited staff and time, Albuquerque issued a city-wide request for proposals (RFP) to solicit grant writers with experience writing federal grants. The RFP was able to temporarily fill this gap. In one instance, Albuquerque had one month to submit a large grant application for a Climate Pollution Reduction Grant (CPRG). CPRG is a program under the Environmental Protection Agency that provides \$5 billion in grants for states and local governments to reduce their greenhouse gas emissions. Due to Albuquerque's incorporation of the RFP, city officials were able to submit the CPRG despite a quick turnaround time, and the grant was awarded.

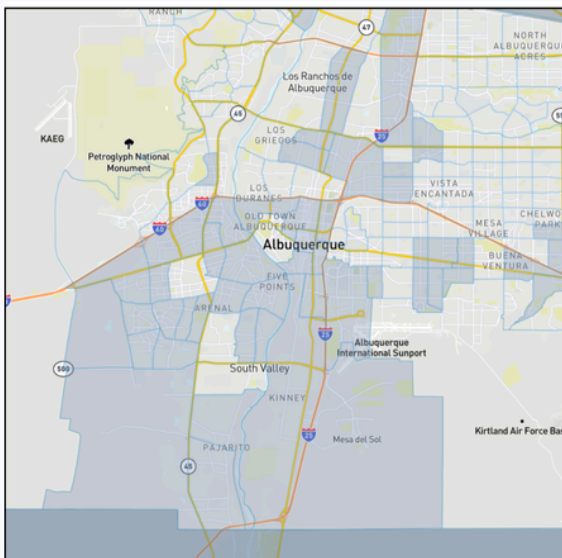


Figure 15: CEJST Definition of disadvantaged in Albuquerque
Source: CEJST

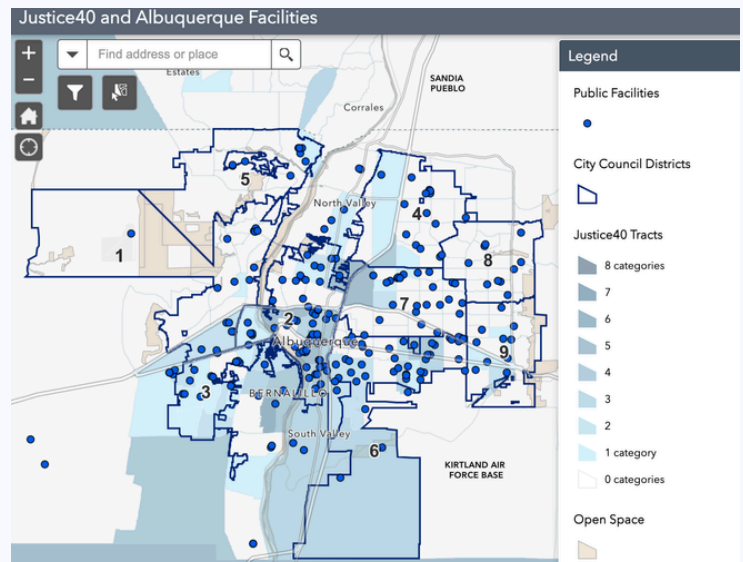


Figure 16: City of Albuquerque Mapping tool
Source: ArcGIS, City of Albuquerque, Esri

Question #3 Overview

How are local governments collaborating and partnering with their historically marginalized communities?

1

All cities faced deficits in data quality and accuracy in defining the changing realities of communities.

2

The often more vocal and established organizations have closer working relationships with officials given their larger capacity to engage and navigate federal grant applications

3

Some city officials expressed concern about specific communities that not well represented such as non-native speakers or those without established social infrastructure

Question 3: How are local governments collaborating and partnering with their historically marginalized communities?

Summary

Local governments are employing various strategies to conduct outreach, engagement, and partnerships with marginalized communities. **Based on the 14 city officials interviewed, the majority disclosed using pre-existing interpersonal relationships to determine which communities to engage with rather than quantitative data metrics such as exposure to environmental hazards. The preference for a relationship-based approach is partially due to the lack of quality data city officials have on local groups.**

This reliance on relationship-based strategies helps cities identify which communities to engage with, and these organizations often assist in suggesting grant ideas, and in gathering necessary community input for project proposals. **However, concerns persist about the inclusiveness of this approach, as typically larger, well-resourced community-based organizations (CBOs) with pre-existing governmental relationships are selected repeatedly, potentially overlooking smaller or lesser-known groups.** To address these challenges and broaden community inclusion in projects and grant applications, cities are implementing various strategies such as hosting community events and forming dedicated outreach teams, though obstacles like staffing limitations and the reliance on established CBO relationships remain significant.

Identifying EJ Communities: Data Deficits and Generational Mistrust

Identifying environmental justice communities is the first step to engaging and collaborating with them. In the context of Justice40, environmental justice communities are “marginalized by underinvestment and overburdened by pollution”[2]. While the six cities analyzed reported a variety of approaches to knowing which groups disproportionately struggle with the effects of environmental degradation and climate change, **all of them acknowledged a deficit in their data when it comes to accounting for these groups.**

For historically underserved and marginalized groups, officials emphasized leveraging existing knowledge and relationships with these communities to inform Justice40 program development, especially in the strategic planning phase. However, in some cases, relying only on existing relationships proved problematic. For example, in Birmingham, officials highlighted that their DACs are considered eligible for Justice40 program benefits due to the generational exposure of neighborhoods to pollution from nearby coal plants and the percentage of families living below the poverty line. Although there would seem to be ample opportunities to include different underserved and historically marginalized communities into Justice40 programs, Birmingham and Portland city officials indicated working predominantly with the same groups or communities—the ones that they had well-established relationships with. In places like Detroit and Birmingham, where affected communities have faced similar issues for generations, the identification of environmental justice communities is often easier. However, working with the same groups precludes new or unorganized groups from being identified or targeted for support.

Identifying and reaching new environmental justice communities for a more successful Justice40 implementation can be challenging for several reasons. First, within historically marginalized groups, there is **often a rooted mistrust of the government due to decades of direct or indirect government neglect.** This is the case for tribal groups in Albuquerque as well as with marginalized groups in other cities [25]. Second, the dynamic or transient nature of some communities — such as those mentioned in Portland, where it was mentioned that there is a significant unhoused population of residents who face constant displacement — makes it difficult to maintain consistent engagement to support updated data. Portland officials also cited that **tribal communities and communities with disabilities can be especially hard to reach**, either because of historical distrust, such as in the case of tribal communities or limited government capacity to conduct tailored outreach to groups with special needs.

Cities with prominent immigrant communities face similar challenges, including language barriers, which can make identification and engagement even more difficult. As a result, the city of Dayton has created an outreach group to address language barriers specifically through their “Welcome Dayton” Program which has seen success in promoting education, business development and access to social services for immigrants [27].

Engaging with Communities

Although EJ communities may be well known, establishing strong relationships with them can require years, especially considering the aforementioned challenges. City officials use various strategies to build trust with communities, recognizing the need for involvement and feedback on Justice40 program development, as well as sustained and meaningful engagement. As several city officials aptly said, outreach requires “meeting communities where they are,” and local city offices have implemented a series of creative strategies to achieve this. Portland's Third Space Approach advocates for empowering communities to exert bottom-up pressure on governments, reversing the traditional top-down engagement model [28]. Organizing community events, like Albuquerque's potlucks, provides a setting that fosters open communication and bonding. Some cities, such as Birmingham and Dayton, assign dedicated staff to work specifically with neighborhood organizations or minority populations. While these efforts highlight the necessity of a cultural shift within city and local governments to prioritize community engagement and trust building, there are significant staff capacity issues which also must be solved in order to improve such outreach efforts across cities. Additionally, city offices must ensure that community members are not overwhelmed in being asked for program feedback, as was noted by one official from Albuquerque.

Moreover, the long-term time frame needed to build trust with communities is often misaligned with the short-term grant timelines required for Justice40 programs. In addition to extending grant timelines, as one Detroit official suggested, there are supplementary mechanisms which cities have used to improve community input into program design and grant applications. Designated offices, such as Dayton's Community Engagement Office, and Albuquerque's Office of Equity and Inclusion, target specific communities and support leaders through training programs. Baltimore has tried to standardize its community engagement approach, starting with key contacts who have strong connections with community activists who can help with level-setting meetings with government agencies to identify challenges and needs. A Portland official also discussed how COVID impacted relationships by causing many in-person events (e.g. council hearings, open input sessions, etc) to be canceled, but said that adapting to creating online communities and informal spaces (e.g. Slack groups) to stay up to date with communities was a successful pivot.

While such efforts have aided in Justice40 program development, officials in each city emphasized that working with the same community members or groups was generally the easiest approach since they have established, proven relationships. One Portland official mentioned that they often saw an unfortunate tradeoff between building deep relationships and getting agreements and contracts signed in a timely manner. Recognizing this issue, Birmingham applied for and was awarded a Bloomberg Innovative Cities grant to support CBO capacity building for organizations that are smaller or newly formed. An official from the city of Dayton also acknowledged that the loudest voices in the room do not necessarily always represent the majority of community members. Thus, while it is easier to consult with the most participatory community members, doing so may quiet the voices of others not frequently heard or lead to misrepresentations of true community values.

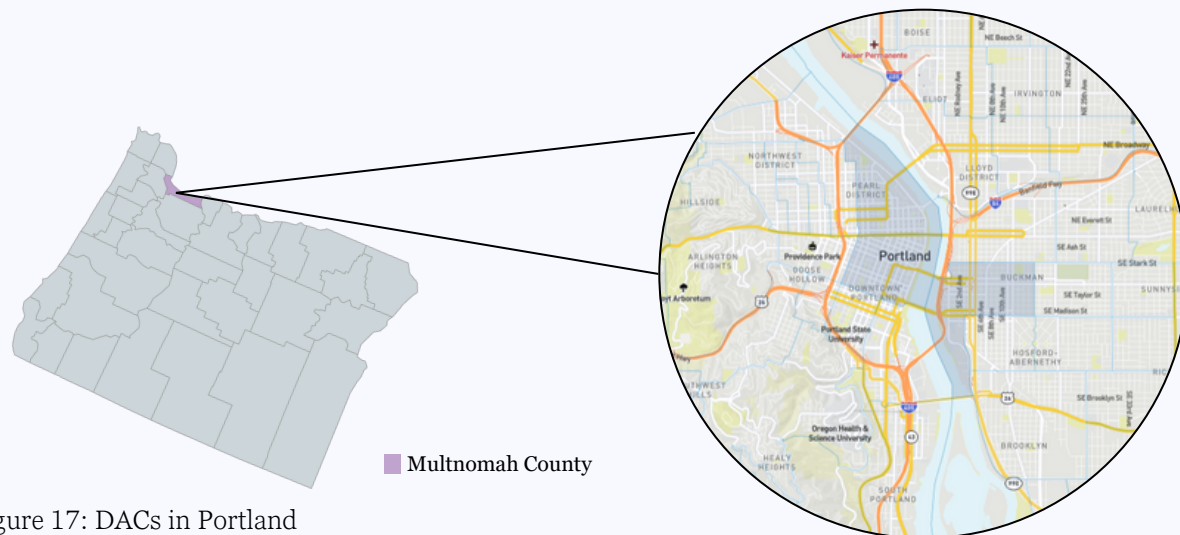


Figure 17: DACs in Portland
Source: CEJST

Success story: An example of a successful community-driven approach is the **Equitable Tree Canopy Program in Portland**. Receiving overwhelmingly positive community feedback, the program addressed disparities in tree canopy coverage across Portland's neighborhoods. Recognizing the importance of shade equity, it focuses on areas with historically lower green investments, particularly in East Portland, and aligns with the broader goals of the PCEF. This fund, supported by a clean energy surcharge on large retailers, finances community-responsive grants for clean energy and building retrofits, transportation decarbonization, workforce development, and green infrastructure projects. The community's positive feedback highlights the effectiveness of the city's engagement strategies and the ability to achieve substantial environmental and social improvements through targeted investments. This method demonstrates Portland's dedication to climate initiatives through utilizing local resources to empower communities and bolstering their resilience to climate-related challenges.

Collaborating With Community-Based Organizations

Across all six studied cities, officials highlighted the significance of cultivating robust partnerships with CBOs to ensure sustained collaboration on various projects. In Albuquerque, a survey issued by the City's Office of Equity and Inclusion revealed that many CBOs lack the necessary technical skills and staffing to manage federal grants, narrowing the choice of partners for city projects. Portland officials similarly mentioned that many smaller CBOs faced obstacles of limited capacity and expertise. Smaller municipalities like Dayton and Birmingham also only have a limited number of CBOs focused on sustainability or environmental justice programs. Inevitably, these focused groups tend to be the primary candidates for partnerships with government offices.

These ongoing partnerships not only streamline the collaboration process for city officials who often face budget and staffing constraints, but also create a direct line of communication and advocacy between the community and the government. Notable examples of such dynamics can be found in Portland, Detroit, and Dayton, where CBOs play a central role in initiating grant applications.

However, this reliance on established CBOs raises concerns about representational accuracy, especially in disadvantaged areas that might lack large and robust CBOs and/or social infrastructure. In Albuquerque, this issue is compounded by the distrust that some smaller CBOs have towards federal programs. To address some of these challenges, cities like Dayton and Birmingham have invested efforts to ensure consistent engagement with hard-to-reach communities, recognizing that larger, more established organizations can sometimes overshadow the needs of smaller groups. For example, in Dayton and Birmingham there are specific grant and contracting opportunities designated to support minority-owned businesses.

“Our Community Engagement Department, I think is one of the strongest things that we get to talk about because we actually have designated staff that go and do education with communities”

- City Official in Dayton



Question #4 Overview

How can city governments/states leverage Justice40 benefits (with state/federal support)?

1

Strengthening community engagement yields better outcomes and ensures that community needs are met with Justice40 programs

2

Interagency cooperation within cities and state governments has enabled more effective approaches to Justice40 Programs

3

The federal government can support Justice40 implementation through better grant management, flexibility with CEJST, and more technical assistance

Question 4: How City Governments/States Can Leverage Justice40 Benefits (with state/federal support)?

Summary

The following section presents recommendations that will enable cities to best leverage Justice40 initiatives. **These recommendations highlight the need for improved communication, thorough technical assistance, and a commitment to community-driven strategies** to facilitate the effective use of federal funds towards building resilient, equitable communities.

City/State Recommendations

To leverage Justice40 benefits with state and federal support, city governments can use resources provided by federal initiatives including the EPA's partnership with the Department of Energy, which has established 16 TCTACs across the country [26]. With a funding allocation of \$177 million, these centers are equipped to address environmental injustice by offering training on how to navigate federal grant systems, write effective grant proposals, and manage grants efficiently[26]. TCTACs also aim to facilitate community engagement, provide language translation services for non-English speakers, and create communication channels for the equitable access to resources [26]. **According to the literature review, these centers have significantly improved the ability for environmental justice communities to apply for grants. However, in some cases, assistance centers have reached capacity and can no longer accommodate additional requests from city governments and officials [26].** This limitation was exemplified in the interviews too. For instance, an official from Dayton described a scenario in which the Office of Sustainability sought assistance from the Minnesota TCTAC for superfund site remediation assistance. Unfortunately, the official was unable to receive support due to the center being already at capacity with existing commitments.

1

***Recommendation 1:
Strengthen Community Engagement***

Local governments need to fully adopt community-driven solutions rather than imposing solutions on communities. This approach allows communities to identify the issues most relevant to them, and enables them to suggest their preferred solutions. Communities should be centered in these processes and local governments should aim to co-create solutions to yield better program outcomes. The strategy reverses a traditional model where city governments seek community input on drafted proposals, serving oftentimes as merely as a procedural formality.

2

***Recommendation 2:
Improve Inter-agency Coordination***

In Portland, Dayton and Baltimore, fostering collaboration among local government departments was suggested as an avenue for improving the efficiency of project implementation. In Birmingham, city officials have greatly relied on inter-agency collaboration for project management and implementation, and oftentimes this partnership has yielded success. Similarly, officials in Dayton noted positive experiences around city department collaboration for facilitating the co-writing of grant applications. However, officials recognize that there are still areas in which efforts could be better coordinated, particularly in the sharing and maintenance of up-to-date community data. Improving inter-agency coordination will require the creation of frameworks and platforms for continuous communication and collaboration among departments, to eliminate inefficiencies and duplications in their efforts.

Portland, Oregon Success Story:

In Portland, there's a significant opportunity to enhance the effectiveness of local government actions by breaking down existing silos and improving internal coordination and processes. The city of Portland has recently scheduled a reorganization of many local government offices to facilitate better coordination. It is hoped that this reorganization will improve the efficiency of pursuing and implementing federally funded projects. By encouraging departments to work closely together, share resources, and streamline processes, cities will be better equipped to maximize the impact of federal funds and initiatives, leading to more successful and impactful outcomes. This strategy requires not just structural changes but also a cultural shift towards more open, collaborative, and integrated operations within local government.

Portland City Hall
Source: Portland Monthly



Federal Government Recommendations

Recommendation 1:

1

Initiate A Merit Based Grant Award System

Allocate merit-based awards to streamline grant applications and reduce administrative burdens for local city governments and the CBOs they work with. Cities with a proven track record of meaningful and continuous community engagement, previous success in grant awards and implementation and with equity and environmental justice frameworks within their state or city government legislation, should be allowed to submit minimized Justice40 grant applications. Much like universities give awards for students who have demonstrated their commitment to learning, cities that have dedicated their commitment to advance environmental justice issues within their communities but have limited capacity to continuously apply for larger grants should be given an opportunity to receive project funding on the basis of the merit of their past project implementations, and/or current environmental justice state or local policies. To implement this, state legislatures or state level government agencies with Justice40 covered programs could design criteria for cities to be graded on based on current policies, frameworks, and previous incentives which incorporate environmental justice and equity. Then, when new grant opportunities arise, cities with high grades would be able to submit shorter applications and project implementation plans to reduce the administrative burden caused by the grant application process, increasing the speed at which they receive funding.

Federal Government Recommendations

2

Recommendation 2:

Dedicate more time to responding to city officials.

Dedicate more time to responding to city officials. City officials have many questions about grant guidelines and obligations, **but the federal government can be unresponsive to requests and clarification, or take significant time to respond.**

Baltimore officials mentioned an example when they received conflicting information from the Federal Highway Administration when applying for electric vehicle charging station funding, which made the grant harder to complete. The federal government should hire more staff or dedicate more time to responding to questions to clarify grant-specific details and not deter any officials or communities from applying. Furthermore, feedback should be provided when grant applications are not awarded, so that cities can better improve future applications.

3

Recommendation 3:

Extend the timelines for grant applications.

Extend the timelines for grant applications. Officials in Dayton, Detroit, Birmingham, Baltimore, and Portland discussed how short grant application timelines can make it hard to prepare thorough applications, collect necessary data, and include community feedback and partnerships. In Baltimore, officials suggested that having extra time to conduct preliminary research would allow for a more nuanced understanding of vulnerable individuals. In Albuquerque, an official said that “too often, cities are struggling themselves to meet the timelines and other requirements.” In Dayton, officials stressed that short application windows inhibit their ability to engage communities during this process. These challenges are often compounded by limited staff and capacity. Extending the grant timelines will help ease pressure on local officials and allow for more detailed applications.

Federal Government Recommendations

4

Recommendation 4:

Provide more funding for administrative capacity within J40 grants.

Provide more funding for administrative capacity within Justice40 grants.

Most programmatic funding does not include the resources for building administrative capacity. While administrative funding is not an issue in some cities, Detroit in particular spoke to how administrative funding is hard to find; the city's sustainability team only had four staffers in the entire city and did not have the funding to hire more. In Albuquerque, officials highlighted how they had to hire external grant writers in order to meet the deadlines for some Justice40 applications. Including administrative funding in Justice40 grants, for grant writing services for example, will allow cities to hire the additional staff necessary to support grant management.

5

Recommendation 5:

Create more flexibility within CEJST

Create more flexibility within CEJST. Given the varying opinions on how accurate CEJST identifies the myriad of issues within environmental justice communities, the federal government should introduce some level of flexibility and local customization in the tool. Some options include changing the binary categorization to having multiple levels (to highlight how some disadvantaged communities are more underserved than others), making it easier for communities to input their feedback on the categorization, and incorporating both qualitative and quantitative data, considering local knowledge and community-driven solutions as vital components for environmental justice efforts.

Federal Government Recommendations

Recommendation 5:

6

Run technical assistance programs for city officials and CBOs.

Run technical assistance programs for city officials and CBOs. City officials in Albuquerque, Baltimore, Dayton, Detroit, and Portland cited that government officials and CBOs require further technical assistance to understand the grant application and data collection process. A city official in Albuquerque mentioned that “federal funding is daunting for small CBOs” and that the “federal government needs to make resources easier to use and more relevant in the first place.” To help facilitate learning, federal agencies should host online workshops and publish grant application resources tailored to both CBOs and city officials, to make the application process, and the collaboration between officials and CBOs which is often required, smoother. The federal government should also ensure that the technical assistance and training provided reflects the technical complexity of federal grant applications.



Baltimore City Town Hall
Source: Google Images

Optimizing Impact: Strategic Recommendations and Next Steps for WRI

SECTION 3

United States Capital Building
Source: Google Images

Section 3 Overview

1

Recommendation 1: Improve Data Collection and Measurement

2

Recommendation 2: Enhance Community Engagement

3

Recommendation 3: Assess and Support Technical Assistance ProgramsX

4

Recommendation 4: Create a space for local officials to engage with other US city officials

These recommendations aim to provide WRI with clear, actionable insights to further support city and state governments in leveraging Justice40 benefits through improved data collection and measurement, and enhanced community engagement and technical assistance.

1

Recommendation 1: Improve Data Collection and Measurement

A) Defining Disadvantaged Communities (DACs):

Outside of CEJST, federal agencies and state and city offices have established or created additional tools to identify impoverished and overburdened communities. CEJST does not include race as an indicator of burden; however, it does use a variety of indicators that are highly correlated with race such as levels of environmental pollution, income, health disparities, level of education, and linguistic isolation. Local mapping tools, established by city officials, have been designed around the varying and unique disparities that cities face, to better define their DACs. While the creation of additional mapping tools to define city-specific DACs is commendable, the use of different sets of criteria in each city and/or state can make it difficult to streamline tracking, measurement, and identification of recipients of initiative benefits.

Thus, it is recommended that WRI collaborate with federal agencies to ensure that the intricacies of CEJST are explained and demonstrated to city officials, and to facilitate a feedback mechanism for areas of the tool that cities feel require improvement. Furthermore, WRI should help to create, and strengthen the platforms for which local officials can use to provide feedback on CEJST DAC designations. Establishing an accessible, standardized platform for cities to regularly provide feedback on the tool's data accuracy and the designation of DACs would improve the tool's reliability and usefulness, promoting better intergovernmental communication about community needs and resources.

B) Community Engagement for Improved Data Collection:

To improve and expand data collection, community engagement activities can be leveraged as opportunities. Several cities in the analysis already employ this technique. In Dayton, the city government uses monthly community meetings as an opportunity to consult with CBOs and to gather qualitative data and communicate upcoming Justice40 projects and grant opportunities. Other cities such as Albuquerque, host small community events such as potlucks to reach and engage with residents. However, there are few metrics to measure what methods of outreach and engagement are most effective. WRI should work with cities to recommend city-specific approaches for outreach (for information sharing, project updates, etc.) and engagement (for feedback, insight, and requests). These methods should be based on forms of communication most appropriate for the age ranges, population size, and city office personnel needed to engage with the community.

Additionally, cities should take advantage of other events where a lot of city participation occurs (for example, on election days, checking in for hospital appointments, and at local schools) as many community residents often don't have time to attend community meetings or other planned events. Collecting data during events that have a high traffic of city participation (e.g. election days) decreases administrative burden and inherently broadens the demographic of city resident participation. WRI should work with cities to create new and expand existing community engagement protocols and data sets to ensure as many residents are reached as possible. This method of enhancing community engagement allows city officials to learn about community needs and priorities from the perspective of a larger number of residents. These insights can then be used to help identify opportunities for cross-sectoral projects based on increased resident feedback, as well as to strategically leverage the federal funding opportunities available by applying for the most actionable and community-desired programs. This recommendation also further supports the development of a streamlined protocol for each city's reporting and record-keeping of community inputs, before, during, and after project completion.

2

Recommendation 2: Enhance Community Engagement

Ensuring that underserved communities benefit from federal programs demands active dialogue and joint efforts with those communities to address their evolving needs. Considering the contractual obligation of community engagement under Community Benefit Plans, cities must engage with their communities to understand each group's own concerns, needs and priorities using their insights to identify and co-design projects inclusively. WRI is well-positioned to support this engagement process, drawing on its research expertise and wide network of partners to enhance communication and collaboration between municipalities and communities.

The analysis of six cities revealed varied approaches to outreach and engagement, with strategies ranging from using data dashboards for tracking engagement to establishing entire offices dedicated to community interaction. However, some cities reported insufficient engagement and difficulties in connecting with their communities. Understanding effective community engagement methods is essential for all city plans, programs, and projects, including Justice40 ones. Future research should explore methods to better reach underrepresented communities, addressing obstacles such as language barriers and lack of representation, to enhance communication and collaborative solution development.

Analyzing and Promoting Successful Community-Led Initiatives:

Furthermore, building upon the success of Portland's PCEF and Safe Streets Grant initiatives, WRI is in a prime position to evaluate these community-led programs' strategies and outcomes for future replication. By conducting in-depth case studies, WRI can identify the elements that contribute to their effectiveness, particularly their emphasis on community engagement and equitable benefit distribution. These insights can then be shared with a broader audience of city officials and policymakers through WRI's platforms, such as reports, webinars, and policy briefs, to inspire similar community-driven approaches in other cities.

Success Story: WRI's Work with the Clean Energy to Communities (C2C) Program

An example of one successful community-led model that could be expanded and replicated is the partnership between WRI and the DOE, which educates community groups on electric vehicle charging infrastructure and financing strategies through their "Clean Energy to Communities (C2C)" program [29]. The C2C program connects local governments, electric utilities, and community-based groups with community engagement experts from across the United States [30]. It is recommended that WRI develop and offer additional peer-to-peer learning programs to support cities in their expansion of community collaboration efforts, and to provide cities and their community groups with technical assistance.



3

Recommendation 3: Assess and Support Technical Assistance Programs

The positive impact of the EPA's TCTACs and the DOE's Regional Energy Democracy Initiative (REDI) programs present opportunities for additional research by WRI. By further evaluating the benefits and challenges of these programs, WRI can advise cities who stand to benefit from enhanced community benefits plans and expanded technical assistance on how to access support.

Similarly, the success of Birmingham's involvement in Bloomberg Philanthropies' American Sustainable Cities program provides an opportunity to study and share innovative capacity-building practices. Through research and analysis of different case studies, WRI can highlight how technical assistance programs can significantly advance community-led climate initiatives. Using this data, WRI could then create recommendations for enhancing and / or expanding these approaches to additional cities, taking advantage of the organization's existing partnerships and success in securing grants for sustainable urban development in the six cities studied and beyond.

“Federal funding is daunting for small CBOs. The federal government needs to make resources easier to use and more relevant in the first place.”

- City Official in Albuquerque

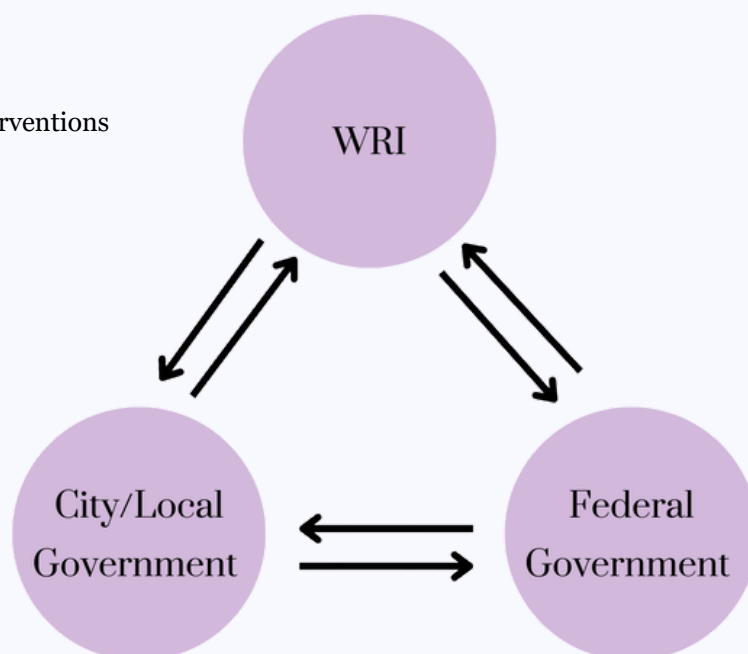


4

*Recommendation 4:****Create a space for local officials to engage with other US city officials***

WRI can leverage its large contact base to create spaces (either online or in-person) for city officials from across the country to share challenges and success stories with each other, using its partnership with the DOE Clean Energy To Communities program as a model. Many of the officials interviewed were interested in speaking to staff members from other cities to better understand how they could scale solutions and not reinvent the wheel. Given WRI's prior work with many of these cities – and their experience in organizing conferences, seminars, and discussion forums – WRI is well-positioned to connect these stakeholders. Some examples of events could include online discussion spaces (e.g. on Slack), structured calls and workshops where city officials share short presentations of their strategies, and problem-solving sessions where city officials work together to find solutions to shared challenges.

Figure 18:
WRI Strategic Interventions



Conclusion

This report provides a comprehensive analysis of the effectiveness and challenges of implementing the Justice40 Initiative at the city level. It serves as an initial framework to guide the World Resources Institute's ongoing efforts to advance environmental justice and equitable development, and informs the next phase of research focusing on community organizations' involvement in the Justice40 Initiative.

Findings were synthesized from interviews with 14 local city government officials across six cities, highlighting the successes, obstacles, and best practices in implementing Justice40 programs. The analysis revealed that since the federal definition of disadvantaged communities broadly encompasses 34 indicators, it qualifies numerous census tracts in the six cities studied for Justice40 funding.

Although the Climate and Economic Justice Screening Tool does provide important information on the geographic areas which are eligible to receive federal funding, it may not always precisely indicate where environmental justice communities are located in real time, especially in cities with varying social, historical, and cultural contexts. As a result, five of the six cities use additional local, state, and city designed mapping tools. These mapping tools include additional datasets, including community assets and unique neighborhood features, to display features not shown by CEJST. Due to its limitations and recent inception, CEJST is currently used by cities primarily as a formality to qualify for Justice40 applications.

Cities also faced common barriers in implementing Justice40 programs. A lack of staff with technical skills and grant writing experience was consistently highlighted across all six cities as a major challenge which hinders the ability of local governments to make progress on Justice40 initiatives. Additional shared challenges included navigating short grant application deadlines, engaging meaningfully with communities, and carrying out project implementation—all of which are further exacerbated by staffing challenges.

Two municipalities faced challenges coordinating resources between their state and city governments, while one city faced challenges competing for grant funding against other inter-city agencies. Surprisingly, in four of the six cities studied, accessing federal grant funding for Justice40 programs was not seen as a major issue. Instead, officials discussed the challenge of having to spend large pools of unspent federal or state programmatic funding, funds which can only be used for programmatic purposes.

From the interviews it was evident that city governments attempt to collaborate with new community partners by undertaking both outreach and engagement in a variety of ways. However, many cities currently rely on existing interpersonal relationships when selecting which CBOs to partner with for grant applications, which can make it difficult for newly-formed or less resourced CBOs to receive partnerships and representation. Many CBOs that city governments partnered with were found to be larger, with a greater capacity to work on often laborious federal grant applications and project implementation. Some officials expressed concerns that not all CBOs accurately represent all marginalized communities. Four of the six cities were actively seeking partnerships with new CBOs or aiming to support communities in voicing their opinions through the creation of informal meeting spaces and new community input mechanisms.

Overall, recommendations for enhancing program effectiveness underscore the need for clear federal guidance, increased technical and administrative support, and more robust community engagement mechanisms. Furthermore, the report illuminates the importance of flexible, community-centric approaches to ensure that the benefits of environmental and energy policies are equitably distributed.

Team Bios:

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Team Manager Robert Rosso has an MPA in Environmental Science and Policy at Columbia SIPA (2024) and holds a Bachelor of Arts in Political Science and a Bachelor of Science in Economics from College of Charleston (2021). He has conducted research at the Resilient Coastal Communities Program, with a focus on equitable urban development and resilience. Robert is a passionate advocate for environmental justice. As team manager of the MPA-ESP team, he emphasizes the importance of integrating equity into both climate action and infrastructure projects through his work.

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Deputy Manager Christina Van Dyke has an MPA in Environmental Science and Policy at Columbia SIPA (2024) and holds a BA in Government from Connecticut College (2023). Christina has worked in diverse roles from recruitment at Plastic Tides to advocacy at PINKConcussions. Her commitment to environmental justice is driven by a desire to link public health with environmental inequalities, aiming for impactful work in both natural conservation and social equity.

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Cate Twining-Ward has an MPA in Environmental Science and Policy from Columbia SIPA (2024) and a BA in Environmental Studies and Sustainability from George Washington University. She has worked on advancing sustainable development at the United Nations Secretariat, on international carbon policy, and in collaboration with NGOs to develop community-driven conservation programs in west and east Africa. Cate is also a published journalist specializing in environmental issues. Through her work she aims to address the climate crisis through a lens of human well-being, focusing on policies which consider both systems change and environmental justice.

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Ariane Desrosiers holds an MPA in Environmental Science and Policy from Columbia SIPA (2024) and a BA in Political Science & Economics from Minerva University (2023). Her professional journey in environmental sustainability includes roles at Uptake Alliance as a Portfolio Analyst and research positions at Columbia's Center on Global Energy Policy, the Rocky Mountain Institute, and the Global Energy Monitor. Ariane also co-founded the Asian Environmental Youth Network, an organization which works to further environmental justice and community empowerment throughout Asia.

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Mina Hoti has an MPA in Environmental Science & Policy from Columbia SIPA (2024) and a BSc in Politics and Philosophy from The London School of Economics (2018), has demonstrated excellence as a Management Consultant and Sustainability Team Lead. Her experience includes project management, change management, and data analysis across various sectors. Mina is deeply committed to addressing global environmental injustices, emphasizing educational awareness, community empowerment, and equal opportunities for all communities.

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Yawen Zhang holds an MPA in Environmental Science and Policy from Columbia SIPA (2024) and a BA in Philosophy and Mathematics from Hamilton College (2023). Her professional roles include being a Research Assistant at Columbia Climate School and pursuing internships focusing on sustainability and public engagement. Yawen is passionate about Environmental Justice, particularly the just transition and the implementation of environmental justice principles at local levels, through policy and community resources.

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Yugratna Srivastava, earned an MPA in Environmental Science and Policy from Columbia SIPA, and a Bachelor of Technology from IIIT Allahabad (2018), has excelled in advocacy and partnerships at Plant-for-the-Planet and the UN. Her skills in policy development, event planning, and stakeholder engagement have supported her passion for global environmental justice, with a focus on supporting communities in the global south and integrating environmental justice in policy and community initiatives.

Albuquerque, NM
Source: Redfin



Key Definitions:

Environmental Justice Community: For the Justice40 initiative, an environmental justice community is defined as communities that are marginalized, underserved, and overburdened by pollution. [30]

Disadvantaged Community (DAC): The White House CEQ defines DACs using their Climate and Economic Justice Screening Tool separated by US census tracts. [2]

Climate and Economic Justice Screening Tool (CEJST): CEJST was developed by the White CEQ in January of 2021 after the passing of President Biden’s Executive Order 14008.³¹ The interactive map is meant to be used as a tool for federal agencies to identify DACs by using indicators of burden in the eight categories of: climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development.³² Organized by US Census tracks, CEJST reports burdens in these categories as percentages, percentiles, or “yes/no” metrics based on indicators pulled from 34 datasets, and considers a community disadvantaged if it meets tool methodology or is within Federally Recognized Tribal Lands.³³ While US census data is only updated each decade, CEJST will be updated yearly to include the most up to date versions of its sourced datasets and incorporate public feedback [33].

Justice40 Guidelines:

Defining Disadvantaged Communities: All agencies are instructed to identify their DACs, also known as “Justice40 communities”, using CEJST [34]. CEJST is to be the primary tool used to identify these geographically defined communities, however in “special circumstances” agencies may be allowed to issue a “limited exception” to using CEJST to identify these communities if justifiable and communicated to the CEQ no later than 30 days prior to their use.

Covered Federal Programs: Agencies are instructed to work with their respective Office of Management and Budget (OMB) Resource Management Office to determine what programs could be covered under the Justice40 initiative.

“Covered programs” are federal government programs that invests benefits in one of the seven categories EO 14008 aims to support: (1) Climate Change, (2) Clean Energy and Energy Efficiency, (3) Clean Transportation, (4) Affordable and Sustainable Housing, (5) Training and Workforce Development, (6) Remediation and Reduction of Legacy Pollution, (7) Critical Clean Water and Waste Infrastructure [33]. These “covered investments” are federal investments that include one or more of the following: (1) federal financial assistance as defined at 2 CFR 200 (including federal grants, loans, credit, ect.), (2) direct payments or benefits to individuals, (3) federal procurement benefits, (4) programmatic federal staffing costs (salaries for technical assistance staff), (5) any others determined by OMB [35].

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Interview Questions

INTRODUCTORY QUESTIONS:

- Tell us a little bit about your role at [office] and how it is related to Justice40.
- What offices or partners do you work and engage with?

EJ ENGAGEMENT QUESTIONS:

- What are some of the challenges you've faced when trying to work with or gather input from marginalized communities that the city has identified? Are there specific communities harder to reach or engage?
- How are city staff collaborating with non-profits, community-based organizations, private sector groups, and other partners on this program/effort?
 - How? (e.g., planning, subgrants/contracts, local hiring, workforce, education...)
 - What does this process look like?
- Are you monitoring or tracking community engagement? Are the results of engagement monitored through mapping tools or through relationships?

PROGRAM SPECIFIC QUESTIONS:

- Are there specific equity issues or connections to EJ communities prompted <<city>> to apply for [specific programs]? Who do you partner with on these programs?
- What are your desired targets and outcomes for [the programs] and how were these developed? (internally, based on required DOT/DOE indicators, or co-developed with community partners?)
- What feedback do you receive from communities on these programs? How are you incorporating feedback from EJ communities into program implementation?
- Are you facing any challenges or barriers when implementing this/these program(s)? What would you say is needed to address these challenges?
 - Have you faced any challenges with the following: capacity, funding, bureaucracy, definitions/terms?
 - What are some of the solutions you've implemented (or want to implement) to address these challenges? How have federal and state actors supported these solutions? (EPA technical centers, etc)

Interview Questions

EJ DEFINITION QUESTIONS:

- What is <<name city/municipality>> approach to equity / EJ and has the city been tracking the federal J40 initiative?
 - Does your city have a specific strategy for J40?
- Does a mapping tool drive your definition and identification of EJ communities?
 - Have you explored how this compares against federal definitions in the J40 Initiative - for example, using the Climate and Economic Justice Screening tool?
 - Do you think this tool accurately defines the realities of these communities? How are qualitative and quantitative metrics weighed in policy decisions and reflecting these realities?
- What are some of the solutions you've implemented (or want to implement) to address any challenges?

CONCLUDING QUESTIONS:

- Who else should we talk to who might know more about this topic?
- We recognize each community is unique, but if you have any high-level advice, recommended resources, or city reports that would add to our learnings, we'd greatly appreciate that guidance. Feel free to send it over email after this interview!
- What more support, including from the state or federal level or other partners, would be helpful for implementation?
- What do you think we should know about improving Justice40 implementation at the municipal level?



Portland, OR
Source: TripAdvisor

City Summaries:

Albuquerque, NM

Albuquerque has the seventh largest urban Native and Indigenous population (approximately 25,000 people) in the country [39]. Albuquerque was the first city in the nation to sign an Executive Order to establish a Justice40 Oversight Coordinating Committee and help prioritize federal investments in historically disadvantaged communities. This committee has been tasked with preparing and implementing a five-year plan, therefore city officials have a longer time lapse of program implementation data [39]. The city has a Justice40 oversight committee that oversees program implementation along with their own equity toolkits and mapping tools for environmental justice specific data [40].

Baltimore, MD

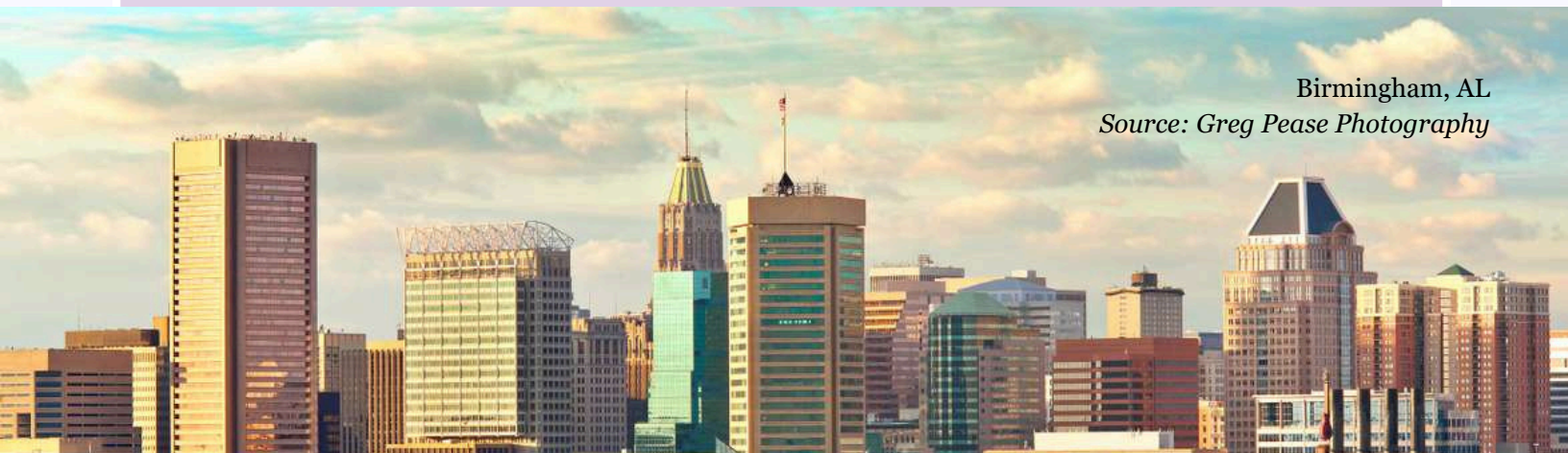
Baltimore is known for its rich history, vibrant culture, and diverse population of over 585,000 residents. Baltimore is also a national leader in developing environmental justice screening tools and initiating government-community partnerships [41]. The city was one of the first to receive funding and has received tens of millions from the BIL on remediation, infrastructure, transportation and electrification—thereby situating it as a key city to provide insights into how cities incorporate community input and ensure community benefits.

Birmingham, AL

Birmingham has a population of approximately 197,575 residents, and serves as a poignant case of environmental injustice with the aftermath of industrial pollution and racial segregation. Efforts toward addressing environmental justice issues have been fragmented, with no specific engagement programs targeting underserved communities [42]. Community organizations have been pivotal in advocating for environmental justice, which enables an understanding of the community-driven push towards addressing those issues and how the city can better implement the Justice40 framework.

Birmingham, AL

Source: Greg Pease Photography



Dayton, OH

Dayton has a population of approximately 135,944 residents who are majority white. Despite no dedicated environmental justice office, the city has identified environmental injustice as a key issue in their sustainability report [43]. Dayton has received \$160,000 BIL funding for their Safe Streets and Roads for All Program which provides insights into how the city navigates Justice40 covered programs and ensures the benefits reach to underserved communities [44].

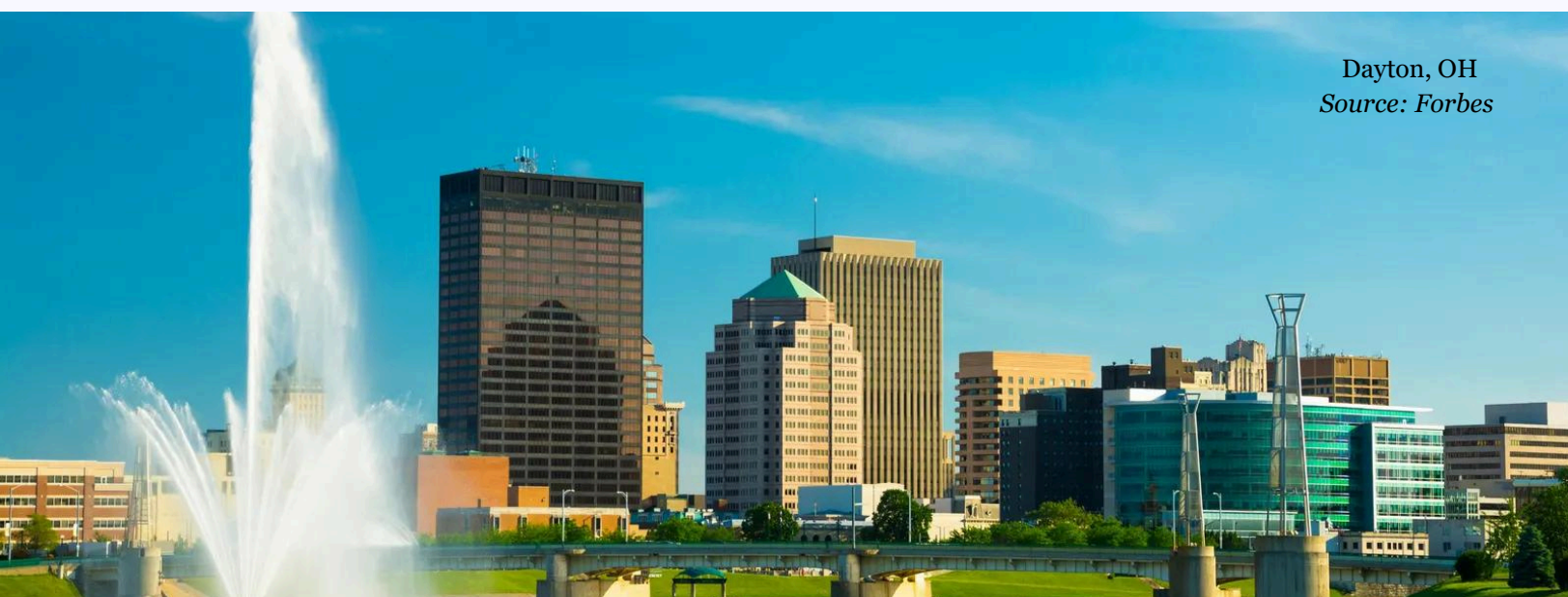
Detroit, MI

Detroit is known for its rich history and diverse population of 632,464 [45]. As a city that has faced significant economic and social challenges, Detroit's efforts to revitalize its infrastructure through BIL funded Justice40 programs such as Safer Streets for Detroit offer insights into how these initiatives are being implemented, the tools being used, and the collaboration between local governments and historically marginalized communities [46].

Portland, OR

With a diverse population of over 635,000 residents, Portland presents a landscape where socioeconomic diversity intersects with ambitious urban initiatives [47]. Portland has received \$4.9 billion BIL funding to upgrade critical infrastructure, which offers insights through which to examine the implementation of the Justice40 Initiative [48]. The city also recently reset their climate action plan in 2022 to ensure their approach was more equitable and environmental justice communities, providing the opportunity to better understand how cities evaluate and improve their plans for environmental justice implementation over time.

Dayton, OH
Source: Forbes



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