

### VULNERABILITIES TO CLIMATE CHANGE IN FRONTLINE COMMUNITIES: OPPORTUNITIES AND SHORTCOMINGS



#### **KEY REPORT FINDINGS**

This report considers the degree to which the historic federal investments enabled by the Infrastructure Investment and Jobs Act (IIJA) of 2021 and the Inflation Reduction Act (IRA) of 2022 might improve pre-existing economic, health, and infrastructure conditions in frontline communities. We conclude that, with careful implementation that centers the needs and voices of the most impacted communities, key provisions in the IRA and the IIJA could further contribute to addressing greenhouse gas reduction goals and could cumulatively help improve these pre-existing conditions. However, numerous challenges remain, including shortcomings in the statutes that fall short of meeting the needs of Black, Indigenous, and People of Color (BIPOC) and frontline communities, implementation processes affecting how and where funds are disbursed and who receives them, and the need for future policy advocacy, design, and implementation of economic and social solutions to advance a Just Transition.

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# **About Just Solutions**

Just Solutions is a BIPOC-led organization working to broaden and deepen the understanding of equitable and effective policies and programs to support the priorities of environmental justice organizations to define, innovate, replicate, and scale their solutions to the climate crisis. We do this work by: identifying and coalescing leading community-created policy solutions; conducting requested, relevant, comprehensive, and accessible policy analysis and research; organizing peer learning, foundational educational programming, space for states to share and strategize; and providing financial support for expertise, ideation and participation.

# Acknowledgements

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Black, Indigenous, and People of Color (BIPOC) and frontline communities in the United States continue to experience a disproportionate share of the effects of climate change. The increasing frequency and intensity of climate events exacerbate pre-existing economic, health, and infrastructure conditions in these communities. Given the exposure of these communities to risks of all kinds, these impacts are likely to increase in the future without the design and implementation of effective policy solutions.

In 2023, Just Solutions published "The Perfect Storm of Extraction, Poverty, and Climate Change," which takes a case study approach to examine these pre-existing conditions in six frontline communities across the country.<sup>1</sup> The report argues that the economic, health, and infrastructure conditions experienced by these communities are the direct consequence of enacted policies that have deprived these communities of resources and assets, environmentally degraded or undervalued their lands, or facilitated systemic racism.

This follow-up report considers the degree to which the historic federal investments enabled by the Infrastructure Investment and Jobs Act (IIJA) of 2021 and the Inflation Reduction Act (IRA) of 2022 might improve the underlying conditions highlighted in "The Perfect Storm." We conclude that, with careful implementation that centers the needs and voices of the most impacted communities, key provisions in the IRA and the IIJA could further contribute to addressing greenhouse gas reduction goals and could cumulatively help improve the conditions that exist in frontline communities. However, numerous challenges remain. These challenges include shortcomings in the statutes that fall short of meeting the needs of BIPOC and frontline communities, implementation processes affecting how and where funds are disbursed and who receives them, and the need for future policy advocacy, design, and implementation of economic and social solutions to advance a Just Transition.

#### The Opportunities and Shortcomings of Federal Investments

The IRA and the IIJA have been lauded for the historic investments they make in addressing climate change and improving U.S. infrastructure. In total, the IRA includes "\$228 billion in appropriations and an additional \$324 billion in tax expenditures. The majority of the bill's spending is climate- and energy-oriented, but it also makes consequential changes to corporate tax law and healthcare affordability."<sup>2</sup> Similarly, the IIJA makes critical investments to revitalize the country's infrastructure. Its total spending comes to \$1.2 trillion and consists

<sup>1</sup> Just Solutions, "The Perfect Storm of Extraction, Poverty, and Climate Change," May 24, 2023.

<sup>2</sup> Just Solutions, "IRA: Our Analysis of the Inflation Reduction Act." 2023.

of "\$550 billion in new spending, along with \$650 billion in routine reauthorizations of various energy, water, and surface transportation programs."<sup>3</sup>

Although historic in their reach and scope, the laws are insufficient to meet the climate justice and clean energy needs of the moment.<sup>4</sup> They both should be regarded as a down payment, as the investments made in infrastructure and climate fall far short of the need. Our previous "Analysis of the Inflation Reduction Act" found that many claims related to the benefits of the IRA for frontline communities are overstated.<sup>5</sup> This detailed analysis of the environmental justice provisions in the IRA examines both beneficial investments and areas where estimates of the effects of the legislation on environmental justice communities have been inflated. In addition, our analysis concludes that the IRA reinforces the status quo "all of the above"

approach in addressing greenhouse gas emissions and a market-based approach to energy policy in a way that perpetuates the injustices experienced by frontline communities.

Our analysis of the IIJA finds that it funds false solutions and makes concerning changes to the law that pose harm to frontline communities.<sup>6</sup> This includes attempts to "streamline permitting and siting of highways and transmission lines, significantly weaken[ing] the National Environmental Policy Act (NEPA)." IIJA also spends over \$12 billion to subsidize carbon capture, utilization, and storage (CCUS) and Direct Carbon Capture (DAC) projects, "costly and unproven technologies that will be used to justify the continued extraction, processing, and combustion of dirty fossil fuels."<sup>7</sup>

Implementation of the IRA and the IIJA must center the needs and voices of the most impacted communities. Just Solutions has examined provisions from each law (Appendix) that hold the potential to improve the economic, health, and infrastructure conditions that exist in frontline communities across the country, as highlighted in "The Perfect Storm." Whether or not this potential is realized will depend on a number of factors, including:

- The degree to which the Justice40 Initiative (J40) is successfully implemented. J40, authorized under Executive Order 14008, sets a goal that "40 percent of the overall benefit of certain Federal climate, clean energy, affordable and sustainable housing, and other investments flow to disadvantaged communities that are marginalized by underinvestment and overburdened by pollution."<sup>8</sup> Transparency and engagement with the "disadvantaged communities" that are designated as the recipients of J40 benefits must be essential elements of demonstrating the success of the initiative.
- The degree to which states effectively administer funds disbursed through IRA and IIJA in ways that facilitate a Just Transition. State Energy Offices, in particular, will need to center environmental justice in their program design and implementation in order to deliver meaningful benefits to frontline communities in their respective states.

<sup>3</sup> Just Solutions, "Climate and Environmental Justice and the Infrastructure Bill," November 16, 2021.

<sup>4</sup> Just Solutions, "Climate and Environmental Justice and the Infrastructure Bill," November 16, 2021.

<sup>5</sup> Just Solutions, "IRA: Our Analysis of the Inflation Reduction Act," 2023.

<sup>6</sup> Just Solutions, "Climate and Environmental Justice and the Infrastructure Bill," November 16, 2021

<sup>7</sup> Just Solutions, "Climate and Environmental Justice and the Infrastructure Bill," November 16, 2021

<sup>8</sup> White House, "Justice40 Initiative: A Whole of Government Initiative."



The degree to which frontline communities in need of and/or seeking funds are able to realize the benefits of IRA and IIJA. Complex grant application processes and limited capacity to meet federal grant requirements may impede frontline communities from realizing the benefits of these historic investments. In addition, some programs disburse grant funds on a reimbursement basis, meaning that prospective grantees need to have the upfront capital needed for improvements. Similarly, non-profit organizations and local governments seeking to make clean energy investments can benefit from "direct pay" tax credits for the first time to subsidize their projects, but they need to be able to fund the projects in advance of receiving the tax credits. Other potential barriers include the absence of robust public education, outreach, and technical assistance.

Policies and practices that effectively increase the ability and capacity of frontline communities to access these historic levels of funding could bring significant improvement in economic, health, and infrastructure conditions in communities like those highlighted in "The Perfect Storm." As funds are released and programs are implemented, insisting upon transparency and community engagement at all levels and stages of implementation and tracking where and how investments are made will be necessary to ensure that the IRA and the IIJA advance a Just Transition.

#### Methodology

This report references the "pre-existing conditions" examined in "The Perfect Storm," which were organized into three domains - Economic Conditions, Health Conditions, and Infrastructure Conditions. Data relating to the three domains and how six frontline communities are affected are presented in the report.<sup>9</sup> Together, these domains can tell us a great deal about the capacity of frontline communities to cope with, prepare for, and respond to climate change and participate equitably in the transition to a clean energy economy.

Based on these three domains, Just Solutions compiled a list of selected provisions within the IRA<sup>10</sup> and the IIJA<sup>11</sup> (Appendix) that have the potential to improve outcomes in these areas in frontline communities like those highlighted in "The Perfect Storm." The provisions highlighted in the Appendix are categorized according to their primary impact or extensive reach into communities.

This report also uses previous Just Solutions analysis of the IRA and IIJA, as well as previous research conducted in partnership with Ground Work Consulting. This research was supplemented with further analysis related to the healthcare and infrastructure provisions of the legislation.

- 10 Just Solutions, "IRA: Our Analysis of the Inflation Reduction Act," 2023.
- 11 Just Solutions, "Climate and Environmental Justice and the Infrastructure Bill," November 16, 2021

<sup>9</sup> Just Solutions, "The Perfect Storm of Extraction, Poverty, and Climate Change," May 24, 2023

#### IRA and IIJA Provisions for Addressing "Pre-Existing Conditions"

In selecting indicators in "The Perfect Storm," we considered those that had particular relevance for increasing the capacity of communities to cope with, prepare for, and respond to climate change. Economic conditions were considered in the context of their determinative impact on the other domains. The report described, for example, how poor economic conditions degrade community health. Poor community health, in turn, can affect local economic vitality. The presence or absence of infrastructure investments can lead to more or fewer local, quality job opportunities, while a weak local economy can reduce available funding for infrastructure investments. In the same way, the investments made through the IRA and the IIJA will have cross-cutting effects.

In the tables below, we highlight a few of the provisions contained in the IRA and the IIJA that could improve economic, health, and infrastructure outcomes in frontline communities.

#### **Economic Conditions**

The Economic Conditions indicators examined in "The Perfect Storm" were:

- Rising poverty and insufficient income
- Rates of home ownership and renters
- High housing and energy cost burdens
- Limited jobs, education, and language access
- Access barriers to transportation
- Too little credit and too much debt
- Access barriers to insurance coverage

Provisions within the IRA and the IIJA hold the potential to provide positive benefits to communities like those highlighted in "The Perfect Storm." Within the Economic Domain, the prevailing wage and apprenticeship provisions contained in both pieces of legislation could support economic development and increased income, thereby alleviating poverty rates and providing relief for those struggling with few financial resources. Tax credit bonuses for projects located in or benefiting low-income communities serve as an additional incentive for local investment in clean energy infrastructure.

The **High-efficiency Electric Home Rebate Program** established through the IRA is one example of how the legislation could bring benefit to low- and moderate-income households.<sup>12</sup> This program provides up to \$14,000 in point-of-sale rebates to eligible households. The statutory eligibility for the rebate program is based on a household's income relative to Area Median Income (AMI). Those with incomes under 80% of AMI can receive a rebate at the point of sale for 100% of the cost of eligible purchases. Those with incomes between 80% and 150% of AMI can receive 50% rebates. Eligible purchases include certain appliance upgrades (including electric heat pumps, heat pump water heaters, induction stoves, and heat pump clothes dryers), as well as electrical wiring, panel upgrades, insulation, air sealing, and ventilation.

<sup>12</sup> Just Solutions, "Home Energy Rebates and the IRA: Recommendations for Equity and Environmental Justice," March 7, 2023; Just Solutions, "Implications of AMI for Home Electrification and Appliance Rebates," September 13, 2023.

#### Implementing a High-efficiency Electric Home Rebate Program

#### Inflation Reduction Act, Section 50122

This program provides up to \$14,000 in point-of-sale rebates to eligible households. Eligible purchases include certain appliance upgrades (including electric heat pumps, heat pump water heaters, induction stoves, and heat pump clothes dryers), as well as electrical wiring, panel upgrades, insulation, air sealing, and ventilation.

Funding Amount	Beneficiaries	Benefits	Impact	Recommendations
\$4.275 million to states, \$225 million to Tribes	Low- and moderate- income homeowners	<ul> <li>Increased energy efficiency</li> <li>Lower energy burden</li> <li>Improved comfort</li> <li>Increased resilience to extreme weather conditions</li> <li>Improved air quality and public health</li> </ul>	For low- and moderate- income homeowners, the rebate program holds the potential of providing relief for strained household budgets while improving living conditions for recipient households	<ul> <li>Among the steps states can take to maximize benefits for low-income households are:</li> <li>Directing a greater proportion of rebates to low- income households and multi-family buildings than is required.</li> <li>Reducing administrative barriers in the application process.</li> <li>Implementing enhanced outreach and education efforts.</li> </ul>

As is the case with many features of the IRA and the IIJA, whether or not frontline communities stand to benefit from the High-efficiency Electric Home Rebate Program will depend on a number of factors. An analysis by Just Solutions found that, although this program prioritizes low- and moderate-income households, it is most likely to benefit homeowners rather than renters who likely will be reliant upon landlords to access many of the benefits the program provides. The U.S. Department of Energy has issued guidance stating that a percentage of funding for the rebate program should align with a state's percentage of low-income households and that at least 10% of rebate funding be directed to multi-family buildings, in addition to the low-income allocation. There are also various tenant protections included in the guidance. However, many renters struggling with housing and energy cost burdens will likely be excluded from the benefits of this program.

State Energy Offices responsible for implementing the rebate program can do more to advance equity. They can maximize benefits by directing a greater percentage of rebates to low-income households and multi-family buildings than the threshold set in the guidance. Reducing administrative barriers will also increase the likelihood that low-income households can benefit. This includes providing a variety of methods for eligibility verification, including self-attestation, not requiring Social Security numbers for applications, implementing enhanced outreach and education efforts, and ensuring language access, transportation, and other barriers associated with application processes are addressed.<sup>13</sup>

13 U.S. Department of Energy, Office of State and	Community Energy Programs,	"Home Energy Rebates Application Guidance."
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Additional appropriations to the Low Income Home Energy Assistance Program (LIHEAP) could similarly benefit frontline communities by easing household energy burdens and providing relief for household budgets. LIHEAP provides federally-funded assistance to help households manage costs associated with home energy bills, energy crises, weatherization, and energy-related minor home repairs.<sup>14</sup> All 50 states, the District of Columbia, five U.S. territories, and approximately 150 tribes and tribal organizations receive LIHEAP grants each year.<sup>15</sup> The Department of Health and Human Services (HHS) released \$3.7 billion in Fiscal Year (FY) 2024 LIHEAP block grant funds. These initial awards include \$3.6 billion under the continuing resolution (CR), which is 90% of LIHEAP's annualized base funding, plus an additional \$100 million for FY 2024 appropriated in the IIJA.<sup>16</sup> Although the IIJA is providing much-needed funding for existing programs to alleviate energy burdens – \$500 million for LIHEAP and \$3.5 billion for the Weatherization Assistance Program (WAP) – these programs have faced challenges in participation rates. Studies show that although the current LIHEAP performance measures "satisfy the statutory requirements for monitoring and reporting, less is known about the program's effectiveness in reducing the actual problem of energy poverty."<sup>17</sup> Ultimately, LIHEAP is not designed to fully address long-term solutions to energy burden or energy poverty.

#### Increasing Funding for the Low-Income Home Energy Assistance Program (LIHEAP)

IIJA, Division J - Appropriations - Title VII - Labor, Health and Human Services, and Education, and Related Agencies

LIHEAP is a federally-funded program that helps low-income households pay their home heating and cooling bills. It operates in every state and the District of Columbia, as well as on most Tribal reservations and U.S. territories.

Funding Amount	Beneficiaries	Benefits	Impact	Recommendations
An additional \$100 million per FY through 2026	Households with low incomes, particularly those that have a high home energy burden (percentage of income that goes to heating and/ cooling costs) and/or have members who are elderly, disabled, and/or a young child.	<ul> <li>Increased energy efficiency</li> <li>Improved comfort</li> <li>Increased resilience to extreme weather conditions</li> <li>Lower energy burden</li> <li>Improved air quality and public health</li> </ul>	States can provide funding to recipients for heating and/or cooling costs, as well as up to 15 percent of their funding (or 25 percent with a waiver) for weatherization assistance.	<ul> <li>Increase program funding to more effectively reduce energy burden.</li> <li>Support households with recurring and direct assistance rather than just one- time assistance.</li> <li>Provide adequate funding for program offices to have the appropriate staff capacity to ensure outreach, education, and technical support to applying for assistance, and a coordinated, regional approach to home energy and housing policy that integrates programs in each area."</li> <li>Reduce administrative barriers through policies like categorical eligibility and automatic enrollment.</li> </ul>

<sup>14</sup> Administration for Children and Families, U.S. Department of Health and Human Services, <u>"Low Income Home Energy Assistance</u> <u>Program (LIHEAP)."</u>

<sup>15</sup> U.S. Department of Health and Human Services, "LIHEAP Factsheet."

<sup>16</sup> U.S. Department of Health and Human Services, "LIHEAP DCL 2024-02 First LIHEAP Funding Announced Award of FY 2024."

<sup>17</sup> Just Solutions, "Energy Burden and the Clean Transition: Challenges and Just Solutions from Energy Assistance Practitioners," May 8, 2022

<sup>18</sup> U.S. Department of Health and Human Services, <u>"LIHEAP Factsheet."</u>

<sup>19</sup> Just Solutions, "Energy Burden and the Clean Transition: Challenges and Just Solutions from Energy Assistance Practitioners," May 8, 2022

#### Health Conditions

"The Perfect Storm" examined some of the ways in which health conditions are associated with and affected by climate change. The health impacts of climate change include exposure to extreme heat, air quality impacts, environmental exposures such as mold and industrial pollutants, and vector-borne illnesses. Those with poor health are at increased risk from climate impacts. The degree to which people have access to healthcare services to prevent and treat chronic conditions can be of critical importance in determining a community's capacity for climate adaptation and resilience.

The Health Conditions indicators considered in "The Perfect Storm" were:

- Limited access to health care
- Risk of preterm births
- Higher rates of chronic health conditions

The IRA included numerous provisions related to healthcare affordability that will benefit lowincome communities across the country. For the first time, the IRA established the ability of Medicare to negotiate the price of certain medications with pharmaceutical companies. The program will roll out over a number of years, but this change will significantly improve the affordability of needed medications for those receiving Medicare benefits. Other provisions benefiting Medicare beneficiaries include expansion of the Low-Income Subsidy Program and caps on out-of-pocket costs for recommended vaccines and prescription drugs, including insulin.

Besides changes to the Medicare program, the extension of subsidy assistance for Affordable Care Act (ACA) marketplace insurance plan premiums will increase the affordability of healthcare for those who are ineligible for Medicare, Medicaid, or employer-based health insurance. The American Rescue Plan enacted in 2021 during the COVID-19 pandemic removed a cap on premium subsidy assistance for those with incomes above 400% of the Federal Poverty Level (FPL) while also expanding the amount of subsidies. These changes, however, were limited to two years. The IRA extended these provisions beyond 2022 so that they will now be in place through 2025. Although challenges in accessing healthcare more affordable and prevent an estimated 3.3 million people from becoming uninsured.<sup>20</sup>

In the context of climate change resilience, controlling the costs of healthcare means that households have more money not only for other household expenses, but also for investments in greater household energy efficiency measures. Ensuring that people have access to affordable and reliable healthcare services means that, when a climate disaster strikes, people may be living with fewer chronic conditions or have increased capacity to continue to manage their conditions through the disaster.

<sup>20</sup> The Commonwealth Fund, "Next Steps in Expanding Health Coverage and Affordability: What Policymakers Can Do Beyond the Inflation Reduction Act," September 6, 2022.

#### Improving Affordability and Reduce Premium Costs of Health Insurance for Consumers

#### IRA, Section 12001

This provision provides a three-year extension of subsidy assistance for Affordable Care Act marketplace plan premiums through 2025.

Funding Amount	Beneficiaries	Benefits	Impact	Recommendations
N/A	Uninsured individuals and families who would otherwise be unable to afford health insurance.	<ul> <li>Improved affordability of healthcare</li> <li>Improved public health</li> </ul>	The subsidy program provides a refundable tax credit to those with incomes above 100% of the Federal Poverty Level (FPL) to purchase health insurance through the Health Insurance Marketplace, also known as the Exchange, thereby making health insurance accessible to more individuals and families with low incomes.	Extending these provisions under the IRA beyond 2025 will be the needed next step to maintain health insurance affordability for low-income households.

#### Infrastructure Conditions

Although the communities profiled in "The Perfect Storm" were once the site of significant public and private infrastructure investment, much of that investment was associated with an extractive economy. When resources were exhausted or market conditions changed and investors moved on, these communities fell into decline. They have subsequently seen insufficient investment in local infrastructure over the course of decades. This sustained lack of infrastructure investment poses economic and health risks to frontline communities and puts them at significant risk in the event of climate-related disasters.

With historic investments in infrastructure being made through the IRA and the IIJA, these conditions could begin to be remedied for frontline communities across the country. Whether they are or not will depend upon the implementation of the many programs contained in the IRA and the IIJA. The legislation includes funds for:

- Transportation, including reconnecting communities divided by barriers such as highways and improving the climate resilience of transportation infrastructure.
- Urban streetscapes, including reducing the effects of heat islands and reducing stormwater runoff risks.
- Energy efficiency upgrades, including retrofits, weatherization, incentives for renewable energy adoption, and investments in a clean energy workforce.
- Clean water, including investments in water systems in disadvantaged communities, water system resilience measures, and wastewater management.
- Air quality, including monitoring and emissions reduction.
- Broadband access, with a focus on underserved communities.
- Disaster prevention, including flood prevention and brownfield cleanup.

All of these efforts hold promise for reshaping the physical environment in which frontline communities live.

Specific to "The Perfect Storm," the IRA and the IIJA provisions examined in the charts below could improve the Infrastructure Conditions examined in the report, including:

- Poor quality of the housing stock
- Outdated or dilapidated water and sewage systems
- Lack of urban planning and climate-mitigation measures
- Increased exposure to industrial hazards

As previous Just Solutions research has highlighted, the \$27 billion Greenhouse Gas Reduction Fund (GGRF) is the single largest climate program in the IRA, second only to the suite of energy tax credits that make up the majority of the IRA's spending. As stated in our analysis, "Because of its vast size, as well as the flexibility provided by the authorizing language in the law, it could potentially be a huge opportunity to advance environmental justice, but only if it is implemented appropriately."<sup>21</sup>

The Inflation Reduction Act authorized the U.S. Environmental Protection Agency (EPA) to create and implement the Greenhouse Gas Reduction Fund (GGRF) to mobilize financing and private capital for greenhouse gas- and air pollution-reducing projects in communities across the country.<sup>22</sup> EPA will implement the funds in the form of three grant competitions: "a \$14 billion National Clean Investment Fund competition to finance clean technology deployment nationally; a \$6 billion Clean Communities Investment Accelerator competition to finance clean technology deployment in low-income and disadvantaged communities while building the capacity of community lenders that serve those communities; and a \$7 billion Solar for All competition to spur adoption of clean distributed solar energy that lowers energy bills for millions of Americans in low-income and disadvantaged communities."

While EPA provides much-needed clarity in several areas, many crucial questions about the program remain unanswered. Concerns have arisen as to whether the program and awardees will actually benefit the communities they are intended to benefit, in addition to concerns about authentic community engagement, institutional accountability, and transparency. The Greenhouse Gas Reduction Fund Equity Alliance,<sup>23</sup> of which Just Solutions is a founding member, is working to ensure that the GGRF is implemented in a way that centers environmental justice communities. The Alliance's recommendations are featured below.

<sup>21</sup> Just Solutions, "Greenhouse Gas Reduction Fund: Best Practices for Equity and Governance," May 9, 2023

<sup>22</sup> U.S. Environmental Protection Agency. Greenhouse Gas Reduction Fund, May 16, 2024.

<sup>23</sup> Just Solutions, "GGRF Best Practices Pledge and Equity Alliance."

#### Administering a Greenhouse Gas Reduction Fund (GGRF)

#### IRA, Section 60103

GGRF funds a competitive process to provide grants, loans, or other financial assistance to enable lowincome and disadvantaged communities to deploy or benefit from zero-emission technologies and carry out other GHG emission reduction activities; includes provisions for providing financial and technical assistance to low-income and disadvantaged communities.

Funding Amount	Beneficiaries	Benefits	Impact	Recommendations
\$27 billion	GGRF defines low-income and disadvantaged communities as encompassing the following four categories: (a) Climate and Economic Justice Screening Tool (CEJST), (b) EJ Screen, (c) geographically dispersed low-Income households, and (d) properties providing affordable housing. <sup>24</sup>	<ul> <li>Increased energy efficiency</li> <li>Improved comfort</li> <li>Increased resilience to extreme weather conditions</li> <li>Lower energy burden</li> <li>Improved air quality and public health</li> <li>Increased high- quality jobs</li> <li>Community wealth- building</li> </ul>	The GGRF prioritizes historically marginalized communities that disproportionately bear the burdens of climate change.	The Alliance calls on recipients of GGRF to publicly commit to adhering to the best practices for equity and governance listed below: <sup>26</sup> • Prioritize direct benefits to low- income and disadvantaged communities • Require community engagement • Ensure accountability to local and impacted communities, especially low- income and disadvantaged communities • Operate with transparency • Apply robust safeguards

With an increased risk of flooding from climate change, frontline communities, which are more likely to be located in areas at heightened risk of exposure to sewage and stormwater overflows, face heightened public health risks. Over 700 communities across the country, mostly located in the Northeast and Midwest, have outdated combined sewer overflow systems where sewage and stormwater are carried in one pipe. In flooding events, these systems can overflow, releasing a toxic mixture of raw sewage and industrial contaminants. Fixing these systems is very expensive and upgrades take years – often decades – to complete. Because of funding challenges, ratepayers often bear at least some of the expense of fixes to these systems.

Included in the IIJA were additional funding and implementation requirements for the Sewer Overflow and Storm Water Reuse Municipal Grants Program. The legislation provides funding for sewage and stormwater management projects, prioritizing financially distressed communities. Last August, the EPA announced that a portion of the available funds – \$50 million – would be available to states. These funds are in addition to continuing appropriations for the program, including approximately \$41 million announced by the EPA in May 2024. Although the amount of funding appropriated to this program falls short of the need, it does have a few beneficial provisions for frontline communities:

- Cost-free grant assistance is available to financially distressed communities.
- States are required to prioritize projects in rural areas and financially distressed communities.

<sup>24</sup> U.S. Environmental Protection Agency. <u>Greenhouse Reduction Fund, Frequent Questions about the National Clean Investment Fund</u> and Grants.gov, <u>EPA-R-HQ-NCIF-23</u>. May 16, 2024

<sup>25</sup> Just Solutions, "Greenhouse Gas Reduction Fund: Best Practices for Equity and Governance," May 9, 2023

The legislation limits the degree to which costs can be passed on to ratepayers in such areas.<sup>26</sup>

Grants IRA, Section 50204	tes for the planning, d	esian and constructi	on of treatment and i	management
	Beneficiaries			Recommendations
\$280 million annually (2022-2026)	<ul> <li>Over 700 communities with combined sewer overflow systems</li> <li>Financially distressed and rural communities with system upgrade needs</li> </ul>	<ul> <li>Improved public health</li> <li>Increased resilience to extreme weather conditions</li> </ul>	As extreme rain events and flooding become more common occurrences with climate change, upgrading these systems will prevent the exposure of frontline community members across the country to sewage and stormwater public health threats.	The IIJA makes a downpayment for federal investment in sewage and stormwater management systems Congress must increase continuing appropriations to this program in the coming years to ensure that frontline communities have the financial capacity to upgrade their system and protect their communities' public health.

# Conclusion

The degree to which the IRA and the IIJA improve outcomes in frontline communities like those highlighted in "The Perfect Storm" will depend upon a number of factors including how and where funds are disbursed and whether administrative and statutory barriers (e.g., onerous application requirements, insufficient outreach, education, and technical assistance efforts) are addressed and mitigated to improve access to resources. Such factors will be key indicators in determining the effectiveness of these laws in reaching communities most in need.

The IRA and the IIJA are first steps in efforts to ensure a Just Transition. Despite historic levels of investment, the need continues to far exceed the resources available for frontline communities to cope with, prepare for, and respond to climate change. In order to advance the work toward improving economic and health outcomes in these communities, provisions in earlier versions of the IRA and IIJA that were ultimately omitted could be reintroduced and enacted. These include:

• Funding for child care to ensure that most families pay no more than 7% of their household budgets on child care

<sup>26</sup> U.S. Environmental Protection Agency, "Biden-Harris Administration Announces \$50 million in Available Grants to Upgrade Stormwater and Sewer Infrastructure," August 10, 2023; U.S. Environmental Protection Agency, "Sewer Overflow and Stormwater Reuse Municipal Grants Program"; American Flood Coalition, "The bipartisan infrastructure bill will create flood-resilient communities — here's how," November 15, 2021; U.S. Environmental Protection Agency, "Sewer Overflow and Stormwater Reuse Municipal Grants Program."



- Universal preschool for 3- and 4-year-olds
- Universal paid family and medical leave policies that would provide up to four weeks of paid leave
- An enhanced and fully refundable Child Tax Credit
- Expansion of home care for older adults and those living with disabilities
- Increases to Pell Grant funding to reduce the cost of postsecondary education
- Investments in maternal health care
- Expanded funding for rental assistance and investments in public housing repair and maintenance
- Investments in public housing development

Policy solutions such as these are needed to increase the capacity of frontline communities and must be considered part of what it means to ensure a Just Transition. In addition to ensuring that frontline communities benefit from the greenhouse gas reduction, energy efficiency, and infrastructure investments contained in the legislation, investments that improve the preexisting economic and health conditions in frontline communities must not be overlooked. Without such investments and policy solutions, we will not meet the challenge of the climate crisis, protect all of our communities from climate disasters, and position the U.S. as a leader in the clean energy future.

#### Appendix Economic Indicators

IIJA or IRA	Legislative Provision	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	21st Century Energy Workforce Advisory Board	Section 40211	Establishes a board and appoint members to develop the Department of Energy's strategy to meet current and future industry/ labor needs of the energy sector, prioritizing education/training for underrepresented groups, racial/ethnic minorities, women, veterans, and displaced/unemployed energy workers.	N/A	Increased workforce development in EJ communities
IIJA	Wage Rate Require- ments	Section 41101	Sets prevailing wage requirements for all laborers and mechanics employed by contractors or subcontractors in performance of construction alteration, or repair work on a project assisted in whole or in part by funding made available under this division.	N/A	Higher household income levels
IIJA	Low Income Home Energy Assistance (LIHEAP)	Division J - Appro- priations - Title VII - Labor, Health and Human Services, and Education, and Related Agencies	Allocates an additional \$100 million annually for LIHEAP (2022-2026).	\$500 million	Increased energy efficiency; improved comfort; increased resilience to extreme weather conditions; lower energy burden; improved air quality and public health
IRA	Extension and Modi- fication of Credit for Electricity Produced from Certain Renew- able Resources	Sections 13101, 13102	Extends and expands the production and investment tax credits for renewable electricity production.	N/A	Higher household income levels; increased workforce develop- ment in EJ communities
IRA	Increase in Energy Credit for Solar and Wind Facilities Placed in Service in Connection with Low-Income Com- munities	Section 13103	Increases Investment Tax Credits by 10% for small wind/solar facilities in low- income communities and 20% if installed in connection to affordable housing or qualified economic benefit project and specifies that financial benefits of electricity produced is to be equitably allocated among housing occupants or to low-income households; tax credits are capped annually for this program and are subject to application approval.	N/A	

### **Economic Indicators**

IIJA or IRA	Legislative Provision	Reference	What It Does	Funding Amounts	Potential Benefits
IRA	Clean electricity production credit	Section 13701	Provides a 10% bonus in energy communities, which includes brownfields.	N/A	Increased workforce development in EJ communities
IRA	Clean electricity investment credit (+10% in energy communities, +10% in low-income com- munities, +20% for affordable housing/ economic benefit projects)	Section 13702	Provides a 10% bonus in energy communities, which includes brownfield sites, and in low- income communities. Provides a 20% bonus for affordable housing/economic benefit projects. Tax credits are capped annually for this program and are subject to application approval.	N/A	Increased workforce development in EJ communities; improved housing infrastructure; improved community development opportunities
IRA	High-efficiency electric home rebate program	Section 50122	Provides up to \$14,000 in point-of-sale rebates to eligible households. Eligible pur- chases include certain appliance upgrades (including electric heat pumps, heat pump water heaters, induction stoves, and heat pump clothes dryers), as well as electrical wiring, panel upgrades, insulation, air sealing, and ventilation.	\$4.275 billion to States, \$225 million to Tribes	Increased energy efficiency; improved comfort; increased resilience to extreme weather conditions; lower energy burden; improved air quality and public health
IRA	Tribal Energy Loan Guarantee Program	Section 50145	Increases loan authority from \$2 billion to \$20 billion.	\$75 million (avail- able through 2028)	Increased energy efficiency; increased resilience to extreme weather conditions; lower energy burden; improved air quality and public health; increased workforce development opportuni- ties in EJ communities

### Health Indicators

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IRA	Providing for Lower Prices for Certain High-Priced Single Source Drugs	Section 11011	Enables the Medicare program to negotiate prices for certain drugs. A list of 10 drugs have initially been selected, with negotiated prices set to take effect in 2026. In subsequent years, the Medicare program will be able to negotiatic prices for 10 drugs in 2027, 15 in 2028, and 20 per year each year thereafter.	N/A	Improved affordability of needed medications
IRA	Medicare Part D Benefit Redesign	Section 11201	Beginning in 2024, out-of-pocket prescription drug costs are capped at about \$3,250. In 2025, the cap will be \$2,000. In subsequent years, the cap will be indexed to the rate of increase in Part D costs.	N/A	Improved affordability of needed medications
IRA	Coverage of Adult Vaccines Recom- mended by the Advisory Committee on Immunization Practices under Medicare Part D	Section 11401	Eliminates out-of-pocket costs for recom- mended adult vaccines under Medicare and requires States to cover recommended adult vaccines at no cost.	N/A	Improved access to preventive healthcare
IRA	Expanding Eligibility for Low-Income Subsidies Under Part D of the Medicare Program	Section 11404	Extends the Low-Income Subsidy to 150% of the Federal Poverty Level (FPL) beginning in 2024.	N/A	Improved affordability of healthcare; improved public health
IRA	Improving Access to Adult Vaccines Under Medicaid and CHIP	Section 11405	Requires state Medicaid and CHIP programs to cover recommended adult vaccines at no cost.	N/A	Improved access to preventive healthcare

### Health Indicators

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IRA	Appropriate Cost Sharing for Covered Insulin Products Under Medicare Part D	Section 11406	Limits monthly out-of-pocket costs for insulin for Medicare recipients to \$35 beginning in 2023. Includes additional cost controls begin- ning in 2026.	N/A	Improved affordability of needed medications
IRA	Improve Afford- ability and Reduce Premium Costs of Health Insurance for Consumers	Section 12001	Provides a three-year extension of subsidy assistance for Affordable Care Act market- place plan premiums.	N/A	Improved affordability of healthcare; improved public health

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Reconnecting Communities Pilot Program	Section 11509	Establishes a pilot program to fund feasibility studies, planning, and construction for projects that restore community connectivity due to barriers resulting from high speeds, grade separations, or other design factors.	\$1 billion (2022- 2026)	Increased workforce development in EJ communities; improved housing infrastructure; improved community development opportunities
IIJA	Promoting Resilient Operations for Transformative, Effi- cient, and Cost-Sav- ing Transportation (PROTECT) Program	Section 11405	Provides formula funding to States and competitive grants to enable communities to assess vulnerabilities to current and future weather events and climate disasters and to plan and implement transportation improvements to address vulnerabilities and ensure access to evacuation routes, emergency services, employment, and other critical needs.	\$1.4 billion (2022- 2026)	Increased resilience to extreme weather conditions; increased community safety
IIJA	Healthy Streets Program	Section 11406	Creates a discretionary grant program to provide grants to local, state, and Tribal governments and non-profit organizations to reduce the effects of urban heat islands, improve air quality, and reduce runoff and flood risks by expanding tree cover and deploying cool pavements and porous pavements.	\$100 million per year (2022-2026)	Increased resilience to extreme weather conditions; increased community safety; improved air quality and public health
IIJA	Strengthening Mobil- ity and Revolution- izing Transportation Grant Program	Section 25005	Funds grants for demonstration projects focused on advanced smart city or community technologies and systems that improve transportation efficiency and safety	\$100 million annually (2022-2026)	Improved mobility; improved community development opportunities

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Energy Efficiency Revolving Loan Fund Capitalization Grant Program	Section 40502	Provides capitalization grants to States to establish a revolving loan fund under which the State shall provide loans and grants for energy efficiency audits, upgrades, and retrofits to increase energy efficiency and improve the comfort of buildings.	\$250 million (available until expended)	Increased household energy efficiency, improved comfort; increased resilience to extreme weather conditions; lower energy burden
IIJA	Energy Auditor Training Grant Program	Section 40503	Funds grants to eligible States to train individuals to conduct energy audits or surveys of commercial and residential buildings to build the clean energy workforce, save customers money on their energy bills, and reduce pollution from building energy use.	\$40 million (2022- 2026)	Increased workforce development in EJ communities
IIJA	Cost-effective codes implementation for efficiency and resilience	Section 40511	A competitive grant program to enable sustained, cost-effective implementation of updated building energy codes to save customers money on their energy bills	\$225 million (2022- 2026)	Increased energy efficiency; improved comfort; increased resilience to extreme weather conditions; lower energy burden

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Building, training, and assessment centers	Section 40512	Provides grants to higher education institutions and Tribal colleges and universities to establish programs to improve building energy efficiency and performance, apply emerging technologies, and provide research, development, and training to support clean energy.	\$10 million (available until expended)	Increased workforce development in EJ communities
IIJA	Grants for Energy Efficiency Im- provements and Renewable Energy Improvements at Public School Facilities	Section 40541	Funds competitive grants for energy efficiency and energy improvements, including those that improve teacher and student health through indoor air quality improvements and that achieve achieve energy savings.	\$500 million (2022- 2026)	Increased energy efficiency; improved air quality and public health; increased workforce development opportunities in EJ communities
IIJA	Weatherization Assistance Program	Section 40511	Appropriates \$3.5 billion and waives wage requirements except for multifamily properties with at least 5 units.	\$3.5 billion (available until expended)	Increased household energy efficiency; improved comfort; increased resilience to extreme weather conditions; lower energy burden

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Energy Efficiency and Conservation Block Grant Program	Section 40552	Expands possible uses under this existing program to include financing and incentives for energy efficiency/renewable energy, and zero-emission transportation.	\$550 million (available until expended)	Increased household energy efficiency, improved comfort, increased resilience to extreme weather conditions, and lower energy burden; improved air quality and public health
IIJA	Orphaned Well Site Plugging, Remedia- tion, and Restoration	Section 40601	Provides grants to States/Tribes to plug, remediate, and reclaim orphaned wells on Federal lands, including identifying, characterizing, and ranking orphaned wells, measuring/estimating and tracking methane emissions, and addressing disproportionate health/environmental effects on communities of color, low-income communities, or Tribal/ Indigenous communities.	\$4.677 million (available until expended)	Improved air quality and public health
IIJA	Drinking Water State Revolving Loan Funds	Section 50102	Amends the Safe Drinking Water Act to re-authorize and fund capitalization grants.; includes loan subsidization provisions for disdvantaged communities.	\$11.4 billion (2022- 2026)	Improved public health
IIJA	Assistance to Small and Disadvantaged Communities	Section 50104	Provides funding for disadvantaged communities, including grants for improving water quality, filtration, connecting households to public water systems, and the resilience of drinking water infrastructure in disadvantaged communities.	\$510 million for disadvantaged communities, \$20 million annually to connect households to public water systems, \$25 million annually to support the resilience of drinking water infrastructure in disadvantaged communities, and \$50 million annually for State competitive grants (2022-2026)	Improved public health

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Midsize and Large Drinking Water System Infrastruc- ture Resilience and Sustainability	Section 50107	Grants to eligible entities to increase resilience to natural hazards and extreme weather events and reduce cybersecurity vulnerabilities	\$50 million annually (2022-2026)	Improved public health; increased resilience to extreme weather conditions
IIJA	Rural and Low- Income Water Assistance Pilot Program	Section 50109	Funds up to 40 grants to eligible entities to develop and implement programs to assist qualifying households with need in maintaining access to drinking water and wastewater treatment.	Not appropriated in the legislation	Improved public health
IIJA	Indian Reservation Drinking Water Program	Section 50111	Funds projects that improve drinking water quality, sanitation, and wastewater services.	\$50 million annually (2022-2026)	Improved public health
IIJA	Sewer Overflow and Stormwater Reuse Municipal Grants	Section 50204	Funds grants to States for the planning, design, and construction of treatment and management systems for combined sewer overflows and sanitary sewer overflows.	\$280 million annually (2022-2026)	Improved public health; increased resilience to extreme weather conditions

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Clean Water Infrastructure Resiliency and Sustainability Program	Section 50205	Funds grants to eligible entities for the purpose of increasing the resilience of publicly-owned treatment works to a natural hazard or cybersecurity vulnerabilities.	\$25 million annually (2022-2026)	Increased resilience to extreme weather conditions
IIJA	Small and Medium Publicly Owned Treatment Works Circuit Rider Pro- gram	Section 50206	Funds grants up to \$75,000 to non-profit entities to provide technical assistance to owners and operators of small and medium publicly owned treatment works.	\$10 million annually (2022-2026)	Improved public health
IIJA	Small Publicly Owned Treatment Works Efficiency Grant Program	Section 50207	Funds grants to non-profit entities or treatment works operators for the replacement or repair of equipment that improves water or energy efficiency of small publicly owned treatment works.	Not appropriated in the legislation	Improved public health
IIJA	Grants for Construction and Refurbishing of Individual Household Decentralized Wastewater Systems for Individuals with Low or Moderate Income	Section 50208	Funds non-profits to provide assistance to eligible households to upgrade and/or improve household decentralized wastewater treatment systems	\$50 million annually (2022-2026)	Improved public health

IIJA or IRA	lssue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Connection to Publicly Owned Treatment Works	Section 50209	Establishes a competitive grant program enabling non-profit entities or treatment works operators to assist low- and moderate- income households connect to public treatment works.	\$40 mllion annually (2022-2026)	Improved public health
IIJA	Grants to Alaska to Improve Sanitation in Rural and Native Villages	Section 50212	Funds grants to the State of Alaska to develop and construct public water systems and wastewater systems to improve the health and sanitation conditions and provide training, technical assistance, and education.	\$150 million (2022- 2026)	Improved public health
IIJA	Grants for Broad- band Deployment	Section 60102	Funds projects that improve high-speed internet access in unserved and underserved locations	\$42.45 million	Increased connectivity, providing improved workforce development, employment, and educational opportunities; higher level of safety in the event of an emergency
IIJA	Digital Equity Competitive Grant Program	Section 60305	Funds grants to support digital inclusion for covered populations, including low-income and disadvantaged communities	\$250 million annually each of first 5 years of the program	Increased connectivity, providing improved workforce develop- ment, employment, and educational opportunities; higher level of safety in the event of an emergency
IIJA	Brownfield Activities	Title VI - Depart- ment of the Interior, Environment, and Related Agencies	Provides grants and other funding mech- anisms to identify, assess, and clean up brown- fields	\$300 million annual- ly (2022-2026)	Improved public health; improved community development oppor- tunities

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Watershed and Flood Prevention Operations	Title 1 - Agriculture, Rural Development, Food and Drug Administration, and Related Agencies	Allocates an additional \$500 million for watershed and flood prevention.	\$500 million	Increased resilience to extreme weather conditions
IIJA	Rural Utilities Service - Distance learning, telemedicine, and broadband program	Title 1 - Agriculture, Rural Development, Food and Drug Administration, and Related Agencies	Allocates an additional \$2 billion for various broadband programs.	\$2 billion	Increased connectivity, providing improved workforce development, employment, and educational opportunities; higher level of safety in the event of an emergency
IIJA	Construction	Division J - Appropriations - Title III - Energy and Water Development and Related Agencies	Allocates an additional \$11.615 billion for construction including aquatic ecosystem restoration projects, coastal storm risk management, hurricane/storm damage reduction projects, inland flood risk management projects; authorizes the prioritization of projects that benefit areas in which the percentage of people that live in poverty or identify as belonging to a minority group is greater than the average such percentage in the U.S., based on Census data.	\$11.615 billion	Increased resilience to extreme weather conditions
IIJA	Energy Programs - Energy Efficiency and Renewable Energy	Division J - Appro- priations - Title III - Energy and Water Development and Related Agencies	Allocates an additional \$16.264 billion to remain available until expended.	\$16.264 billion	Improved energy efficiency

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IIJA	Energy Programs - Energy Efficiency and Renewable Energy	Division J - Appro- priations - Title III - Energy and Water Development and Related Agencies	Additional \$500 million for Energy Efficiency Improvements and Renewable Energy Improvements at Public School Facilities.	\$500 million	Improved energy efficiency; improved air quality and public health
IIJA	Energy Programs - Energy Efficiency and Renewable Energy	Division J - Appropriations - Title III - Energy and Water Development and Related Agencies	Allocates an additional \$3.5 billion for the Weatherization Assistance Program.	\$3.5 billion	Improved energy efficiency; improved housing infrastructure; increased comfort lower energy burden; improved public health
IIJA	Energy Programs - Energy Efficiency and Renewable Energy	Division J - Appropriations - Title V - Department of Homeland Security	Allocates an additional \$3.5 billion for flood mitigation	N/A	N/A

IIJA or IRA	lssue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IRA	Improving Energy Efficiency or Water Efficiency or Climate Resilience of Affordable Housing	Section 30002	Funds loans or grants to improve energy or water efficiency, enhance indoor air quality or sustainability, implement the use of zero- emission electricity generation, lower emission building materials or processes, energy storage, or building electrification strategies, or address climate resilience, as well as supporting information technology and other purposes	\$1 billion	Increased energy efficiency; improved comfort; increased resilience to extreme weather conditions; lower energy burden; improved air quality and public health; increased resilience to extreme weather conditions
IRA	Bureau of Reclamation Domestic Water Supply Projects	Section 50231	Funds grants, contracts, or financial assistance agreements for disadvantaged communities to plan, design, or construct water projects serving communities or households that do not have reliable access to domestic water supplies.	\$550 million (through 2031)	Improved public health
IRA	Grants to Reduce Air Pollution at Ports	Section 60102	Award grants and rebates on a competitive basis to purchase/install zero-emission port equipment, conduct relevant planning/ permitting in connection with purchase/ installation of such equipment, and to develop qualified climate action plans.	\$3 billion (available through 2027)	Improved air quality and public health
IRA	Greenhouse Gas Reduction Fund	Section 60103	Funds competitive grants to provide grants, loans, or other financial assistance to enable low-income and disadvantaged communities to deploy or benefit from zero-emission technologies and carry out other GHG emission reduction activities; includes provisions for providing financial and technical assistance to low-income and disadvantaged communities.	\$27 billion (most of which is available through September 2024)	Increased energy efficiency; improved comfort; increased resilience to extreme weather conditions; lower energy burden; improved air quality and public health

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IRA	Diesel Emissions Reductions	Section 60104	Funds grants, rebates, and loans to identify and reduce diesel emissions from goods movement facilities, and vehicles servicing them, in low-income and disadvantaged communities, to address the health impacts of such emissions on such communities.	\$60 million (available through September 2031)	Improved air quality and public health
IRA	Funding to Address Air Pollution	Section 60105	Provides funding for such activities as air monitoring and other air toxics and community monitoring; includes provisions regarding air quality sensors in low-income and disadvantaged communities and adopting and implementing greenhouse gas and zero-emission standards for mobile sources.	\$235.5 million (available through September 2031)	Improved air quality and public health
IRA	Funding to Address Air Pollution at Schools	Section 60106	Funds grants and other activities to monitor and reduce air pollution and greenhouse gas emissions at schools in low-income and disadvantaged communities and funds technical assistance to such schools.	\$50 million (available through September 2031)	Improved air quality and public health

IIJA or IRA	Issue/Name	Reference	What It Does	Funding Amounts	Potential Benefits
IRA	Low Emissions Electricity Program	Section 60107	Funds consumer-related education and partnerships, education, technical assistance, and partnerships within low-income and disadvantaged communities; includes other provisions related to industry-related outreach and technical assistance, EPA outreach, and assessment of greenhouse gas reductions from changes in domestic electricity generation and use.	\$87 million (available through September 2031	Increased energy efficiency; lower energy burden; improved air quality and public health
IRA	Climate Pollution Reduction Grants	Section 60114	Funds planning and implementation grants to reduce greenhouse gas air pollution; implementation grant applications must include information on the degree to which greenhouse gas air pollution will be reduced in low-income and disadvantaged communities.	\$5 billion	Improved air quality and public health
IRA	Environmental and Climate Justice Block Grants	Section 60201	Provides grants (up to 3 year periods) to community-based organizations to carry out various environmental/climate justice projects that benefit disadvantaged communities (including construction of low- or zero-emission projects or greenhouse gas-reducing infrastructure and community- led pollution monitoring).	\$3 billion (available through September 2026)	Improved air quality and public health; improved community development opportunities
IRA	Neighborhood Access and Equity Program	Section 60501	Funds competitive grants to improve walkability, safety, and affordable transportation access, mitigate or remediate negative environmental impacts resuilting from surface transportation in disadvantaged or underserved communities, and to support planning and capacity-building activities in disadvantaged or underserved communities.	\$3.025 billion (available through September 2026)	Improved mobility; improved community development opportunities; increased community safety; improved air quality and public health



#### Vulnerabilities to Climate Change in Frontline Communities: Opportunities and Shortcomings



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