



GRID Alternatives
Comments on Transportation Climate Initiative Program (TCI-P) Draft
Model Implementation Plan and Framework for Public Engagement

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August 13, 2021

GRID Alternatives (“GRID”) is pleased to offer comments on the draft Model Implementation Plan and draft Framework for Public Engagement for the Transportation Climate Initiative (TCI) program (TCI-P). We again thank TCI for its efforts to date to include equity as a core component of the program.

As noted in prior comments, GRID’s mission is to build community-powered solutions to advance economic and environmental justice through renewable energy. We implement this mission through renewable energy project installation, program administration, technical assistance, job training, and other program areas. A growing program area is working to make electric vehicles, electric vehicle charging and other clean mobility options more accessible to the communities we serve. This effort has been initially focused on California, in conjunction with investments from the California Air Resources Board (CARB) in low-carbon transportation equity programs; we are also engaging with other clean mobility initiatives around the country, including in Colorado and the East Coast. Our affiliate GRID Alternatives Mid-Atlantic operates in the TCI jurisdictions of Maryland, Virginia, and the District of Columbia, providing renewable energy job training and no-cost solar installations to underserved and low-income customers.

TCI’s responses to input on the draft Model Rule indicate that a number of commenters’ suggestions relating to equity will be addressed through rule implementation in each TCI-P jurisdiction, rather than through incorporation of additional suggested details in the Model Rule itself. GRID Alternatives appreciates the opportunity to provide further input on these other key documents to guide this implementation. The relatively minimal, albeit positive, changes to the Equity section of the Model Rule make it all the more crucial that equity, inclusion, and justice are maximized in the Implementation Plan and Framework for Public Engagement. While recognizing the need for flexibility in approaches across different jurisdictions, these documents can still benefit from greater detail to assist implementing agencies and communities in operationalizing equity.

Comments on Draft Model Implementation Plan

The draft Model Implementation Plan provides prompts in item 2 for jurisdictions to fill in the details for the Equity Advisory Body (EAB), but the prompts omit how the implementing agency will be accountable to the EAB, beyond reports. Either the sub-point regarding “EAB Roles, Responsibilities, and Capacity Building” or a new sub-point should include clear accountability mechanisms for the agency, and ways the EAB can use them, in case any instances arise where the EAB or the community believe that recommendations are not being followed fully or goals are not being met. It also appears that item 3 could be incorporated into 2. It is the EAB’s responsibility to develop the criteria for determining which

communities are identified as “Underserved and Overburdened” for the purposes of administering TCI-P, and thus the EAB should lead or at least be significantly involved with the determinations.

This theme continues with items 6 and 7 in the draft, where accountability to the EAB’s recommendations is under-emphasized. For an implementation plan to be truly credible, it must be airtight against the possibility that the EAB and community engagement will end up as box-checking exercises, or things to which the actual decision-makers merely pay lip service. Accountability on equity must go well beyond air quality monitoring and reporting.

Item 7’s directives for jurisdictions to describe plans for “identifying new jobs and new skills that may be required for TCI-P funded projects” and “developing programs to train workers for these jobs” are necessary for program success and equity. As a provider of job training and workforce development for clean energy technologies, GRID Alternatives urges TCI to intentionally and expressly prioritize workforce development and related services and opportunities within low-income and underserved communities. The implementation plan should reflect the needs in many such communities for job training to be paired with wrap-around services and other support for trainees, including paid training. Inclusive workforce development must also emphasize outreach, education, and partnerships.

In addition to job training, entrepreneurship opportunities in underserved communities are also important to build community wealth through transportation decarbonization. Project selection criteria must prioritize local and disadvantaged businesses as much as possible.

Lastly, TCI-P should clarify the distinction between the “implementation plan” and the “strategies for regional collaboration,” and should not rely on the latter to flesh out important elements of the former. For example, the regional collaboration document states that TCI-P jurisdictions will aim to prioritize TCI-P-funded projects that create economic opportunities for people of color and low-income communities and to promote “Ban the Box” hiring practices. It is unclear why this is limited to the regional collaboration document, when each jurisdiction’s own implementation needs to prioritize equitable and inclusive workforce development. TCI-P and member jurisdictions should also take care that prevailing wage policies, again mentioned only in the regional collaboration document, are applied in a way that is compatible with different kinds of hands-on training programs to maximize inclusion and opportunity.

Comments on Draft Framework for Public Engagement

The Framework for Public Engagement will be key to ensuring that relevant agencies actively solicit, enable, and hold themselves accountable to input from members of overburdened and underserved communities within their jurisdiction. Again, this framework document is most useful when it is less aspirational and more concrete.

For example, it is a good idea for the framework to give examples of “other types of community centers” that jurisdictions can partner with to expand the transportation dialogue, and a few more examples would be even more helpful. In addition to employment centers and rural health offices, local institutions that can help bring community members into the conversation include shelters (including women’s shelters), low-income service providers, schools and childcare facilities, libraries, and agencies working with returning citizens. These partnerships should be informed by the Equity Advisory Group

and the community. In addition, the framework should reflect the need for partnerships and coordination across government agencies within a jurisdiction.

The framework should also specifically provide for youth outreach. As users of various modes of mobility including public transit, school buses, family vehicles, and micromobility, youth can contribute crucial perspectives toward equitable decarbonization. Moreover, creating an educational extension or other means for youth to be more involved can help create generational change towards clean mobility.

Finally, a measure that can be essential for all of the guiding principles in the framework is to actually value participants' time and expertise, by compensating them for it. This can take different forms in different contexts, including intervenor compensation for formal proceedings, stipends or incentives of various sorts, or the provision of childcare and other benefits at evening dialogue events. Community engagement and capacity building are worth doing right, and that requires recognizing the need to invest real resources in them. To the extent jurisdictions do not have such compensation mechanisms in place, the TCI-P framework document should strongly encourage them to create them.

GRID Alternatives thanks the Transportation Climate Initiative and its member jurisdictions for this opportunity to provide input on these draft documents for TCI-P implementation, and we look forward to continued engagement.