



**Community Climate Investments Entity Request for Information  
Geos Institute Comments  
Submitted January 23, 2023**

**Contact:**

Tonya Graham, Executive Director  
www.GeosInstitute.org  
541.482.4459 X301  
Tonya@GeosInstitute.org

- 1. What types of expertise would you suggest is appropriate for an organization and/ or staff and/or key partners to have in climate change, environmental justice, and reducing greenhouse gas emissions and/or co-pollutants when implementing CCI projects?**

While it is helpful for organizations to have expertise in climate change and reducing greenhouse gas emissions, what is even more important is that the organization is trusted within environment justice communities in the regions where they are supporting projects. One of the greatest obstacles to progress in bringing resources and technical support to these communities is a lack of existing relationships and trust with service delivery organizations. Environmental justice communities often have good reason not to trust government and formal programs that come from it, so the relationships piece is the critical piece. It is better if the organization has those strong relationships and subs out for the technical climate change element if they do not possess both. Regardless of how the process moves forward, selected entities must have relationships and expertise in reaching out to environmental justice communities, whether that is through the lead organization or subs. The same is true regarding technical expertise in reducing greenhouse gas emissions. In a perfect world, these organizations would also understand climate resilience as projects that address both greenhouse gas emissions and increasing resilience are even more effective.

**2. What types of greenhouse gas emission reduction projects would you suggest being considered or prioritized for CCI throughout Oregon? Please be as specific as possible.**

Given the wide range of ecosystems and economic drivers across the state, this section should be kept very flexible. We have one global carbon budget, so what matters is that a project is a good investment in reducing greenhouse gas emissions, both in terms of the amount of emissions reduced and the cost of implementing the project. By keeping it flexible, the program will be able to encourage innovate and integrate new technological advancements as they are made going forward. Within this range, however, projects should be prioritized to the extent they can show other benefits in the community, such as increased resilience of essential services, businesses, and families; new family-wage jobs; and new businesses startups or expansions.

**3. Please provide a one-paragraph description of potential project ideas:**

Ideally, projects will address multiple goals in terms of climate, equity, and living wage job creation. One such example is supporting small businesses (particularly women and minority owned) in developing weatherization services that focus on homes for renters and low-income homeowners – and providing funding to subsidize those efforts. These programs would include some guarantee of ongoing affordability from landlords. Other ideas include: community solar projects; renewable resilient electricity programs for essential municipal services (such as water, wastewater, fire, police, electric, emergency services, etc.); electric car and bicycle rebate programs for low-income Oregonians, and supporting changing agricultural practices for farmers and timberland owners. There are many others, but essentially, these projects should be aiming toward specific goals, but not restricted in the pathways available to meet those goals.

**4. How would you suggest engagement happen with environmental justice communities in project development and implementation? Please specify as much detail as possible and list which environmental justice communities you might be referring to.**

This program is an excellent way to build capacity within these communities and the organizations that serve them. Engagement should happen by organizations that are already embedded in these communities. The application process to be selected as a receiving entity for these funds should make it clear that successful applicants will show how they are already connected to the communities they intend to serve in the region they intend to cover. They should be required to speak to the geographic region inside the state that they plan to serve and share evidence of those relationships through

letters or statements of support. Because those relationships may not yet exist between organizations with technical expertise and those with community connections, the lead time for proposals should allow for the development of those partnerships. We suggest a three-month timeframe between announcing the program and expectations of the organizations or teams applying to be receiving organizations and the application deadline. In terms of specific communities, this program should be looking particularly at serving Tribal communities, rural communities with depressed economies, and low-income areas of larger cities. It may be useful to consult the Climate and Economic Justice Screening Tool to identify areas in need of focus in this program. The tool is here: <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5> Information about the tool is here: <https://www.whitehouse.gov/ceq/news-updates/2022/11/22/biden-harris-administration-launches-version-1-0-of-climate-and-economic-justice-screening-tool-key-step-in-implementing-president-bidens-justice40-initiative/>

**5. How would you suggest an organizational structure provide oversight and administration of CCI funds that are directly sent from covered fuel suppliers?**

The process needs to ensure that the state is made aware by the fuel suppliers of their contributions. This is likely already underway given that fuel suppliers will use this program to meet their regulatory requirements. However, it will be critical that they show the state which entity they made the contribution to, how much it was, and the date. Then, the State will have the CCI receiving entity account for how the funding was spent on an annual basis. This is easy to do in nonprofit accounting, but the State should plan to keep this accounting process as simple as possible while maintaining accountability so that the lead organizations can focus on project delivery. It will require putting some effort into training, particularly if the program selects (as it should) organizations from under-resourced communities that may not have the administration capacity of larger organizations.

**6. CCI entities could potentially be receiving millions of dollars annually. What type of financial tools would you suggest are appropriate for financial oversight and auditing (securing, tracking, and reporting on funds)?**

Annual external audits should be required over a certain thresholds and funds must be able to be spent on the administration side, including for the annual audit. Too often, programs require specific, detailed accounting but limit funding to cover only direct expenses. The funding model to the receiving organizations must include adequate funding to meet the administrative and fund management requirements of the

program. It also needs to include training as mentioned above. For this program to be successful, it will need to build capacity in existing, and potentially new, organizations and collaborations. That element is in the RFI, which is encouraging, but it needs to be properly resourced with an understanding that younger organizations and those that serve under-resourced communities often struggle to have the administrative systems in place necessary for government funding. That should not be a criteria for excluding them from participation. Rather, it should be expected that some receiving entities are going to need more help meeting the accountability requirements than others and the program needs to provide that assistance.

**7. What additional systems would you suggest being needed for project implementation?**

The selected receiving entities should be networked in some fashion – possibly through a cohort supported financially by the program. All of the entities will be lifting their programs simultaneously and learning from that lift. By creating a collaborative network, the State will reduce the likelihood of competition between the entities, and increase the sharing of knowledge, expertise, and problem solving. These entities will be breaking new ground and learning rapidly. Systems need to be in place that ensure that that learning is taken up rapidly across the state, both in terms of innovative best practices and pitfalls to avoid. It does not need to be a significant investment – a two hour call once a month could be enough – but this networking structure is important.

**8. What partnerships, such as subcontracting with other non-profit organizations, sovereign tribal nations, companies, etc., should be considered?**

All partnerships should be considered, and innovative partnerships given preference in the selection process. In new endeavors like this, some of the best innovations will come from organizations coming together to partner that have very different perspectives. Unnecessarily limiting partnership types will only hinder innovation and limit the potential of this program.

**9. What tracking and reporting systems would you suggest being used for greenhouse gas emission reductions?**

No comment. This is not Geos Institute's area of expertise.

**10. Please provide any additional information you or your organization believes DEQ should know as part of the RFI process.**

We suggest the following:

- DEQ makes it possible for other organizations to apply and enter the program at a later time. It is likely that there will be a lot of interest in certain parts of the state and not much in others initially.
- An organization's ability to continue to be a receiving entity should depend on their performance. We suggest an initial 5-year contract with clear expectations and progress check ins annually. That way, if a receiving entity is not performing well, they can be replaced at the end of their contract. Again, though, some allowances will need to be made for organizations that start with less capacity than others.
- DEQ puts measures in place in the application and accountability processes to ensure that the entire state is covered and projects are actively being sought in rural eastern, southern, and coastal Oregon by organizations in those areas. It may take a while to get there, but geographic distribution of the receiving entities should be a significant consideration in the selection process. This distribution, especially if receiving organizations are networked, will also help Oregon bridge the urban/rural divide that is so destructive to our state politics.
- DEQ ensures that statewide organizations are able to be receiving entities, but those entities may be assigned specific geographical service regions to balance out the geographical reach of the other receiving organizations.
- DEQ focuses first on selecting good, hardworking people who care deeply about this work in environmental justice communities and have existing relationships in those communities that can be leveraged in the creation of this program. DEQ should then provide the resources they need to build the capacity necessary to be successful. Such an investment will reap dividends on multiple fronts well into the future.