May 12, 2023

Jahi Wise
Senior Advisor to the Administrator and Acting Director,
Greenhouse Gas Reduction Fund
U.S. Environmental Protection Agency

Via Electronic Mail – Environmental Protection Agency ggrf@epa.gov

RE: Greenhouse Gas Reduction Fund Implementation Framework

Dear Mr. Wise and Members of the U.S. Environmental Protection Agency,

On behalf of the Community Builders of Color Coalition (Coalition), I am writing to comment on the recently released Greenhouse Gas Reduction Fund Implementation Framework. We are thankful for the opportunity to provide feedback on this important program that has the potential to not only reduce greenhouse gas emissions and air pollution, but also to generate significant benefits (environmental, energy, climate, health, and economic) in low income disadvantaged and communities of color across this country. This letter introduces the Coalition, outlines our intentions regarding the three Greenhouse Gas Reduction Fund competitions and provides comments on the recently released framework.

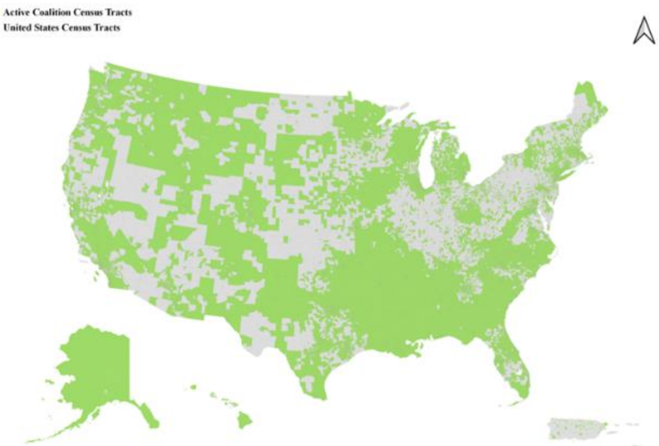
INTRODUCTION

The Coalition is a national network of **16 financial institutions and advocacy organizations,** primarily led by people of color working together to ensure low-income and disadvantaged communities can equitably benefit from the Greenhouse Gas Reduction Fund (GGRF). Our mission is to help eradicate the disproportionate impact of climate change on low-income and disadvantaged communities by sufficiently capitalizing and equipping BIPOC-led and other organizations that are deeply rooted in and serving disenfranchised populations.

This coalition represents nearly 1,000 individual organizations that have been active for decades and in some cases over a century in communities across the country with a focus in providing financial services to the under resourced, underserved and often overlooked communities, particularly communities of color.

These organizations have:

- **National Reach:** Members provide frontline services to every State, the District of Columbia, and Puerto Rico, including Rural, Urban, and Tribal communities.
- **Financial Strength:** Members have reported over $461 Billion in assets under management.
- **Green Activity:** Currently, 439 community lenders (Credit Unions, CDFI Loan Funds, and Community Banks) either offer or are building green lending products.



- **Community Roots:** In 2021, members provided access to capital in 3 out of 4 Justice 40 designated census tracts and 3 out of 4 of all US census tracts.

INTENT TO APPLY

In anticipation of the formal release of the NOFO, the Coalition has launched the Justice Climate Fund (JCF) to serve as the primary vehicle for application to the EPA for the GGRF. It is the intention of the Coalition to apply through the JCF in all three competitions in the preliminary amounts listed below:

Competition	Preliminary Amount
National Clean Investment Fund	$ 10.0 Billion
Clean Communities Investment Accelerator	$ 4.0 billion
Solar For All	$ 3.0 billion

This intent reflects the overall strategy of the Coalition through the JCF to prioritize the GGRF resources to serve the needs of low income and disadvantaged communities across this country. To meet the needs of these communities, it is imperative that BIPOC leaders and other organizations that have long served in and with these communities not only have a voice but are central in how programs and products are structured, businesses supported, capital deployed, benefits allocated, and our neighbors protected. Participating in all three competitions is the most efficient way to integrate the available resources in a comprehensive approach that delivers transformational change from urban to rural, east coast to west coast, black belt to rust belt and heartland to native lands.

Through the JCF, our clear **intention** is to bring much needed climate finance resources to:

- Over 110 million Americans living in low income and disadvantaged communities including 1 in 2 African- Americans, Latinos, Native Americans and Alaska Natives and 1 in 4 Asian Americans living in Justice 40 communities;
- Nearly 37 million Americans living in energy poverty, experiencing high energy burdens which impact family budgets, health and climate resiliency;
- Tens of millions of Americans impacted and soon to be impacted by the increased number and intensity of climate related events (e.g., droughts, storms, floods) which stresses inadequate housing and infrastructure; and

- Thousands of communities facing negative health impacts from legacy pollution and environmental hazards.

The Justice Climate Fund is **intentionally** built to maximize the dual goals of rapid reductions in greenhouse gas emissions and transforming communities through increased benefits (environmental, energy, climate, health and economic). Our strategy is based on three core principles:

1) **Community First:** Building and designing products, services, and solutions from the inside out that first meet the needs of low-income disadvantaged communities (consumers, businesses, and organizations) creates a more sustainable, durable and impactful market.
2) **Distributed Strength:** Embedding expertise, resources and capital in local communities using the entire existing network of CDFIs, Credit Unions, MDIs and Green Banks is the quickest and most efficient way to deploy capital and reduce greenhouse gas emissions.
3) **Urgent Patience:** Balancing the need for near-term greenhouse gas reductions with the creation of medium to longer term benefits in low-income communities must be a constant priority to achieve the promise of the GGRF as outlined in the Inflation Reduction Act.

Since the initial comments provided in December 2022, the Coalition has increased its membership by 7 organizations. Through the JCF, our growing Coalition anticipates partnering with a significant number of organizations that share our core principles and commitment to truly serve low-income and disadvantaged communities across the country. It is our **intent** to bring together the best ideas, solutions, and people to create meaningful, long-lasting and trusted partnerships that work to transform and ready all of our communities for the climate transition as full beneficiaries and partners.

COMMENTS

The Coalition applauds the continued efforts of EPA, through the GGRF, to reduce greenhouse gas emissions and air pollution across the U.S. particularly in low-income and disadvantaged communities. We welcome the opportunity to provide the following comments in response to the EPA Implementation Framework for the GGRF. The Coalition has provided below a number of general comments that apply across competitions, as well as competition specific comments. Our comments reflect a desire for further clarification on a few points and include suggestions that we believe will provide greater flexibility to achieve EPA's goals as set forth in the initial announcement and framework including: 1) Reduce emissions of greenhouse gases and other air pollutants, 2) Deliver direct and indirect benefits of greenhouse gas and air pollution reducing projects to American communities, particularly low-income and disadvantaged communities and 3) Mobilize financing and private capital to stimulate additional deployment of greenhouse gas (GHG) reduction and air pollution reduction projects and technologies.

General

1) Definition of Community Lender

The implementation framework requires Clean Communities Investment Accelerator (CCIA) grantees to provide funding and Technical Assistance (TA) to establish new or to support existing "community lenders" that provide financial assistance (FA) to qualified projects at the state, local, territorial, or Tribal level or in the District of Columbia, including community- and low-income-focused lenders and capital providers. These "community lenders" must meet the definition of nonprofit organization set forth in 2 CFR § 200.1 (i.e., any corporation, trust, association, cooperative, or other organization, not including Institutes of Higher Education, that: (1) is operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest; (2) is not organized primarily for profit; and (3) uses net proceeds to maintain, improve, or expand the operations of the organization.

The Coalition is concerned that defining community lender in such a manner precludes banks that are Minority Depository Institutions (MDIs) and Community Development Financial Institutions (CDFIs) from participation in the CCIA, as they do not meet the definition of a "nonprofit organization" per 2 CFR § 200.1. MDIs are often located in low-income and minority communities where traditional banks may be less likely to operate. By providing basic banking services such as savings accounts, checking accounts, and loans, MDIs and CDFI banks can help individuals and businesses access the financial services they need to manage their money and grow their assets. MDI and CDFI banks also promote economic development in low-income and minority communities by providing capital to small businesses, supporting affordable housing initiatives, and investing in community development projects.

By supporting economic growth and development, MDI and CDFI banks create jobs, build wealth, and improve the overall economic health of the community. Furthermore, MDI and CDFI banks often provide financial education and counseling to their customers, helping them build financial literacy and improve their financial well-being. By providing education and resources to customers, MDI and CDFI banks can help empower individuals to take control of their financial lives and make better financial decisions. Their track record in low-income and disadvantaged communities is reflective of the critical role they can play in the efficient delivery of greenhouse gas emissions and air pollution reduction projects to the very low-income and disadvantaged communities at the heart of the GGRF.

Recommendation: To incorporate MDI and CDFI banks into the community lender definition, the Coalition recommends amending the definition of "quasi-public" entity. Specifically, we recommend adding the following option under the quasi-public definition:

> *"(4) not have been created by a public entity and are a Community Development Financial Institutions, as defined in section 103 of the Riegle Community Development and Regulatory Improvement Act of 1994 (12 USC 4701), a Minority Depository Institution, as defined in section 308 of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (12 USC 1463), or such other standards as the agency may establish for financial institutions with a primary mission of facilitating positive environmental outcomes consistent with the purposes of the Inflation Reduction Act."*

2) *Technical Assistance*

The effective and efficient provision of technical assistance is of critical importance at every stage of the process in developing strategies and solutions to reach low income and disadvantaged communities and communities of color. Throughout the Implementation Framework, EPA has identified technical assistance as accompanying financial assistance in the approaches to enable low-income communities to deploy and benefit from emission reduction and pollution reduction technologies and projects. However, we believe that greater clarification is needed to ensure that the GGRF has a comprehensive, coordinated and user-friendly structure for the funded technical assistance strategy. For example, technical assistance can include resources for capacity building, training, predevelopment and development activities, community engagement processes and IT support.

We view the goal of technical assistance or as we often describe it, "market support", as the removal of bottlenecks that prevent the flow of capital into greenhouse gas reducing projects. Unfortunately, today the market is full of bottlenecks. Consequently, we believe that the funding for market support is as crucial in the National Clean Investment Fund (NCIF) as it is in the other competitions. And that the coordination of the market support functions and activities are paramount to avoid costly duplication or outright ineffective activities. The most effective market support activities will be in response to real world challenges that community lenders and other members of the ecosystem face as we engage (and reengage) with consumers and communities on opportunities to use greenhouse gas reduction projects to improve people's lives and strengthen their communities. The goal is not to fund activities that might be best described as predevelopment for a specific transaction but to provide broader market support that activates the market for the benefit of all participants.

Recommendation: Therefore, the Coalition requests that under the NCIF competition, 5% of the total award be eligible for centralized technical assistance and market support. In addition, the eligible applicant should have the ability and flexibility to put forth a technical assistance plan in the other competitions that is designed to remove bottlenecks in the deployment of capital. These technical assistance/market support plans may include but should not be limited to consumer (education, and protection), workforce (installer, contractor, and professional services), business (BIPOC and J40 growth), and community (EJ engagement, outreach, and project design). The goal of this additional funding is not just to increase the quantity of dollars deployed but to simultaneously increase the impact of the dollars by maximizing the benefits within communities including, environmental, health and economic impacts and outcomes.

3) *Competition Allocations (National Clean Investment Fund and Clean Communities Investment Accelerator*

The Coalition applauds the EPA and the spirit of the CCIA. In response to our comments and others, the EPA has identified a pathway to ensure that community lenders have direct access to the GGRF and the flexibility to use capitalization grants and technical assistance grants in ways that provide direct access to capital for qualified projects in J40 communities. However, there are a few adjustments that we suggest to improve the outcomes of the NCIF and CCIA competitions.

a) Eliminate the Funding Cap per Community Lender

Community lenders exist in all sizes. For instance, within the Coalition, there are institutions with assets under $500 million and over $10 billion. To structure a program whereby each community lender receives the same amount of flexible CCIA capital to deploy for the benefit of greenhouse gas reductions, limits the ability to not only meet the urgency of the moment but efficiently deploy capital for many of the larger community lenders. Furthermore, we are concerned that the cap of this size will deter some lenders from making the investment where the administrative costs and burdens could discourage participation rather than creating the needed momentum for scale.

b) Allow use of alternative allocation methods for CCIA Awards

We strongly support approaches to deployment that allow for flexibility by the decision by the applicants. The Coalition recommends that the EPA allow National Hubs to submit to EPA an alternative method of allocating the CCIA awards to its applicants. These alternatives can utilize historical lending activity or balance sheet size, green activity market opportunity and other data to inform a transparent allocation methodology. The methodology could also allow for the creation of an average award size for each Hub based on the actual community lender awards. Such a methodology would seek to eliminate the one-size-fits-all guidance and allow Hubs to determine the strategy that best fits their regional, utility, and community-specific needs.

c) Increase Technical Assistance percentage

As discussed above, technical assistance is an incredibly important use of funding for the CCIA and GGRF. In fact, a 12.5% ($625,000) allocation of technical assistance will not be sufficient to provide the support necessary for a community lender to conduct outreach to consumers, potentially train employees, adjust underwriting risk management and reporting systems, oversee community engagement, and provide other support, as necessary. The Coalition recommends a combination of increasing the individual award percentage up to 20% and reducing the pass-through requirement of the National Hub percentage from 95% to 90%. These changes would provide more direct TA awards to community lenders and give Hubs more flexibility in designing and implementing market support at scale to aid the deployment of CCIA and GGRF capital.

d) Increase the CCIA Competition Funding

In order to satisfy the recommended increase in individual recapitalization awards and increase in technical assistance grants, the total amount allocated to the CCIA should be increased. The Coalition recommends the CCIA competition funding be increased by a minimum of $3 Billion. While this is a significant increase, the coalition by itself represents nearly 900 organizations that qualify as community lenders which under the initial framework could be eligible for over 80% of the original $6 Billion competition allocation.

e) Decrease the NCIF Competition Funding

With the increase in CCIA funding, there would need to be an equal reduction in the NCIF Competition.

4) Low-Income and Disadvantaged Communities Definition

We urge EPA to provide additional guidance about defining low-income and disadvantaged communities to include low-income households that may be located outside of CEJST tracts. The EPA will use the Climate and Economic Justice Screening Tool (CEJST) to identify geographically defined disadvantaged communities for the purpose of defining low-income and disadvantaged communities in the NCIF competition. EPA will also include census block groups that rank at or above the 90th percentile for EJScreen's Supplemental Indexes. The EPA will provide further guidance in the NOFO on the definition of low-income and disadvantaged communities, which may include low-income households and affordable housing properties located *outside* of geographies identified by CEJST.

The Coalition has concerns that this approach to identifying low-income and disadvantaged communities may lead to the most disadvantaged low-income communities being overlooked by the NCIF. While the EJ Screen has proven to be a useful tool in the identification of communities that may be disproportionately burdened by pollution and other environmental stressors, its effectiveness is wholly reliant upon the accuracy of the data and methodologies used by the tool. Any limitations or gaps in the data may not fully capture the environmental and social conditions in a given community. In addition to data quality, the methodologies used to analyze the data and produce the screening tool affects its accuracy. EJScreen uses statistical models to estimate the potential burden of environmental hazards on different populations and communities, but these models can be sensitive to the assumptions and parameters used in the analysis. For example, the choice of environmental indicators and thresholds used to define "burden" can affect which communities are identified as being most impacted.

The limitations of the EJScreen can be mitigated when used in conjunction with the CEJST. CEJST builds on the data and methodologies used in EJScreen and expands the analysis to consider additional factors such as economic hardship, racial and ethnic diversity, and linguistic isolation. CEJST provides a more comprehensive understanding of the social and economic challenges faced by low-income and disadvantaged communities, and helps identify the most vulnerable communities across the U.S. However, the tool takes a more holistic approach to defining disadvantaged communities, and low-income is but one of many factors considered. This may lead to the identification of low-income communities but may also include communities with other characteristics, such as those that have high levels of air pollution or are located near toxic waste sites. Therefore, though the EJScreen and CEJST tools, when used together, can be effective in identifying potential environmental justice concerns with greater accuracy and help direct resources and interventions to the communities that are most in need, they do not, either individually or in tandem, fully capture the complexity of low-income and disadvantaged communities. To that end, the EPA should consider additional mechanisms that will assist the agency in its understanding of the environmental and social challenges faced by low-income and disadvantaged communities.

We strongly recommend that EPA also consider the Community Development Financial Institutions Fund (CDFI Fund) Low-Income Targeted Population (LITP) definition when defining Low-income and disadvantaged communities for the purpose of the GGRF competitions. LITP refers to individuals or families with incomes at or below 80% of the area median income, or AMI. This population is the primary focus of the CDFI Fund's programs and services, which are designed to provide affordable and accessible financial products and services to underserved communities. The CDFI Fund's definition of LITP, Native Communities and other Target Markets can be considered alongside the Climate and Economic Justice Screening Tool (CEJST) and the Environmental Justice Screening and Mapping Tool (EJScreen) to identify low-income and disadvantaged communities. CEJST and EJScreen can help identify geographically defined disadvantaged communities and areas with potential environmental justice concerns, while the CDFI Fund's definition of LITP can help identify additional populations that may be in need of economic and community development resources.

Recommendation: By combining these tools and definitions, organizations implementing the GRGF across competitions can gain a more comprehensive understanding of the social, economic, and environmental challenges facing low-income and disadvantaged communities, and develop more targeted and effective strategies to address these challenges.

5) *Benefits to Disadvantaged Communities*

The Coalition urges further clarity regarding how Financial Assistance and Technical Assistance will be deployed in low-income and disadvantaged communities. According to the enabling statute, $8 billion dollars shall be available to eligible recipients "for the purposes of providing financial assistance and technical assistance *in* low-income and disadvantaged communities." However, in the implementation framework, EPA suggests that each GGRF competition will align with President Biden's Justice40 Initiative, ensuring that 40 percent of the overall benefits from the program *flow to* low-income communities and communities of color. The term "low-income communities and communities of color" refers to areas and populations that have historically experienced social and economic disadvantage and discrimination, including people who live in poverty and people who belong to racial and ethnic minorities. We believe that the goals of the Justice40 Initiative, ensuring that 40% of the overall benefits from the program flow to disadvantaged communities is a floor, not a ceiling in ensuring that those most in need have access to benefits that these programs offer.

However, the Coalition questions whether the requirement that Justice40 benefits flow to communities of color and low-income areas is equivalent to the requirement that those benefits be expended there. Though it may be a matter of semantics, the Coalition believes that "flow to" refers to the ultimate impact of federal investments on low-income and communities of color (e.g., improved air and water quality, increased access to clean energy, etc.), while "expended in" refers to the specific projects and activities that are funded with federal dollars in these communities (e.g., development of renewable energy infrastructure, etc.).

Recommendation: The Coalition believes that both concepts are critical to ensure GGRF investments are distributed equitably and that low-income and communities of color are meaningfully included in the transition to a clean energy economy. However, further clarification would be appreciated before the release of the NOFO.

National Clean Investment Fund

1) Explicitly allow investments (equity and debt) in community lenders balance sheets as an eligible project

These investments will strengthen and accelerate the ability of community lenders to deploy capital in greenhouse gas reduction projects. In addition, this will allow intermediaries to continue performing their important role of working with and through community lenders to efficiently mobilize and deploy capital.

2) Provide capital deployment flexibility by considering grants as an eligible form of Financial Assistance

We share a commitment to ensure that the GGRF capital remains available to be recycled into new products to support ongoing waves of deployment. And the targeted use of grants provides a tool that can be used to achieve the dual goals of greenhouse gas reductions and maximizing benefits to low income and disadvantaged communities. Despite being explicitly included in the CFR definition of Federal Financial Assistance, the GGRF Implementation Framework states that the EPA does not expect to consider grants as a financial product. In some cases, grants offer several advantages to indirect recipients of GGRF as they serve low-income and disadvantaged communities across the U.S. For instance, projects funded by grants are significantly less expensive than those financed by loans, equity investments, loan guarantees, etc., which is especially critical for CDFIs, community development credit unions, and minority depository institutions that may not have the financial resources to take on additional debt for GHG- and air pollution-reducing projects in low-income and disadvantaged communities. Further, grants can reduce the risk associated with financing projects in low-income and disadvantaged communities.

3) **Allow for the creation of product development grants**

As described in the framework, the NCIF should seek to maximize the establishment of products and tools that access secondary markets and provide market liquidity. To efficiently access these markets, a conforming set of financial products will need to be developed that aligns with the needs of qualified projects in low-income, disadvantaged communities with the needs of long-term investors. While some of this work has been started, more direct funding for this activity will be needed to ensure that secondary markets are in sync with the product structuring needs of the primary markets. This important work should be funded as a grant separate and apart from the administration budget of the eligible applicant since much of this work will carry benefits beyond the transaction to support the entire market ecosystem. In addition, utilizing grants in this way will not only remove the need to recover the cost in the interest rates, thus, keeping costs down on qualified projects but also accelerates the ability to do this work in real time. These added efficiencies increase the likelihood and size of direct savings for consumers.

Clean Communities Investment Accelerator

1) **Provide flexibility to adjust Priority Projects to Community Needs**

While we agree with the three project priorities identified in the framework, there must be flexibility for community lenders to shape their program to meet the needs of their communities. For example, decarbonization of manufactured housing, decarbonization of existing facilities, purchase of household electric vehicles and sustainable agriculture support should be eligible. Although the framework suggests that additions can be made, we want to ensure that the process is not overly cumbersome so that the community lenders and Hubs can deploy capital without fear that a project – while having a clear GHG reduction benefit are later deemed as ineligible to receive GGRF resources.

2) **Fund potential increases in staffing needs**

It is critical that the allocated technical assistance dollars allow for the community lenders to fund staffing needs that will likely front run the capital deployment. As such, any revenue received from the expanded climate activity will likely not align with new personnel expenses. This mismatch might dampen or delay the deployment of capital because it creates unnecessary burden for community lenders trying to execute under the framework of this program.

3) **Fund critical system upgrades, including carbon accounting**

In addition to new staff, it is likely that many community lenders will need to invest in new reporting systems, especially related to carbon accounting. In order to maximize the coordination with the NCIF, it is critical that we track, report and compile information related to the financial and environmental performance of qualified projects. As we prepare for changes in the financial system related to carbon disclosure, we want to ensure that any investments made now are aligned with future standards. Providing support for community lenders to comply with protocols such as Partnership for Carbon Accounting Financials (PCAF) will be extremely important for maintaining future flexibility. Additionally, we recommend that EPA clearly articulate the approaches to measure, monitor and disclose emission reductions and identify for applicants the approaches that are aligned with global best practices.

4) **Allow grantees to provide subsidies**
To minimize the funding spent on compliance and administration and maximize the funding flowing to greenhouse gas reduction projects, the EPA should allow grantees to provide subsidies to community lenders.

5) **Workforce Opportunities Must Have Standards and Minimum Performance Indicators**
We recommend that EPA clarify performance standards and opportunities for interagency coordination of workforce development programs. Meaningful categories of investment also extend to job and workforce training. The programs proposed must have and be aligned in partnership with institutions with track records in delivering job training and certification programs that are connected to real jobs and employment opportunities that provide the building blocks for careers in these industries.

6) **Provide Geographic Flexibility associated with increased J40 benefits**
We understand the desire for J40 communities to have access to GHG reduction projects and activities through community lenders. However, we want to ensure that community lenders have the maximum flexibility to meet the needs of their borrowers and communities they serve. For instance, we want a community lender to have the flexibility to provide capital through the CCIA to a BIPOC owned solar developer who is supporting community owned solar infrastructure in both J40 communities and non-J40 communities. Consistent with the NCIF structure, we want to incentivize community lenders supporting the growth of businesses, particularly BIPOC businesses that are developing projects that are maximizing J40 benefits but may not be located within J40 communities. To reinforce this point, members of the Coalition were financially active in over 20,000 of the 27,000+ J40 census tracts while also active in nearly 53,000 of the 74,000+ national census tracts. For these reasons, we urge EPA to provide flexibility in setting the requirements for how applicants deploy funding and technical assistance so that investments are right sized to meet the regional and community needs of direct and indirect project benefits.

Solar For All

1) **Energy Efficiency should be an allowed "Enabling Upgrade"**
It is critical that EPA affirmatively allow for investments in energy efficiency alongside investments in solar to reduce energy burdens, right-size solar investments, and enable efficient program design – thus allowing states, local governments, and Tribes to improve program accessibility while reducing pollution and energy burdens especially in low-income communities of color and rural communities. According to a 2020 Study of the ACEEE, found that while U.S. Households spend an average of 3.1% on energy bills, low-income households spend three times more of their income on energy costs compared to the median spending of non-low-income households. [1] The same study further recommends that strategies to ramp up energy efficiency and weatherization for low-income housing

---

See Drebhol, Ross and Ayala, ACEEE "How High are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burden Across the United States (ACEEE Household Energy Burden Study, September 2020 available at chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.fdacs.gov/content/download/96425/file/ACEEE_HouseholdEnergyBurdensStudy.pdf.

will both ease energy burden on American families while achieving the emission reductions aligned with U.S. greenhouse gas reduction commitments[2]. Additionally, EPA must clarify how applicants for participating technologies, including weatherization and energy efficiency, can mobilize funding and technical assistance opportunities across multiple government agencies in a manner that allows for the opportunity for full participation in multiple programs to achieve the full potential of energy, climate, economic and health benefits.

2) **Allow financial support for multifamily buildings, family farms and community buildings, including churches, health centers charter schools and small businesses**

Solar PV installations on community buildings can have a catalyzing effect in low-income and disadvantaged communities. Solar For All programs that adopt a comprehensive, community-wide approach that includes single-family homes, multifamily buildings, family farms and community buildings are more likely to create an activated network of community lenders that can finance the installation of solar PV systems in perpetuity.

At a minimum, EPA should clarify that multifamily buildings and family farms are eligible for all forms of financial assistance and technical assistance under Solar for All programs, even though they are often classified as commercial properties. In the proposed implementation framework, the word "residential" can be interpreted to exclude commercial properties, i.e., multifamily buildings and family farms, where millions of low-income families live.

[2] See ACEEE Household Energy Burden Study at pdf 20. Available at chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.fdacs.gov/content/download/96425/file/ACEEE_HouseholdEnergyBurdensStudy.pdf

***

On behalf of the Community Builders of Color Coalition and the Justice Climate Fund, I thank you for the opportunity to provide feedback regarding the Greenhouse Gas Reduction Fund Implementation Framework. Please do not hesitate to contact us for clarifying questions or comments.

Sincerely,

Lenwood V. Long, Sr., President &CEO
African American Alliance of CDFI CEOs