



Hope Credit Union  
Hope Enterprise Corporation  
Hope Policy Institute  
4 Old River Place | Jackson, Mississippi 39202  
601-944-1100  
[www.hopecu.org](http://www.hopecu.org)  
[www.hopepolicy.org](http://www.hopepolicy.org)

December 5, 2022

Michael Regan, Administrator  
US Environmental Protection Agency  
Office of the Administrator, Mail Code 1101A  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OA-2022-0859

Dear Administrator Regan:

Please find below the comments of HOPE (Hope Enterprise Corporation / Hope Credit Union / Hope Policy Institute) in response to the Request for Information on the structure and implementation of the Greenhouse Gas Reduction Fund (GHGRF) managed by the Environmental Protection Agency (EPA).

#### **About HOPE**

One of the nation's largest Black- and women-owned financial institutions, since 1994 HOPE has worked to increase financial inclusion among vulnerable populations in Alabama, Arkansas, Louisiana, Mississippi, and Tennessee – a region that is home to more than a third of the nation's persistent poverty counties. HOPE was established to ensure that all people regardless of where they live, their gender, race or place of birth have the opportunity to support their families and realize the American Dream. HOPE has generated over \$3.6 billion in financing, investments and related services for the unbanked and underbanked, homeowners, entrepreneurs, nonprofit organizations, health care providers and other community and economic development purposes. Collectively, these activities have benefited more than 2 million individuals throughout the Deep South. Of the credit union's 35,000 credit union members, 69% have household incomes below \$45,000 and eight out of 10 are people of color. Our branches are located in areas with less public, private and philanthropic investment, with 86% in counties where the majority of the residents are Black. More than 85% of HOPE's branches are in high poverty census tracts, and in many places, HOPE is the only depository with a local branch.

The devastating effects of climate change on people and communities of color are far too familiar. Earlier this year, the flooding of the Pearl River in Jackson, Mississippi, where our organization is headquartered, contributed to the failure of the water system in a city that is 83% Black. Along the Gulf Coast, low-income communities are often situated in the most precarious and least well protected areas when hurricanes strike. In the Mississippi Delta and throughout the Alabama Black Belt, tornados have leveled homes, hospitals and entire communities. As a community development financial institution, we are uniquely equipped and have a long history of acquiring, leveraging, deploying and tracking public funding for climate inflicted disaster response. Unfortunately, when disaster strikes, public resources almost always arrive in the communities we serve after every other need has been addressed.

Within the GHGRF an opportunity exists to change this pattern, to engage and invest in low-income communities and people of color first, with a proactive focus on long term solutions. The following letter suggests a number of high level approaches for ensuring people and communities most in need meaningfully participate.

### **Structure and Eligibility**

In the structuring of the competitive grant programs to be funded through the GHGRF, it is paramount that the EPA invest in multiple applicants. A strategy that engages multiple entities is needed to quickly deploy the resources made available through the GHGRF – while ensuring they reach the people and communities most in need. Within this approach, selected applicants should, at a minimum, be comprised of diverse leadership at both the board and executive levels. Applicants should also be able to demonstrate long track records of investing in both people and communities of color – especially ones facing economic distress.

In contrast, a strategy that directs funding through one national entity should not be pursued. Such a strategy will reinforce long standing structural inequities where the communities and people who are hardest to reach, with the least information, are served last, if ever at all.

### **Financing, Technical Assistance and Outreach**

In order to advance strategies that increase access to zero emissions technologies or reduce greenhouse gas emissions among low-income people and communities of color, the EPA should prioritize the funding of approaches that:

- Provide direct, affordable, flexible financing to low-income people and communities of color to achieve intended climate outcomes;
- Make technical assistance available to lenders and borrowers to facilitate the accessing of resources and subsidies to adopt clean energy solutions and low carbon technology
- Raise awareness among low-income people and communities of color around the financial benefits of adoption and to provide a culturally relevant roadmap to access the resources made available through the GHGRF;
- Engage community-owned financial institutions with long track records of investment in and ties to historically underserved people and places.

The GHGRF presents a generational opportunity to reduce greenhouse gas emissions through direct engagement with low-income communities and households most affected by climate change. Thank you for the opportunity to comment on its structure and implementation.

Sincerely,



Ed Sivak  
Chief Policy & Communications Officer