

BUILDING 'BUILD BACK BETTER' BACK BETTER:

Lessons from Inflation Reduction Act Implementation for Equitable Federal Climate Policy





THE UNIVERSITY OF BRITISH COLUMBIA

Centre for Climate Justice

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Lessons from Inflation Reduction Act Implementation for Equitable Federal Climate Policy

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The Centre for Climate Justice (CCJ) at the University of British Columbia advances the urgent social, political, and economic changes necessary to address the climate crisis.

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
INTRODUCTION	3
Research Questions	4
Methods	4
Report Structure	5
From Build Back Better to the IRA: Working with a flawed reconciliation bill	6
I. INTRODUCING AND EVALUATING JUSTICE40	7
a. The IRA pushes local and regional governments towards better EJ engagement	8
b. Justice40's Flaws	9
"Race-neutral" environmental justice policy	9
The Climate and Economic Justice Screening Tool (CEJST) leaves some off the map	9
Lights on Louisiana: Closest to climate impacts, closest to solutions	12
II. IMPLEMENTATION ANALYSIS	14
Rollout pace	14
Barrier: Short-staffing	16
Condition for Success: Hiring staff	18
Lights on Arizona: Short-staffing hampers renewable funding rollout	18
Barrier: Grant Application Burden	19
Grant Burden is an EJ Issue	20
Technical assistance too little, too late	21
Condition for Success: External Technical Assistance to Bolster Federal Programs	22
Lights on Oregon: Technical assistance helps electrify rural communities	22
Condition for Success: NGO support is filling in gaps	23
Barrier: Compressed timelines	24
Climate planning on a deadline: Building on relationships, not making new ones	25
Evaluating Direct Pay for Cities, Nonprofits, Communities	25
Direct Pay for Cities	26
Lights on Seattle: What does it take to make direct pay work for cities?	27
Direct Pay for Nonprofits	28
Barrier: Upfront Funding	29
III. CATALYZING TRANSITIONS & CEMENTING WINS	30
The IRA's outreach problem	30
Communications strategies that work	32
Fighting local backlash, building local momentum	33
Regional Collaboration	37
Building progressive guardrails for the IRA	37
Housing justice is climate justice	38
Building people power through public utilities	39
A just transition is labor-led	40
CONCLUSION	42
BIBLIOGRAPHY	44

The Inflation Reduction Act (IRA) has created unprecedented opportunities for just climate action. **However, qualitative interviews with 17 implementation organizers, nonprofits, and planners revealed that the distribution of IRA funds stalled due to understaffed bureaucracies and burdensome grant processes that have frozen out many justice-oriented groups.** The experiences of equity-deserving funding applicants and their supporters are an important and undervalued indicator to evaluate IRA program design.

This report synthesizes key barriers identified by interviewees, including: slow federal program rollout, burdensome grant applications moving through a defunded bureaucracy, and a lack of upfront finance tools to make tax-based rebate payments a feasible option for under-resourced groups. For each barrier, we list justice implications — and ways that groups have worked strategically within their political, place-based contexts to succeed.

Distribution obstacles left money on the table that is disappearing under the second Trump presidency. Regardless of the IRA's longevity though, **interviews suggested that IRA programs have set in motion new, durable processes: collaboration in regional climate planning, workforce shifts towards high-road green jobs, and renewable energy expansions to decrease fossil fuel power.**

The organizing that enabled these wins reveals how transformative shifts do not happen top-down. To fully realize federal climate policy's potential for equitable and reparative climate action requires base-building and mobilization for worker protections, utility democratization, renter's rights, and other progressive goals — with or without ongoing federal support.

Research Questions



What are the capacities, skills, and institutions required to do effective co-governance and implementation of federal climate policy at the state and municipal level?



What are the barriers and enabling conditions to community organizations effectively participating in IRA implementation? What are the environmental and climate justice implications of these barriers?

IRA Access Barriers

1. Off the Map

The federal EJ scoring process to allocate Justice40 funds for marginalized communities often fails to map onto the local context of where equitable and reparative funding is most needed.

Recommendation: Improve state-level consultation processes to harmonize local environmental justice needs assessments with federal criteria, including substantial engagement and leadership requirements with Indigenous communities and Tribes.

2. Grant Burden

The administrative load of federal grant applications is too high for smaller organizations and local government bodies, especially those who have not accessed federal grants before. Technical assistance and upfront funding options (via public climate finance institutions such as Green Banks) were available through the IRA, but the delayed timing of rollout prevented implementation.

Recommendation: Federal grant programs must ensure community organizations have access to the staff, technical assistance, and upfront funding access to administer grants. Effective federal climate policy requires reinvesting in public sector bureaucracy to build out the capacity to administer it.

3. Communication Breakdown

The IRA was hamstrung by a poorly-communicated rollout, which failed to sufficiently mobilize people to access the IRA or to support it politically.

Recommendation: Interviewees found success through outreach messaging that emphasized affordability, energy independence, and rural, agrarian concerns.

Catalyzing Transitions

Entrenching EJ engagement in local government:

65% of interviews described Justice40 as a productive, if flawed, commitment to environmental justice (EJ). Tying federal funding to EJ incentivized some local governments to improve engagement and build capacity for co-governance with equity-deserving groups.

Market transformation

Planners and advocates framed the IRA's impact on good jobs and community economic development as a "market transformation" with momentum beyond the bill's direct funding streams. While the IRA's market-led energy transition through tax credits is not enough, some IRA implementers are optimistic about using IRA programs to transform labor relations and mass-upskill workers into sustainable careers.

Progressive guardrails

If federal governments pursue market-led energy transitions without progressive guardrails around housing justice, workers rights, and utility democratization, advocates must continue to push for progressive goals from the outside to ensure a just transition.

Introduction

After years of organizing for significant climate investment in the US, the federal floodgates opened in 2021. The Inflation Reduction Act (IRA) is a ground-breaking climate policy mobilizing approximately \$392 billion to accelerate decarbonization. Three years later, the climate movement is still reckoning with where the funding is flowing, its political impact, and what to do as the administration of President Donald Trump tries to pare it down.

In the biggest experiment yet in incentive-based climate policy, the IRA relies on carrots rather than sticks to compel big investments in renewable energy transitions and climate adaptation. It includes over 100 funded programs and billions of tax credits flowing through over a dozen government agencies. This means that how the IRA is actually implemented depends almost entirely on how industry, states, cities, and non-government organizations choose to — or are able to — access funding. While other research has addressed the IRA's impact in terms of [jobs created](#), pollution [decreased](#), and environmental justice [impacts](#),¹ less work has addressed the experiences of the people trying to put the IRA to work.

The Build Back Better agenda, which includes the IRA, the Bipartisan Infrastructure Law (BIL), and the Infrastructure Investment and Jobs Act (IIJA), also notably focuses on environmental justice. 40% of federal investments, called Justice40, are earmarked for low-income and racialized communities with high exposure to environmental harm.² Justice40 is supposed to fund climate adaptation in places that otherwise can't afford to, and to redress the ongoing impacts of environmental racism.

While the IRA has been received by many with optimism, it has become clear since its passage that to actually get money into community-led and -benefitting projects has been slow, bureaucratic, and uneven. Some issues stem from the design of the Justice40 criteria, while others relate to the problematic processes of federal funding dispersal.³ Work by the Center for Popular Democracy (a coalition base-building for social and climate justice) found that community-based organizations (CBOs) are struggling to access the IRA's Community Change Grants because they lack the staff or technical support to successfully apply (Ang et al., 2023). This report finds the same dynamic echoed across grant programs and locations. We also highlight strategic and contextual ways that groups have successfully put IRA funding towards justice-oriented goals.

Domestic climate policy always has international effects. Canada often follows closely behind American political trends — especially considering the nations' economic and geographical links.⁴ This report also aims to speak to Canadian climate organizers pursuing justice-based federal climate policy under an increasingly hostile and populist political climate on both sides of the border.

¹“Two Years of the Biden-Harris Clean Energy Boom”(Climate Power, August 2024), https://climatepower.us/wp-content/uploads/2024/08/Clean-Energy-Boom-Two-Year-Anniversary-Report-RES-2024_07_30-DR.pdf; Babu Gouder and C. Taylor Brown, “The (Un)Just Transition in Ecomodernist Climate Policy: Critical Analysis of Social Inequities in the US Inflation Reduction Act,” *Critical Social Policy*, September 28, 2024, 02610183241281349, <https://doi.org/10.1177/02610183241281349>.

²For a comprehensive explanation of Justice40 programs, see the Global Center for Climate Justice Federal Funding Primer.

³Margaret Walls, Sofia Hines, and Logan Ruggles, “Implementation of Justice40: Challenges, Opportunities, and a Status Update,” n.d.

⁴Macdonald, D., & VanNijnatten, D. (2010). Canadian Climate Policy and the North American Influence. *Revue Gouvernance / Governance Review*, 7(1). <https://doi.org/10.7202/1039137ar>

In Canada, carbon pricing has become the scapegoat for a high cost of living under an unpopular Liberal regime. What would it look like to reframe climate action around affordability and equity-based incentives?

“As the carbon price falters, we must pivot to direct investments in environmental justice policies and projects that benefit communities. This means massive investments in Indigenous-led renewable energy, public ownership of clean infrastructure, and targeted support for workers transitioning from the fossil fuel sector. Given the current affordability crisis and looming trade war with the U.S., our messaging should highlight how a green economy would make life more affordable, strengthen national security, create stable jobs, and ensure energy independence, countering the false choice between economic stability and climate action.”

- 350 Canada (via personal communication)

This report focuses on four years (2020-2024) where the US federal government prioritized climate more than it has in the past. But, it also suggests possibilities for organizers in both countries to lay the groundwork for infrastructure — both physical and social — that builds power to turn the tide in leaner times.

Methods

We conducted 17 semi-structured interviews with organizers, municipal leaders, and state energy office employees from 9 states to gain a wide range of perspectives about on-the-ground IRA implementation.⁵ Interviews were coded in Nvivo, and are quoted (edited for length and clarity) throughout. Some interviewees chose to be anonymous to ensure they could speak freely without concern about being representative of or censored by their government workplaces.



States Represented in Semi-Structured Interviews on IRA Implementation

⁵ Interviews were completed with approval from the UBC IRB under application H24-01721.

This report pays special attention to three IRA programs: **the Rural Energy for America Program (REAP), Direct Pay, and Climate Pollution Reduction Grants (CPRG)**, selected after consultation with policy experts who identified these programs as particularly impactful and innovative. These three programs each illustrate a different way that the IRA allocates funding, from novel mechanisms (direct pay) to new block grants (CPRG) to supercharging existing grant programs (REAP). Our findings are not specific to these programs, but serve as a jumping off point to wider insights about the IRA across the bill and across the country.

FOCUS PROGRAMS

REAP is a United States Department of Agriculture (USDA) grant program for energy efficiency projects in rural areas. It started in 2008, and the IRA quadrupled its funding

CPRG is a new EPA-administered grant program which provides uncompetitive funding for municipal, state, and regional planning agencies to develop climate plans, and competitive multimillion dollar grants to implement them.

Direct Pay allows tax-exempt entities, like nonprofits, churches, and cities, to recover funds for climate-aligned projects via tax returns..

Report Structure

Section 1: Introducing and Evaluating Justice40 provides an overview of, and interview perspectives on, environmental justice in the IRA.

Section 2: Implementation Barriers, Enabling Conditions, Justice Implications addresses key barriers interviewees identified to implementation and their justice implications.

Section 3: Catalyzing Transitions and Entrenching Wins zooms out to the larger story of the IRA's deeper impacts on regional collaboration, workplace transformations, and the progressive base-building at all levels required to fulfill its potential — regardless of the bill's own longevity. Throughout, boxes highlight and analyze stories from interviews and secondary research to show how barriers, enabling conditions, and EJ dynamics play out in different contexts.

From Build Back Better to the IRA: Working with a flawed reconciliation bill

When evaluating the IRA, it's important to note that the bill that made it past the Senate is much less transformative than what many advocates, including three interviewees, hoped. Since the IRA is a budget reconciliation bill, most of its policies work through the tax system, which strips the bill of much of its power to actually regulate fossil fuel extraction and its impacts.⁶ The IRA does include creative workarounds to expand the EPA's power to regulate greenhouse gas emissions via Clean Air Act amendments.⁷ However, it also [auctions off](#) federal land for oil and gas leasing and incentivizes mining for [critical minerals](#) on sovereign Tribal land without appropriate consent or consultation.⁸ Many of the IRA's more radical, productive proposals, including support for [universal pre-K and family leave](#), green job training, and \$150 billion in affordable housing investments were cut from the final bill in a compromise with fossil fuel-funded interests in Congress.⁹ The IRA instead relies on billions of dollars of tax incentives, as well as funds allocated to federal agencies to distribute as grants.

The IRA is also limited in its equity objectives by the structure of the tax system. Tax credits can leave loopholes both for fossil fuel industry interests to exploit, and for other corporate interests to use without any guarantee that local communities will benefit equitably (more on this later). Tax credits can also make clean energy startups an easy outlet for investors to reduce their tax liability — saving wealthy investors money instead of increasing energy affordability for racialized communities. A [Roosevelt Institute report](#) analyzes how tax credit-based climate policy reproduces existing inequalities:

“ Unlike direct investments that communities can design and control for their own benefit, as envisioned in Justice40, a tax-driven transition is not likely to promote widespread, equitable access either to the tax benefits themselves or to the clean energy resources and related benefits that the tax credits are supposed to promote.”
 - Daly & Chi, 2022¹⁰

Some interviewees working to implement the IRA agreed. John Seng, a policy manager at Spark NW, a renewable energy development support nonprofit working in Oregon and Washington, expressed concerns that corporations might take advantage of ITC tax credits on Tribal land by installing energy projects that aren't actually owned by or benefitting Indigenous people.

⁶ Patrick Bigger et al., "Inflation Reduction Act: The Good, The Bad, The Ugly" (Climate + Community Institute, August 2, 2022),

https://www.researchgate.net/profile/PatrickBigger/publication/362456006_Inflation_Reduction_Act_The_Good_The_Bad_The_Ugly/links/62eabb0c0b37cc344769c150/Inflation-Reduction-Act-The-Good-The-Bad-The-Ugly.pdf.

⁷ Greg Dotson and Dustin J. Maghamfar, "The Clean Air Act Amendments of 2022: Clean Air, Climate Change, and the Inflation Reduction Act," *Environmental Law Reporter* 53 (2023): 10017.

⁸ Jake Bittle, "The Inflation Reduction Act Promises Thousands of New Oil Leases. Drillers Might Not Want Them.," *Grist*, August 9, 2022, <https://grist.org/energy/inflation-reduction-act-oil-gas-leases-federal-land/>; Rachel Herring, Keaton Sandeman, and Lyuba Zarsky, "Decarbonization, Critical Minerals, and Tribal Sovereignty: Pathways towards Conflict Transformation," *Energy Research & Social Science* 113 (July 1, 2024): 103561, <https://doi.org/10.1016/j.erss.2024.103561>.

⁹ Bigger et al., "Inflation Reduction Act: The Good, The Bad, The Ugly."

¹⁰ Lew Daly and Sylvia Chi, "Clean Energy Neoliberalism: Climate, Tax Credits, And Racial Justice" (Roosevelt (Roosevelt Institute, June 2022), https://rooseveltinstitute.org/wp-content/uploads/2022/06/RI_ClimateTaxCreditsRacialJustice_202206.pdf).

“When you introduce massive incentives you need to pair them with regulations, otherwise it’s really hard to ensure that the benefits will reach frontline communities, and you risk promoting harmful development without consent from Tribal nations and other impacted communities.”
 - John Seng, Policy Manager, Spark Northwest

On the other hand, the USDA State Director in Oklahoma framed incentives as the only way to expand renewable energy in states dominated by fossil fuel interests, where regulation and penalties are fiercely opposed.

Recognizing its flaws, the IRA is what we got. Learning from implementers’ experiences of bureaucratic shortcomings, delays, and environmental justice goals that went far but not far enough can provide lessons for how to be more prepared to seize future opportunities. They can also provide insight for how to build power and just transitions at the local scale when federal support shrinks.

1. Evaluating Justice40

Justice40 requires per Executive Order 14008 that 40% of all federal funding for climate and environmental justice objectives go to communities that are “disadvantaged, underserved, or overburdened by pollution.”¹¹

While the Inflation Reduction Act has been widely hailed as a groundbreaking step for environmental justice funding,¹² implementation of Justice40 has been difficult to track. Many agencies have not formally reported how much of their IRA funding has been obligated.¹³ The Union of Concerned Scientists (UCS) found Bipartisan Infrastructure Law investments in California to drastically underinvest in marginalized communities, with only approximately 18% of BIL funding confirmed to align with Justice40, but researchers couldn’t access enough data for a comprehensive analysis.¹⁴ The UCS makes an important call to improve federal tracking and data sharing for Justice40 investments.¹⁵ A January 2024 analysis by Resources for the Future reviewed public information for federal programs on the White House Justice40 Covered Programs List and similarly found that many had no information about their actual Justice40 objectives or progress.¹⁶ Considering this knowledge gap, this report looks to another source of knowledge: insights of a sample of people implementing Justice40 programs.

¹¹ Tara Steckler, Walker Meghan, and Nina Schlegel, “The Federal Funding Primer on Climate Justice” (Global Institute, June 2022), Center for Climate Justice, April 2024), <https://www.climatejusticecenter.org/federal-funding-primer>.

¹² Steckler, Meghan, and Nina Schlegel, “The Federal Funding Primer on Climate Justice.”

¹³ Jessie Blaeser and Kelsey Tamborrino, “The Mystery Number That’s Key to Whether Biden’s Spending Survives,” POLITICO, November 12, 2024, <https://www.politico.com/news/2024/11/12/trump-return-white-house-how-much-biden-climate-money-safe-001889> 28.

¹⁴ Union of Concerned Scientists et al., “Follow the Money: Are Historic Infrastructure Investments Going to California Communities That Need Them Most?” (Union of Concerned Scientists, June 6, 2024), <https://doi.org/10.47923/2024.15488>.

¹⁵ Union of Concerned Scientists et al., “Follow the Money.” Walls, Hines, and Ruggles, “Implementation of Justice40: Challenges, Opportunities, and a Status Update.” p.31

¹⁶ Walls, Hines, and Ruggles, “Implementation of Justice40: Challenges, Opportunities, and a Status Update.” p.31

a. The IRA pushed governments towards better EJ engagement

“I think that its attention to environmental justice is really admirable.” - Rev. Dr. Becca Edwards, *Texas Impact* (a faith-based climate advocacy group in Texas).

The IRA, while flawed, has moved environmental justice more squarely into the federal policy conversation. Ten interviewees shouted out Justice40 as a huge boost to their work. By tying federal funding to historically marginalized communities, the IRA has caused some local governments to ramp up their engagement and equity practices. Federal incentives aren't only about private investment via tax credit — they can also shift what governments prioritize to create a “ripple effect” for environmental justice.¹⁷

“The IRA opportunities are so focused on communities of color and communities that are specifically low-income, and it's very inclusive of Tribes. That is something that it's like, it's obvious for us to do that, but it forces others to think that way as well.” -
A federal funds manager in New England

In Colorado, a local government coalition, the Denver Regional Council of Governments (DRCOG), created a new equity subcommittee to apply for a CPRG grant. DRCOG planner Maddy Nesbit said that they hired additional consultants to identify areas with heavy pollution and social burden to ensure their building decarbonization planning put the areas with greatest need first and did not leave anyone behind. While equity was already a priority, the pull of millions of dollars of available federal funding moved climate justice up on their agenda.

Interviewees named specific IRA-funded programs as EJ wins:

- The EPA Greenhouse Gas Reduction Fund puts \$27 billion towards developing green financial institutions to fund projects, as well as \$7 billion for 60 grantees to develop solar programs for low-income households.
- The Community Change Grants is a direct investment in EJ through partnering with communities to lead projects to reduce greenhouse gas emissions and prepare for climate impacts while alleviating socioeconomic burdens.
- The Home Energy and Appliance Rebates (HEAR) provide rebates for low-income single and multi-family buildings to weatherize and install energy efficiency upgrades, such as heat pumps.

¹⁷Walls, Hines, and Ruggles, “Implementation of Justice40: Challenges, Opportunities, and a Status Update.”

b. Flaws of Justice40

“Race-neutral” environmental justice policy

The IRA’s climate justice credentials have also faced pushback for not going far enough, and for locking in harmful framings of what constitutes an EJ program and community. First, Justice40 does not mention race at all (related to the Supreme Court’s 2023 ruling against Affirmative Action), despite race remaining the number one predictor of exposure to pollution and of access to rooftop solar.¹⁸ One planner in Oregon described the watered-down federal framing of environmental justice as actively blocking their own more accurate and fair criteria:

“**We have a race-forward definition of equity.** Race is not a factor in [Justice40], and race is our number one factor. We developed our definition of equity ... collaboratively with [community based organizations] and advocates and all these experts through [engagement] in 2018 and so we feel like **that's a good definition, and it guides all of our thinking about equity, and we can't use that,**”
 - Eliot Rose, Transportation Strategist, Metro Portland

The Indigenous Environmental Network (IEN) also criticized the allocation of IRA funds. IEN classifies nearly 50% of potential tax credit investments as “false solutions” including carbon capture, offsets, and unsustainable mining.¹⁹ Tax credits provide federal incentives for industrial activity that risks nonconsensual extraction on Indigenous lands and which fail to substantively halt the pollution which disproportionately impacts Native communities. IEN also rejects claims that the IRA creates \$60 billion for EJ communities, as much of this sum comes in the form of competitive grants which may not reach where they are intended — a point corroborated by several interviewees.

The Climate and Economic Justice Screening Tool (CEJST) leaves some off the map

Justice40 communities are identified through the Climate and Economic Justice Screening Tool (CEJST), which determines where to allocate funds by mapping census tracts where communities are overburdened on the basis of income and climate/environmental impact.²⁰

¹⁸ Brittney J. Miller, “Racism Drives Environmental Inequality — but Most Americans Don’t Realize,” *Nature*, June 14, 2022, <https://doi.org/10.1038/d41586-022-01283-0>; United Church of Christ. Commission for Racial Justice. *Toxic wastes and race in the United States: A national report on the racial and socio-economic characteristics of communities with hazardous waste sites*. Public Data Access, 1987. <https://www.nrc.gov/docs/ML1310/ML13109A339.pdf>; Sunter, Deborah, Sergio Castellanos, and P. D. Kammen. “Installing inequality: the racial disparities in solar deployment.” *The Beam* (2019): 63-65. <https://rael.berkeley.edu/wp-content/uploads/2019/06/Sunter-Castellanos-Kammen-TheBeam9-Installing-inequality.pdf>

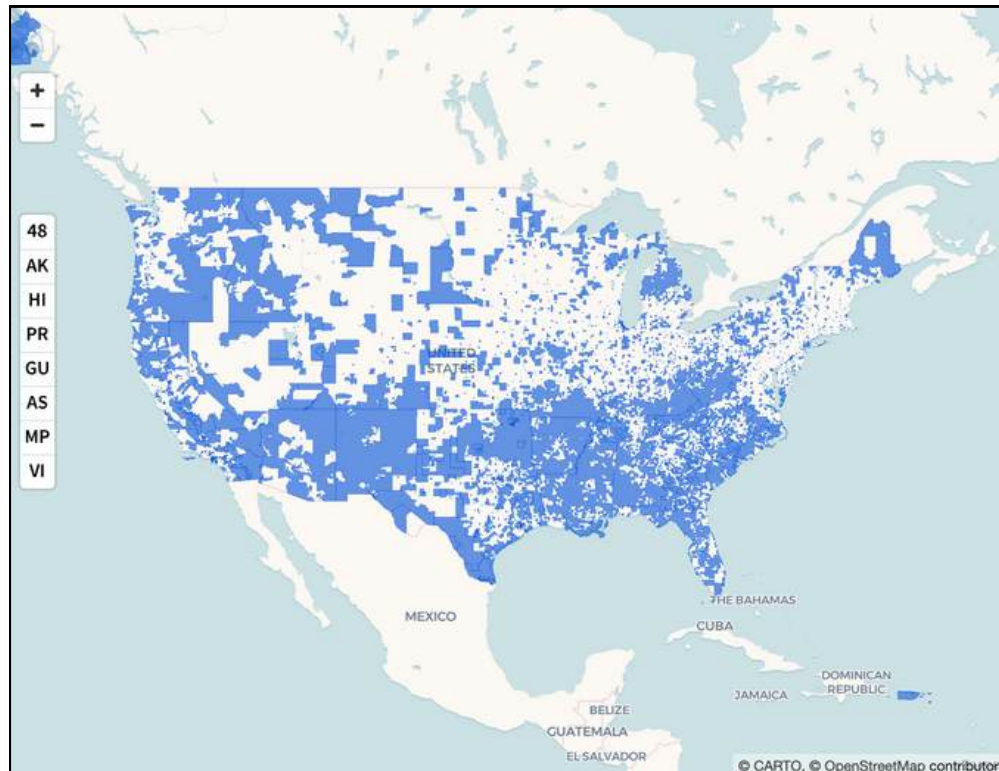
¹⁹ Indigenous Environmental Network, “An Analysis on The Climate and Energy Provisions of the Inflation Reduction Act” (Indigenous Environmental Network, August 2023), <https://www.ienearth.org/wp-content/uploads/2023/08/IRA-FINAL-AUG-30-2023-OptimizedFinal.pdf>.

²⁰ More on their methodology here: <https://screeningtool.geoplatform.gov/en/methodology>

The CEJST aimed to improve on the previous federal tool for mapping environmental injustice (called the EJScreen), but both have faced criticisms for failing to account for local, especially Indigenous, contexts. While some interviewees appreciated the mapping tool as a simple way to identify regions to prioritize for funding and engagement, six noted discrepancies between the map's goals and equity-deserving communities in their regions who are not included.

“The country is so big that when it got down to the community-level for some of the mapping, it didn't always connect to where the actual need was.”

— Elena Santarella, BlueGreen Alliance Colorado



Map from CEJST (disadvantaged areas represented in blue)

According to Hawaiian organizer Evan Webber, who helped write the IRA and is now working to implement it in his home state, the IRA used “boilerplate” language around Tribal issues that restricts Indigenous benefits to those with federally-recognized status. Native Hawaiians are not federally recognized, shutting them out of Tribal and Justice40 provisions despite their high environmental and socioeconomic vulnerability due to historic and ongoing colonization.²¹

²¹ Greenlining Institute, “CEQ Screening Tool Feedback Letter,” accessed December 27, 2024, <https://greenlining.org/wp-content/uploads/2023/04/CEQ-Screening-Tool-Feedback-Letter.pdf>:7

Hawaii's small size and heterogeneity also makes it difficult to accurately identify environmental justice populations from spatial units. While much of the US is highly segregated based on income and race due to historic redlining and zoning practices which purposefully delineated areas of marginalization, Hawaii is more complicated: property value reflects proximity to ocean views. Beachfront properties worth millions sit in the same census tract, or even the same street, as low-income communities of Native Hawaiians.

“Most of the very rigid and large-scale geographic mapping that they tried to do to define environmental justice and low-income communities has not worked out well for the reality of a lot of communities here in Hawaii. **A lot of our Native Hawaiian communities are getting cut out of resources that I think were intended to help them.**”
- Even Webber, Our Hawaii.

Advocacy groups such as the Greenlining Institute have written extensively about how to [reform the CEJST](#) to better serve environmental justice.²² One of their recommendations, supported by several of our interviews, is to improve the process of local consultation. For states, regions, and cities with existing EJ mapping systems, such as Colorado and Oregon, consultation could be as simple as comparing and aligning two criteria.

“Even if they had talked to the Office of Just Transition, they could have improved the Colorado map.”
- Elena Santarella, BGA

Others, including some interviewees who criticized the CEJST, nonetheless appreciate the map as a simple way to target important equity-deserving regions for outreach and funding.

In New Orleans, where 60% of census tracts qualify as disadvantaged, planner Dan Jatres said the map has been useful.

“I think generally the census tracts that are identified in that tool line up with our on the ground knowledge and understanding of what parts of the city have historically been disadvantaged or under-invested in,”
- Dan Jatres, Infrastructure Projects Administrator, City of New Orleans

Seattle's CEJST similarly highlights regions of South Seattle that experience disproportionate urban heat and exposure to industrial pollution, which, due to legacies of redlining and current migration patterns, are home to majority BIPOC communities.

²² Greenlining Institute, “CEQ Screening Tool Feedback Letter,” accessed December 27, 2024, <https://greenlining.org/wp-content/uploads/2023/04/CEQ-Screening-Tool-Feedback-Letter.pdf>.



Lights on Louisiana: Closest to impacts, closest to solutions



“New Orleans is known as a city that, at least in its recent history, has struggled as a poor city that has a lot of residents who are living in poverty and are struggling day to day. Because of the focus of the Biden administration on Justice40 and its influence and impact on the discretionary funding programs, there are opportunities that now exist.”

- Dan Jatres, Infrastructure Projects Administrator, City of New Orleans

New Orleans has been one of the most visible frontlines of climate injustice in North America since Hurricane Katrina laid bare how climate disasters devastate along the lines of race and class. Going after federal funds for climate justice is nothing new in NOLA, and neither is organizing through grassroots channels for mutual aid and political base-building. Both have a crucial role in federal climate policy implementation for climate justice.

FEMA's neglect of Black residents after Katrina revealed the rampant racism in federal disaster response. A 2019 study found that between 1999 and 2013, Black and Latino residents in disaster-stricken communities across the country lost between \$27,000 and \$29,000, while white residents in the same counties gained an average of \$126,000 through FEMA aid and insurance.²³ In this context, some organizers look to the IRA and Justice40 as a chance for the federal government to do better, but they are not betting on it.²⁴

According to city planner Dan Jatres, the city's history and context has set it up well for the IRA: although the city doesn't have a specific federal grants office, they have seasoned staff and a network of community organizations that are on the pulse of where the city needs to direct resources.

New Orleans was one of only three cities to win a competitive \$50 million CPRG implementation grant, which they are using for a host of projects: bike share programs, urban reforestation, grants to supplement state [Solar for All](#) funding, and more. Louisiana also got a NOAA Climate Resilience Regional Challenge, with significant projects going towards climate adaptation and pollution reduction in marginalized areas of New Orleans.


²³Junia Howell and James R Elliott, "Damages Done: The Longitudinal Impacts of Natural Hazards on Wealth Inequality in the United States," *Social Problems* 66, no. 3 (August 1, 2019): 448-67, <https://doi.org/10.1093/socpro/spy016>.

²⁴Terry L. Jones, "Advocates Fear Billions in Inflation Reduction Act Money Won't Reach Targeted Communities • Louisiana Illuminator," *Louisiana Illuminator*, October 25, 2023, <https://lailuminator.com/2023/10/25/inflation-reduction-act/>; Elise Plunk, "Inflation Reduction Act Money Might Not Get to Those in Most Need, Study Finds • Louisiana Illuminator," *Louisiana Illuminator*, 2024, <https://lailuminator.com/briefs/inflation-reduction-act-might-not-get-money-to-those-in-most-need/>.

Jatres said that the IRA made federal funding easier to access for the city. Previous federal block grants required up to 20% local matching, which the IRA removed. Jatres said that this allows the city to go after funds to fulfill pressing local needs without having to scrounge up funds to match.

The EPA and DoE also allocated 13 million to the [Deep South Centre for Environmental Justice](#) to provide technical support and grant-writing assistance to Louisiana communities as an Environmental Justice Thriving Communities Technical Assistance Center (EJ TCTAC).²⁵ This is an example of how the federal government can allocate funds to a well-connected and established local organization to more accurately meet the environmental justice needs of communities who have been burned by the failures of federal funding before.

While the city government and communities are racing against the clock to secure their communities against an encroaching coastline, their state may be working against them. The Louisiana Illuminator reported in October 2023 that community organizations are concerned that the climate-denying governor will block funds, or at least fail to prioritize acts that states like Washington have implemented to bolster the IRA.²⁶ Still, climate advocates in Louisiana are moving forward and crossing the aisle when they need to.

“While Louisiana may be viewed as ... a conservative state where climate issues are not as high priority, when it comes to coastal issues, it's very much a bipartisan issue in Louisiana. We don't have all the resources we need, but the state is and has been acting and taking leadership on both planning and implementing projects.” - 

Dan Jatres, Infrastructure Projects Administrator, City of New Orleans

While local backlash is a challenge in Louisiana, their strategic IRA projects also serve as an example of how cities can implement ambitious climate projects against the political tide.

²⁵“DSCEJ Selected as an Environmental Justice Thriving Communities Technical Assistance Center and Receives \$10 Million Grant,” Deep South Center for Environmental Justice, April 18, 2023, <https://dscej.org/2023/04/18/deep-south-center-for-environmental-justice-selected-as-an-environmental-justice-thriving-communities-technical-assistance-center-and-receives-10-million-grant/>.

²⁶Jones, “Advocates Fear Billions in Inflation Reduction Act Money Won’t Reach Targeted Communities • Louisiana Illuminator.”

II. Implementation Barriers, Enabling Conditions, Justice Implications

This section addresses logistical issues identified with the IRA, and their implications on environmental justice. We analyze four barriers: **program rollout delay, short-staffing, grant burden, and tight grant application timelines**. For each barrier, we also analyze the conditions of success through which some interviewees and groups have succeeded despite barriers.

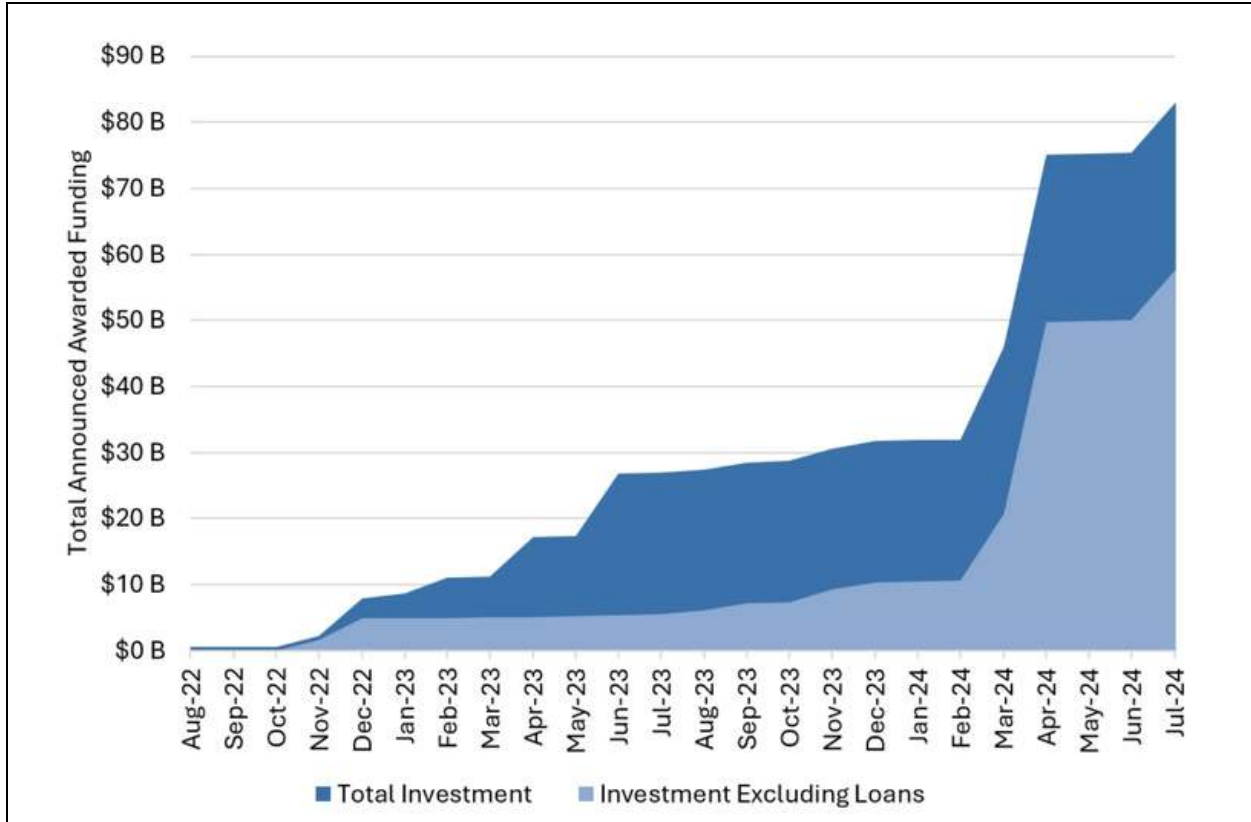
Barrier: Rollout pace

“**It's not delivering the impact we were hoping it would, on the timeline we would hoping it would deliver,**”
- Betamia Coronel, Center for Popular Democracy”

The IRA's passage in 2022 sparked excitement but left significant uncertainty about the details. Some programs, such as direct pay, released federal guidelines for implementation over a year after IRA passage. Some of these uncertainties have taken years to clear, and, for many IRA implementers (including 6 interviewed here), the slow pace of IRA program rollout has dampened their hopes for the bill.

“There was a good year-ish period where we knew the law had been passed. We knew [direct pay] exists. **But how do companies or how do nonprofits actually claim this, was a piece we were missing for a really long time,**”
- Adrian Keller, Arizona Solar United Neighbors”

According to an analysis by Politico, only \$125 billion of 1.1 trillion allocated Build Back Better funds (including the IRA, the CHIPS act, and the Federal Infrastructure and Jobs Act) had been spent by May 2024. The IRA specifically put \$145 billion towards climate programs, with approximately \$60 billion allocated as of April. Federal allocation announcements accelerated in 2024 in the lead-up to the election, with investments accelerating sharply after February 2024. Back Better funds (including the IRA, the CHIPS act, and the Federal Infrastructure and Jobs Act) had been spent by May 2024. The IRA specifically put \$145 billion towards climate programs, with approximately \$60 billion allocated as of April. Federal allocation announcements accelerated in 2024 in the lead-up to the election, with investments accelerating sharply after February 2024.



Graph from the Climate Program Portal.

Other anticipated programs are still not online: the Home Energy Rebate programs, which provide incentives to retrofit and weatherize housing for low-income households, are only available in Arizona, New Mexico, New York, and Rhode Island as of September 2024. The hydrogen tax credit regulations, which are a major draw for the private sector, are also still in [development](#) as of December 2024.²⁷

“I’m really grateful that we have something finally, but it needs to move faster ... We’re two years into the program already, we’re still waiting for some of these funds to be released, and the next administration is threatening to claw back what still remains. In the meantime our state agencies are working around the clock to roll these programs out as quickly as possible, but they can only work with what the federal offices give them.” - John Seng, SparkNW

While some are impatient to see results of slow-cooking policy guidelines, other implementers have been overwhelmed by waves of funding opportunities. The uneven pace of allocation means that to applicants, federal funding can quickly turn from a drought to what some interviewees described as a “firehose.”

²⁷Bruce White, “Are We There Yet? Treasury Promises Final Section 45V Hydrogen Tax Credit Regulations by Year-End,” Barnes & Thornburg, October 9, 2024, <https://btlaw.com/en/insights/alerts/2024/are-we-there-yet-treasury-promises-final-section-45v-hydrogen-tax-credit-regulations-by-year-end>.

“IRA seems to be being dispersed really fast, which is exciting, obviously, and that means that there’s a lot of opportunities, but also that means that the plans might not be the best quality if you haven’t been already thinking about what you’ve been wishing to fund.”
- A federal funds manager in New England.

The uneven pace of dispersal has created bottlenecks that risk leaving money on the table rather than at the disposal of those who need it most.

✓ **Condition for Success: More Staff, More Support**

For both nonprofits and government agencies, adequate staffing and federal support are critical to handle the waves of grants. State and regional offices especially could have benefitted from proactively hiring community engagement specialists and grant administrators to ensure they had the resources to meet deadlines with high-quality and equitable proposals.

“I think it happened so fast. We could have done it way better had we been strategic and planned ahead instead. I felt like the national office was always just putting out fires, you know, instead of getting ahead of it,” - A state energy coordinator from Arizona.

Good policy and community engagement take time. Much of the IRA also requires building new systems from scratch. There is no easy solution in the tension between moving at the speed of urgency versus the speed of trust.²⁸ To smooth out the process despite a rocky pace, it helps to have the staff capacity to react quickly to large influxes of funding and plans already in place to inform priorities when funding emerges. Unfortunately, this is often not the case.

Barrier: Short-staffing

Effective federal climate policy requires reinvesting in the public sector to administer it.

Half of the interviewees across sectors cited staffing shortages in federal, state, and nongovernmental agencies as a key barrier: three local government employees, three state energy coordinators, and two from implementation advocacy nonprofits. Understaffing slows down federal and state governments’ timeline on releasing programs, and local government and CBO’s abilities to apply for them.

According to John Seng, policy manager at Spark Northwest, some delays stem from the immense challenges of creating and implementing new programs at an unprecedented scale

²⁸ Bender Grey and Shannen Maxwell, “Catalyzing Regional Energy Transitions: Improving Conditions for Inflation Reduction Act Implementation in Central Appalachia and Texas,” M-RCBG Associate Working Paper No. 206 (Harvard, December 2023), <https://www.hks.harvard.edu/centers/mrcbg/publications/awp/awp206>; Peter J. Newell, Frank W. Geels, and Benjamin K. Sovacool, “Navigating Tensions between Rapid and Just Low-Carbon Transitions,” *Environmental Research Letters* 17, no. 4 (April 2022): 041006, <https://doi.org/10.1088/1748-9326/ac622a>.

““Allocating IRA funds has been a major undertaking for state agencies, and I have nothing but respect for the state energy offices that are working to roll these programs out at the state level. They’ve had to hire new staff and create new programs, and they’ve also faced ongoing delays and a lack of transparency at the federal level.”

- John Seng, SparkNW

Interviewees from states that could prioritize hiring extra staff to draw down and distribute IRA funds reported more success. One federal funds manager in New England described how her relatively-new office plays a major role in coordinating and informing agencies about available grants to secure the maximum amount of funding possible.

Making federal climate policy work requires many layers of bureaucracy to administer it, and US environmental and energy agencies have suffered from understaffing for decades.²⁹ EPA employees have been ringing the alarm since 2023 that understaffing and underfunding [compromises](#) their ability to implement their portions of the IRA.³⁰ The union representing half of the EPA’s 14,000 staff told Congress that the agency needed at least a 40% staff increase to fulfill their mandate. At the state and local level, public sector jobs are also down by 200,000 positions – a decline of 3.8% since February 2020.³¹ Federal disinvestment in the public sector means that when departments and local governments finally have the money to build robust public services, they don’t have the manpower.

“**“You’re handing this over to a broken country.”**

- Betamia Coronel, Popular Democracy

Decades of disinvestment have also made federal jobs uncompetitive on the market.³² According to Oregon USDA Public Relations and Community Engagement Specialist Max Sprague, it is hard to find qualified people who want to work for the federal government when they have other (better-paying) options.

²⁹ Christopher Flavelle, “As Major Hurricane Approaches Florida, FEMA Faces Severe Staffing Shortage,” *The New York Times*, October 7, 2024, sec. Climate, <https://www.nytimes.com/2024/10/07/climate/hurricane-milton-fema-staff-shortage.html>; Nick Bowlin, “The Forest Service Is Cutting Its Seasonal Workforce and Public Lands Will Suffer,” *High Country News*, October 8, 2024, <http://www.hcn.org/articles/the-forest-service-is-cutting-its-seasonal-workforce-and-public-lands-will-suffer/>; “The Rising Cost of Fire Operations: Effects on the Forest Service’s Non-Fire Work” (United States Department of Agriculture, August 4, 2015), <https://www.fs.usda.gov/sites/default/files/2015-Fire-Budget-Report.pdf>.

³⁰ Lylla Younes, “At EPA, Staffing Crisis Clashes with Expanded Mission,” *Grist*, February 14, 2023, <https://grist.org/regulation/at-epa-staffing-crisis-clashes-with-expanded-mission/>.

³¹ Christian Weller, “Amid Strong Labor Market, State And Local Governments Struggle To Hire,” *Forbes*, February 9, 2023, <https://www.forbes.com/sites/christianweller/2023/02/09/amid-strong-labor-market-state-and-local-governments-struggle-to-hire/>.

³² Ximena Bustillo, “‘Pretty Brutal’: Hiring Woes Plague Biden Effort to Contain Wildfires,” *POLITICO*, March 15, 2022, <https://www.politico.com/news/2022/03/15/bidens-effort-to-contain-wildfires-threatened-by-staffing-woes-0016419>.

✓ **Condition for Success: Hiring staff**

On the other side, interviews with people from states and agencies that have prioritized hiring more staff for IRA implementation described greater success. Denver Regional Council of Governments, a nonprofit collaboration between local governments in the Denver region, successfully applied for a \$199 million CPRG to implement a broad building decarbonization strategy. They allocated funding to hire grant-writers and experts to work on the application and are now using funds to hire people to make it happen.

“We’re providing funds to the jurisdictions to hire staff. A lot of things we heard throughout our planning program, probably the main thing we heard as a barrier was staff capacity.”
- Maddy Nesbit, Denver Council of Regional Governments



Lights on Arizona: Short-staffing hinders renewable funding rollout



The Rural Energy for America Program (REAP), administered by the USDA under the Farm Bill, has provided loans and grants to rural small businesses for energy efficiency improvements since 2009. REAP’s funding quadrupled in 2023 with an extra \$2.025 billion under the IRA for renewable energy, with 40% earmarked for EJ applicants.

According to Adrian Keller from nonprofit Solar United Neighbors Arizona, the program has made a huge difference for rural businesses:

“Those have been really cool conversations to have with especially small family farmers who were really struggling to keep up with their bills. They have low-to-almost nonexistent electricity bills, and that’s helped them stay in business” -
Adrian Keller, Solar United Neighbors Arizona

In Arizona, REAP applications skyrocketed with the new funding. But, just as too much power can make a breaker trip, a massive increase in funding without increasing the staff to manage it can overwhelm an office. While the state energy coordinator is thrilled about the program’s new capacity, their office has been struggling to get through funding applications. For the first seven months of the program, they were the only employee. Now they have two more staff, but they’re stuck in catch-up mode.

“We’re just so backlogged, and my plate is so full, and I’ve been doing this for a year. It’s just a big lack of planning that made this hard on me.” - an Arizona state energy coordinator

States with “a tradition of small government,” as the above energy coordinator described theirs, are less prepared to deal with big federal funding, often failing to prepare for the demands of federal grant administration until it’s too late. While the state knew the funding was coming, they didn’t prepare for how much work it would take. Understaffing can risk leaving workers burned out and frustrated.

“I've been so stressed out and have not had the support we need to do the program, and now I feel like all of Arizona's customers are waiting ... Hopefully, now that we're a team of three and everyone knows the program, we're jamming and working like a machine, but it's gonna take us a long time to dig out of this hole because of that.”

an Arizona state energy coordinator

REAP is a highly technical grant, so the applications they have received are often not filled out right. The program aims to help through Technical Assistance Grants (TAG). According to the energy coordinator, the rollout of TAG didn't happen fast enough, only opening for applications on [February 13, 2024](#), nor did it reach as far as it needed to.

TAG is also crucial for getting REAP to the customers that need it most — small rural businesses without the resources to have a grant-writer on staff. While REAP has been around for 7 years, three state energy coordinators we interviewed described it as a “word of mouth” program that businesses discover through similar counterparts. According to all three REAP coordinators interviewed, these networks have featured wealthier, larger businesses, such as dentist offices and agricultural warehouses, which have the money, time, and staffing to apply for it. Justice40 communities, whose access to the program was expanded by the IRA, often still don't know about it, let alone how to navigate the burdensome application process.

“I'm really happy about the program. I'm really happy about the applications I'm seeing. I'm really happy about the awards that we're making. I feel like we're doing a good job, I'm doing a good job, Arizona is doing a good job at getting this money out there, but the agency has not been good at supporting us and making this process really logical.” - an Arizona state energy coordinator

Whether support comes from the state or through a nonprofit, it takes an army to successfully administer a federal climate justice grant. This is especially true for targeting the rural communities who need funds the most but are hardest to reach — and whose support makes or breaks federal climate policy at the ballot box.

Barrier: Grant Application Burden

“—
 “We are finding, and I'm sure many others are finding that getting the grants is one thing, implementing them and having the internal capacity to manage federal funding is an entirely different challenge, particularly for smaller communities”
 - Dan Jatres, City of New Orleans Infrastructure Projects Administrator
”

All 16 interviewees mentioned the administrative load of federal grant applications as a struggle in accessing IRA funds. Federal grants involve long applications on tight deadlines. It can be difficult for applicants to parse application requirements, or determine whether they're

even eligible. Federal climate communication has also faced accessibility criticisms for providing information only in English through information sessions that take place during the workday, creating barriers for working people, multilingual and migrant populations.³³

Since many environmental justice-based IRA programs depend on the government collaborating with community groups, nonprofits and advocacy organizations need the staffing capacity to participate.³⁴

“We've been working for two years trying to get rural schools and schools in underserved communities to be able to set up a grant, or go after IRA funding and we just keep coming up short on resources.”
- Elena Santarella, BlueGreen Alliance Colorado

A Policy Director for Washington State Community Action Partnership (WSCAP), a nonprofit that coordinates and advocates for poverty-reduction groups across Washington, said that many WSCAP members are unable to go after federal grants because they lack the administrative capacity to apply and report. Similarly, according to a transit planner for Portland, Oregon, many nonprofits in the Portland area are unwilling to go after federal money because grants only yield “50 cents of the dollar” because of the time and labor they monopolize.

Many IRA programs, including REAP, work through individuals and businesses applying directly to the federal government for grants and loans. If grants are overwhelming for government officials, they're even less accessible to people filling out applications for federal loans on top of their demanding jobs. All three REAP energy coordinators interviewed said that it was a challenge to help people through the complex application processes and to get word out about the program at all. That leaves gaps: many who need the funding most face the most barriers to apply.

“There's a lot of really big corporate agricultural producers in the state. They have grant writers on staff. They're looking for stuff like this all the time. That's part of their job. But you're a mom and pop, small family farmer, they probably don't know what REAP is, much less how to apply for it.” - Adrian Keller, Arizona SUN

Grant Burden is an EJ Issue

Accessing IRA funding comes at a high cost of time, staffing, and labor that the communities that need it most are least able to spend. Seven interviewees raised concerns that larger organizations are taking a disproportionate share of federal funding, leaving smaller organizations that are closest to community needs with the least.

³³ Molly M. Hooks, “A Just Solution to Port Pollution: Tailoring the Clean Ports Program to Ensure Equitable Distribution of Inflation Reduction Act Grants,” May 1, 2024, <https://hdl.handle.net/1794/29449>; “USDA Equity Commission Interim Report 2023” (United States Department of Agriculture Equity Commission, February 2023), <https://www.usda.gov/sites/default/files/documents/usda-ec-interim-report-2023.pdf>.

³⁴ Joel Carreon, “Inter-Organizational Collaboration: Challenges and Opportunities for Implementing the Inflation Reduction Act Among Latinos in South Los Angeles” (California State University, Northridge, 2024), <https://scholarworks.calstate.edu/downloads/2f75rh50g>.

This is a known dynamic: a [2023 study by the Justice, Equity, Diversity, and Sustainability Initiative at the Yale School of the Environment](#) found that several of the largest mainstream environmental organizations received more funding from private grants from 2015-2017 than did all the environmental justice organizations combined.³⁵ While the IRA disperses public grants, the problems are the same: smaller organizations lack capacity, name recognition, and staffing because their resources are more likely to go towards actually doing the work rather than chasing big money to do it.³⁶

All three interviewees from the REAP program described how understaffing and program design is leaving rural, low-income, and BIPOC small businesses out. Instead, they see the most applications from larger agricultural producers and rural businesses who need the funding the least.

“I guess the question should really be, what is the goal? Is it to increase renewables and reduce energy demand and cost? If that’s the ultimate goal, then yes, the program is, I think, effective, because it doesn’t matter who gets it. If the goal is to provide assistance to people who can least afford these upgrades, I think we could do a better job there.”
- Oklahoma USDA State Director Kenneth Corn

One coordinator described REAP’s tendency to be a “word of mouth” program that circulates mainly among larger businesses like agricultural warehouses and dentist offices — too often leaving rural farmers, who the program is meant to target, in the dark. These are small family businesses that are already stretched thin by long days, low staffing, and the pressures of addressing water shortages, storms, and other immediate impacts of climate change on their work and livelihoods. Under these conditions, knowing about, let alone successfully completing, a complex federal grant is nearly impossible without specialist support.

Some states provide that support. A REAP Public Relations and Outreach Specialist in Oregon said that they’re using IRA funds, as well as supplemental state funding sources, to ramp up outreach through an extensive community engagement process which has started to show results. According to Adrian Keller from Arizona SUN, targeting REAP in rural census tracts has the added effect of proving the of renewable energy and federal climate funding to areas most likely to vote against it. Implementation just requires communication — which requires more funding, and a state energy office willing to spend it.

Technical assistance too little, too late

In September 2023, the White House released guidelines for accessing the 100+ technical assistance programs available for accessing funding under the Investing in America agenda. These technical assistance programs are meant to provide funding and guidance to help organizations not used to accessing federal grant funding develop successful applications to take advantage of both new grants and enhanced capacity of existing grants, such as REAP.

³⁵ Dorceta E Taylor and Molly Blondell, “Examining Disparities in Environmental Grantmaking: Where the Money Goes,” 2023, <https://doi.org/10.13140/RG.2.2.10106.36801>.

³⁶ Arielle King, “Reimagining Funding for Climate Justice: Beyond the IRA,” *Intersectional Environmentalist*, accessed December 27, 2024, <https://intersectionalenvironmentalist.com/the-joy-report/reimagining-funding-for-climate-justice>.

To access technical assistance grants also requires grant-writing capacity, creating a paradox for smaller groups.

“**It's like you need to have a baseline capacity in order to even go out and get the technical assistance sometimes.**”
- John Seng, Spark NW Oregon

✓ **Condition for Success: External Technical Assistance to Bolster Federal Programs**

Two interviewees described proactive local support for technical assistance as an enabling condition to using the IRA, while three described its absence as a barrier. Several also received help from the [Urban Sustainability Directors Network \(USDN\)](#), which partnered with the federal government to provide free technical assistance for municipal governments in applying for CPRG and other programs.³⁷



Lights on Oregon: Technical assistance helps electrify rural communities



According to Oregon USDA public relations and community engagement manager Max Sprague, REAP is succeeding in Oregon because the program already had a network of technical assistance in place — so when IRA funding hit, they were ready to go.

When REAP funding quadrupled at the start of the Biden-Harris administration, the USDA started doing community engagement to determine how to direct funding to those who needed it most.

The biggest need that they identified, according to Sprague, was technical assistance: “How’s a farmer who’s working from well before sunrise to well after sunset gonna fill out this huge grant?”

While ideally the government would help, Oregon’s USDA office, like its red state counterparts, does not have the people.

“We have 60% of the people we had a decade ago. We are so understaffed, it's wild,”
— Max Sprague, Oregon USDA

Luckily, Oregon USDA had extra support and community engagement capacity through the Renewable Energy Development Assistance (REDA) program. REDA supports a network of partner organizations working on rural electrification, including the Oregon DOE and the USDA. An Americorps member through the Resource Assistance for Rural Environments (RARE) provides dedicated grant-writing support to REDA partners and farmers. In 2023 and 2024, Oregon’s REAP program secured an additional \$30 million in technical assistance grants

³⁷ “Welcome to the USDN National EPA TCTAC!,” Urban Sustainability Directors Network, accessed December 27, 2024, <https://www.usdn.org/projects/epa-ej-tctac.html>.

to create a robust team to travel all over the state, spread the word about the program, and help people fill out successful applications.

These streams of technical assistance combined to fund over 50 projects. Sprague said that their technical assistance enabled development of the biggest solar project on Oregon's North Coast: a million-dollar array to the Fort George Brewery Public House, a heritage building that the owner refurbished into a brewery and gathering place.

“Being able to fund [the technical assistance program] has both increased our applications and the quality of those applications. Having these guys on the ground and being able to build that framework has allowed us to astronomically raise the number of people that we've been able to get through the application process.”

- Max Sprague, Oregon USDA

✓ **Condition for Success: NGO support is filling in gaps**

Where implementation is lagging due to capacity gaps for cities, businesses, and communities, nonprofits are also assisting. A niche has emerged for implementation support organizations, such as Rewiring America and SparkNW, to directly support individuals, organizations, and institutions in funding applications and building capacity for future renewable programs.

SparkNW is working in Washington and Oregon to build local capacity in communities on the front lines of the climate crisis:

“One of our big goals is to work with community partners, including community-based organizations and Tribes, to build in-house capacity to take on these funds. As local capacity grows, communities become more autonomous and more able to directly influence the clean energy transition.” - John Seng, SparkNW

Arizona Solar United Neighbors (SUN) similarly provides grant-writing and outreach support, as well as policy advocacy, to get solar on the Arizona agenda.

“REAP has been a really big priority of our work, because there's a lot of rural, a little bit more conservative, folks who aren't maybe the biggest fans of solar, or are more likely to vote for policies that don't help solar. A big part of what we're doing at SUN is trying to really broaden that net.” - Adrian Keller, Arizona SUN

Arizona SUN has grant-writers on staff that can help with REAP, and although they have not yet written many REAP grants, they're hiring a rural outreach campaigner to broaden their impact. They have also talked to former REAP applicants about the impact of the program.

It's also important to note the concerning implications of outsourcing policy implementation to “third sector” nonprofits.³⁸ Under neoliberal government downsizing since the 1980's, groups

³⁸ Benjamin Y Fong and Melissa Naschek, “NGOism: The Politics of the Third Sector,” *Catalyst* 5, no. 1 (2021): 93-131.

aiming to provide public services are increasingly managerialized into nonprofit organizations that are encouraged to pursue private funding to operate.³⁹ Major IRA implementation nonprofit ReWiring America, for instance, has received large grants from the Rockefeller Foundation and the Sergey Brin Family Foundation, the foundation for Google co-founder Sergey Brin.⁴⁰ While their support is an important windfall for organizations doing implementation work, organizations should not have to court billionaires to perform essential public services.

Barrier: Compressed timelines

“
“The number one barrier was time.”
 - Maddy Nesbit, Denver Council of Regional Governments (DRCOG) |”

On the flip side of uneven federal rollout pace, applicants also often had little turnaround time to complete grants. Five interviewees described the pace of CPRG Implementation grants as breakneck, with only four months to get proposals together.

With not enough time or resources to apply, some state and city agencies let opportunities go by. A federal funds manager and policy advisor in New England said that the sheer amount of grants, all with short turnaround times, led to overwhelmed applicants leaving money on the table.

“
 “By that time there's two months left, folks will just not even engage. They will say, I definitely need money, but I'm not even going to try,”
 - A federal funds manager in New England |”

She clarified that efficiency and speed is important — quick grant turnarounds just require administrators and pre-existing community engagement processes ready to meet the challenge. As many grants are competitive, successful applicants we interviewed tended to have already laid the groundwork for implementing climate justice plans and projects.

“
 “I do think that there is a benefit to moving really fast on climate related grants. It just makes sense, obviously, since things are happening really fast with climate change.” - A federal funds manager in New England |”

The IRA itself is on a deadline. The federal government was under pressure to get money out the door before the election. This impacts what grants get funded: to move money faster, a transit planner in Oregon said that larger state and regional-level proposals seem to have been prioritized over smaller local allocations.

³⁹ B. Mitchell Evans and John Shields, “Neoliberal Restructuring and the Third Sector: Reshaping Governance, Civil Society and Local Relations,” Working Paper Series (Ryerson University Centre for Voluntary Sector Studies, July 2000), <https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=1f53bf237bfb6fd9eafe167537a8c828dcfa5c41>.

⁴⁰ Suozzo, Andrea, Alec Glassford, Ash Ngu, and Brandon Roberts. “Sergey Brin Family Foundation, Form 990PF - Nonprofit Explorer.” ProPublica, 2024. <https://projects.propublica.org/nonprofits/organizations/472107200/202243199349103084/IRS990PF>.

Climate planning on a deadline: Building on relationships, not making new ones

It's hard to do good community engagement, which is core to equitable climate planning, on a tight deadline. **Successful CPRG applicants relied on preexisting relationships with community organizations, since they didn't have time to forge new ones.**

“A funding opportunity has been published and is open. At that point, it's too late to do a new public engagement process. You've got 60, maybe 90 days to submit a proposal. So our approach has been we can rely on planning and engagement that has already taken place. We don't need to recreate the wheel. We don't need to create opportunities where we're potentially risking planning fatigue with our residents ... So we're really focused on taking the plans that we already have and the projects that were already identified as ways to address needs in the city.” - Dan Jatres, Infrastructure Projects Administrator, City of New Orleans

Similarly, planners in Austin, Texas, used a “grass-tops” approach to do community engagement on a deadline: they couldn't talk to every stakeholder, but they did consult extensively with community leaders and experts they already knew. This allowed them to write a successful CPRG implementation grant to improve the public transportation system for underserved areas of the city during a disruptive highway construction project underway.

According to a federal funds manager in New England, the competitive CPRG grant rewarded engagement with equity and justice. If there was an IRA 2.0, she said that she would want planning grants to build in extra time for engagement. If that wish is not granted, to prepare for future federal funding, planning agencies should do what they already should have been doing: listening to racialized, low-income, disabled, and otherwise justice-deserving groups about how to make climate adaptation, mitigation, and just transitions work for them.

Direct Pay for Cities, Nonprofits, Communities

One of the Inflation Reduction Act's most impactful ideas is direct pay, a new mechanism to allow cities and nonprofits, which are tax-exempt entities, to receive tax credits and rebates — a new pathway for cheaper renewable infrastructure construction.

Direct pay has received some of the most enthusiasm from IRA commenters⁴¹ but it's been difficult to implement in practice. Many dynamics in the direct pay implementation process illustrate common trends across IRA implementation, so this section unpacks municipal and nonprofit experiences in detail.

⁴¹ James A. Ferguson, “Death, Taxes and Clean Energy: How the Inflation Reduction Act Harnesses Tax Law to Revitalize American Clean Energy,” *Journal of Business, Entrepreneurship and the Law* 17 (2024 2023): 91.

“We understand that direct pay is probably the future, and that's why we care so much about it ... We know that the IRA competitive grants money is going to be dispersed, and it will run out, but the tax money is what's going to ... stick around for many years, and it's setting precedent. So, we were tough on it because we love it,”
 - a federal funds manager in New England

Interviewees named three main roadblocks to accessing direct pay:

1. Guidance from the federal government has been slow.
2. Groups that haven't done taxes before often don't have access to accountants and specialists.
3. Under-resourced groups aren't able or willing to proceed with projects without funding upfront, rather than months later during tax season.

Direct Pay for Cities

Direct pay was touted as a windfall for cities, which are well-equipped to take decisive climate action.⁴² However, bringing direct pay to cities has required municipal specialists working around the clock to adapt the tax code to their local processes with a lower success rate than they hoped.

A New England policy advisor and federal funds manager was excited about direct pay but has not seen the level of uptake she expected: “We have heard from a lot of municipalities that they know about direct pay and they don't think it's a good fit for them. That's funny because direct pay is a good fit for everyone!”

In her own state, it has also been a slow process: “We're leaders on the east coast with direct pay, but we're all very confused.” Another interviewee, a planner in Austin, Texas, said city accountants are working on it but similarly have yet to put all the pieces together.

Seattle City Light direct pay specialist Shelby Ketchum said that accountants are beginning to emerge that specialize in helping cities and organizations demystify direct pay. This speaks to the system's discouraging complexity but also to the type of capacity that must be built to get federal money to cities and organizations through the tax system.

Experts in Seattle, New England, and Hawaii all echoed that upfront funding is the missing piece to make direct pay work. The New England and Seattle interviewees both are counting on state-level legislation to unlock funding pools.

“We haven't been able to unlock those dollars yet. Folks just need a lot of upfront money to be able to even think about direct pay.” - A federal funds manager in New England.

⁴² Carolyn Berndt, Payton Siller Jones, and Kelly Aves, “How Local Governments Can Use Direct Pay on Clean Energy Projects,” National League of Cities, December 22, 2022, <https://www.nlc.org/article/2022/12/22/how-local-governments-can-use-direct-pay-on-clean-energy-projects/>.



Lights on Seattle: What does it take to make direct pay work for cities?



While direct pay is slow-moving in most places, a city like Seattle has an unusual mix of factors that could make it live up to its promise. Shelby Ketchum is a direct pay specialist at Seattle City Light (SCL), Seattle's municipally-owned utility company. Ketchum is optimistic: Seattle is a relatively wealthy city that cares about climate, and perhaps most importantly, the city owns its own power provider.

While private utilities are accountable to distant shareholders, municipal utilities are owned by the public they serve. This allows citizens and community members to vote on their leadership and rates, and allows consumers to **directly benefit** from grid decarbonization in the form of lower costs.⁴³ A 2020 study on the only five American communities that have completely transitioned to electricity found that four of the five had municipally-owned utilities (MOU) or cooperatives, indicating MOUs to be a core enabler of city-level decarbonization.⁴⁴

Cities and their utilities could not previously claim tax credits or rebates, but direct pay is opening up new financing options to expand the city's renewable power options for transit, building decarbonization, and more. This opens up possibilities for MOU's to more easily secure financing for energy transitions.

To test direct pay last year, Seattle purchased 45 EVs for internal use by Seattle City Light, the Seattle Department of Transportation, and the city Department of Finance and Administration Services. They submitted a direct pay application for \$7,500 credit, and expect to get back \$337,500. They are also doing outreach to city departments, local nonprofits, and cultural centers to set them up to claim tax refunds as well.

State support can also be crucial for supplementing federal funding. According to Ketchum, the city's strategy for building momentum around direct pay centered on the Climate Commitment Act (CCA), a state climate spending bill. The \$12 million allocated for IRA in the CCA funds support for nonprofit and community projects.

“The state is providing funding from the CCA for tax assistance, which is going to be a huge part of it too. ... That's really exciting. It's cool to see how those different funding streams could bolster each other” - Shelby Ketchum, SCL

The CCA faced backlash just like the IRA has, but popular mobilization rescued it on the ballot. A Republican party-funded hedge fund manager got a motion to repeal the CCA on the November ballot.⁴⁵ While voters across the country seemed to reject climate in 2024, Washington voters did the opposite — they defeated the repeal and saved the CCA. Getting federal climate money out to the door for EJ requires mobilizing on multiple levels: to hold onto federal and state-level electoral power and to equip nonprofits, schools, and religious institutions with the skills and support to apply for opportunities like direct pay.

⁴³Thomas M Hanna, Johanna Bozuwa, and Raj Rao, “The Power Of Community Utilites” (Democracy Collaborative, Climate + Community Project, April 2022), https://climateandcommunity.org/wp-content/uploads/2023/12/The-Power-of-Community-Utilities_-Full-Report_002.pdf.

⁴⁴Adewale A. Adesanya, Roman V. Sidortsov, and Chelsea Schelly, “Act Locally, Transition Globally: Grassroots Resilience, Local Politics, and Five Municipalities in the United States with 100% Renewable Electricity,” *Energy Research & Social Science* 67 (September 2020): 101579, <https://doi.org/10.1016/j.erss.2020.101579>.

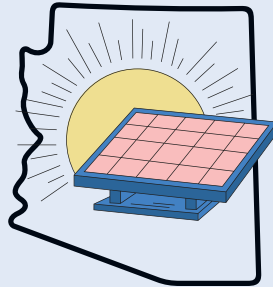
⁴⁵Hallie Golden, “Washington State's Landmark Climate Law Hangs in the Balance This Election,” *AP News*, October 14, 2024, sec. U.S. News, <https://apnews.com/article/washington-climate-policy-repeal-initiative-4175d6c89a40a987b0eadaa88af22c15>.

Direct Pay for Nonprofits

Of the six community-based organizations interviewed, all were interested in accessing direct pay, but only one reported success. Becca Edwards, policy director at Texas Impact, a faith-based coalition advocating for sound climate policy in Texas, said that churches in their network were interested in applying for Direct Pay but did not know how — a missed opportunity considering many megachurches' energy use.

As with grants and rebates, cash-strapped smaller organizations cannot pay for projects upfront and count on tax refunds later. According to Evan Webber, an organizer with Hawaiian coalition OurHawaii, community organizations are also hesitant that refunds could be taken away by another Trump presidency.

Direct pay success story: Arizona Solar United Neighbors (SUN)



A program manager at Arizona SUN, a nonprofit that helps Arizonans go solar, collaborated on a project with a local high school to use direct pay to build a 56 kilowatt solar panel canopy over their parking lot. It also funded the district's first fleet of electric school buses.

“**They're going to save more than \$1,100 per month on their energy bills, and they told us that because of that, they're going to be able to reopen a summer education program and buy new laptops for all of their students.**” - Adrian Keller, Arizona SUN

While there was a wait for direct pay to become operational, Keller said that “the federal government did as good of a job as they could at rolling this out.” Still, making it work depended on a contractor being willing to front some of the costs, to be paid back after taxes. Most contractors aren't willing to work that way, meaning that upfront assistance grants or Green Banks will be a crucial part of the direct pay puzzle that haven't yet fallen into place (see next section).

Arizona SUN is involved with both implementation support and policy advocacy. Keller said that direct pay has long been on their political wishlist.

“This has probably been one of the things I've gotten the most questions about and the most interest from from Arizonans,” - Adrian Keller, Arizona SUN

Tucson has the highest per capita of nonprofits in the country, many of which have wanted to install solar for years but have not had the opportunity until direct pay expanded their tax eligibility. The city also has many megachurches with high energy consumption — which could be fulfilled by the year-round sun. They just need a little help up front.

Barrier: Upfront Funding

To make direct pay, ITC, and other reimbursement-based funding programs fulfill their promise requires innovative ways to fund projects upfront. Interviewees said that climate finance solutions to support direct pay are in development but do not yet work at scale. The EPA Greenhouse Gas Reduction Fund allocates \$20 billion to public climate financing program via the National Climate Investment Fund (NCIF) and the Clean Communities Investment Accelerator (CCIA) in April, 2024. These are creating new or supercharging existing financial institutions that can provide bridge loans and other forms of financing to make renewable development more feasible for low-income Americans.⁴⁶ Green banks have been growing since Connecticut established the first in 2011. There are now 20 subnational green banking institutions across 20 states and Washington D.C., with 13 proposed via state legislation since 2013.⁴⁷

Upfront assistance is also the missing piece for making many rebate and direct pay programs workable for under-resourced groups and individuals. Washington State Community Action Partnership (WSCAP), a network of Community Action Agencies working on poverty reduction and justice in Washington state, should be well-placed to assist their members with IRA applications. While WSCAP has been monitoring federal and state climate funding eagerly, their Policy Director Linda Garcia said that the groups in their network remain on the outside of many programs because they don't have the capital to invest in projects upfront.

“Nobody can afford to put the money out upfront and then wait for a rebate. That's just not going to happen... We hear a lot of people saying, we're not going to be a part of this transition. We'd love to, but we just simply can't afford it. So rebates don't work in our communities.” - Linda Garcia, Washington State Community Action Partnership

⁴⁶ Ilmi Granoff, “The End of the Beginning for US Green Banks,” Roosevelt Institute, April 5, 2024, <https://rooseveltinstitute.org/blog/the-end-of-the-beginning-for-us-green-banks/>.

⁴⁷ Annabelle Rosser, “Issue Brief: Greenhouse Gas Reduction Fund” (Washington D.C.: Atlas Public Policy, April, 2023), <https://atlaspolicy.com/wp-content/uploads/2023/04/Issue-Brief-Greenhouse-Gas-Reduction-Fund.pdf>, p.4

Novel financing schemes posed in the IRA, including the Green Banks and Community Financial Institutions in the GGRF, could be crucial for bridge funding and loans. In Seattle, IRA green bank funding could eventually dovetail with funding earmarked in the state Climate Commitment Act (CCA) to provide bridge funding that nonprofits, schools, and religious institutions could use towards direct pay. However, as of September 2024, these bridge funding schemes have not materialized for most interviewees.

“You could see the green bank eventually kind of becoming some of that financing, maybe for large scale solar, or direct pay on a church, or maybe some of these smaller retrofit projects.” - Shelby Ketchum, Seattle City Light.

Evan Webber from OurHawaii described the GGRF as the missing piece to making many of the IRA mechanisms, including direct pay, possible. The delays in rollout have hampered the IRA’s EJ success, but Webber expressed hope that they could still pay off for communities in the future.

III. Catalyzing Transitions & Cementing Wins

Fighting for the IRA

While the IRA has set important shifts in motion, it also faces repeal from a Republican-controlled White House and Congress. [Project 2025](#) establishes intentions to slash EPA authority, staffing, dismantle the prevailing wage requirement, Justice40 and repeal tax credits.⁴⁸

“The next Administration should stop using energy policy to advance politicized social agendas. Programs that sound innocuous, such as “energy justice,” Justice40, and DEI, can be transformed to promote politicized agendas.” - [Project 2025](#)⁴⁹

While Project 2025 threatens climate action, it cannot stop it. Interviewees described shifts catalyzed by this opportunity that could reverberate beyond the policy itself. This section addresses how organizers frame the IRA’s lasting impacts, and what it requires to turn one bill into deeper change.

What aspects of the IRA are durable to attempts to repeal?

Repealing the IRA completely would require a filibuster-proof majority in Congress. Reuters [reported](#) that repealing the IRA may not be that popular with Red state politicians: The majority

⁴⁸Devon Lespier and Jessica Ordóñez-Lancet, “How Project 2025 Threatens the Inflation Reduction Act’s Thriving Clean Energy Economy,” *Center for American Progress* (blog), August 15, 2024, <https://www.americanprogress.org/article/how-project-2025-threatens-the-inflation-reduction-acts-thriving-clean-energy-economy/>.

⁴⁹“Project 2025” (Washington D.C.: Heritage Foundation, 2023), https://static.project2025.org/2025_MandateForLeadership_FULL.pdf: 370/

of IRA tax credits deliberately benefit conservative areas, with nearly 60% of announced projects, 85% of investments, and 68% of jobs in Republican-represented congressional districts. Many major conservative donors are also invested in cleantech companies that have benefitted from IRA tax credits. Justice40 however was an executive order, which can be reversed—a concerning prospect for environmental justice.

Funding already allocated is hard to rescind. According to Climate Programs Portal, \$61 billion in climate funding had been allocated by September 5, 2024 for more than 6,100 projects (excluding loans, direct government spending, and tax credits). The EPA made a significant allocation to the Greenhouse Gas Reduction Fund (GGRF), awarding \$20 billion to two competitions dedicated to kickstarting public financial institutions, such as green banks. The GGRF put \$7 billion to 60 applicants in the Solar for All competition to provide solar for low-income communities. Once green banks are jumpstarted, they could mobilize public-private partnerships to continue funding projects (although the equitability and community involvement in those projects is not given).

Even if IRA tax credits remain, organizers and legal experts say that the uncertainty could prevent people from claiming them. The Internal Revenue Services (IRS) has been gradually developing regulations for claiming each tax credit. Congress could order the IRS to halt regulations still in development, making accessing tax credits harder for filers.

This uncertainty is harder for smaller companies, cities and organizations, who can't afford to put up funds for projects without reimbursement. Still, the IRA's new technology-neutral tax credits expire in 2032, or until US electricity sector carbon dioxide emissions are equal to or below 25% of 2022 levels, giving companies and cities time.

The IRA's outreach problem

Bad communication hamstrung the IRA: A nationally-representative Yale survey found only 39% of voters had heard of it.⁵⁰ Successful incentive-based policy requires people to apply for funding, and to mobilize politically to maintain it. To do so, they have to know about it, and to trust it will actually deliver.

“[We didn't predict that] actually the biggest part of our implementation wasn't going to be events, groundbreakings, bidding on projects, but actually just getting people to know that they could even access this.” - Elena Santarella, BGA

The IRA's quiet impact is not only a pitfall of a complex policy that didn't allocate enough resources to outreach. Interviews emphasized the importance of showing people who have been repeatedly failed by the government that climate funding can work for them.

⁵⁰ Karin Kirk, “Voters Love This Climate Policy They've Never Heard of» Yale Climate Connections,” Yale Climate Connections, September 3, 2024, <http://yaleclimateconnections.org/2024/09/voters-love-this-climate-policy-theyve-never-heard-of/>.

Strategies

Ten interviewees named IRA communication as a struggle, but they also suggested success strategies. While good communication is audience-specific, all affirmed the importance of showing how federal funding can make people's lives less expensive, healthier, and more independent.

“**Our people need to feel that their material conditions can change when federal funding is implemented.** We are not going to be able to build political support for future investments that we know are absolutely critical in our country, whether it's healthcare or housing or anything, if we cannot prove that people feel this money in their homes and in their lives,” - Betamia Coronel, Center for Popular Democracy”

Popular Democracy has been running decarbonization bootcamps to equip people to talk about climate in ways that connect to both place-specific struggles and joys. In Richmond, CA, a workshop discussed the Chevron plant that has produced decades of ill health — and the community organizing that has fought against it.⁵¹ Another workshop cooked carne asada on electric induction stoves – a healthier and cheaper alternative to gas. By centering racialized and low-income community leadership in climate justice organizing, CPD shows how moving federal money to those closest to the problems has the potential to create the most transformative and locally-popular solutions.

REAP interviewees from Arizona, Oklahoma, and Oregon all similarly emphasized the importance of showing how the IRA can materially improve peoples' economic conditions. REAP focuses on outreach to rural areas. While REAP communities are often remote, predisposed against climate messaging, and critical of the federal government, they have a lot to gain from the IRA through cost-savings and energy efficiency.

“In Oklahoma, people have a distrust of the federal government, and so sometimes they don't want anything to do with the federal program. So I'm very clear to people that this is their money ... that the President has made available through the Inflation Reduction Act for them to get some of their money back.”- Oklahoma USDA State Director Kenneth Corn

Similarly, Adrian Keller from Arizona SUN said that rural business-owners and media alike responded well to an emphasis on helping farmers. Agriculture supports American life, and it's also well-known that climate change hits farming — a notoriously risky and weather-dependent business — especially hard.⁵² Focusing not only policy but also communication on sustainable agriculture can be one useful way to reach across the aisle.

⁵¹ “CBE Advocates For A Just Transition From Fossil Fuels To Building A New Healthier And Thriving Economy,” *Communities for a Better Environment* (blog), accessed December 27, 2024, <https://www.cbecal.org/organizing/northern-california/richmond/>; Stephanie Tai, “Environmental Hazards and the Richmond Laotian American Community: A Case Study in Environmental Justice,” *Asian Law Journal* 6 (1999): 189. <https://heinonline.org/HOL/Page?handle=hein.journals/aslj6&id=193&div=&collection=>

⁵² Adam K. Wilke and Lois Wright Morton, “Climatologists' Communication of Climate Science to the Agricultural Sector,” *Science Communication* 37, no.3 (June 1, 2015): 371-95, <https://doi.org/10.1177/1075547015581927>.

“People love hearing stories about farmers and ranchers. I think, especially in Arizona, it’s still part of our culture. Hearing this young woman who’s a beef rancher get up there and say, ‘Hey, I invested in solar. I love it. It’s working for me. It’s helping me reduce my emissions’ ... was just such a unique framing that a lot of media outlets hadn’t heard before, which is why I got picked up so so widely”
—Adrian Keller, Arizona SUN

Renewable energy also increases independence and disaster resilience. People may deny climate change, but they less frequently deny the escalating risks of hurricanes, floods, and fires.

“Disaster resilience has been really big in our rural communities, and energy independence is a huge part of that.”
- Max Sprague, Oregon USDA

Fighting local backlash, building local momentum

Making the IRA last requires not only maintaining federal power, but also combating challenges that emerge at state, city, and even neighborhood levels. In Washington, as addressed in the Seattle highlight, state funding to climate initiatives was tied up in the Climate Commitment Act, which a conservative hedge fund millionaire pushed an initiative on the ballot to repeal. Since upfront bridge funding to make IRA programs feasible is on hold until after the election, nonprofits were concerned that they wouldn’t be able to access much-needed IRA funds for energy efficiency upgrades for low-income housing and more.

“One of our primary work pieces is the Weatherization Plus Health program. And this past legislative session, they took that ... funding and put 100% of it into the Climate Commitment Act, which would be fantastic if we did not have an initiative on the ballot this November to repeal that act. So we’re a little panicky about that,” -
Linda Garcia, WSCAP

Maintaining the equity gains made by the IRA requires working against elite capture of state-level political processes, including fossil fuel lobbying, that threaten to roll them back. That requires building a base, which interviewees described as achievable through strategic communication and local coordination.



Lights on Texas: Building climate power in a gas-powered state



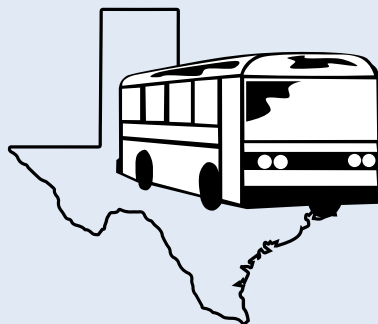
In Austin, highway construction is planned to disrupt transit for the next decade, and public transit users, who are disproportionately low-income and racialized, will be most impacted by delays and longer commutes. Disrupted transit also means more traffic and pollution. The Austin Department of Transportation saw an opportunity in the IRA to not only fund projects to help people navigate around the construction, but to expand low-emissions mobility across the region. Austin won \$47.9 million, one of only three cities the EPA selected for a competitive CPRG implementation grant. They're using the money to expand bus service, bike share programs, and outreach to encourage active transportation.

According to a planner at the City of Austin, the EPA may have selected Austin's application because it's otherwise hard for Austin to wrest climate funding from Texas. The City of Austin Office of Sustainability knew they had a limited window to pursue funding from the federal government that their state would be unlikely to provide. To do so, they selected projects strategically, built bipartisan support, and threw resources (including hiring an external infrastructure grant-writing consultant) at the issue.

“Usually Austin is the punching bag of everything else in Texas. You know, the state likes to make an example out of us, and typically the state is not on the same side as we are when it comes to things around environment and climate,” - City of Austin planner

Making it happen required a supportive municipal government. Austin allocated funds to hire AECOM, an infrastructure consulting firm, to coordinate pursuit of grant opportunities.⁵³ The planner also suggested that it helps that the project targets pollution and air quality — an issue which can serve as a more palatable proxy for the loaded term “climate change.”

“The rest of the region is not quite as progressive as Austin on this issue. So there's a bit of tension around that, and a little bit of us trying to figure out the best ways to communicate with folks outside of Austin.” - City of Austin planner



⁵³Zach Baumer, “Memorandum: Coordinated Pursuit of Opportunities in the Inflation Reduction Act,” April 12, 2023, <https://services.austintexas.gov/edims/pio/document.cfm?id=406524>.

By building regional coalitions, some Texan organizations are working to unite to disrupt the fossil fuel industry's chokehold on state politics, which has only grown tighter in backlash to the IRA. Interfaith organizing network Texas Impact is one, advocating on the state level while building grassroots support through education. One of their main campaigns, led by policy lead Becca Edwards, is about state enforcement of EPA regulations on methane emissions. The IRA Methane Emissions Reduction Program provides funding to implement methane emission reductions technology, as well as enforces a charge on methane flaring.⁵⁴ In May 2024, Senator Ted Cruz introduced a motion to repeal it,⁵⁵ which an AXIOS investigation found to be heavily supported by oil lobbyists.⁵⁶

“The higher levels of our state leadership are so opposed to the methane rule. I also think there's lots of people that, if they understood that there is federal money available to mitigate methane, that the technology that we need to mitigate methane is readily available, [would support it.] And I think part of my role is to expand people's understanding of the health impacts of methane emissions.”

- Becca Edwards, Texas Impact

Many on the political left have criticized the program for providing incentives for methane reduction technologies to fossil fuel companies that already have money to burn. Still, fossil fuel interests are dragging their feet on even that. The repeal motion is a signal of what would likely occur in a Republican congress in 2025.

Edwards education work aims to not only hold the state accountable, but to shift the narrative for ordinary people around energy and environmental health. Texas Impact focuses their outreach to faith-based communities, including churches and mosques. By mobilizing religious networks and values around community care, they hope to shift the narrative on fossil fuels from a partisan issue to one of health and wellness that people can unite behind.

Although Texas Impact's work in methane education won't immediately pay off through legislative wins, especially in a heavily corrupt political system, it could be an example of how to build trust for more transformational change. The IRA has created a rare opportunity to inject funding for climate into a state that has traditionally rejected it — despite the destructive impacts of recent climate disasters like Hurricane Harvey. Cities like Austin and advocacy organizations like Texas Impact are working around and against fossil fuel capture of the state legislature to slowly clear the air in ways that could last.

⁵⁴ USEPA, “Waste Emissions Charge,” Overviews and Factsheets, January 11, 2024, <https://www.epa.gov/inflation-reduction-act/waste-emissions-charge>.

⁵⁵ Emma Dumain, “Senate Republicans Introduce Bill to Repeal Methane Fee,” *E&E News by Politico*, May 28, 2024, <https://www.eenews.net/articles/senate-republicans-introduce-bill-to-repeal-methane-fee/>.

⁵⁶ Nick Moore and Daniel Sobczyk, “Oil Group Pushes GOP to End Methane Fee, Internal Documents Show,” *Axios*, October 18, 2024, <https://www.axios.com/pro/energy-policy/2024/10/18/oil-group-pushes-gop-to-end-methane-fee-internal-documents-show>.

Interviewees' stories of the local-scale power, including school boards and utility commissions, required to implement IRA projects show how federal policy breaks or succeeds on lines of local coordination.

“Political tensions ... that are happening at the federal level are just mirrored and intensified all the way down, whether it's in school boards or city councils,”
- Betamia Coronel, Popular Democracy

One Centre for Popular Democracy campaign in Saint Paul, Minnesota found a window of opportunity to push for climate justice in the teachers' union contract negotiations.⁵⁷ Alongside demands for increasing mental health support and paid family medical leave for schools, the Saint Paul's Federation of Educators, in coalition with Minnesota Takes Action,⁵⁸ pushed for geothermal energy, climate justice curricula, electric bus fleets, and more. In October, the Saint Paul's Federation of Educators passed a Healthy Green Public Schools memorandum.⁵⁹

According to Coronel, this was possible partially because of progressive organizing to get climate justice-aligned leaders elected to the union bargaining committee and the school board. This is an example of the importance of local organizing, right down to the school board and neighborhood level, for federal policy.

⁵⁷Frank Jossi, “St. Paul, Minnesota’s Public Schools Are Tapping Geothermal to Cut Emissions and Building Costs | Energy News Network,” *Energy News Network*, March 22, 2024, <https://energynews.us/2024/03/22/st-paul-minnesotas-public-schools-are-tapping-geothermal-to-cut-emissions-and-building-costs/>.

⁵⁸“Healthy, Green Saint Paul Schools,” TakeAction MN, accessed December 27, 2024, <https://takeactionminnesota.org/healthy-green-schools/>.

⁵⁹Saint Paul Federation of Educators, “Memorandum of Agreement: Healthy Green Public Schools,” Proposal, October 26, 2023, <https://www.spfe28.org/wp-content/uploads/2023/10/SPFE-Proposal-25-Healthy-Green-Public-Schools-.pdf>.

Regional Collaboration

IRA grants also are nudging regions towards more integrated, long-term, and justice-oriented climate planning. The IRA favored regions, such as Colorado, that were already working collaboratively, but also jumpstarted areas like Texas with less connection in the planning process.

“Something that's really nice about our region is that it's very collaborative. I'll keep saying that. But it really is the hurdle I think a lot of people have to face.”
- Maddy Nesbit, Denver Regional Council of Governments

For example, the CPRG grant requires multiscalar collaboration between CBOs, cities, and regions to incentivize engagement and relationship-building. Interviews said the connections sparked by the grant requirements are useful beyond the IRA. The long-term planning enabled by the CPRG process also sets in motion processes of justice-based adaptation, as long as federal and local funding holds.

Led by the Austin Department of Transit but involving city and regional-level governing bodies, a planner characterized their CPRG as catalyzing regional collaboration and leadership that has previously been missing for climate planning.

“I would say we filled a vacuum of regional leadership ... through this project. And you know, it's an opportunity now to help, maybe light a fire under some of these regional bodies, to be more active and to incorporate climate and greenhouse gas emissions into their work,”
- A planner at the City of Austin

Two interviewees also mentioned the Urban Sustainability Directors' Network as a key facilitator of city-to-city learning and support. Although funding comes top-down from the federal government, the actual work of implementation often happens laterally and regionally.

Building progressive guardrails for the IRA

The IRA's climate promise is only as strong as the equity-centric political framework pushing it forward. Since the IRA is primarily based on private sector incentives, ensuring that developers and companies use funds equitably requires political guardrails around the IRA, if not within the policy itself, that prioritize public good over private profit.

“We can unite housing, labour, and migrant rights movements under a shared vision of economic justice and climate resilience. Policies like rent-controlled green housing, a just transition for workers, and full status for migrant workers could be the backbone of a broad coalition. A state-led green industrial strategy or Green New Deal, rooted in public investment and wealth redistribution, can shift power away from fossil fuel billionaires toward communities, ensuring climate action serves people, not corporations. - 350 Canada”

Housing justice is climate justice

Five interviews talked about housing justice — such as renter protections, vacancy control, and rental retrofits — as a crucial precondition for federal climate policy success. Without strong housing policy, decarbonization measures can contribute to displacement and gentrification, and the IRA fails to consider climate-related health, safety, and affordability issues facing renters.⁶⁰

“[In some cases] We can't move this campaign until we close the loophole on rents and eviction and other housing things ... we already see two landlords taking advantage of [potential access to money] by qualifying for retrofitting money but then installing electric stoves from the 80's.” - Betamia Coronel, Center for Popular Democracy

IRA Production Tax Credits and Investment Tax Credits both provide incentives for locating projects in low-income and energy areas, but they don't mandate consultation or financial benefit to the communities where they're located. The Low-Income Communities Bonus Credit program (LICBC) provides tax credits for developers working in low-income areas and does mandate benefit sharing in federal housing projects, but not in all.⁶¹ Solar, wind and other renewable infrastructure projects could raise property values, propelling gentrification without benefitting and even displacing renters. While the LICBC suggests the IRA's environmental justice potential for providing renewable energy for renters, it fails to comprehensively cover them:

“In a lot of circumstances, for example, low income housing developers, which already get huge checks from the US federal government in the forms of LIHTC [Low Income Housing Tax Credits], were probably going to do these projects anyways, and are just getting another subsidy. These private companies and their CEOs ... who make a lot of money are just making more money from this thing,” - Evan Webber, Our Hawaii

Housing justice organizing and policy is already energized by an escalating crisis.⁶² Climate and Community Project researcher Ruthy Gourevitch has written extensively about the IRA's gaps in renter protection and advocacy pathways to address them.⁶³ States could pass local ordinances tying IRA rebate funding to tenant protection measures, such as eviction regulation and restrictions on rent hikes. Tenant unions and other advocacy organizations could also use the IRA as an opportunity to push landlords to pay for repairs using IRA rebates, rather than leaving

⁶⁰Stefan Bouzarovski, Jan Frankowski, and Sergio Tirado Herrero, “Low-Carbon Gentrification: When Climate Change Encounters Residential Displacement,” *International Journal of Urban and Regional Research* 42, no. 5 (September 2018): 845-63, <https://doi.org/10.1111/1468-2427.12634>.

⁶¹Madison M. Schettler, “Closing the Renter-Sized Gap in the Inflation Reduction Act: How Housing Policy Can Help Climate Legislation Achieve Environmental Justice,” *Connecticut Law Review* 56 (2024 2023): 631

⁶²Mikaela Tajo et al., “Community Power Building for Housing Justice: A Case Study from Los Angeles” (Urban Institute, May 2024), <https://search.issuelab.org/resources/43697/43697.pdf>.

⁶³Ruthy Gourevitch, “Decarbonization Without Displacement: Tenant Advocacy in the Context of Inflation Reduction Act Implementation” (Climate + Community Institute, January 2024), https://climateandcommunity.org/wp-content/uploads/2024/01/CCP-IRA_final-brief.pdf.

buildings neglected or passing costs to tenants. If IRA funding disappears, renewable energy justice advocates can still gain ground through working within housing policy for decarbonized, affordable housing for all.

“I've been thinking a lot about, what can we do that's going to tackle the housing crisis and the climate crisis at the same time? I think weatherization and electrification are going to become extra important if we lose some of that funding. In the 2025 legislative session one of our top priorities is to improve low-income home repair and weatherization services, which will cut power bills, preserve housing stock, and protect folks' health and safety.”
- John Seng, SparkNW

Building people power through public utilities

Utilities hold the power to propel or to obstruct energy transitions. Journalist Kate Aronoff argues that utility democratization and control is a precondition for renewable energy that benefits the public.⁶⁴ 66% of customers fall under private utility companies beholden to stakeholders rather than those they serve. While public utility rates are set by members, private utilities are less accountable, less regulated, and often more expensive — according to the American Public Power Association, public power customers pay 9% less.⁶⁵ Even if IRA policies increase renewable generation and capacity, private utilities could still surge prices and fail to actually decarbonize the electricity supply. Federal climate policy must avoid inadvertently raising electricity prices at risk of further alienating the public from climate action.

“The thing that we're most worried about is actually all of this backfiring when people do transition to electric and then their utility prices skyrocketing,”
- Betamia Coronel, National Climate Justice Organizer, Center for Popular Democracy

Utilities have often been an obstructionist force in decarbonization. In Arizona, utilities companies are regulated by the elected officials of the Arizona Corporations Commission. The commission voted in February 2024 to repeal the state's 15-year-old energy efficiency and renewable energy standards.⁶⁶ Meanwhile, private utility companies, prompted by the Arizona Corporations Commission, are slashing net-metering rates to make solar installation less affordable and less profitable.⁶⁷ Under a public utility, Arizona solar could not only be widely accessible to install, it could lower power costs for everyone to benefit from the abundant Arizona sun.

⁶⁴Katie Aronoff, “The IRA Is an Invitation to Organizers,” *Dissent Magazine*, Spring 2023, <https://www.dissentmagazine.org/article/the-ira-is-an-invitation-to-organizers/>.

⁶⁵“Stats and Facts,” American Public Power Association, accessed December 27, 2024, <https://www.publicpower.org/public-power/stats-and-facts>.

⁶⁶Joe Dana, “Arizona Utility Regulators Vote to Kill Renewable Standards,” *12News*, July 2, 2024, sec. 12news,news,local,arizona,consumer, <https://www.12news.com/article/news/local/arizona/arizona-utility-regulators-vote-to-kill-renewable-energy-standards/75-f369d444-3a14-460a-93f5-011827d0a0b7>.

⁶⁷“Solar Buy Back Rates Cut,” *Solar Topps*, 2023, <https://www.solartopps.com/solar-buy-back-rates/>.

“A lot of Arizonans are interested in battery storage because our utility companies keep cutting the rate that solar owners get compensated for excess solar and so it's makes much less economic sense now to sell excess power back to the utility”
- Adrian Keller, Arizona SUN

On the other hand, Seattle’s municipal consumer-owned utility, Seattle City Light (SLC), exemplifies how quickly energy transitions can move under public ownership (helped along by regional reliance on hydroelectricity and a high-income tax base). Since the SLC is consumer-owned and governed under the Seattle City Council, they are guided by the city’s ambitious emissions-reductions policies. Seattle City Light owns and operates seven hydroelectric plants, which enables a 95% carbon-free electricity supply. The SLC buys carbon offsets for the remaining 5% to declare themselves the first carbon-free utility in the nation (Ketchum, 2023). SLC is now using direct pay to build solar infrastructure and EV charging capacity.

A just transition is labor-led

Access to IRA renewable energy tax credits is contingent on following state prevailing wage and apprenticeship requirements. That incentivizes developers and contractors to pay workers well so they can get tax credits — creating the “high road” green jobs that make a just labor transition possible. But, since IRA labor provisions are tied to state-level prevailing wages, they are also tied to state labor movements and how much they can push for. Without strong state-level worker protections holding employers accountable, developers can get away with keeping prevailing wages low, standards unenforced, and energy transitions first serving the wealthy.

In some states, nonprofits and coalitions emerged to ensure that connections between policymakers, developers, and unions got made. BlueGreen Alliance (BGA) is a nonprofit unifying labor unions and environmental organizations together to create and maintain good-paying, union green jobs through political lobbying and “grasstops” organizing:

“We passed a law to thread the needle on the labor standards and everything in Colorado, which was Senate Bill 23-292. That law basically creates a new standard where environment or energy projects are all ... classified as public works, and then, as a result, have to follow the labor standards that were set up in the IRA (prevailing wage and registered apprenticeship utilization requirements) as one path, or negotiate a project labor agreement as the other pathway,” - Elena Santarella, BlueGreen Alliance Colorado

According to Santarella, the IRA enabled BGA to pressure Colorado to raise the floor on labor standards and wages — something they’d been trying to do for years.

Labor engagement was also a big piece of a CPRG grant awarded to the Denver Regional Council of Governments (DRCOG). They included workforce training and other union priorities in their plan \$199,705,797 CPRG implementation grant for a comprehensive building electrification program across the Denver region. Preexisting relationships with unions, further incentivized by IRA labor provisions, are helping them build a decarbonization program that brings everyone with them.

“Once you upskill someone and train them and give them and align the good jobs principles, that doesn't go away. We are really trying not to leave people behind — I think that's the market transformation that we're looking for,”
- Maddy Nesbit, DRCOG

Especially in the entrepreneurial world of renewable energy and cleantech — supercharged often by IRA tax credits — good jobs are not a given. Webber (OurHawaii) said that the labor provisions are a good, if incomplete, step in weighing in on the side of labor in a longstanding tension between cleantech entrepreneurs and local workers. Without pressure from labor though, some advocates are concerned that developers will flout labor standards. The IRA is a window of opportunity, and to fulfill its potential requires mass mobilization. Still, it made connections where there were none before, and to some organizers, that signals the start of something bigger.

“For states in the South, states that have right to work, states where it's always a fight, where we don't have the union density... Those connections haven't been made or have purposely lapsed but now, there's an incentive to talk to a labor union ... And I think the start of all those conversations is going to have a lasting legacy.”
- Elena Santarella, BlueGreen Alliance.

Conclusion

The IRA's first three years have been a rocky experiment. Speaking with a diverse group of organizers and policymakers involved in implementation revealed frustrations, but also excitement and gratitude for the opportunities the IRA created that wouldn't have been possible without a federal government willing to commit money to environmental justice. None of that would have been possible without the organizers, advocates, and movements that pushed federal climate policy onto the agenda.

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“I was really hoping for a Green New Deal, and I don't think we could have gotten the IRA without all the push for the Green New Deal, all the activism around it, and just the people beating that drum for years ... I would have loved to see a massive federal jobs program and real restrictions on polluters. And instead, we got this really market-based program. Still, it's the best thing we've seen from the federal government thus far, and we're going to do everything we can to make it count. We need to stay coordinated and make sure the implementation process is as equitable as possible.” - John Seng, Spark NW

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Implementation efforts have also been shadowed by the knowledge that the window of opportunity it created could be very limited, hinging on the four-year electoral cycle and a friendly political climate. We know now that window is closing rapidly. We don't know yet, in November, 2024, how severely a Trump presidency will gut the IRA, delay energy transitions, and withhold life-saving adaptation aid from frontline communities. Either way, the climate crisis will continue to escalate. From our interviews and our own communities, we also know that people will continue working on electrification, adaptation, and disaster response. Climate adaptation is necessary and life-sustaining work that was underway before the IRA, and will continue after.

The IRA revealed places to push. We know now that propelling energy transitions through a regressive tax system too easily serves investors and private equity, and shuts out racialized and working people. Incentive-based policies offer money attached to a lot of paperwork and a question. The answer of implementation depends on who has what it takes to go after them. Taking advantage of incentive-based policy requires an activated civil society movement that has the resources, political will, and planning to pursue funding. In light of the limited conditions of IRA funding, nonprofits and regional networks emerged or pivoted to support people to decipher complex grants and tax codes.

Large-scale federal climate policy, whether under the Green New Deal label or not, relies on mobilizing all levels of the economy in a mass political effort that advocates such as policy analyst Seth Klein have compared to Canada and the US' World War II response.⁶⁸ Mass mobilization entails centralized planning and management over energy transitions, but also creating innovative new institutions to fund them, and regulatory apparatus that claw back neoliberal cuts to wages, environmental protections, and progressive taxation.

⁶⁸ Seth Klein, *A Good War: Mobilizing Canada for the Climate Emergency* (Toronto: ECW Press, 2020).

Mass mobilization entails centralized planning and management over energy transitions, but also creating innovative new institutions to fund them, and regulatory apparatus that claw back neoliberal cuts to wages, environmental protections, and progressive taxation. The IRA demonstrates that a whole-of-government approach to climate policy only fully succeeds with a progressive movement able to work on all levels of government. Failure to build power to support the IRA is clear from obvious breakdowns, such as the moderate compromises that prevented a stronger policy from being passed at all, and the popular election of a presidential candidate who promised to tear the IRA down.

However, a less-recognized stumbling block of the IRA came through understaffed federal agencies, state energy offices, and city governments. It's hard to implement climate policy in a hollowed-out administrative state. Preparing for windfalls like the IRA requires strategizing in advance to invest in capacity, to hire and train people, and to proactively engage with communities to hit the ground running with impactful, equitable programs. If the US or Canada can push back the tide of denial and austerity to invest in climate again, our interviews suggested that federal policymakers must put more resources and care into ensuring that funding goes to decision-makers closest to the issues of climate injustice.

“The Inflation Reduction Act, and especially associated programs such as Justice40, demonstrate that when faced with multiple overlapping crises, governments can choose an all-of-the-above approach to climate action which centres housing, labour, migrant rights and economic justice. At a time when there is an urgent need to shift our local and national economies away from costly and harmful fossil fuels, governments in Canada can benefit from the experience of their American counterparts. This report demonstrates that unlike market-based mechanisms, and despite certain challenges, the initiatives in the IRA permanently and holistically moved the needle in hundreds of communities across the United States. The impact of these policies will last for decades to come.” Alex Cool-Fergus, CAN-rac

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