



DEC 18 2013

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The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator McCarthy:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to work with you and the US EPA on a wide range of issues of interest and concern to local governments. Today, we offer our unanimous support for a program that cleans up the environment, provides an exemplary model of economic growth and development within communities, and creates jobs: The Brownfields Program and its Environmental Workforce Development and Job Training (EWD&JT) grant program.

EPA's Environmental Workforce Development and Job Training (EWD&JT) grant program was created to help create a locally-skilled workforce in communities where EPA brownfields assessment and cleanup activities are taking place. It provides grant funds to eligible entities and nonprofit organizations to recruit, train and place, unemployed and under-employed, including low-income and minority residents of solid and hazardous waste-impacted communities with the skills and certifications needed to secure full-time, sustainable careers in environmental remediation, environmental health and safety, water quality and the environmental field at large.

In 2011, the program was renamed the Environmental Workforce Development and Job Training Grant program to reflect EPA's efforts to create a more interdisciplinary environmental job training program composed of multiple appropriations and statutory authorities that now allows applicants to deliver a variety of environmental training outside the scope of Brownfields hazardous waste remediation. This flexibility now allows graduates of the EWD&JT grant program to expand their training and earned certifications to include ecological restoration, mold remediation, stormwater management and wastewater treatment.

To date, the EWD&JT program has pooled funds from nine EPA program offices across the Agency. As a result, communities have the flexibility to deliver training that meets the varying local labor market

demands of the environmental sector in their communities and graduates can develop a broader set of skills that improve their ability to secure full-time, sustainable employment in the environmental field.

Since 1998, the EPA has funded 206 job training grants totaling over \$45 million through the Environmental Workforce Development and Job Training program. As of March 2013, approximately 11,473 individuals have completed training, of which, approximately 8,198 have obtained employment in the environmental field with an average starting hourly wage of \$14.12. This equates to a cumulative placement rate of approximately 71% since the program was created in 1998.¹ Compared to other federal environmental job training programs, the EWD&JT has an excellent placement rate.

EPA's environmental training program has focused on environmental remediation and other less saturated areas of the environmental field. Based on feedback from EWD&JT grantees, the EPA has emphasized the importance of delivering multiple certifications to equip graduates with a diverse portfolio of skills so that graduates of the program are better able to secure full-time employment. Additionally, the EPA continues to emphasize the importance of conducting labor market assessments and employer surveying prior to grant application submission. While the EPA wants to further the delivery of training in renewable energy related installation and help local economies adopt more sustainable energy sources, some grantees have indicated that robust renewable energy markets do not yet exist in their communities. Training curricula should be designed to ensure the greatest employment opportunities for program graduates. Unless employers have indicated a willingness, or interest, to hire graduates with certain environmental skill sets, grantees are advised to deliver training that will most likely result in employment.

This program is also an exemplary representative for EPA's commitment to fight injustice. Based on preliminary analysis, approximately 65% or more of graduates of the program are ex-offenders and the majority of graduates are young African-Americans between the ages of 18 and 30. This cohort exemplifies the portion of Americans with the highest unemployment rate and who are most likely to be incarcerated. The EWD&JT program also serves single mothers, veterans, and tribal residents.

The EWD&JT program has spent over 10 years developing a network of environmental professionals, employment and training experts, social services providers, and environmental health and safety leaders. Environmental remediation, industrial hygiene and hazardous waste cleanup activities are an established pathway to employment in the larger environmental field. Graduates of EPA's EWD&JT program are highly respected in their communities and have worked in some of the nation's most visible cleanup projects, such as the response and cleanup of the World Trade Center site and the BP Oil Spill, Hurricanes Katrina, Rita, and, more recently, Sandy. Unfortunately, those will not be the last environmental disasters inflicted on American citizens.

In closing, the LGAC strongly recommends the following:

1. The Brownfield program has exhibited an excellent record of providing job training and employment to the un-employed and under-employed in our communities. Adding evaluation points for grant applicants that

¹ The EPA's Office of Brownfields and Land Revitalization generally provides approximately \$2.6 million annually through the regular fiscal year budget to support EWD&JT grants.

encourage grant applicants to continue to reach out to these identified segments of the population would be to method to continue the program performance record already established. We would certainly encourage EPA to continue or expand the funding for this very successful program;

2. The Environmental Workforce Development and Job Training (EWD&JT) Grant Program be given additional funding to continue building on their record of job training, economic development and rebuilding America's Communities. The LGAC supports EPA provisions in the Brownfields program for small wastewater systems operator training and recommends that EPA should widely disseminate information regarding this program; and

3. The EWD&JT Grant Program consider providing 'bonus points' in grant cleanup applications submitted by non-profits, municipalities and community groups for impacted and impaired sites located in those communities already implementing specific training for those target demographics identified for this grant program.

Local governments appreciate the opportunity to work with EPA in determining the best way to sustain our communities. We thank you in advance for your consideration of these comments and recommendations.

Sincerely,



Mayor Bob Dixon
Chair, LGAC



Mayor Terry Bellamy
Chairwoman, Cleaning Up
Communities Workgroup