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**GSA Green Building Advisory Committee Advice Letter on
Environmental Justice and Equity in Federal Sustainable Buildings
*Final***

April 18, 2022

Kevin Kampschroer
Chief Sustainability Officer and Director,
Office of Federal High-Performance Buildings
U.S. General Services Administration (GSA)

RE: Recommendations for Environmental Justice and Equity in Federal Sustainable Buildings

Dear Mr. Kampschroer:

This letter summarizes recommendations of the Green Building Advisory Committee (the Committee), based on the work of its **Environmental Justice and Equity (EJ&E) in Federal Sustainable Buildings** Task Group. It can be a starting point for a larger and broader discussion and collaboration on environmental justice¹ and equity² in the Federal building portfolio.

Task Group Mission: to identify and propose effective approaches to intentionally improve environmental justice and equity in federal building processes, thereby eliminating persistent inequities found in the local community and enhancing engagement with a diverse group of local communities and key partners throughout the building lifecycle that is responsive to the true needs of the local community.

¹ White House Environmental Justice Advisory Council, May 2021, “The term “environmental justice” means the just treatment and meaningful involvement of all people regardless of race, color, national origin, or income, or ability, with respect to the development, implementation, enforcement, and evaluation of laws, regulations, programs, policies, practices, and activities, that affect human health and the environment.”

(https://www.epa.gov/sites/default/files/2021-05/documents/whejac_interim_final_recommendations_0.pdf)

² Executive Order, Jan. 20, 2021, “The term “equity” means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.” (<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>)

In pursuing its mission, the task group focused on how to intentionally improve engagement³ with a diverse group of local communities resulting in meaningful participation throughout planning, design, procurement, construction, leasing, operation, renovation, occupancy, and de-acquisition, leading to increased equity, justice, access, opportunities, and green jobs. (Please see Appendix 1.)

Background

On January 27, 2021, the Biden Administration issued an [Executive Order \(EO\) 14008, Tackling the Climate Crisis at Home and Abroad](#), which emphasizes securing environmental justice and spurring economic opportunity. This Executive Order specifically states:

“Agencies shall make achieving environmental justice part of their missions by developing programs, policies, and activities to address the disproportionately high and adverse human health, environmental, climate-related and other cumulative impacts on disadvantaged communities, as well as the accompanying economic challenges of such impacts. It is therefore the policy of my Administration to secure environmental justice and spur economic opportunity for disadvantaged communities that have been historically marginalized and overburdened by pollution and underinvestment in housing, transportation, water and wastewater infrastructure, and health care.” (Section 219)

Recent Executive Orders require that each Federal agency address Environmental Justice and Equity in its Fiscal Year Strategic Planning Framework and identify activities to meet the requirements of the EOs. (Please see Appendices 3 and 4.) These strategic plans should include input from those with expertise in Equity and Environmental Justice, and provide practices, processes, and guidance to ensure effective engagement of diverse groups of local communities. This includes but is not limited to the opportunity to address diverse groups of local community needs on a grassroots level that are relevant to the mission and proposed project.

This Advice Letter from the Green Building Advisory Committee, which provides independent policy advice and recommendations to GSA’s Office of Federal High-Performance Buildings as required by the Energy Independence and Security Act of 2007 (EISA), can provide a basis for the GSA Office of Federal High Performance Green Buildings to work closely with other GSA offices and other federal agencies to develop effective practices, policies and guidance to advance environmental justice and equity for Federal buildings. (Please see Appendix 2.) Please see the list of GBAC EJ&E Task Group members, including GBAC members, GSA Participants, and Additional Participants below.

We would like to gratefully thank all the Task Group members, GSA Participants, and Additional Participants for their participation, insights, and contributions towards advancing equity and environmental justice in Federal facilities. The Task Group held 15 Task Group

³ Engagement is a two-way exchange of information, ideas, and resources. It should offer opportunities for communities to express their views and have a meaningful role in decision-making. Effective engagement removes barriers for communities that may have previously prevented residents from successfully working with the government.” (Community Engagement Guide: A Tool to Advance Equity & Social Justice in King County).

meetings from April to November 2021, with over 83 invitees to each meeting, and drafted six versions of the Advice Letter from July 2021 to April 2022.

Sincerely,

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Executive Summary

Although Environmental Justice and Equity is not a new issue, it has recently been brought into sharper focus by both the Federal Administration and societal events. While Environmental Justice and Equity is a topic covering much more than green Federal buildings, the GBAC believes that it is important to support the larger, ongoing process of trying to create a more just and equitable society. We believe that understanding how GSA might apply this thinking to greening the Federal building stock will continue to evolve and need to be reevaluated periodically, incorporating best practices from diverse local communities and experts in other parts of the Federal government as well as states, local jurisdictions, and non-governmental organizations.

The Environmental Justice & Equity Task Group (EJ&E TG) was formed by the Green Building Advisory Committee's membership in February 2021 to provide advice to the GSA and other Federal agencies in response to [Executive Order 14008, Tackling the Climate Crisis at Home and Abroad](#), which emphasizes securing environmental justice and spurring economic opportunity. The EJ&E TG was formed *“to identify and propose effective approaches to intentionally improve environmental justice and equity in federal building processes, thereby eliminating persistent inequities found in the local community and enhancing engagement with local communities and key partners throughout the building lifecycle that is responsive to the true needs of the local community.”*

The Advice Letter is structured around **eight Guiding Principles** and **three Cross-Cutting Themes**, presented in the Framework (Section 1). The principles include: provide **direct significant benefits** to the communities where the buildings are situated; **reflect those communities' identities** and traditions; **partner with the communities** as equals; develop **transparent accountability measures**; **share data** and information, transparently, with the communities; **prioritize access to transit, walking, and bicycling**; **reduce or eliminate harms and risks**, especially for communities with histories of exposure to harmful and hazardous materials; and ensure **inclusive, on-going access to services and amenities** that result from completed projects. The cross-cutting themes are: **Economic Opportunity and Economic Development**; **Public Health, Safety, and Well-Being**; and **Resilience to Disaster and Disruptions**.

The Advice Letter also provides a framework for **Processes to effectively engage with diverse groups of local communities** throughout the lifecycle of Federal facilities in Section 2. The Advice Letter includes several examples of environmental justice and equity initiatives, programs, policies, and practices by State, Local, and Federal governments, and other resources for government agencies to advance equity and environmental justice in Section 3.

The EJ&E TG, through this letter, makes the following recommendations (with more detail in Section 4):

1. Apply the Guiding Principles for Environmental Justice and Equity in Federal Buildings to all Federal projects. (see Section 1 Framework).
2. Engage effectively with a diverse group of local communities throughout planning, design, construction, leasing, operation, renovation, occupancy, and de-acquisition,

leading to increased equity, justice, access, opportunities, and green jobs. (see Section 2 Process for Collaboration).

3. Leverage existing regional, state and local public agency programs, including the examples identified by this EJ&E Task Group, to advance Federal government programs that address EJ&E in public buildings. (see Section 3 Leading Examples).
4. Conduct Community and EJ&E Impact Review early in project development.
5. Maximize shared use of Federal facilities with a diverse group of local communities.
6. Increase technical assistance, coaching, mentoring, preparation, and other support for diverse groups of local business owners, particularly minority and women-owned business enterprises (MWBE), to successfully compete for and participate in Federal vendor and construction contracts, establish specific targets for MWBE and other local companies' participation in procurement contracts (goods and services), and regularly report progress on achieving those specific targets to local diverse groups of local communities and other stakeholders.
7. Restructure GBAC membership to better reflect the diverse groups of communities that GSA and other Federal agencies serve.

In addition, this letter includes Attachment 1, which was developed independently by a NAACP Centering Equity in the Sustainable Buildings Sector (CESBS) Initiative team. The CESBS team developed an alternate set of recommendations for the GSA on environmental justice and equity, which it sent to the EJ&E Task Group on November 5, 2021 following the last meeting of the Task Group on November 2, 2021.⁴ The CESBS subsequently expanded that document as of January 31, 2022, which is the version that can be found in Attachment 1. The CESBS team included a subset of professionals listed in the Task Group “Additional Participants” as well as unnamed participants.

⁴ NAACP CESBS Initiative Recommendations to GSA is included in Attachment 1. NAACP CESBS “Guidelines for Equitable Community Involvement in Building & Development Projects and Policies,” (<https://naacp.org/resources/guidelines-equitable-community-involvement-building-development-projects-and-policies>)

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SECTION 1: FRAMEWORK

A. GUIDING PRINCIPLES FOR ENVIRONMENTAL JUSTICE AND EQUITY IN FEDERAL BUILDINGS

These Guiding Principles are intended to assist Federal agencies in assessing progress towards environmental justice and equity (EJ&E) associated with their buildings and related real property assets. These principles were developed based on foundational environmental justice and equity work, including:

- [*Principles of Environmental Justice*](#), First National People of Color Environmental Leadership Summit, 1991⁵;
- [*Equity and Buildings: A Practical Framework for Local Government Decision Makers*](#), Urban Sustainability Directors Network (USDN), June 2021.⁶

To effectively address environmental justice and equity, Federal agencies (working with their state, tribal, and local partners) must intentionally and explicitly engage with highly diverse neighboring and local communities (including historically disadvantaged people, physically and cognitively challenged individuals, single working parents, service industry workers, vulnerable populations, and others that bear a disproportionate share of negative environmental and other consequences resulting from government actions). Intentional engagement will enable the Federal agencies to identify and respond to the true needs of these communities equitably and justly, and thereby apply these Guiding Principles to the management and operation of public buildings, sites, and related real property assets including parks, landmarks, and trails.⁷

Guiding Principles:

- Provide direct, long-lasting, and significant benefits to the diverse group of local communities.
- Respect, reflect, and champion the culture, identity, and traditions of the diverse groups of local communities.
- Incorporate the rights of diverse groups of local communities to have access and participate as equal partners at every level of decision-making, including needs assessment, planning, implementation, enforcement, and evaluation.
- Develop and report transparent accountability measures of environmental justice and equity for building processes and operational performance, working with the diverse groups of local communities, particularly those with the greatest need.
- Accessibly, transparently, and openly share data and information about building processes and ongoing operations performance so it can be leveraged to develop local capabilities and leadership sustainably over time.

⁵ <http://www.ejnet.org/ej/principles.html>, First National People of Color Environmental Leadership Summit, *Principles of Environmental Justice*, Oct. 24-17, 1991.

⁶ https://www.usdn.org/uploads/cms/documents/usdn_equity_and_buildings_framework_-_june_2021.pdf

⁷ Federal, state, and local government agencies must comply with all applicable Federal, State, and Local Environmental Laws, statutes, and regulations, to protect the environment, and prevent the generation of hazardous substances, pollutants, and contaminants at the source, and comply with the Emergency Planning and Community Right to Know Act, working with emergency response coordinators on all levels to ensure there is emergency response plans so that communities are prepared for potential releases, accidents, and disruptions.

- Ensure easy, affordable, and direct access for the diverse groups of local communities, building occupants, and visitors traveling by foot, bicycle, wheelchair or other mobility assistive devices, public transportation, or other means.
- Work with diverse groups of local communities, particularly those most impacted and those with the greatest need, to rapidly reduce and/or eliminate the existing or potential environmental, economic, or social harms and risks.
- Provide inclusive, on-going access to services and amenities that result from completed projects.

B. MAJOR CROSS-CUTTING THEMES FOR ENVIRONMENTAL JUSTICE AND EQUITY

Federal agencies (working with their state and local partners) must intentionally and explicitly address environmental justice and equity in collaboration with diverse groups of local communities, particularly those that bear a disproportionate share of negative environmental and other consequences resulting from government actions. Government actions to advance equity and environmental justice, including policies, regulations, organizational processes, and practices related to Federal buildings, can have demonstrable impacts in multiple areas. The following Cross-Cutting Themes for equity and environmental justice were developed based on foundational and emerging priorities for public buildings and related real property assets.



- **Economic opportunity and economic development:** support economic opportunities and economic development for diverse groups of local communities, including supporting enterprise development, workforce development, career development, local procurement, and economic inclusion of the community.

- **Health, safety, and well-being:** enhance health, safety, and well-being for diverse groups of local communities, building occupants, and visitors, including: environmental quality (indoor and outdoor air quality and sound control); neighborhood quality (lighting, walking trails/sidewalks); mental and community health; access to healthy food; access to local green spaces (such as parks, community gardens, and tree canopy); and transportation access (for all modes, all ages, and all abilities).
- **Resilience to disruptions and disasters:** address resilience⁸ to disruptions and disaster for diverse groups of local communities, building occupants, and visitors, including: ensured access to critical power, water, communications, information (such as phone, radio, and/or internet) sanitary services and safe shelter; community prosperity, and capacity; mutual aid; climate adaptive responses to climate-related emergency events; and preventive action plans to reduce energy and water usage, health and well-being risks, and costs, particularly in economically disadvantaged communities.

SECTION 2: PROCESS FOR COMMUNITY-FOCUSED COLLABORATION TO ADVANCE ENVIRONMENTAL JUSTICE AND EQUITY IN FEDERAL REAL PROPERTY MANAGEMENT

The Urban Sustainability Directors Network (USDN) recently released a report, *Building Performance Standards: A New Framework for Equitable Policies to Address Existing Buildings*.⁹ A table in Appendix A of that report summarizes possible roles and responsibilities of various government stakeholders (e.g., city governments), quasi-public organizations (e.g., utilities, labor unions), real estate and professional services (e.g., building owners, design professionals), and community (e.g., racial and social justice groups, community development corporations), with a common need for measurable outcomes throughout the preparation, policy making, and policy implementation roles. Building projects (including renovation and new construction) similarly need to include methods to ensure measurable outcomes in environmental justice and equity throughout the decision-making processes.

Changes in decision-making processes and a focus on measurable outcomes can enable Federal agencies to effectively apply the Guiding Principles for Environmental Justice and Equity in Federal Buildings (Section 1 above) throughout the development and implementation of an agency's strategic plan. These changes can include an explicit decision-making framework for environmental justice and equity for Federal real property management and operation.

This section proposes three objectives that can be a means to effectively engage diverse groups of local communities, and a *possible* collaborative process that can be applied throughout the lifecycle of a Federal facility. Measurable outcomes during program development, site selection, design, construction, and operation can include on-going documentation and implementation of collaborative decisions that support both the Federal facility and the identified and fulfilled needs

⁸ Resilience is *the ability to prepare and plan for, absorb, recover from, and more successfully adapt to adverse events*. (National Academy Press, 2012, *Disaster Resilience: A National Imperative*, <https://www.nap.edu/read/13457/chapter/2>)

⁹ <https://www.usdn.org/projects/building-performance-standards.html>

of the community at-large.¹⁰ Additional examples of emerging collaborative processes for building projects that center community-based collaboration around environmental justice and equity can be found in Section 3 below.

The following objectives can be applied at each step of the example collaborative process described below to effectively engage with diverse local communities. The example collaborative process includes the formation of a collaborative team with diverse groups of local communities based on an inclusive, integrated, and intentional process.¹¹ The focus is to support inclusive environments, provide access to services and amenities for diverse local community groups, match diverse local community needs with project needs, and identify opportunities for healthy interdependence of meeting the needs of diverse local community groups and the federal agency.

Objective 1

Enable Federal agencies to apply and implement the Guiding Principles for Environmental Justice and Equity in Federal Buildings. The process is a means for accomplishing strategic planning for environmental justice and equity decisions for Federal real property management and operation.

Objective 2

Engage and maintain collaborative dialogue among diverse groups of local communities and stakeholders throughout the life cycle of a Federal facility (i.e., program development, site selection, programming, design, construction, opening, post-occupancy, and on-going operations). The process is a systematic framework for developing and sharing information, and establishing an on-going dialogue and communication system.

Objective 3

Correlate and align project needs with community needs for every project, and identify and document positive and other impacts with the diverse local community groups and other stakeholders. The process is a means to support collaborative decision-making.

IMPLEMENTATION PROCESS

- Identify all stakeholders and diverse groups of local communities.
- Identify community needs and goals and Owner Project Requirements (OPR) for a Federal facility with diverse local community groups and other stakeholders.
- Identify roles and responsibilities for collaboration participants, including each community and stakeholder group, and provide means for collaboration.
- Document the community goals, OPR, and updates and publicly share that information with supportive documentation.

¹⁰ Facility Guidelines Institute: www.fgiguilines.org develops Guidelines for Design and Construction of Residential Health, Care, and Support Facilities, Hospitals, and Outpatient Facilities. The process provided herein is based on the functional programming process that includes safety risk assessment and environment of care (EOC) criteria as it relates to improvement of outcomes for all stakeholders – including staff, users, visitors, and community members. The results are guidelines that are produced and updated every four years that are adopted as licensing code throughout the United States.

- Schedule public meetings for collaboration and follow-up before, during, and after construction.
- Schedule public meetings on a regular interval post-occupancy for collaboration and feedback, incorporation of updates, and continual improvement.

It is recommended that GSA and other Federal agencies play a significant leadership role in researching and analyzing community-based data and information in conjunction with agency mission imperatives, as part of the Federal real property decision-making process. The goals are to: ensure thoughtful, collaborative discussions with all stakeholders; develop design, building, and operations programming processes; and identify strategic, inclusive approaches based on community needs that continue dialogue, which is documented to result in sustained change. At the onset of a Federal real property project, each Federal agency should clearly outline initiatives, priorities, and deliverables related to Environmental Justice and Equity that specifically include the intended outcomes and their subsequent alignment with the entity's strategic plan and the community needs' analysis. Addressing environmental justice and equity has to be integrated into the planning framework throughout the programming, design and construction process, through operational occupancy, and subsequently throughout the post-occupancy to be truly sustainable. (Please see extended example of this process applied to the GSA Public Building Service (PBS) Project Life Cycle Process in Appendix 5.)

SECTION 3: EXAMPLES OF FEDERAL, STATE, AND LOCAL POLICIES, PROCESSES, AND PRACTICES TO ADVANCE ENVIRONMENTAL JUSTICE AND EQUITY IN PUBLIC BUILDINGS

This section includes several prominent examples of Federal, state, and local initiatives to advance environmental justice and equity in building projects. Each initiative addresses at least one of the cross-cutting themes, and reflects the EJ&E Guiding Principles. These initiatives were presented to the EJ&E Task Group during regularly scheduled meetings. (Please see Appendix 1.)

PROGRAM MANAGEMENT

- **The Indian Health Service (IHS) and the Indian Self-Determination Construction Contract agreement:** The Indian Health Service (IHS), at times through the Indian Self-Determination Construction Contract agreement, transfers control of healthcare-related construction projects, including administrative functions, to the Tribe to facilitate effective and meaningful participation by the Tribe in planning, conducting, and administering the construction project, and so that the construction project is responsive to the true needs of the Indian community. In 1975, US Congress enacted the [Indian Self-Determination and Education Assistance Act, Public Law 93-628](#), which allowed for Indian tribes to have greater autonomy and to have the opportunity to assume the responsibility for programs administered to them.

PROCUREMENT

- **Equity prioritization in Washington, DC RFP/RFQs** for project teams that maximize, by percentage of ownership and control, entities designated as Disadvantaged Business

Enterprise (DBE) and local Resident Owned Business (ROB), or any entities (including non-profits and community institutions) led by, or majority controlled by, individuals designated as socially disadvantaged under the Small Business Administration's (SBA) definition.

- City of Orlando **procurement requirements**: any major city investment must procure 18% from minority-owned businesses and 6% from women-owned businesses.
 1. For new public venues, Orlando established the Blueprint program in which contractors are required to pull from a pool of applicants and employees that went through blueprint training program intended to help contractors meet the 18% and 6% procurement requirement.

PRIORITIZATION

- **Detailed equity mapping exercise** for Orlando to understand what pockets of communities had/have disproportionate impacts (i.e., higher energy burden, food insecurity, lack of housing, etc.). They secured a grant to work with Greenlink Analytics whose [Equity Map tool](#) (GEM) has been made available to cities across the country that want to better address equity with a data-driven approach.
 1. Internet speed - a community college student cohort developed a tool to run an internet speed check on all addresses in the tool to help identify discrepancies from an internet-availability angle
 2. Tree canopy - tree equity map available at treeequityscore.org. Orlando has free street trees and this Fall will use this map to only release the trees only to neighborhoods in most need (determined by the data)
 3. Energy burden - Greenlink did a full analysis on the Orlando's energy burden: [Orlando Energy Burden Report](#) (assessing impact over 6 years). Used to pinpoint neighborhoods with greatest burden so that they can provide free energy assessments to homeowners and funding for weatherization and high-level efficiency improvements that can be repaid on the utility bill and are income-subsidized.
 4. Resiliency Hubs - neighborhood centers (19 of them) that are strategically provided to provide wrap-around services (school, childcare, etc.), with focus on the communities, based on the GEM equity map, which have high energy burden, lack of internet access, food insecurity, and are often challenged with a lack of resources due to prior events.
- **New climate policy (Orlando) incorporates equity components** (e.g., EV-readiness, equitable access to infrastructure).
- **King County, WA Equity and Social Justice (ESJ) rating system** (<https://kingcounty.gov/~media/depts/dnrp/solid-waste/green-building/documents/ESJ-credits.ashx?la=en>):
 1. Develop ESJ plan (up to 2 points)
 - Based on assessment of conditions and information gathered on priorities of stakeholders and existing and/or potential users
 2. Participation, partnering, and engagement (up to 2 points)
 - Priority population active participation in siting design and/or programming via community organization partnerships, multifaceted

- outreach, and approaches to pro-equity involvement, and/or participatory budgeting.
- Engagement continuum: Goal is to move from “County informs” to “Community directs action”
3. Diverse project design team (up to 2 points)
 - Diversity among decision makers (both within internal staff and consultant staff teams). Guides pro-equity development and build capacity among priority population.
 - Example: Metro Transit zero Emission Battery Bus Deployment included a stakeholder panel with groups focused on low-income communities, racial equity, public health, climate change, and public transit
 4. Conduct equity impact review (EIR) (up to 2 points)
 - To inform equity and social justice effects of siting, design, and /or construction alternatives in the local community.
 - EIR is public.
 - The EIR Process Overview is available online: https://kingcounty.gov/~media/elected/executive/equity-social-justice/2016/The_Equity_Impact_Review_checklist_Mar2016.ashx?la=en
 5. Siting, design, and construction to counter known disparities (up to 4 points)
 - To enhance input access to create project equity differentiators through project characteristics and development model
 6. Realize pro-equity elements of ESJ plan (up to 4 points)
 - Including features driven by those with the greatest need.
 7. Advance economic justice (up to 3 points)
 - Selecting contracts to include socially just enterprises, and partner with companies and community-based organizations to foster wealth equity.
 - E.g., provide participatory opportunities for apprenticeships, internships, women and minority owned businesses, mentoring, training, professional development, and entrepreneurship opportunities.
 8. Pro-equity sourcing (up to 3 points)
 - Select materials that have pro-equity upstream and supply chain impacts
 - Support market movement to incorporate socially and environmentally responsible manufacturers
 9. Innovation (4 points)
 - Encouraging others to lead by example and take advantage of pro-equity actions that may be above and beyond the eight credits’ criteria listed.
- City of Orlando prescribes **LEED social equity credits** for the scorecard to ensure meeting of certain priorities.
 - King County, WA **Equity and Social Justice Ordinance** states “The condition in which people live, work and play are determinants of equity. Equal opportunity in these areas is necessary for all people to thrive and achieve their full potential regardless of race, income, or language spoken. (<https://kingcounty.gov/depts/dnrp/solid-waste/programs/green-building/county-green-building/equity-social-justice.aspx>)
 1. Healthy built and natural environments.
 2. Economic development.
 3. Strong, vibrant neighborhoods.

4. Family wage jobs and job training.
- National nonprofit conservation organization (American Forests), with a mission to create healthy forests from coast to coast, just released a new "**Tree Equity Score**" that analyses tree canopies and access to trees in 486 municipalities across the country that have at least 50,000 people.
- NYC Climate Resiliency Design Guidelines require that **siting of buildings** should be based on future conditions for the building based on its design/useful life.

GOVERNANCE

- **Chief Equity Official** (City of Orlando) meets with community-based organizations (CBOs) to better understand their split incentives, barriers to entry, why they're not using the current programs offered by the city, and how to move forward (spectrum of engagement) - providing more ownership to communities.
- **Framework for police reform** (City of Orlando) based on the city's internal policies and processes.
- King County **Strategic Climate Action Plan** was created with equity principles in mind (including community-driven policy making, building capacity within frontline communities, green jobs, emergency preparedness, etc.).
(<https://your.kingcounty.gov/dnrp/climate/documents/scap-2020-approved/2020-scap-preparing-for-climate-change-section.pdf>)

SECTION 4: RECOMMENDATIONS FROM THE ENVIRONMENTAL JUSTICE AND EQUITY TASK GROUP

The Environmental Justice and Equity Task Group provides the following recommendations to the GSA Office of Federal High Performance Green Buildings to work closely with other federal agencies to develop relevant best practices, policies, and guidance to advance environmental justice and equity for Federal buildings.

1. Apply the Guiding Principles for Environmental Justice and Equity in Federal Buildings to all Federal projects. (See Section 1 Framework)

It is recommended that the GSA and other Federal agencies include “Guiding Principles for Environmental Justice and Equity in Federal Buildings” into the existing guidance and associated instructions for the Guiding Principles for Sustainable Buildings.¹² This inclusion would guide agencies in designing, locating, constructing, maintaining, and operating Federal buildings to explicitly address equity and environmental justice for all Federal real property.

Background: The definition of a high-performance green building was established in the Energy Independence and Security Act (EISA) of 2007, and the current Guiding Principles for Sustainable Buildings serve as guidelines for Federal agencies to assess progress towards

¹² https://www.sustainability.gov/pdfs/guiding_principles_for_sustainable_federal_buildings.pdf, White House Council on Environmental Quality (2020), *Guiding Principles for Sustainable Buildings and Associated Instructions*, December 2020.

the sustainability metrics associated with their real property assets, in accordance with the statutory duties of executive agencies and recent Executive Orders. On January 27, 2021, the Biden Administration issued an [Executive Order 14008, Tackling the Climate Crisis at Home and Abroad](#), which emphasizes securing environmental justice and spurring economic opportunity.

Potential Resources: King County, WA Equity and Social Justice rating system, EPA “Equitable Development and Environmental Justice”¹³

2. Engage effectively with a diverse group of local communities throughout planning, design, construction, leasing, operation, renovation, occupancy, and de-acquisition, leading to increased equity, justice, access, opportunities, and green jobs. (See Section 2 Process for Collaboration).

It is recommended that GSA and other Federal agencies be explicitly accountable and play a leadership role in developing and sharing with diverse groups of local communities and all stakeholders, the evidence, information, and analysis of community needs and integration of those needs with agency mission imperatives. Community involvement contributes to thoughtful, thorough, and collaborative discussions and approaches to planning and decision making that support the actual needs of local communities. Upfront collaboration at the onset of a project’s programming process and during the subsequent design, construction, and occupancy phases of a Federal real property allows for each community and stakeholder group to clearly outline initiatives, priorities, and deliverables that specifically support inclusivity and intended Environmental Justice and Equity (EJ&E) outcomes. It also brings the needs of underserved communities to the forefront of planning discussions at the beginning of the programming process and throughout project development and facility operation.

Background: On June 4, 2019, the Office of Management and Budget published Memorandum [M-19-18, Federal Data Strategy — A Framework for Consistency](#), which provided a Mission Statement, Principles, and Practices to provide a government-wide vision for how agencies should manage and use federal data by 2030. Specifically, the FDS calls for the federal government to replicate, accelerate, and scale leading practices related to government data, including steps to fill gaps in government capacity and knowledge; increase the sharing and use of data for federal decision-making and operational needs; and make federal data more findable and discoverable.¹⁴

Potential Resources: Indian Health Service (IHS) Indian Self-Determination Construction Contract agreement.

3. Leverage existing regional, state and local public agency programs, including the examples identified by this EJ&E Task Group, to advance Federal government programs that address EJ&E in public buildings. (See Section 3 Leading Examples)

¹³ <https://www.epa.gov/environmentaljustice/equitable-development-and-environmental-justice>

¹⁴ Federal Data Strategy, 2021 Action Plan, <https://strategy.data.gov/2021/action-plan/>

It is recommended that the GSA and other Federal agencies work with local, state, and regional partners to leverage existing programs, practices, and policies that advance equity and environmental justice in public buildings.

Background: On December 8, 2021, President Biden signed the Executive Order Catalyzing America’s Clean Energy Economy Through Federal Sustainability, which takes a “whole of government” approach to achieving critical priorities, including advancing environmental justice and equity, providing clean, healthy, and resilient communities, and improving economic opportunity and economic development.¹⁵ This EO explicitly encourages: “Collaboration with leading American unions, businesses, States, Tribes, municipalities, and other countries will accelerate progress and catalyze greater climate action at home and abroad.”

Potential Resources: City of Orlando, FL; King County, WA; other intergovernmental and interorganizational networks focused on equity and environmental justice

4. Conduct Community and EJ&E Impact Review Early in Project Development

It is recommended that GSA and the other Federal agencies conduct meaningful community impact and Environmental Justice and Equity analyses during the program development and feasibility stages of a project, including project planning and throughout the project. Documentation should include a brief summary of the potential environmental justice and equity impacts and opportunities in the project approval process and highlight potential issues that need to be managed during the project development as well as opportunities to advance EJ&E that may need funding.

Background: Traditionally, GSA consideration of local impacts takes place largely through consultation with local governments and during National Environmental Policy Act (NEPA) analysis. The interactions with local governments tend to focus on general community impacts which, in some cases, may leave some community stakeholders and disadvantaged populations out of the discussion. NEPA engagement later in the process may involve individuals with EJ&E concerns, but it may take place too late in project development to have a significant or optimal impact.

Potential Resources: King County WA conducts a formal Equity Impact Report during their project development. GSA should consider this approach and other models to identify the best way to structure the EJ analysis for their project planning.

5. Maximize Shared Use of Federal Facilities with a Diverse Group of Local Communities

It is recommended that GSA and the other Federal agencies continually explore, develop, and expand access to and use of local Federal facilities for diverse groups of local communities.

¹⁵ FACT SHEET: President Biden Signs Executive Order Catalyzing America’s Clean Energy Economy Through Federal Sustainability <https://www.whitehouse.gov/briefing-room/statements-releases/2021/12/08/fact-sheet-president-biden-signs-executive-order-catalyzing-americas-clean-energy-economy-through-federal-sustainability/>

In addition, the GSA and other Federal agencies can collaborate directly with local diverse communities, local and regional governments, and national stakeholder organizations to expand awareness of and improve programs to enhance these shared use opportunities and, if appropriate, bring outside resources to the table for mutual community-based benefit.

Background: The NAACP town hall identified a lack of connection between federal properties and local diverse or disadvantaged communities in a need for more shared use of facilities. While federal agencies are directed to seek shared public use of federal facilities to support local economic, cultural, and other goals (Public Buildings Cooperative Use Act), communities are not aware of or lack the resources to make use of these facilities. For example, although GSA has a track record of successfully hosting such activities (e.g., community meetings in jury assembly suites; farmers markets on public plazas; ground floor retail), there are currently only a relatively small number of these activities.

Potential Resources: NAACP, SBA

6. Increase technical assistance, coaching, mentoring, preparation, and other support for a diverse group of local business owners, particularly minority and women-owned business enterprises (MWBE), to successfully compete for and participate in Federal vendor and construction contracts, and regularly report progress on achieving specific targets to local diverse groups of local communities and other stakeholders.

It is recommended that GSA and other Federal Agencies further diversify the vendors and contractors that they work with by establishing MWBE (minority and women-owned business enterprise) target award objectives, and, working with local, regional, tribal, and state governments and organizations, leverage and develop training, support, and workforce development programs to enhance the capability of diverse groups of local organizations and MWBEs to participate in Federal contracts. Understanding the local expertise, service offering, available amenities and providing real opportunities for engagement are key to successfully working with local business owners, workers, and community members.

Background: On July 20, 2021, the Office of Management and Budget released the Interim Implementation Guidance for the Justice40 Initiative¹⁶ to achieve 40% of the benefits from Federal investments flowing to disadvantaged communities. The covered programs and investments include training and workforce development, and Federal procurement (acquisition of goods and services for the Federal government's use).

Potential resources: City of Orlando, FL procurement requirements (18% from minority-owned businesses and 6% from women-owned businesses) and its Blueprint program (i.e., contractors required to pull from a pool of applicants and employees that went through Blueprint training program).

7. Restructure GBAC membership to better reflect the diverse groups of communities GSA serves.

¹⁶ <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>, Office of Management and Budget, Interim Implementation Guidance for the Justice40 Initiative, July 20,2021.

It is recommended that GSA incorporate expertise in equity and environmental justice into the selection of non-governmental GBAC members. Adopt the Guiding Principles for Environmental Justice and Equity in Federal Buildings as standard GBAC practice.

ALTERNATIVE RECOMMENDATIONS TO GSA ON ENVIRONMENTAL JUSTICE AND EQUITY FROM THE NAACP CESBS TEAM

This letter includes Attachment 1, which was developed independently by a NAACP Centering Equity in the Sustainable Buildings Sector (CESBS) Initiative team.¹⁷ The CESBS team developed an alternate set of recommendations for the GSA on environmental justice and equity, which it sent to the EJ&E Task Group on November 5, 2021 following the last meeting of the Task Group on November 2, 2021. The CESBS team subsequently expanded that document as of January 31, 2022, which can be found in Attachment 1. The CESBS team included a subset of professionals listed in the Task Group “Additional Participants” as well as unnamed participants.

¹⁷ NAACP CESBS Initiative Recommendations to GSA is included in Attachment 1. NAACP CESBS “Guidelines for Equitable Community Involvement in Building & Development Projects and Policies,” (<https://naacp.org/resources/guidelines-equitable-community-involvement-building-development-projects-and-policies>)

APPENDIX 1: ACTIONS AND PRESENTATIONS TO EJ&E TASK GROUP DURING DISCOVERY

Engagement:

- 15 GBAC EJ&E Task Group Meetings between April 6, 2021 to November 2, 2021
 - **83 invitees** to each meeting
 - Public meetings listed in the Federal Register
- GBAC EJ&E Task Group Survey (March-April 2021)– Top Priorities and Top Actions to Advance Environmental Justice and Equity in Federal Buildings – used to develop Section 1 Framework
- NAACP Townhall - The NAACP CESBS Initiative (Centering Equity on the Sustainable Building Sector) organized a NAACP Townhall focused on Environmental & Climate Justice Visions for Federal Buildings and invited members of the GBAC EJ&E Task Group and NAACP members to participate. (Please see Appendix 6 for the Summary of the NAACP Townhall)
- Task Group composition of Advice Letter
 - Composition Time Period: July 27, 2021 to January 31, 2022
 - Edited Versions with Task Group contributions: 6 Versions

Presentations:

- Dr. Cecilia Martinez, Senior Director for Environmental Justice at the White House Council on Environmental Quality (CEQ)
- Elizabeth Fahey, GSA OGP - Federal Real Property Program
- Kristen Smith & Maria Torres, GSA Public Building Services (PBS) - GSA Portfolio
- Steven Lewis, FAIA, AIA Architects Foundation Board President – Environmental Justice and Equity
- Evelyn Britton, GSA Office of Civil Rights - NEPA for Environmental Justice and Equity
- Frank Giblin, GSA PBS Office of the Chief Architect - GSA Urban Development and Good Neighbor Programs
- Alex Gamble, Architect/Sustainability Coordinator, Indian Health Service (IHS) Division of Engineering Services – IHS Leading Examples
- Chris Castro, Director of Sustainability and Resilience, City of Orlando, FL – Orlando Leading Examples
- Nori Catabay, Green Building Team Program Manager, King County, WA – King County Leading Examples
- Kenneth Schelbert, GSA Leasing – GSA Leasing Process Overview
- Don Kottl, GSA – GSA Small Project Processes
- Mandy Lee, Program Manager, National Association for the Advancement of Colored People (NAACP) Centering Equity in the Sustainable Building Sector (CESBS) Initiative – Summary of NAACP Townhall held on August 19, 2021

APPENDIX 2: RESOURCES FOR ENVIRONMENTAL JUSTICE AND EQUITY IN FEDERAL SUSTAINABLE BUILDINGS

- **Public Building Legislation**
 - [Local Law 97 of 2019](#) is one of the most ambitious plans for reducing emissions in the nation. Local Law 97 was included in the Climate Mobilization Act, passed by the City Council in April 2019 as part of the Mayor’s New York City Green New Deal. [Local Law 97 - Sustainable Buildings](#)
- **Federal EJ&E Legislation**
 - [EJ Guidance Under the National Environmental Policy Act](#) (1997)
 - [FACT SHEET: Biden-Harris Administration Announces New Actions to Build Black Wealth and Narrow the Racial Wealth Gap](#): The Biden-Harris administration's new goal to enhance procurement from small disadvantaged business.
 - [The Path to Achieving Justice40](#): There are a number of agencies and actions outlined by thematic impact in Justice40
- **Public Building Resources**
 - [Federal Real Property Profile \(FRPP\) public data set](#): Federal government’s database of its real property inventory
 - [NBI Releases Zero Energy Performance Targets for New Construction Projects](#)
 - [Guiding Principles for Sustainable Federal Buildings](#): Federal criteria for sustainable buildings
 - [Comprehensive Annual Energy Data and Sustainability Performance](#): DOE FEMP resource for sustainability data, sortable by agency
 - [Federal Sustainability Progress, Plans, and Performance](#): (Office of Sustainability, Council on Environmental Quality (CEQ)) Individual agency performance graphics and OMB Scorecards for Efficient Federal Operations/Management. Includes annual performance data on facility energy use, water use, renewable electricity, facility efficiency investments, high performance sustainable buildings, fleet petroleum and alternative fuel, greenhouse gas emissions.
- **Federal EJ&E Resources**
 - [Community Guide to EJ and NEPA Methods](#), EJIWG (March 2019)
 - [Promising Practices for EJ Methodologies in NEPA Reviews](#) (March 2016)
 - [Environmental Career Worker Training Program](#): One avenue for training, with a focus on delivering comprehensive training to increase the number of disadvantaged and underrepresented minority workers in areas such as environmental restoration, construction, hazardous materials/waste handling, and emergency response.
 - [Federal Real Property Assistance Program](#): Public health benefit conveyance program whereby certain Federal surplus real property may be transferred to eligible organizations for public health and homeless assistance purposes at a discount, or no cost.
 - [Low Income Home Energy Assistance Program \(LIHEAP\)](#): Assists families with their energy burden
- **GSA-Specific Public Building Resources**
 - [Federal Property Resources \(Updated 5/26/21\)](#): Overview of most of the resources mentioned by Dr. Martinez in her presentation to this task group on 5/18/21 and many of the Federal Real Property resources we covered in the 6/1/21 task group meeting.

- [GSA P100 facility design standards](#): Facility Standards for the Public Buildings Service, most updated version (July 2018).
- [System for Acquisition Management \(SAM\)](#): GSA does all lease advertisements through this system.
- [GSA FORM R100 Global RLP](#): GSA's standard requirements can be found in the Request for Lease Proposals.
- [Standard Requests for Lease Proposals](#)
- GSA's pricing limits are dictated by market conditions, agency budgets and [prospectus limits](#).
- **GSA-Specific EJ&E Resources**
 - [GSA's Environmental Justice webpage](#): Contains GSA's EJ Strategy for FY16-FY18 and EJ Progress Reports
 - [Office of Small and Disadvantaged Business Utilization \(OSDBU\)](#)
 - [EJ Mapping presentation by GSA](#): (Request access as needed.) An incomplete list of mapping tools for analyzing EJ issues and opportunities. GSA is using this to track what GSA needs to look at. Includes hyperlinks to external resources. Many are focused on specific regions or towns, usually adding their local detail (e.g., public works investments) on top of the national data sets. GSA has access to much of this and there are many more tools. Scaling up, GSA's needs would be to have a tool that operates not as a viewer but that lets GSA run queries on its inventory. Consider: what nationally available data elements they believe are most relevant to government real estate?
- **GSA-Specific Data**
 - [GSA owned and leased properties](#)
 - [Federal Real Property Public Data Set](#)
- **GBAC Resources**
 - [Green Building Advisory Committee \(GSA.gov\)](#): Overview of GBAC and past performance information and records.
 - [GBAC Advice Letters and Resolutions](#)
 - [Sustainable Response to COVID-19 Decision Guide](#): The product of GSA's Green Building Advisory Committee (GBAC) Sustainable Response to COVID-19 Task Group.
- **Non-Federal EJ&E Resources**
 - [MTA Business Services Center overall resource page](#)
 - [Voluntary Land Taxes](#): From the Native Governance Center. GSA should consider the idea of paying voluntary land taxes where Indigenous communities have those systems in place and there is overlap with federal property.
 - [Social Economic Environmental Design \(SEED\) Network](#): The SEED Network connects similarly-minded members of the general public with designers from the fields of Architecture, Communication Design, Industrial Design, Landscape Architecture, Urban Design, and Urban Planning, who have an interest in community-based design practice.
 - [Justice Equity Diversity Inclusion Webinar](#): Monthly calls about projects that are exemplary in terms of justice, equity, diversity, and inclusion; hosted by the National Organization of Minority Architects (NOMA), National Association for the Advancement of Colored People (NAACP), and Social Economic Environmental Design (SEED) Network.

- [EcoDistricts](#): EcoDistricts aims to mobilize, empower and accelerate sustainable and equitable urban development leadership throughout North America and beyond.
 - [An overview of the 3 imperatives \(Equity, Resilience, Climate Protection\)](#): Within those 3 Imperatives are 6 Priorities and within the Priorities are 20 Objective Categories.
- Living Future Challenge
 - [Living Building Challenge – overview of the seven petals](#)
 - [Living Building Challenge – Equity Petal](#)
 - [Living Community Challenge – overview of the seven petals](#)
 - [Living Community Challenge – Equity Petal](#)
 - [Living Product Challenge – overview of the seven petals](#)
 - [Living Product Challenge – Equity Petal](#)
 - [Living Building Affordable Housing](#)
- [Living Building Challenge](#): LEED is prescriptive; suggest performance-based rating system as well. Living Building challenge is more stringent and is performance-based. The system includes an inclusion of equity.
- [WELL Community Standard](#): A performance based standard focused on health and well-being with a category specifically on community issues including fundamental housing quality, housing equity and affordability, and access to mental and physical health services.
- [WELL Health Equity Advisory and Rating](#): An advisory established in 2020 to identify opportunities to make healthier places more accessible to everyone. The rating system will be released in 2022 that will focus on equity issues as part of the larger WELL Certification.
-
- [NRDC on incorporating EJ and Climate Change strategies in Existing Buildings](#): A new framework for cracking the nut of existing buildings.
- **EJ&E Examples**
 - [Equity and Social Justice credits](#) applied to capital projects in King County, Washington State as a part of green buildings and sustainability development practices.
 - [“This Black Soil”](#) is a documentary about the community of Bayview, CA and offers great lessons about grass roots community empowerment to combat the imposition of unwanted uses that sought to take the path of least resistance through a poor, Black community.
 - [“7th Generation”](#) is a documentary by Jim Warne, and NFL and indigenous leader
 - Indigenous Peoples
 - [Native Governance Center](#): A guide to Indigenous land acknowledgment.
 - [Native Land](#): Maps Indigenous territories, treaties, and languages across the world.
 - [Orlando Energy Burden Analysis](#) to focus resources in the communities that need it most
 - [NIBS Diversity + Inclusion](#): NIBS is conducting surveys, convening stakeholders, and developing reports on equity.
 - [NIBS Survey](#): Survey on equity
 - [NAACP definitions of EJ&E in the context of building & design projects](#): NAACP, National Organization of Minority Architects, and SEED Network surveyed NAACP members for their definitions.
 - [Senior Living Sustainability Guide](#): Programming Process Document for Senior Living. We [Jane Rohde] developed in 2011 a guideline for senior living, because they are vulnerable, and their voices are not heard: Focus on the first three sections as the sustainability building section has been replaced through reference to ASHRAE 189.3 while the document is under update for 2021/2022.
 - [HHS Office of Community Services - Low Income Home Energy Assistance Program](#)

- [\(LIHEAP\)](#): Helps keep families safe and healthy through initiatives that assist families with energy costs. We provide federally funded assistance in managing costs associated with home energy bills, energy crises, weatherization and energy-related minor home repairs.
- [HHS Office of Community Services - Low Income Household Water Assistance Program \(LIHWAP\)](#): provides funds to assist low-income households with water and wastewater bills.

- LIHWAP grants are available to States, the District of Columbia, the Commonwealth of Puerto Rico, U.S. Territories, and Federally and state-recognized Indian Tribes and tribal organizations that received fiscal year 2021 LIHEAP grants.
- [HHS Office of Community Services - Environmental Career Worker Training Program \(ECWTP\)](#): Known as the Minority Worker Training Program until 2014, ECWTP focuses on delivering comprehensive training to increase the number of disadvantaged and underrepresented minority workers in areas such as environmental restoration, construction, hazardous materials/waste handling, and emergency response.
 - [EPA National Environmental Justice Community - engagement calls](#): "The Agency is relaunching these calls as a first step towards reestablishing meaningful and engaging participation with community groups and the public. This direct dialogue will strengthen the integration of EJ into all that we do as we pursue achieving meaningful improvements on the ground for communities."
 - [Commission for Environmental Cooperation EJ4Climate](#): "A grant program that supports underserved and vulnerable communities, and Indigenous communities, in Canada, Mexico, and the United States to prepare for climate-related impacts."
 - [King County](#): Website includes a plethora of information and examples of social justice and equity in the green buildings space.
 - [Equity Impact Review Process Overview](#): How and When to Use the EIR Process - It is expected that the Equity Impact Review is embedded within the development and implementation processes of the proposed action.
 - [King County ESJ Credits and Guidelines](#)
 - Strategic Climate Action Plan
 - [Sustainable and Resilient Frontline Communities](#): This was co-developed with our community-based organizations. All community members were financially compensated for their time and participation.
 - Preparing for Climate Change [2020 King County Strategic Climate Action Plan](#): This covers resiliency, adaptation and preparedness
 - General website [2020 Strategic Climate Action Plan \(SCAP\) - King County](#)
 - [Pathways to Equity](#): Process work in this equity space.
 - [Equity in Buildings Framework for Local Government Decision Makers](#): The Urban Sustainability Directors Network's (USDN) framework walks government staff and practitioners through the emerging practice of centering equity in sustainable buildings policies and programs.
 - [WE ACT for Environmental Justice](#): Their mission is to build healthy communities by ensuring that people of color and/or low-income residents participate meaningfully in the creation of sound and fair environmental health and protection policies and practices. WE ACT envisions a community that has - informed and engaged residents who participate fully in decision-making on key issues that impact their health and community, strong and equal environmental protections, and increased environmental health through community-based participatory research and evidence-based campaigns.
 - [Facilitating Power - Spectrum of Community Engagement to Ownership](#): For community-driven solutions. Charts a pathway to strengthen and transform local democracies. Thriving,

diverse, equitable communities are possible through deep participation, particularly by communities commonly excluded from democratic voice & power.

- **EJ&E Tools**

- [Greenlink Equity Map](#): Maps provided for local governments across the US to help us better understand the inequities that manifest in our community
- [6 Maps That Show How Bad Energy Poverty Is and Reveal 2 Ways to Make it Better](#) (Union of Concerned Scientists)
- [Tree Equity Score](#): National nonprofit conservation organization American Forests has just released a new “Tree Equity Score” that analyses tree canopies and access to trees in 486 municipalities across the country that have at least 50,000 people.
- [EPA EJ Screen](#): Environmental Protection Agency’s environmental justice screening and mapping tool that maps EJ neighborhoods and risks (i.e., toxic land sites, etc.)
- [High Road Contracting](#): The Building Innovation Hub, supported by Emerald Cities Collaborative and MIT, is wrapping up their completion of tools for building owners and contractors to upholding High Road Contracting Standards. There are RFP templates and other implementable resources.

- **Partners**

- [American Indian Council of Architects and Engineers \(AICAE\)](#)

APPENDIX 3: EXAMPLES OF EXISTING FEDERAL PROGRAMS, PROCESSES, AND PRACTICES ON ENVIRONMENTAL JUSTICE, EQUITY AND FEDERAL SUSTAINABLE BUILDINGS

- General Services Administration (GSA)
 - a. [Environmental Justice](#) : Overview of GSA federal portfolio or any assessment of current diversity, equity, and inclusion (DEI) related policies, programs, and success stories
 - b. [Green Building Advisory Committee](#)
 - c. [Office of Small and Disadvantaged Business Utilization \(OSDBU\)](#)
- Environmental Protection Agency (EPA)
 - a. [National Environmental Justice Advisory Council](#)
 - i. The National Environmental Justice Advisory Council (NEJAC), a federal advisory committee to EPA was established September 30, 1993. The Council provides advice and recommendations about broad, cross-cutting issues related to environmental justice, from all stakeholders involved in the environmental justice dialogue. In addition, the NEJAC provides a valuable forum for discussions about integrating environmental justice with other EPA priorities and initiatives.
 - b. [Interagency Working Group on Environmental Justice \(EJ IWG\)](#)
 - i. The Interagency Working Group on Environmental Justice (EJ IWG) facilitates the active involvement of all Federal agencies to implement [Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."](#) The order states that "Federal agencies must identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations."
 - c. [EPA EJ Screen](#): Environmental Protection Agency's environmental justice screening and mapping tool that maps EJ neighborhoods and risks (i.e., toxic land sites, etc.)
 - d. [EPA Nation Environmental Justice Community - engagement calls](#): "The Agency is relaunching these calls as a first step towards reestablishing meaningful and engaging participation with community groups and the public. This direct dialogue will strengthen the integration of EJ into all that we do as we pursue achieving meaningful improvements on the ground for communities."
- Executive Office of the President of the United States
 - a. Council of Environmental Quality (CEQ)
 - i. [Guiding Principles for Sustainable Federal Buildings](#): Federal criteria for sustainable buildings
 - ii. [Federal Sustainability Progress, Plans, and Performance](#): (Office of Sustainability, Council on Environmental Quality (CEQ)) Individual agency performance graphics and OMB Scorecards for Efficient Federal Operations/Management. Includes annual performance data on facility energy use, water use, renewable electricity, facility efficiency investments, high performance sustainable buildings, fleet petroleum and alternative fuel, GHG emissions.

- b. [White House Environmental Justice Advisory Council](#)
- c. The White House Environmental Justice Advisory Council (WHEJAC) has been established pursuant to Executive Order 14008, titled [Tackling the Climate Crisis at Home and Abroad](#). The White House council will not only bring greater visibility to EJ issues across the federal government but will provide EPA's [National Environmental Justice Advisory Council](#) (NEJAC) with an excellent partner for providing horizon-expanding EJ advice and recommendations to our government's leadership.
- Health and Human Services (HHS)
 - a. [HHS Office of Community Services - Low Income Home Energy Assistance Program \(LIHEAP\)](#): Helps keep families safe and healthy through initiatives that assist families with energy costs. We provide federally funded assistance in managing costs associated with home energy bills, energy crises, weatherization, and energy-related minor home repairs.
 - b. [HHS Office of Community Services - Low Income Household Water Assistance Program \(LIHWAP\)](#): provides funds to assist low-income households with water and wastewater bills. LIHWAP grants are available to States, the District of Columbia, the Commonwealth of Puerto Rico, U.S. Territories, and Federally and state-recognized Indian Tribes and tribal organizations that received fiscal year 2021 LIHEAP grants.
 - c. [HHS Office of Community Services - Environmental Career Worker Training Program \(ECWTP\)](#): Known as the Minority Worker Training Program until 2014, ECWTP focuses on delivering comprehensive training to increase the number of disadvantaged and underrepresented minority workers in areas such as environmental restoration, construction, hazardous materials/waste handling, and emergency response.
 - d. [NIH Environmental Career Worker Training Program](#): One avenue for training, with a focus on delivering comprehensive training to increase the number of disadvantaged and underrepresented minority workers in areas such as environmental restoration, construction, hazardous materials/waste handling, and emergency response.
 - e. [Federal Real Property Assistance Program](#): Public health benefit conveyance program whereby certain Federal surplus real property may be transferred to eligible organizations for public health and homeless assistance purposes at a discount, or no cost.

APPENDIX 4: SELECTED FEDERAL LEGISLATION AND EXECUTIVE ORDERS (EOS) ON ENVIRONMENTAL JUSTICE AND EQUITY

- Civil Rights Act of 1964, Title VI
 - a. Each Federal agency shall ensure that all programs or activities receiving Federal financial assistance that affect human health or the environment do not directly, or through contractual or other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin.
- National Environmental Policy Act (NEPA) of 1969
 - a. Federal agencies must consider environmental justice in their activities under the National Environmental Policy Act (NEPA). The Environmental Justice Interagency Working Group (EJ IWG) recently developed the report [*Promising Practices for EJ Methodologies in NEPA Reviews*](#), which is a compilation of methodologies gleaned from current agency practices. These practices were identified concerning the interface of environmental justice considerations through NEPA processes. Additionally, this page provides more resources to enhance environmental justice considerations in the NEPA review process.
 - b. [Executive Order 12898 \(February, 1994\) \(PDF\)](#), “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” (EO 12898) directs each Federal Agency to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations,” including tribal populations.
(<https://www.epa.gov/environmentaljustice/environmental-justice-and-national-environmental-policy-act>)
 - c. The White House Council on Environmental Quality (CEQ) issued [Environmental Justice; Guidance Under the National Environmental Policy Act \(December, 1997\) \(PDF\)](#). This guidance includes six principles for environmental justice analyses to determine any disproportionately high and adverse human health or environmental effects to low-income, minority, and tribal populations. The principles are:
 1. Consider the composition of the affected area to determine whether low-income, minority or tribal populations are present and whether there may be disproportionately high and adverse human health or environmental effects on these populations
 2. Consider relevant public health and industry data concerning the potential for multiple exposures or cumulative exposure to human health or environmental hazards in the affected population, as well as historical patterns of exposure to environmental hazards
 3. Recognize the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed action
 4. Develop effective public participation strategies
 5. Assure meaningful community representation in the process, beginning at the earliest possible time
 6. Seek tribal representation in the process

- Minority Business Development Agency (1969) (<https://www.mbda.gov/about/history>)
 - a. President Nixon signs [Executive Order 11458](#) creating Office of Minority Business Enterprise (OMBE) and the Advisory Council for Minority Business Enterprise.
- [Clean Air Act of 1970](#)
 - a. The Environmental Protection Agency, when reviewing environmental effects of proposed action of other Federal agencies under section 309 of the Clean Air Act, 42 U.S.C. section 760, shall ensure that the involved agency has fully analyzed environmental effects on minority communities and low-income communities, including human health, social, and economic effects.
- [Emergency Planning and Community Right to Know Act \(EPCRA\)](#)
 - a. The Community Right to Know provisions help increase the public’s knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety and protect public health and the environment.
 - b. The 2018 America’s Water Infrastructure Act enacted on October 28, 2018 amended EPCRA to notify the applicable State agency of any reportable releases and provide community water systems with hazardous chemical inventory data.
- [Executive Order 12898, Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations](#)
 - a. On February 11, 1994, Executive Order 12898 was issued to direct Federal agencies to incorporate achieving environmental justice into their mission.
 - i. “directs federal agencies to identify and address, as appropriate, disproportionately high adverse human health and environmental effects of their programs, policies, and activities on minority populations and low-income populations.” (<https://www.epa.gov/environmentaljustice/title-vi-and-environmental-justice>)
 - ii. Each Federal agency shall ensure that the public, including minority communities and low-income communities, has adequate access to public information relating to human health or environmental planning, regulations, and enforcement when required under the Freedom of Information Act, 5 U.S.C. section 552, the Sunshine Act, 5 U.S.C. section 552h, and the Emergency-Planning and Community Right-to-Know Act, 42 U.S.C. section 11044. [From [Presidential Memorandum Feb 11, 1994](#)]
- [Executive Order 14008, Tackling the Climate Crisis at Home and Abroad](#)
 - a. On January 27, 2021, the Biden Administration issued Executive Order 14008.
 - i. Sec. 212 Empowering Workers Through Rebuilding Our Infrastructure For A Sustainable Economy
 - ii. Sec. 219-223 Securing Environmental Justice And Spurring Economic Opportunity
- Justice40 Initiative
 - a. Interim Guidance (July 20, 2021, <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>)

APPENDIX 5: POTENTIAL PROCESS STEPS FOR COMMUNITY-FOCUSED COLLABORATION TO ADVANCE ENVIRONMENTAL JUSTICE AND EQUITY IN FEDERAL REAL PROPERTY MANAGEMENT

GSA's Public Building Service (PBS) Project Life Cycle Process (including sub-processes) could apply the following steps throughout the development of Strategic, Functional, and Technical Project Requirements. The following questions are part of one pathway for the development of the upfront programming process and are to be answered at the onset of a project. Responses to be evaluated during the design, construction, occupancy, and operations to verify EJ&E documented initiatives have been fulfilled and continue to be supported post-occupancy. Establishing a methodology for measuring outcomes has to be established at the beginning of the programming process in order to be compared to post-occupancy outcomes in a meaningful way. Ultimately the project is to sustain the on-going involvement of stakeholders over time including notification and reporting to stakeholders in a timely and regular manner.

At the onset of a project, each entity should have clearly outlined initiatives, priorities, and/or deliverables that specifically include the intended outcomes and their subsequent alignment with the entity's strategic plan as related to Environmental Justice and Equity. The strategic plan should include input from those with EJ&E expertise within an agency utilizing a Diversity, Equity, Inclusion, Accessibility (DEIA)/equity lens and provide a process that includes the gathering, vetting, and incorporation of community stakeholders that can provide additional feedback and perspective in the creation of inclusive environments and the impacts of a project on the community at-large. This includes but is not limited to the opportunity to incorporate and become part of the solution to meet community needs on a grassroots level that are relevant to the mission and proposed project. Inclusivity is the goal.

1. What is the Project Type and Project Use Type?
 - a. Example: Project Type: New Construction
 - b. Example: Project Use Type: Hospital
2. Who are the project end-users?
 - a. Identify all project end-users, both from the project and community perspectives.
3. What support services (PBS or Federal Acquisition Service (FAS)) are provided specifically to another federal agency to carry out their subsequent mission?
 - a. Building or space design
 - b. Building or space construction
 - c. Building or space leasing
 - d. Acquisition of site, building, etc.
 - e. Technology solutions
 - f. Sustainability guidance
 - g. Health and wellness (H+W) guidance
 - h. Environmental justice and equity guidance
 - i. Continue to edit/add additional GSA support services that can then be used to define the project mission within the specific geographic location and identify communities impacted.
4. What are the roles of stakeholders and collaborative team members that are part of the process?
 - a. Identify agencies and interactions that are representative of the project.

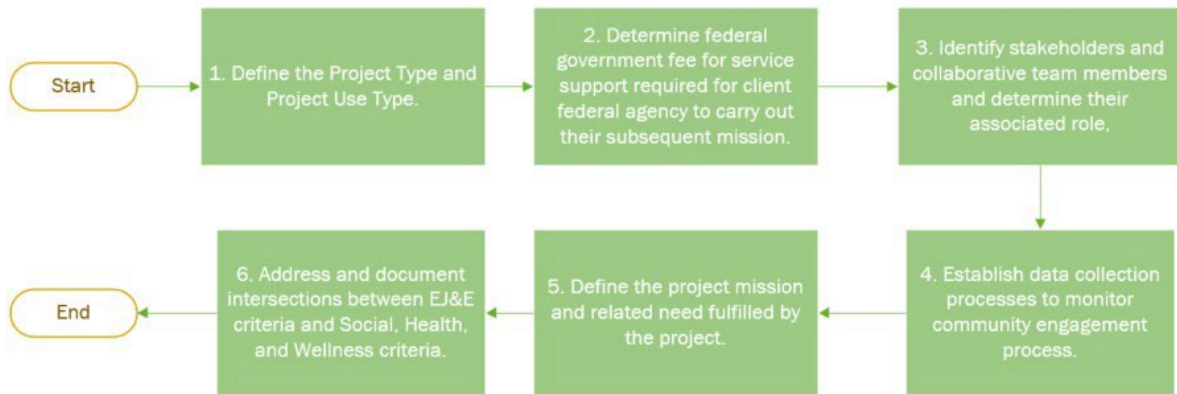
- b. Identify process, people, and product/service offerings that are related to the project.
 - c. Specifically include any persons with a role that has direct engagement, discussions with agencies at the strategic planning level (i.e., National Client Executives and National Planning) or those that engage with agencies related to specific projects and or requirements at the local level (i.e., regional client executives, regional planning managers, business analyst, regional planning managers, etc.)
 - d. Identify community at-large stakeholders that are impacted by the Federal project.
 - e. Identify community at-large stakeholders that can identify economic, social, and environmental needs in the community impacted by the Federal project.
 - f. Foster and hold dialogues between project representatives and community at-large stakeholders.
 - g. Document the dialogues to identify commonalities.
5. What is the collaboration process for identifying measurable outcomes and developing methods for collecting data to monitor community engagement processes?
- a. Identify the process steps to build and complete engagement processes.
 - b. Identify the process steps and approaches to customer/client/user interactions.
 - c. Document the process steps and approaches.
 - d. Complete publicly available schedule for collaborative meetings for all stakeholders.
 - e. Document the results of all collaborative meeting outcomes, specifically commonalities and required deliverables.
6. What is the project mission and related need being fulfilled by project?
- a. How does the project mission and related needs compare with the identified needs of the local community where the project is proposed?
 - i. Identify and document access or lack of access to services (e.g., healthcare services, energy efficient products and services, access to technology including internet services, etc.).
 - ii. Identify and document access or lack of access to alternative, green energy resources.
 - iii. Identify and verify access to clean, potable water.¹⁸
 - iv. Complete and document all testing or other methodologies used (e.g., community survey instruments, bio-monitoring, technological sensors, etc.) required to provide evidence supported outcomes.
 - b. How can both the mission imperatives and community needs be aligned in a congruent manner to fulfill community-based and project-based needs?
 - i. Document both the mission imperatives and community needs.
 - ii. Document and describe implementation of the mutually fulfilled needs by project design, project operation, and anticipated results.

¹⁸ For example, a case study: MASS design out of Boston completed a women's center in Africa with the purpose of improving both mother and infant mortality rates. As part of the analysis, it became evident that the community at-large did not have access to consistent, clean, and potable water. The women's center became a community center that included meeting the initial project need, but also contributed to improved public health overall through the reduction of water borne illnesses

- i. Measure on-going results to verify fulfillment of identified needs and publicly post.
- 7. Intersections between EJ&E and Social, Health, and Wellness / Required Considerations for all projects. Address and document intersections between EJ&E criteria and Social, Health, and Wellness criteria.
 - a. Identify ALL users, related operations, the needs, and desired experiences for each user of the environment (indoor and outdoor) in relation to the mission imperatives and the community at-large needs.
 - i. Identify and document opportunities for workforce development.
 - ii. Identify and document needs for hiring local utilizing resources within the community at-large (e.g., Chamber of Commerce, etc.).
 - iii. Identify training/education gaps and any barriers to workforce development (i.e., substance treatment access, healthcare services access, availability of healthy food, transportation issues, etc.)
 - iv. Include all opportunities for community improvement that could be addressed by the project mission's imperatives.
 - 1. Evaluate the inclusion of as many community improvements as feasible with written descriptions included for those items identified but excluded from the project and those included in the project.
 - 2. Develop preliminary budget that supports initiatives identified as feasible for inclusion within project.
 - 3. Develop listing of excluded items and review potential community-based fulfillment.
 - b. How will the built environment support organizational, technological, and community needs?
 - i. These are based upon the identified community needs from an operational and end-user perspective.
 - ii. Identify how the built environment will support the operational and end-user needs.
 - c. Provide a layout and design that enhances operations, satisfaction of all users, environmental sustainability, health and wellness, and related community needs.
 - i. Complete descriptions for each area of design that accomplishes the needs outlined.
 - 1. Provide the physical building elements that support the needs.
 - 2. Provide the furniture, fixtures, and equipment (FF&E) elements that support the needs.
 - ii. Provide description of 'gaps' that were not accommodated but are solved/met through other community or project means.
 - 1. This aligns with the identification of what identified items are included and what have been excluded based on feasibility of the project.
 - 2. Identify all items that can be supported through alternative means or partnerships to complete identified fulfillments of needs that have been excluded based on feasibility of the project.

- iii. Provide description of ‘gaps’ that are not met and future opportunities to solve/meet needs.
- d. For all designs, the following shall be addressed:
 - i. Use, availability, and control of natural light and illumination to support health and wellness, i.e., circadian systems (entrainment) – referenced back to SFTool (<https://sftool.gov/learn/about/577/circadian-light>)
 - ii. Views of and access to nature and outdoor space.
 - 1. Evaluated on a community basis (e.g., if a local park is accessible to the community and local school and, subsequently, connected to a Rails for Trails program, etc.)
 - iii. Signage and wayfinding that addresses low-vision, culture, clarity of access, acoustical requirements, hearing-challenged, and integrated with the community at-large.
 - iv. User control of the environment – controls and access to services, amenities, housing, workforce development/education, etc. Identify how technology integration supports and/or fulfills the community identified needs.
 - 1. From the listing of needs – define the various user controls that can be included within the project.
 - v. Privacy and confidentiality – identify how the project will provide privacy and dignity based upon the users and related cultures represented within the building and the community at-large. Identify the partners within the community that provide support to users.
 - 1. Define privacy and confidentiality in relationship to the users, operational functions, and use of all spaces – e.g., entrance process, exit process, disclosure of personal information, dignified and equal opportunity to access private space in a safe environment.
 - vi. Building material selections – based upon performance requirements and appropriate application for the specified location, but also inclusive of promoting independence and not creating issues that are limiting in any way to physical accessibility, independent movement, mobility – e.g., addressing aging / population demographics (users), those with visual impairment, limited cognition, etc. Including health & wellness, environmentally preferred and minimization of toxic emitting alternatives, and sustainability / performance as part of the material selection process. (<https://nems.nih.gov/environmental-programs/Pages/Substances-of-Concern.aspx>)
 - vii. Safety and security – evaluation and provision of technology solutions and identification of the risks / benefits of site, building, access to services, etc.
 - 1. Verification that technology and internet services are available within the community.
 - 2. Provide technology and a means to gain access to the internet for the local community.
 - 3. Identify and fulfill gaps in safety and security within the local community.

- 4. Address educational programming identified to support safety and security of the project and the local community.
- viii. Cultural responsiveness – identify opportunities to include cultural responsiveness and inclusivity within a supportive environment. Engage the community in identifying appropriate cultural design elements and operational polices that supportively respond to the local community.
- ix. Person-centered / individual focused community models – identify individual needs and community-based needs for incorporation into the overall project. Evaluate the Federal project and community commonalities and create and implement a plan to fulfill needs through the completion of the project, itself, or identify and engage with community partners and resources to fulfill identified needs for individuals (e.g., access to transportation for appointments) and community at-large (e.g., access to a public park).



APPENDIX 6: NAACP TOWN HALL SUMMARY: ENVIRONMENTAL AND CLIMATE JUSTICE VISIONS FOR FEDERAL BUILDINGS

The NAACP CESBS Initiative (Centering Equity on the Sustainable Building Sector) organized a NAACP Townhall focused on Environmental & Climate Justice Visions for Federal Buildings and invited members of the GBAC EJ&E Task Group and NAACP members to participate. The NAACP Townhall was held remotely (following pandemic guidance from the CDC) on August 19, 2021 from 4-6 pm Pacific time (7-9 pm EDT). NAACP facilitated several breakout groups focusing on the four questions provided below), which used interactive message posting (i.e., jamboards). This summary is the content of the jamboards for all breakout groups, consolidated by question.

These notes are an effort to capture the input provided by attendees to the town hall, and as such, may or may not represent the viewpoints of the members of the task group, committee or GSA.

Summary: Thematic Groupings by Questions

1. How can the Federal Government set the example for the rest of the country for sustainable and equitable development?

Sustainability

- Adopt and align with the Just Transition framework for how we shift from an extractive economy (rooted in practices of extraction, exploitation, domination, militarism, and so forth) to a living & regenerative economy (rooted in cooperation, wellbeing for all, caring for the sacred, and deep democracy)
- Modify all properties and buildings with the most up-to-date and current best and most sustainable practices.
- Ensure that federal buildings include sustainable designs. They can mandate and fund sustainable practices as an example for others.
- Mandate a building-grading system that designates how sustainable the buildings are.
- Make 'Green' development standard.
- Revisit all existing processes tied to building design, and land use to include sustainable, regenerative and restorative solutions and requirements. Ensure human-centered design is considered an integral part of how GSA defines sustainability.
- issuing guidelines for the construction of buildings in general and overseeing building projects

Engagement

- Those who are often in harm's way should be in the driver's seat when we think about the built environment.
- By engaging in public discourse with peoples that may be impacted by development before the parameters of development are defined
- Ask people that are not included in the room or at the decision-making table what they need to make it "equitable" by addressing their needs.
- Host neighborhood listening sessions where federal buildings are located about community needs. Be sure to make sure BIPOC groups are in attendance.
- more people should be involved in decisions the government is making.

- Making accessibility for BIPOC and poor easier when it comes to engagement, and finding out what communities need, rather than assuming.
- Collaborate with the community
- Develop a set of processes for frontline community engagement in design,
- Determine community priorities and update/ construct buildings at serve the community
- What resonated for me was the HUGE positive opportunity for an impact the GSA can have, especially if there is investment in ongoing dialog with surrounding communities.

Acknowledge Failures

- Acknowledge the foundations of the American economy and government built from murder, displacement, theft of land, theft of people, and theft of labor
- Acknowledge how GSA has failed BIPOC communities
- Take accountability by acknowledging the role that government has played in harming underrepresented and communities and making a commitment to correct it.
- Examples: As part of the extractive economy, the ways that so many of our buildings were made were through the enslaved labor of Black people. Examples: White House, U.S. Capitol, the house of George Washington, Wall Street (named after a wall built by enslaved labor and used to be location of one of the largest slave markets in the country in the 1700s), Smithsonian Institute (red sandstone quarried by enslaved persons).

Choosing Projects

- By clearly identifying which buildings are targeted for improvements and what those improvements are.
- Create and share a clear concise list of social/environmental/climate justice issues at different scales of development: urban planning, buildings, landscapes, interior renovations, etc., so that others can learn and implement them.
- Prioritize retrofits and rehabilitating existing buildings in frontline communities without increasing rent/ cost of living (prevent economic and cultural displacement from gentrification)
- Rural communities can and need to be included and seen, even if they are a bit away from the development

Communication

- Lead by Example. Amplify & showcase public hearing opportunities with media blitz, including social media along with print and electronic outlets
- Communicate more explicitly about the importance of this work
- Clearly share with the public how GSA will implement Justice40 and meet the Biden Administration's emission targets by 2030 and 2050.
- Organizational structure is important. More clearly communicate the roles of different departments of GSA that create and implement policy.
- Does GSA have a speaker's bureau that might interact with local NAACP chapters?

Funding

- Make sure that all funding is distributed equally as well as in underserved neighborhoods.
- More funding toward green projects. or incentives for these types of projects.
- spending should be used on projects that are more impactful for communities.
- The government could put in their budget about building infrastructure, Energy Efficiency, installations.

- Dedicate funds

Economic Opportunity

- Give businesses access to contracts to historically and unconstitutionally denied BIPOC communities. Create an equity measurement tool (i.e., Oakland, Ca) in contracting to ensure frontline businesses are at the forefront and at the decision-making table.
- Development of our people - our people are willing to work and make sacrifices, there is a need to create a narrative of investing in people and not in things and bring people together
- Create strict MBWE requirements for all procurement
- Require % of the workforce for the construction of Fed buildings to come from the local communities
- Require community engagement with BIPOC communities when developing any new facilities.
 - Make sure community is aware of these opportunities, and people should be paid for their labor to sit at the table
- The federal government should provide benefits such as jobs, internships, partnerships and the opportunity to work directly with the agency on pending and future building projects

Coordination

- Federal agency hub or coordinator to align multiple agency efforts in capital improvements with local community.
- Reposition govt programs over a period of time
- The NAACP collaboration with GSA is a start and would become a model for other agencies of the federal government that deals with development. Develop a plan and follow with focus on policy and remedies as it relates to equity.
- The federal government should be very generous in providing remedies of all kinds by using its relationship with developers, banks and others to provide incentives for home ownership to African Americans.
- Unifies states so that each state doesn't have their own goals/discrepancies between more liberal vs more conservative states

Access

- Shared resources - e.g., auditorium, large dining facility, large conference room that can be shared w/ community
- Providing accommodations to those who are blind or deaf or have other needs
- Specialized assistance - building operations sensitive to needs
- Welcoming, inclusive staff - emphasis on people with special needs
- Accessible for drop off (e.g., for different weather conditions, different physical needs)
- Accessible to public; engaging, new building appearance; welcoming / welcomed by staff
- Public spaces that do not have anti-homeless architecture.

Urgency

- The federal Govt needs to put their money where their mouth is - consistency - Just DO It
- Generational equity - look at not passing on environmental disasters to future generations

- Community engagement as soon as possible.
- Using the highest standards for sustainable and equitable development - pushing the envelope rather than doing the bare minimum or status quo

Leadership

- Share Data
 - Release data about information supporting sustainable and equitable practices for local and state governments to follow
 - PUBLICALLY release equity and sustainably info about their building portfolio
- implementation, and evaluation, with decision-making authority throughout all processes
- Lead By Example
 - Be truthful and set an example to guide communities through National efforts and not by individual states.
 - Practice what we preach: dramatic reductions in emissions, publicly disclosed; adaptation and resilience connected to the communities in which we work.
 - Show examples by building in accordance with environmentally sound designs: avoiding AC and using renewable energy sources, like solar panels
 - Setting the example of not using extractive energy sources to power buildings All buildings should be net-zero energy.

Energy

- Renewable Energy/Electrification
 - Prioritize renewable energy, electrification
 - High performance buildings mandate- net-zero carbon buildings, net-zero energy low-income housing, new and retrofits
 - Ensure that all federal building's energy is sourced from renewable energy
- Emissions/Decarbonization
 - Offset Carbon emissions from buildings and/or occupants

Intersectionality

- By making its portfolio of buildings green. Not only in the now well understood ways of energy efficiency and renewable generation, but also by means of location choice, equitable access, and being a good neighbor.

Intergovernmental

- Meet and exceed UN Sustainability Development Goals pertaining to Equity

Specific Solutions

- EV
 - Shared EV charging stations
- Solar:
 - Install solar panels on all federal buildings.
 - Solar the primary energy source for lights, heating, etc.
- Transit:
 - Be a part of transit hub - both promoting public transit and taking on maintenance
 - Balance ample parking with plenty of green space and trees
- Pilots:

- Build a series of pilot projects that embody what sustainable equitable development looks like.
- Green Space:
 - Identify green space - roof top gardens etc.
- Micro-Grids:
 - In particular foster the creation of community-based microgrids that will collectively improve the grid reliability locally and nationally, and provide greater local control over power decisions.

Residential

- Provide more funding to upgrade homes with impact windows/doors/electricity etc.
- Should make sure electrical powerlines are not located near residential homes

Miscellaneous

- Clarify terminology - there is some confusion about "Environmental Justice" and "Climate Justice", so agreed definitions would be very helpful.
- Fiscally responsible - look at budgets annually - the govt must spend every dime - the government must practice what they preach - Zero based budget is a bad idea - Don't like affordable housing - creates lack of ownership - digging further deeper into the hole.
- Top should set the tone for what we're doing. Address key issues rather than being political.
- Waste not. want not. meet our own needs without compromising the future generation.
- The federal government has been very involved with our community because we live right outside the base and their children attend this school district.
- The federal government has been very involved in my community because we are right outside the post and their children attend our schools.
- No new non-community serving intuitions. The most sustainable building is the one that is already built.

2. How can the Federal Government be accountable to Black, brown, low-income, and other frontline communities¹⁹ when they are planning a new project or changing an existing Federal building?

¹⁹ Frontline communities are groups of people who are directly affected by climate change and inequity in society at higher rates than people who have more power in society. They are “on the frontlines” of the problem. For example, people of color, people who are low income, who have disabilities, who are children or elderly, who are LGBTQ, who identify as women, etc. have less advantages and access to resources in our society than other people. In the context of climate change, frontline communities’ health, income, and access to resources is less than people who have social privilege (people who are white, upper middle-class or upper-class, able-bodied, in middle age ranges, heterosexual, nontrans, etc.). In other words, people who experience oppression because of race, income, gender, sexual orientation, disability, gender identity, age, etc. are more likely to have less resources and protections in our society in general and even less access to resources and protections not only to adapt to our changing climate but also to pass policies and legislation that are fair and culturally significant. (NAACP Environmental and Climate Justice Program)

Engagement

- Stakeholder engagement
- Include Community Representation in the Planning Process...Be intentional. Include regular citizens/residents in the conversation and planning
- Engage BIPOC communities in the planning and design of these buildings
- Early Engagement
 - Show interest in the community before an asset model comes up, they should help to activate that community - be active in the community beforehand. Add to the community through funding programs.
- Upgrading existing community infrastructure as a part of GSA facility construction or upgrade.
- Include the communities (not just govt. users)
- Host neighborhood listening sessions where federal buildings are located about community needs. Be sure to make sure BIPOC groups are in attendance. Set goals and make these goals visible to the neighborhood.
- Have meaningful and deliberate engagement with local community throughout the process
- Be mindful of context of community (e.g. high-rise in the middle of suburb); what the needs of the community are
- Speak to local rec centers, NAACP chapters, public housing, local churches, and other local organizations
- Working with technical schools or high school to build up local knowledge / skill set
- Engage communities in the decision-making processes.
 - By asking question like what minorities have need of in their community
- Community Approval:
 - First, they have to get community sign-off before any projects happen.
- Meet people where they're at - connect at churches, schools, town halls, etc.
- Engage community from the beginning - not part way through a project
- Having representation on planning boards would be helpful, too.
- Considering how a project will impact a neighborhood instead of writing off certain communities
- Regularly convene BIPOC communities to iterate and improve relations, versus just a transactional relationship.
- By meeting with minorities groups and listening to what they have a need of. Town hall meeting, etc.
- Power sharing with local communities. Cede Power and follow the direction of the local communities.
- Make sure you speak the language of the people. Make sure everyone can understand.
- Assess the needs of the communities and determine the resources needed to improve the conditions and livelihood of the community.
- It's always morally advisable to discuss all plans with all groups affected directly or indirectly by building projects.

- Provide multiple opportunities and methods for participation--not just at the beginning; all the way through the project
- Timing
 - CENTER BIPOC community voices BEFORE the design phase of the project. What does the community want to see in the project?
- Frontline communities should be included in discussions. Not leaving them out of the discussion. Especially if the project is in their community.

Reparations

- Reparations, citizen-participatory, and equity led methodologies that empower BIPOC communities to make their own decisions.
- Power-sharing with local communities. Cede power and follow the direction of local communities. Examples of what communities might want and need: Bring jobs and contracts to local communities. Identify green space and rooftop gardens. Create a safe environment and water for the community.
- Measure and follow whose pockets the dollars actually go into. Are they a local BIPOC-owned, small, or women-owned business?
- The fed govt can be accountable to BIPOC, front-line communities by having fair, equitable voting laws and processes
- Giving preference to small and disadvantaged contractors for federal contracts. Work with local communities to identify areas in need of development when new federal construction is funded.
- Ensure equitable access to the business of designing, planning, and developing Fed buildings.
- in black and low-income communities there are highways that obstruct community access to major resources. - Solutions are how do we remove these highways.
- Low- and moderate-income housing should be provided
- Diversity in the design team who will think about the community along the design process

Compensate Community Members as experts

- Pay people from the community to be involved at every step of the planning, development, use of, and deconstruction of the building/construction item.
- While they have the input of BIPOC communities, they need supply funding for the community members for their thoughts and expertise.
- Provide resources in the form of funding, tools and investment communities so they can become self-sustaining.

Decision-Making Power

- Black, brown, low-income and frontline communities should have a seat at the table, with decision-making power, not just participation, but actual collaboration.
- Bottom-up decision making process. Jemez Principles.
- Members of community sit on actual planning and decision-making board

Communication and Education

- By engaging in very visible public discourse with peoples that may be impacted by development before the parameters of development are defined. Meeting people where they are.

- Make all information readily available and host workshops to help individuals become more familiarized with programs.
- Communicate that a project is happening to the community. This work should belong to GSA to make sure there is community awareness, rather than expecting people to find out through channels of communication that do not reach the community.
- I suspect that publication alone won't do it; one reason why some communities are negatively affected by projects is that they do not have the power to make changes in local administrations.
- Make all the processes public in the way that local communities publicize information-- not the Federal Register only
- More opportunities to learn like the NAACP Town Hall: Fundamental acknowledgement that NAACP members are here to learn and take in information from one another. Become more acquainted with the challenges and opportunities associated with this work. Here to learn as much as they are excited to contribute ideas. Even for those of us who are so dedicated to doing this work in our communities, we are all still learning and growing.

Prioritizing

- Prioritizing contracts to local, BIPOC/women-owned businesses
- Contracting with local firms

Create and Enforce Requirements

- NEPA- Requires community engagement
- The construction and contractors should have designated contracts for local specifically Black contractors should be required to hire Black individuals and once its constructions then the Federal government should train and hire community members

Track and Report Performance

- Make sure Black and Brown BIPOC reap the benefits of good jobs, economic development, cleaner air and water to repair historic injustices.

Site Selection

- Look at how locating a building could benefit those communities most impacted.

Access

- Natural disaster shelter locations, access to shelter-in-place structures/systems.
 - Natural disaster shelters, above or below ground, for resiliency. Where are shelters located? Are they accessible? Does the community know that shelters exist? Government is always looking at the resiliency of the asset, the building itself, especially for new building projects. But due to climate change, natural disasters are going to be prevalent. Katrina was an example, and the Superdome was not necessarily a shelter. Looking at the Federal portfolio, does that system begin to play that role of resiliency and safety for communities?
 - during disaster - local residents should be hired for disaster relief - Sandy is a case study of how it should not be done
- Ensure dense city populations have access to parks and outdoor recreation. Have development projects help the residents of a community and the environment and wildlife

Coordination

- Federal Govt should reach out to trusted partners - such as clergy, NAACP, Climate Justice Alliance, Indigenous Environmental Network, and other organizations that frontline communities do trust.
- Timing
 - Meetings should be held when community members who are working can attend.
- Create advisory boards
 - - that can give input and make sure there is diversity and all members of the community are represented. Different advisory boards for different departments - different groups for different skillsets
 - They can seek local input and representation in the process and on the project(s).
- Be a sustaining, long-term, and reliable community resource; distribute goods and services
- Establish a partnership with the community for providing sustaining, deliberate support
- Think beyond the building - funding for community organizations
- Urban Sustainability Directors Network could be a good ally: The work happening at the Federal Govt level is also happening at the local government level in cities across the U.S. Much of this work is happening through the Sustainability and/or Resilience office/dept.

Economic Opportunity

- Love the concept of a fed building providing community service on many levels and offering benefits both environmental and to local residents and businesses - organically entwined with the community it is situated in.
- Employ local workforce
- Utilize significant numbers of minority designers, engineers, contractors and other team members.

Housing

- Commit to affordable housing and be sensitive about not triggering displacement

Set Goals, Targets and draft agreements

- Have clear list of social, environmental, and climate justice issues and solutions that will be addressed in federal buildings
- Clear targets and goals for minority hire and supplier development
- Make outcomes very clear (e.g., # of residents, impact on home prices)
- Have an agreement between the community and the building owner / fed gov't: community benefits agreement

Track and Report Performance

- Assess and minimize environmental impacts (air, noise, traffic) of the building construction and operation
- Evaluating project 'success' should include metrics/accountability for demonstrating the projects do not harm Black, brown, low-income, and frontline communities
- pursue data about the experiences of BIPOC/low-income communities related to their projects
- Performance metrics established by community so there is an opportunity to track and monitor

- Equity Energy Project has equity metrics coming out:
<https://energyequityproject.com/about-us/>

Leadership

- It starts with our elected leaders
- Change or shift paradigm that Government at local, state and federal level where value is placed on black and brown communities.

3. What kinds of benefits should Federal buildings provide to neighbors from frontline communities?

- **Shared Spaces**

- Provide Community shared Event spaces
 - If possible, they should have a sponsorship budget for local community events and activities to support and build community.
 - Safe environment for families. Provide them with adequate resources such as public space, recreation and education for the children, public hearings and town hall meetings. Listen to the needs of the residents in that community and address those needs
 - Community Recreation centers
- Public spaces
- This would vary depending on the community's needs. In a small city, the building may use interior space specifically designated by the community-- a community center, bodega, convenient care health services, free sharing libraries, etc. For a large city, emergency shelter, cool/heating areas.
- Have the building provide a purpose for the community outside of its Fed operating hours. For example, a Fed. building may be open from 9-4:30, with employees in there from 8-6. The building could be used for another purpose by community members and/or organizations in the evenings (meeting space, activity space, classes, etc.)
- Training locations and community centers
- Parks and playgrounds; provide public greenspace
- Shared space (e.g. auditoriums, training rooms, kitchens)
- public benefits - green infrastructure (trees, parks, etc), transit; economic benefit - jobs, workforce development, training opportunities
- Hours that reflect the communities' needs and accessibility. Maybe not just M-F 9-5 business hours.
- public gender- neutral restrooms
- Post offices could become very handy in providing financial services to their surrounding communities. Every American regardless of any differences should have access to financial services to avoid finding ourselves in a debt trap. If we could change a few laws to ensure post offices can do this for us, it could be transformational.

- **Resilience**

- Shelter from heat and cold and extreme weather

- Fed buildings become "[Resilience hubs](#)" during disasters, providing critical services for energy, water, food, ice, etc. City of Orlando has an example in development.
- Resilience shelter in event of storm, smoke, flood, etc.
- Shelter in dire situations (Katrina, Sandy, etc.)
- Safe space + services - vaccination site, heating/cooling center, youth programs, educational programs
- **Parks**
 - Upgrade local parks
 - Parks, community gardens
 - Gardens lead to access to fresh food, educational access to gardening techniques...and more quality of life opportunities with the community (potential development of other programs, e.g. youth carpentry).
 - Planting fruit orchards and natural landscaping (green infrastructure)
 - Space for local food growing
 - Green space and access to restorative aspects of nature
- **Infrastructure**
 - Upgrade Community Infrastructure...i.e., plumbing, electrical, food services
 - basic necessities - clean air, water, food, park/rec area, health services
 - Ensuring basic fundamentals are part of the building benefits - food access, water quality, education, housing plan, training, jobs.
- **Cooling**
 - After the UN report - on the climate - they should add a cooling element - green roof - cooling rooms - a model on how we have sustainable practices - something we can all get behind.
 - GSA buildings could operate as cooling centers during extreme heat for community members
- **Green Space**
 - Providing Green Space Access to Local Communities
 - Urban Reforestation
 - Increasing Tree Canopy
 - By installing rooftop gardens, they can reduce urban heat island effect in the area. Also, these gardens can provide healthy locally grown food to the employees and/or the local community.
- **Economic Development and Opportunity**
 - Jobs, programming, resiliency hubs, design & construction, training for frontline communities, decision-making processes that citizen-driven, AI & machine learning training.
 - Job creation for local people in and around that community
 - Hire local workforce and development (employment)
 - Programs
 - Make federal buildings have community benefits like:
 - Business planning and incubation support-

- Mentorship (formal and informal) to support growth and connection–
 - Vocational training in energy, sustainability and real estate–
 - Make federal buildings have community benefits like:
 - Apprenticeship program to create pathways to careers–
 - Community technology pilots that highlight emerging opportunity–
 - Paid Internships for local students --Cooling centers
 - Sponsorship of community-based organizations
 - Volunteers
 - Support local businesses
 - Jobs, education for adults, training for jobs that they offer
 - Find ways to address underrepresentation in design firms and other sustainable building professions, including diversifying the pipeline of future leaders through higher education and K-12 design programs.
 - Opportunities for employment
 - Bring jobs to local community - who receives the contracts, access to jobs.
 - Jobs for the community...construction as well as jobs once building is complete
 - When new projects are planned in communities - the government can offer concessions to developers to ensure local and small businesses are a part of the project. For example - subcontract to a minority owned businesses
- **Community agreements.**
 - Look at the needs of the communities to start to look at reparation and immediate needs
- **Collaboration**
 - Partnership with federal departments like FEMA to build resilience hubs and/or natural disaster locations.
 - Community associations that are linked to the business concept
- **Don't forget Rural areas**
 - may not be close to a Federal building development.
 - Make sure rural areas and frontline communities impacted from historic harms are included in design and decision-making and BENEFIT from any federal investments.
- **Air Quality**
 - Monitor local air quality and work with other agencies to improve and remediate pollution in frontline communities.
 - How have air filtration systems been upgraded due to the advent of COVID 19?
- **Free Wi-Fi in/around community centers**
- **Better building material selection**
 - with respect to chemicals of concern avoidance from manufacturers extracting/producing toxic materials in fence line communities...an indirect impact that can be made in building material selection/installation in projects.
- **Transportation**
 - Easy access to transportation, on-site child-care for staff, cafeteria for affordable healthy food options, sustainability as part of national standards and composting

- **Location**
 - Survey the communities need for what they need in the community such as a SS office, unemployment office, services - Design should be a consideration - opportunities - for private minority business owners - Dentists, Central to the community
- **Charging stations**
- **Maintaining** the buildings, keeping them full, to help surrounding businesses and communities benefit from the activity.
- **Enhance Health**
- **Community Solar**
- **Educational programs**
 - Some federal buildings provide education.
- **Avoid Harm**
 - They should avoid causing any of the local issues created by buildings, such as heat island effects, poor air quality, etc. And, if possible, be regenerative to help remediate those issues.
- **Track and Report Performance**
 - Ensure gaps between intent and strive for and reality of what actually happens are addressed
- **Energy**
 - Load sharing for energy; for example, rooftop or canopy microgrid that can power surrounding homes/small businesses.
 - Increased community stability and affordability of energy supply.
- **Housing**
 - I wonder whether public buildings might not also include additional low-cost housing, instead of so-called projects without sufficient respect in the community.
- **Child Care**
 - Child care that is safe and affordable.

4. What should truth, reconciliation, restoration, and environmental justice look like for historically oppressed communities affected by Federal development practices over time?

- **Reparations**
 - Restoration that will directly affect the communities impacted.
 - Helping communities that were harmed with federal projects that might connect communities previously divided by a highway, for instance.
 - Reparations in the form of equity in terms of resources
 - There should be reparations for all affected groups. These might well be in the form of accessible housing in parts of buildings that the government builds.
 - Investment + Revitalization alongside development
 - All future projects should include community-based remediation of past injustices

- Example: If one looks at the extensive loss of farmland from Black farmers in relatively recent times, the matter of restoration takes on tremendous dimensions that the government might take on.
- Reconciliation & restoration should look like free access to green technology like community owned solar and free home weatherization/repair programs in neighborhood homes
- Be neighborly. Not just looking at the building but also identifying some buildings in the community and upgrading those. Use that vehicle as a way to do good community engagement and establish good rapport. Identify and understand some of the federal investment projects, such as the interstate highway system, and their long-term impact on some communities. Be intentional about investing in those communities that have degraded and become segregated based on those actions - electrical, plumbing, social services.
 - Reinvest all savings from improved efficiency in Federal buildings into community improvements
- It is very important that we do not forget and really push for creative reparations. All of the things we have spoken about are creative reparations, ways in which African Americans can be compensated for the historical and unconstitutional denial of access to federal programming. Citizen participatory methodologies that are equity-led, such as the model of the West Oakland Environmental Indicators Project. We bring disinvested residents to our organization for a community-led process. We are all here, and this is all a learning process. Community Building Agreements. Belonging space where diversity, equity, and inclusion creates a space where I feel comfortable being who I am and I can bring forth my empowered decisions about what I think my community needs. Disaster centers - I am part of the Climate Reality Project. In my grandmother's rural community, they have a resiliency hub through partnerships with FEMA. That empowered me to come back to the urban core and create that kind of hub. When we encounter these climatic disasters - fire, flooding, power outages, people know where they can go and know they will be taken care of. We will not have the repeat of what happened in New Orleans with Hurricane Katrina. Black, brown, Indigenous people of color live in the less infrastructure parts in all communities in America.
- **Housing**
 - Low-income + subsidized housing owned by HUD should be upgraded to current/more resilient buildings
 - Hold landlords accountable: bring federally owned housing up to snuff
- **Education**
 - Include the Public schools in low-income neighborhoods in this conversation
- **Water Infrastructure**
- **Cooperation**
 - Centralized and intentional effort at the Federal level to empower our citizens, especially our Black community, which has been disenfranchised over many decades. As we grow and build, we need to hear from and empower our communities to be the builders themselves and give their insight. If we are going

to be spending federal dollars, we need to invest in our people so we invest in the asset that built the nation in the first place - the Black community. Invest in us again but in a positive way.

- between all federal agencies like FEMA, EPA, and energy as well as coordination with state and local governments to resource and support grassroots community leadership in order to bring justice and equity at local levels to frontline communities through citizen-led processes.
- GSA regions should collaborate closely with EPA regions given their geographic alignment
- Interagency cooperation to meet needs of the frontline communities; example provide resources to meet needs
- Citizen-led programs as restoration
- Collaborate with State Department to ensure equity is emphasized in federal buildings abroad - embassies/consulates
- **Health Care**
 - Free health care for those who have been negatively impacted
- **Listen**
 - Ask the community for what they want and follow through with supporting their needs.
- **Acknowledge Historical Problems**
 - Redlining, EJ, and state what and how you are going to do about that.
 - Take in consideration a historical index that captures historic disinvestment, discrimination, disenfranchisement, redlining, & the fact that BIPOC and lower-income communities tend to be in the shadows of harmful emitting facilities.
 - First, an acknowledgement of what federal development has done to hurt these communities. This history is not well known.
 - Acknowledge the cause for injustice and create policies and rules to not permit them to happen again
 - Reparations and acknowledgement of policies that created/continued racial inequities.
 - Recognition of buildings that were in red lined areas - publicly available. and current state of those buildings (compared to buildings in non-red lined areas)
 - A permanent manifestation of acknowledgement of the native American history should exist in the building both inside and out to honor the people of the land upon which the building sits.
- **Access**
 - Free access to energy efficiency like community solar and home weatherization in neighborhood homes
- **Safety and Health**
 - Safe environment and water for the community
- **Location**
 - I've always wondered why people who consume most do not live near the dumps that this overconsumption generates. All areas where people live should have equally healthy environments.

- **Resources**

- Citizen-participatory methodologies where BIPOC are impacted the most by climate change and environmental hazards (air pollution) are empowered to make their own decision. AB 617- a community-led project where the citizens articulate their needs-self-determination in a belonging and equitable, diverse, and inclusive environment.
- Local Governments sustainability peer-network, USDN, created a guide and toolkit for equity in buildings. - <https://www.usdn.org/projects/equity-in-buildings-framework.html>

SOURCE: Original Town Hall Jamboards & Notes

1. Full recording available here:
<https://drive.google.com/file/d/1D7nClrTVobOGuWnkOv0YNhXQwQkYkBnb/view?usp=sharing>
2. Member comments from each breakout group can be found in the Jamboards below:
 - <https://jamboard.google.com/d/10z-czdQEozH38r8z2Y-kETiD2who7O30yX9pFxJnF5l/edit?usp=sharing>
 - <https://jamboard.google.com/d/1uu64yVMYWuINvt0aU0rmpfdlf8vHQhCWexjW-Q1Vcy0/edit?usp=sharing>
 - <https://jamboard.google.com/d/1jUtZ296m-TMzbp6zwKWxd4mP1Cponaxoqnc16nlaGhw/edit?usp=sharing>
 - <https://jamboard.google.com/d/1EhFNL-9WG4N4yVNnEbrEmcEUjWQvO0Kt6u0W5dEv024/edit?usp=sharing>
 - <https://jamboard.google.com/d/1P3UV5BI7jf79kR0rAS1n-DzIKsd3UpRhmdJPxrnBHQ/edit?usp=sharing>
 - <https://jamboard.google.com/d/1bSnfbbh83BTgg7dT-9bqLghwZc9PAS4sb5oktBhiCYg/edit?usp=sharing>
 - https://jamboard.google.com/d/1kzd-8Nch2l8s0L8LM7Us_1QfXC2FnuPsKFleLqtVpac/edit?usp=sharing
 - https://jamboard.google.com/d/15trfnBrt_9axJ32S4SJFf8E75EBEwPqOfM-fzd-P034/edit?usp=sharing
 - https://jamboard.google.com/d/1ZgvHUqCg2eXqPxloVc4tul9BEOzBNaTLw4D_wVRy98o/edit?usp=sharing
 - https://jamboard.google.com/d/12Uhk1h7dei8SZkmxzmqaYEIGw-KKn819JsH3_yY0zX8/edit?usp=sharing
 - <https://jamboard.google.com/d/1w1hc1yLMaZ84-kl3AVffMH0awlVcbj9vZur43cYojs/edit?usp=sharing>
3. Abbreviated Town Hall Remarks from Jacqui Patterson, The Chisholm Legacy Project Just Transition Framework: <https://movementgeneration.org/movement-generation-just-transition-framework-resources/>
 - Strategy framework for how we shift from an extractive economy (rooted in practices of extraction, exploitation, domination, militarism, and so forth) to a regenerative economy

- We give our land acknowledgements often because, despite the romanticism around the Founding Fathers and religious freedom, we know that what actually happened is people coming and murdering, displacing, stealing land, boarding ships, thieving of Black people who were brought here. That is the economy that has existed from the time that this place became called United States of America.
- A challenge is that from that time to now there is this notion that in order for some people to thrive, then other people have to be oppressed.
- For all of us to thrive, which is very possible, we need a living economy rooted in regeneration, cooperation, caring for the sacred, and deep democracy. We have a world of abundance. The very essence of Earth's systems is regenerative. They were designed to continue to recreate all that we need.
- Just Transition forms the basis of the work of the NAACP Environmental and Climate Justice Program and so many on the front lines of climate justice around the world.
- How we see the Just Transition Framework and Principles apply to government buildings and racial justice
 - As part of the extractive economy, the ways that so many of our buildings were made were through the enslaved labor of Black people. Examples: White House, U.S. Capitol, the house of George Washington, Wall Street (named after a wall built by enslaved labor and used to be location of one of the largest slave markets in the country in the 1700s), Smithsonian Institute (red sandstone quarried by enslaved persons).
 - The very basis of our capitalist economy is through enslavement. We have to think about just transition in the context of that history. Just Transition doesn't just start from where we are now, but asks how do we address that history - the stolen lands, the stolen people, the stolen labor.
 - As we move forward, we need to think about how things are just and equitable and also how we pay reparations for what has happened in the past.
 - NAACP members recognize the importance of addressing the past and how we institutionalize the just and equitable forms of having the places where we live, work, play, pray etc built on the ideas of biomimicry in resonance with nature, safety for inhabitants, disaster resilience, low-energy and zero greenhouse gas and other harmful emissions.
 - BIPOC and lower-income communities tend to be in the shadows of harmful emitting facilities.
- How the CESBS Initiative came to be and where it is now
 - Created in response to this very dynamic: Those who are often in harm's way should be in the driver's seat when we think about the built environment.
 - Making sure that we have a built environment built on these principles and practices of regeneration, cooperation, and wellbeing of all.

- Architecture, sustainable building sector, higher education, affordable housing, environmental justice groups in the same room and saying this is about all of us.
 - Naomi Klein: “To change everything, we need everyone.”
4. Abbreviated Town Hall Remarks from Andrea O’Neal (GSA Senior Advisor for Equity), Sonal Larsen (GSA Senior Advisor for Climate), and Dr. Jessica Granderson (Director for Building Technology at the White House Council on Environmental Quality):

Andrea O’Neal

- Historic firsts of women of color in these roles at GSA and CEQ with institutional power advancing the holistic equity and justice priorities of the Biden-Harris Administration
- GSA provides centralized procurement for the federal government, managing a nationwide real estate portfolio of more than 370 million rentable square feet and overseeing more than \$75 billion in annual contracts. The GSA mission is to deliver the best value in real estate, acquisition, and technology services across government. GSA can’t do that mission-critical work without strong community-based counterparts like the NAACP.
- The GBAC EJ&E task group is one of many forms where GSA is centering community voices and applying an equity lens. Three core cross-cutting themes: economic opportunity and development; public health, safety and wellbeing; & resilience to disruptions and disasters.
- President Biden’s Executive Order has charged federal agencies to conduct equity assessments on high-impact programs. GSA is currently evaluating the success of Small Disadvantaged Businesses in federal contracting vehicles, which includes opportunities to improve supplier diversity in construction and building services contracts.

Sonal Larsen

- In the first seven months of the Administration, GSA has revitalized environmental justice (EJ) strategic planning through the GSA Office of Civil Rights. GSA wants EJ to be front of mind for all initiatives related to decarbonizing the federal footprint, including the effort to power facilities by carbon pollution-free electricity and moving the federal fleet to zero emission vehicles. Public Building Service has initiatives to challenge their teams to think about new opportunities in EJ&E for GSA’s building portfolio. GSA is an active member in the interagency group leading Justice40, the whole of government effort to ensure that agencies are examining opportunities and federal investments in clean energy and working together to find ways to prioritize environmental and economic benefits to disadvantaged communities. Office of the Chief Architect hosted an industry roundtable to discuss diversity, equity, and inclusion in the design and construction industry to find ways to address issues like underrepresentation in design firms, diversifying the pipeline of future leaders, and K-12 design programs. GSA launched EJ&E task group under the GBAC.

Dr Jessica Granderson

- President Biden has made historic commitments to use every lever at his disposal to advance EJ and spur economic opportunity for disadvantaged communities. Justice40 is core to that commitment by giving a mechanism to ensure that federal agencies do the work with state, local, and frontline communities to deliver at least 40% of the benefits of federal investments for climate and clean energy back into disadvantaged communities.
- This GSA and NAACP collaboration to establish the Environmental Justice and Equity Task Group is just the kind of partnership needed to be successful in these endeavors.
- The role of buildings in our lives can't be overstated. They are where we work, live, gather, and where we leave impact in communities. There is a new laser sharp focus on bettering the lives of people through good paying jobs, better air quality, lower energy bills, and modern infrastructure. We are at a critical moment to bring transformational change to the equity, health, and resilience of our buildings and communities.

5. Abbreviated Town Hall Remarks from Hilary Shelton (NAACP Washington Bureau):

- When most people think about the work of environmental justice and ask about what government agencies to work with, they wouldn't think of GSA. But this is an agency that owns and leases more than 376 million square feet of space and 9,600 buildings in more than 2,200 communities nationwide. This is an entity with an awful lot of influence. NAACP has 2,200 membership units. In essence, this is a good fit.
- Consumer Financial Protection Bureau just converted their new building to ensure it is safe, secure, environmentally friendly. It is showing an example of what can and should be done when the federal government can lead the way to do the right thing.
- We are looking at our communities differently when we think about GSA. It is tied to land ports of entry, like those in New Orleans, court houses, laboratories, post offices, and data processing centers. We are thinking about a federal agency that touches our lives in so many ways.
- Post offices could become very handy in providing financial services to their surrounding communities. Every American regardless of any differences should have access to financial services to avoid finding ourselves in a debt trap. If we could change a few laws to ensure post offices can do this for us, it could be transformational.
- GSA is a low velocity giant that carries a big stick but walks around gently to get things done, like ensuring that government buildings have green certification.
- We want to rebuild and fortify our coalitions (like this one) and cause all kinds of good trouble, borrowing a term from John Lewis, to advance equal opportunity and equal protection under the law.

6. Resources and feedback from the Town Hall Zoom chat (full chat content here: <https://drive.google.com/file/d/12patCPlOT2Q4DJS-OQFbbn-TZwZabsqq/view?usp=sharing>)

Mandy Lee, NAACP National (she/her): Our NAACP CESBS Initiative community agreements:

https://docs.google.com/document/d/1I0mvpv170n5dYiwTImm1rVnti6q_UHrGUC3dJ1sZL3l/edit?usp=sharing

Mandy Lee, NAACP National (she/her): We acknowledge that all of us live and work on stolen land, in the case of the NAACP National's physical footprint on the land of the Susquehannock, Nanticoke, Piscataway, and Nacotchtank people in Baltimore, MD, and Washington, DC. We honor all of the Indigenous nations and their land with enormous gratitude and acknowledge the genocide and continuous displacement of Indigenous peoples. We also acknowledge the enslaved Africans and exploited/incarcerated Black and brown workers whose labor built and continues to build our country. We acknowledge the harm inflicted upon BIPOC communities across the country in the context of housing, land, development, and labor, which inspires our ongoing work."

Mandy Lee, NAACP National (she/her): Survey:

<https://forms.gle/XBcZjuov2S8j3ioY7>

Rose E Joshua: Is the GSA divided into regions?

Drew Jack: GSA regions: <https://www.gsa.gov/about-us/gsa-regions>

Rose E Joshua: How many regions and where is the HQ located?

Washington, DC is the HQ location.

Kevin Kampschroer: GSA is organized into 11 regions.

Alice Sung: Do those align with US EPA regions?

Kevin Kampschroer: GSA regions align with the EPA regions although the numbers are different in two cases.

Drew Jack: EPA regions: <https://www.epa.gov/aboutepa/regional-and-geographic-offices>

Loaela Hammons: <https://insite.gsa.gov/locations>

Daniel Piselli, FX Collaborative Architects: Does the GSA have a clear list of social, environmental, and climate justice issues and solutions that will be addressed in federal buildings?

GSA is in the midst of developing its EJ strategy and will be publicly posting it later this fall.

Sigal Shemesh: I'm curious to know how equity is emphasized in federal buildings abroad - embassies/consulates?

That is a question for the State Department. For the domestic footprint, there are strategic analyses being done about what the Federal Government can do through its building footprint to ensure and partner for the health and sustainability of communities. The GSA has a Sustainability Plan. Within the

agency, there are working groups as well as interagency working groups to go beyond meeting standards to do human-centered design. GSA can model for other agencies.

Maurissa Brown (she/her): Can you elaborate on Justice 40 and how frontline communities will be impacted?

Never before have we had an explicit Executive-driven target to ensure that we are quantifying the benefits that are made available to frontline communities, benefits stemming from investments in clean energy, energy efficiency, and the extraordinary influx we expect from the President's priorities for infrastructure, resilience. There is now an accountability framework, tools, and institutional processes to ensure those benefits are accruing to where they're most needed.

Mandy Lee, NAACP National (she/her): Check out the federal buildings closest to you on this map: <https://www.iolp.gsa.gov/iolp/>

David O'Longaigh: In April President Biden issued a statement declaring that the us will meet emission targets by 2030 and 2050. Have GSA received instructions to rehabilitate buildings and fleet vehicles to meet these emission targets in their buildings?

Mandy Lee, NAACP National (she/her): Frontline communities are groups of people who are directly affected by climate change and inequity in society at higher rates than people who have more power in society. They are "on the frontlines" of the problem. For example, people of color, people who are low income, who have disabilities, who are children or elderly, who are LGBTQ, who identify as women, etc. have less advantages and access to resources in our society than other people. In the context of climate change, frontline communities' health, income, and access to resources is less than people who have social privilege (people who are white, upper middle-class or upper-class, able-bodied, in middle age ranges, heterosexual, nontrans, etc.). In other words, people who experience oppression because of race, income, gender, sexual orientation, disability, gender identity, age, etc. are more likely to have less resources and protections in our society in general and even less access to resources and protections not only to adapt to our changing climate

Mandy Lee, NAACP National (she/her): ^in case you were wondering what the term "frontline community" means, here is the NAACP's definition

Rose E Joshua: I think understanding organizational structure is important. The departments of GSA implement policy and where discrimination and disparities are birth.

Mandy Lee, NAACP National (she/her): Questions for your consideration in your breakouts:

- How can the Federal Government set the example for the rest of the country for sustainable and equitable development?

- How can the Federal Government be accountable to Black, brown, low-income, and other frontline communities when they are planning a new project or changing an existing Federal building?
- What kinds of benefits could and should Federal buildings provide to neighbors from frontline communities?
- What should truth, reconciliation, restoration, and environmental justice look like for historically oppressed communities affected by Federal development practices over time?

Garry Harris: Special thanks to TEAM Harris You Guys Rocked!!..Especially Our Bus Drivers!!

Kimi Wei: Love the concept of a fed building providing community service on many levels and offering benefits both environmental and to local residents and businesses - organically entwined with the community it is situated in. Also think a permanent manifestation of acknowledgement of the native American history should exist in the building both inside and out to honor the people of the land upon which the building sits.

Priscilla Brown: I enjoyed my group they were GREAT. With Jacqui. I shared some of the same feeling and ideas. Priscilla NAACP 5486

Roberto Rosas: Thanks, Alex, for facilitating the discussion! I enjoyed hearing more about the examples our group produced including community gardens. Great work, everyone!

Alice Sung: Community benefits can be identified by the federal GSA and interagency cooperation might be able to bring real solutions to real needs identified by communities on the ground-even if the building per se is not near the frontline communities.

Marilyn Carter: What resonated for me was the HUGE positive opportunity for an impact the GSA can have, especially if there is investment in ongoing dialog with surrounding communities.

Alice Sung: Rural communities can and need to be included and seen, even if they are a bit away from the development.

Elisha Moultrie: Community Recreation centers

Randall Toure: Have the building provide a purpose for the community outside of its Fed operating hours. For example, a Fed. building may be open from 9-4:30, with employees in there from 8-6. The building could be used for another purpose by community member and/or organizations in the evenings (meeting space, activity space, classes, etc.) - Justin Thompson

Maurissa Brown (she/her): Make federal buildings have community benefits like: Business planning and incubation support– Mentorship (formal and informal) to support growth and connection– Vocational training in energy, sustainability and real estate– Apprenticeship program to create pathways to careers–

Community technology pilots that highlight emerging opportunity– Paid Internships for local students --Cooling centers

Kevin Kampschroer: +1 cooling centers

Alice Sung: +2 cooling centers

Randall Toure: Debra - Federal Govt should reach out to trusted partners - such as clergy, NAACP and other organizations that the community does trust. Meetings should be held when community members who are working can attend.

Amanda Ingmire: Our group had a great conversation about how the Federal Government can be accountable to Black, brown, low-income, and other frontline communities. Major takeaways were the necessity to include community from the beginning of a project (not part way through), meet people where they're at both in location and how information is shared - make sure community is aware of these opportunities, people should be paid for their labor to sit at the table, and the process should integrate bottom-up decision making and the Jemez Principles.

Randall Toure: Harold - the creation of advisory boards - that can give input and make sure there is diversity and all members of the community are represented. Different advisory boards for different departments - different groups for different skillsets

Maurissa Brown (she/her): Reconciliation & restoration should look like free access to green technology like community owned solar and free home weatherization/repair programs in neighborhood homes

Alice Sung: Thanks to Michael for demonstrating the map- NC has quite a few federal buildings occupied by GSA!

Randall Toure: Eric -Development of our people - our people are willing to work and make sacrifices, there is a need to create a narrative of investing in people and not in things and bring people together

Teron McGrew: Reparations, citizen-participatory, and equity led methodologies that empower BIPOC communities to make their decisions.

Nori Catabay: Power-sharing with local communities. Cede power and follow the direction of local communities. Bring jobs and contracts to local communities. Identify green space and rooftop gardens. Create a safe environment and water for the community.

Carmen Phelps: Fundamental acknowledgement that NAACP members are here to learn and take in information from one another. Become more acquainted with the challenges and opportunities associated with this work. Here to learn as much as they are excited to contribute ideas. Even for those of us who are so dedicated to doing this work in our communities, we are all still learning and growing.

Alex Gamble: Natural disaster shelters, above or below ground, for resiliency. Where are shelters located? Are they accessible? Does the community know that shelters exist? Government is always looking at the resiliency of the asset, the building itself, especially for new building projects. But due to climate change, natural disasters are going to be prevalent. Katrina was an example, and the Superdome was not necessarily a shelter. Looking at the Federal portfolio, does that system begin to play that role of resiliency and safety for communities?

Eric Richardson: Centralized and intentional effort at the Federal level to empower our citizens, especially our Black community, which has been disenfranchised over many decades. As we grow and build, we need to hear from and empower our communities to be the builders themselves and give their insight. If we are going to be spending federal dollars, we need to invest in our people so we invest in the asset that built the nation in the first place - the Black community. Invest in us again but in a positive way.

Jacques Werleigh: Be neighborly. Not just looking at the building but also identifying some buildings in the community and upgrading those. Use that vehicle as a way to do good community engagement and establish good rapport. Identify and understand some of the federal investment projects, such as the interstate highway system, and their long-term impact on some communities. Be intentional about investing in those communities that have degraded and become segregated based on those actions - electrical, plumbing, social services.

Teron McGrew: It is very important that we do not forget and really push for creative reparations. All of the things we have spoken about are creative reparations, ways in which African Americans can be compensated for the historical and unconstitutional denial of access to federal programming. Citizen participatory methodologies that are equity-led, such as the model of the West Oakland Environmental Indicators Project. We bring disinvested residents to our organization for a community-led process. We are all here, and this is all a learning process. That's what happens at WOEIP too. Community Building Agreements. Belonging space where diversity, equity, and inclusion creates a space where I feel comfortable being who I am and I can bring forth my empowered decisions about what I think my community needs. Disaster centers - I am part of the Climate Reality Project. In my grandmother's rural community, they have a resiliency hub through partnerships with FEMA. That empowered me to come back to the urban core and create that kind of hub. When we encounter these climatic disasters - fire, flooding, power outages, people know where they can go and know they will be taken care of. We will not have the repeat of what happened in New Orleans with Hurricane Katrina. Black, brown, Indigenous people of color live in the less infrastructure parts in all communities in America.

Andrea O'Neal: Clearly there are a lot of opportunities for engagement with NAACP and across the Administration on EJ. Establish key performance metrics where government can clearly measure and hold accountable to the objectives of what we are doing. In the task group, we have been looking at processes to think about how we are designing a platform and a process that centers the community from the beginning. Bake those intrinsic values into our engagement

plans. Demand response, disaster relief and resiliency, building materials, community relationships, access to buildings and resources related to the federal footprint. GSA is happy to be the convener and connector to other parts of government for NAACP.

Sheryl Freeman: Nori thanks for your leadership and interpreting my thoughts

Chris Castro, City of Orlando, GBAC member, He/Him: Excellent point on Resilience Hubs. There is a great resource if anyone is interested in more details check out: <http://resilience-hub.org/>

Maurissa Brown (she/her): Equity Energy Project has equity metrics coming out <https://energyequityproject.com/about-us/>

Teron McGrew: Thank you for this important conversation, space and allowing me to speak my truth unapologetically.

Matthew Veloz, FSi engineers, he/him: Thanks all, love this conversation. Will we get to see aggregates of everyone's answers on jamboard?

Alice Sung: Yes, measure and assess equity and justice performance. Accountability to frontline communities.

Carol Boyd: Does GSA have a speaker's bureau that might interact with local NAACP chapters?

Alex Gamble: +1 Alice, metrics drive behavior.

Curtis Johnson: Seem like this town hall was gear more around large cities

Andrea O'Neal: @Curtis - GSA Federal buildings tend to be in urban areas, far from rural areas that may be part of frontline communities that need economic investments/ benefits. These are important considerations for our site selection process.

Chris Castro: This is so inspiring. The work happening at the Federal Govt level is also happening at the local government level in cities across the U.S. Much of this work is happening through the Sustainability and/or Resilience office/dept. and encourage you all to utilize them in our transition to a green and equitable future. Networks like <http://usdn.org> could be good allies.

7. Town Hall registration responses:

Have you played a role in the construction, renovation, or operations of a Federal building? If so, please share a brief description of your experience.

For example, have you participated in design charette (community design workshop for a building), a community advisory group, a Federal building project team, or a Federal building operations team?

- Legal
- Architect, Green Building/Sustainability Professional

- Environmental Planner
- Midwestern Building Decarbonization Coalition CO-Director
- Architect & Policy Analyst
- Supply
- Retired Systems Engineer
- NAACP President
- Restoration of a Black painting at Fort Leonard Wood, Missouri
- home builder
- Yes - as NJ NAACP leader
- Architect/Sustainability Coordinator with the Indian Health Service, regularly participate in project team workshops.
- Provided some guidance on healthier flooring and carpet for DOE FY2022 Priority Products List

Have you and/or your communities experienced an environmental, climate, racial, or economic justice issue related to a Federal building? If so, please share a brief description of your experience.

For example, have you lived, worked, or otherwise spent significant time near a federal building contributing to local pollution, cultural or economic displacement, or the insufficient involvement or disregard of the interests/concerns of Black and brown community members or businesses seeking opportunities in a project?

- Gentrification
- I attended a meeting of a local that rejected a waste company from building a landfill close to Black community
- The City of Prichard suffered pollution and water contamination while serving as President of local Unit, definitely racial
- I'm from Texas. They have been polluting our communities for years
- A federal employee being discriminated against
- Not sure MBE/WBE (BIPOC) design team consultants or contractors were a part of any local Oakland or SF federal buildings
- Yes - Mesa/Chandler East Valley 1008-B NAACP member

Questions & Comments

- I am interested in learning the politics associated with environmental racism so that I can share the information with young people, .
- This is Great Training for our members, Greatly Appreciated.

- The area of Eight Miles inside of Prichard face serious challenges and disregarded of a predominantly Black communities.
- Am concerned about a dumping ground put in or near the black community in west cocoa.
- How has air filtration systems been upgraded due to the advent of COVID 19?
- Who can we contact regarding dealing with the issues at Fort Leonard Wood regarding civilian employees?
- I am an older woman of white descent, and my primary environmental focus has been on water/land use. In these issues the racial injustices in our policies & business practices are obvious. The federal building issue is new to me. Thank you.

Note: This is the work of an independent advisory committee to GSA, and as such, may or may not be consistent with current GSA or other Federal Policy. Mention of any product, service or program herein does not constitute endorsement.

ATTACHMENT 1: NAACP CESBS RECOMMENDATIONS TO GSA

NOVEMBER 5, 2021 AND EXPANDED AS OF JANUARY 31, 2022



MEMO

November 5, 2021

NAACP Centering Equity in the Sustainable Building Sector (CESBS) Initiative Environmental Justice & Equity (EJ&E) Recommendations: Executive Summary

This document, prepared with care and the contributions of dozens of community experts, is the result of the [NAACP CESBS Initiative](#)'s participation in the [Environmental Justice & Equity for Federal Green Buildings \(EJ&E\) Task Group](#) hosted by the General Services Administration from April-November 2021. The information and recommendations below were created and informed by NAACP members, staff, allies, partners, and friends, including EJ&E Task Group Additional Participants, participants in an NAACP Town Hall, and those who could not access those spaces and contributed offline.

The document includes an associated [Collective Statement](#) summarizing the experience of task group participants, which necessitated the creation of these recommendations, as well as tailored recommendations for 1) the Green Building Advisory Committee to consider when finalizing the Advice Letter of the EJ&E Task Group, 2) the Office of Federal High-Performance Green Buildings, 3) the Public Building Service, and 4) Administrator Robin Carnahan and GSA leadership. The document concludes with recommendations about pitfalls and false solutions to avoid, which are applicable to all parties. The Appendix includes the original notes and summaries of content shared during the August 2021 NAACP Town Hall on this subject.

A CESBS member offered a valuable analogy about the task group:

Imagine the government wants to build a certain kind of boat, but doesn't know how. There is a community that has generations of experience building both boats (and bridges) that could meet this need, so the government solicits their consultation, knowing full well they don't intend to compensate them for their labor and expertise. The community responds to the invitation and asks questions about what exactly the government is trying to build this boat to do, in order to design the best boat possible. After hearing the answers, the community advises that it would actually be better to build a bridge to serve the government's purpose. However, the government is set on building a boat; moreover, on writing a manual by a certain date, to build a boat. The community is asked again and again for their expert knowledge on how to build a boat, which they eventually share with caution about the limitations of this solution. The government then selectively co-opts what it wants, and writes up its new boat manual by its arbitrary deadline, which the community later hears about being touted on the news. Other market actors then use the manual to build and sell boats in other states for a handsome profit.



In order to avoid the above potential demonstration of exploitative power structures, we respectfully submit the following and request acceptance without re-interpretation. Please note, due to timing of the release of content in the draft advice letter from the task group, we do not necessarily condone, agree nor disagree per se with any of the advice letter's recommendations or other contents.

We express gratitude and are excited and prepared to immediately grasp this opportunity to co-lead with GSA and other federal agencies in this emerging transformational work towards environmental and climate justice and equity in a future we all want. Perhaps this moment in our shared challenge is best captured in a quote from the Emerald Cities Collaborative's [Building Electrification Equity Project](#), (page 11) created in partnership with the NAACP Environmental and Climate Program.

*"Questions regarding other equity issues related to this emerging policy agenda are not sufficiently addressed. The equity questions are unanswered for one simple reason: **the equity advocates and communities are not yet in the ideation, planning and decision-making processes.** This assessment of the equity dimensions of building electrification is a direct result of Emerald Cities Collaborative finding itself in the uncomfortable position of being the solo EJ/CJ voice at the national convenings on this issue. It was clear that the train was leaving the station. The sense of urgency around building electrification is palpable. The rationale and policy frameworks are emerging. The technologies are maturing. Major public and private investments are underway. **Though, without broader engagement of the justice community, its success will either be limited and worse, reproduce the inequities of past well intended policy initiatives.**"*

Written in April 2020, addressing local governments and EJ leaders, organizations and communities, prior to the Biden Administration and Justice40 policy, the report reveals excellent background work and many recommendations and tools that could also be useful as we apply them to the context of the GSA/ federal level **equitable building electrification/decarbonization** work we need to embark upon, together, in shared decision-making that prioritizes the most impacted communities of people first.

Although all recommendations below are important, those marked in **bold** with a double asterisk (**) in the list below should be considered as immediate **Next Steps**.

Key recommendations for GSA based on NAACP participation in the EJ&E Task Group:

****Establish a foundation** for frontline community engagement to advance environmental and climate justice, Justice 40 initiatives, and equitable development with GSA and the federal government based upon the [Jemez Principles](#), the [17 Environmental Justice Principles](#), the new USDN "[Equity and Buildings: A Practical Framework for Local Government Officials](#)" and the [Spectrum of Community Engagement to Ownership](#) (striving to defer to Level 5-- Community Ownership). Together we seek to repair past harms and advance a [Just Transition](#) by deploying climate action at pace and scale that can achieve transformative climate and environmental justice through centering equity.



****Restructure the make-up** of GBAC and all Task Groups for diversity equity, inclusion, and frontline representation, to include no less than 40% BIPOC women and environmental justice and equity leaders, **with both lived experience and qualifications** in the planning/policy-making/green building design/construction/decarbonization industry **and experience in justice and equity advocacy/organizing** to convene for support of research and further development of all of the recommendations herein. Conflict-of-interest statements should be required to ensure no optics of self interest; while unemployed, under-employed, non-pensioned members shall be compensated as “special employees” and/or with other appropriate salaries or contracts. Any hierarchical power structure (i.e., Co-chairs) shall be self-determined by the group as a whole upon early convening(s). Shift to a shared decision-making and more democratic model.

- ****Ensure EJ&E is properly addressed and integral to recommendations from all other current Task Groups’** by allowing restructured EJ & E Task Group and/or GBAC make-up to review, cross-coordinate, and cross reference for alignment of actions called for, for example, not merely “Building Decarbonization, “ but “Equitable Building Decarbonization,” again, to avoid unintended consequences “...**without broader engagement of the justice community, its success will either be limited and worse, reproduce the inequities of past well intended policy initiatives.**”
- ****Also consider reviewing and updating recent past Advice Letters with recommendations and any EJ&E implications in or innovative opportunities to leverage for community equity** in implementation of such.
- EJ&E is so intersectional and broad, as Justice40 implies, that serious thought as to **how to** embody in our leadership, as well as embed in our government agencies such as GSA, requires more diverse and broad systems thinking.

****Establish or designate a new Federal agency hub dedicated to EJ&E in the context of the built environment**, tasked with responding to Justice40, leading co-creation/ development, decision-making, and management of related EJ&E policy, actions, or programs, including implementation and management of all bulleted actions below, and overall recommendations within this document and more. Ensure leadership and make-up is primarily BIPOC women and EJ&E leaders, with both lived experience and qualifications (as described above). Consider organizational integration of this new agency hub with other newly created equity and climate senior advisory and/or policy/operations offices once the right team members are assembled.

- Relay and cross-coordinate all related recommendations from GBAC advice letters and newly created agency hub to other relevant federal agencies
- Partner with all other federal agencies, especially WHEJAC, NEJAC, CEQ, EPA, DOE, DOT, NAS, NOAA, FEMA, internal GSA departments such as Office of Civil Rights, Government wide Policy/Operations, and climate/energy advisories
- Liaise with state and local government agencies to support and leverage state and local EJ&E policies, data, tools, and programs. See also the emerging CEQ screening tool in development, and the Federal funding [FFOLD tool](#).
- Create good green jobs in the process through hiring many BIPOC-led coordination and community design teams, to align multiple agency efforts in capital improvements, build trust, hold accountability, and innovate new GSA justice and equity interventions in implementing and operating a high performance, zero carbon portfolio with and within local communities.
- Look to develop and deepen new partnerships in right relationship not only with local EJ communities where GSA has facilities and operations presence, but also many other national (NAACP, Emerald Cities Collaborative, Climate Justice Alliance, for example) coalitions, tribal alliances, and smaller local EJ and community-based organizations (Asian Pacific Environmental Network, PODER, and many more) to leverage the people power necessary to succeed in a Just Transition to meet our global climate goal of maintaining less than 1.5 degrees Celsius, with 50% carbon reduction by 2030 and zero carbon by 2045.



- Establish a GSA Justice40 and climate change action budget/funding and task this new agency hub with recommendations from below.

****Resource frontline communities**, individual BIPOC experts/climate justice organizations, and community-based organizations to co-design a national learning tour and suggest/host racial equity and other trainings for GSA.

****Hire local environmental and climate justice advocates to perform community needs assessments** and racial equity impact assessments that includes development of new complementary tools to identify environmental justice solution **potentials** by GSA and other federal government agency actions or policy shifts, through the equitable decarbonization of the federal portfolio and real estate operations/assets management/contracting/purchasing, best supporting energy democracy and resilience first, to those communities most impacted.

****Initiate a process for reparations dialogues** with impacted communities, including both federally recognized and unrecognized tribes.

****Develop a set of processes for frontline community engagement** in design, implementation, and evaluation, with decision-making authority, throughout all GSA processes

- **Develop a standard, with metrics, for equitable community involvement in all GSA/Green Building Advisory Committee, Public Building Service, and Federal Acquisition Service activities**
- Initiate a revisioning process to update the Federal Advisory Committee Act
- Designate and train GSA staff, or hire special employees and/or additional staff, to serve as community liaison coordinators and supervisors for each of the GSA & EPA regions
- **Hire special / new employees or independent EJ&E trained design professionals knowledgeable about the zero carbon building sector to help internal equity advisory**



<p>teams assess, review and update to include the Justice 40/equity lens into all governing and facilities processes and standards guidance such as but not limited to: policies, regulations, RFQ/RFP solicitations, contracts, P-100 Facilities Design and Construction Guidelines, high-performance/building standards, siting, project scoping/feasibility, commissioning and post-occupancy evaluation, procurement/selection practices, human resources/hiring policies, supply chains, acquisition/disposal, operations and building maintenance, leases (towards standards for green leases), budget request guidelines, energy and water management/benchmarking, GHG inventory and reporting, renewable energy and storage, master plans, and any strategic energy plans.</p> <ul style="list-style-type: none"> • Develop accountability systems (perhaps within the structure of the Government Accountability Office GAO) and measure/track/report on current/past baselines and progress made towards frontline community engagement processes and equitable community involvement in all activities.
<p>**Develop a method of community-to-government agreements/contracts and templates for community benefits agreements to be modified by communities according to their context and community needs in partnership with tribes, local governments, utilities, other public agencies, and community-based organizations (CBOs), environmental justice (EJ) organizations and other local grassroots groups.</p>
<p>**Adopt/refine equity criteria and requirements to screen for potential to achieve more equitable outcomes in evaluating development/leasing proposals</p>
<p>**Develop and implement specific environmental justice requirements during team and site selection/acquisition/feasibility study/procurement/scoping-programming/design/construction/operations/disposition-disposal</p> <p>These requirements should include changes to solicitation/procurement documents that require the consulting/AE/contracting teams to have environmental justice experts as team members.</p>
<p>**More deeply prioritize Minority, Women Owned, and other Disadvantaged Businesses, particularly those that are local, smaller-sized (SBE), emerging, and cooperative businesses in any GSA facilities development, renovations, or building decarbonization work to align with Justice40. Utilize findings from Disparity Studies conducted for GSA by independent experienced firms to identify equity performance gaps. An example for the State of New York from 2015, published in 2017, is here.</p>
<p>**Immediately remove out-of-date sustainability requirements, or those operational procedures or standards that GSA controls that perpetuate racial, gender, or other social inequities and/or cause more cumulative harm to impacted communities. Track these actions.</p>
<p>Design for disability that exceeds the provisions of the ADA to uphold universal/inclusive design</p>
<p>Prepare historical and sociological surveys of inequities within the larger city/specific context of each site</p>



Acknowledge Indigenous land and injustices to BIPOC and low-income communities in the geographical vicinity of sites
Identify material conditions in frontline communities to be the focus of GSA's self-evaluation of justice and equity impacts
Carry out a series of pilot projects that embody zero carbon, regenerative and equitable development that supports building resilience in the most impacted low income communities of color.
As a leading user, advocate for leading green building organizations to adopt more equity credits in their rating systems, such as LEED, Green Globes, Living Building Challenge, and others, and consider requiring them as prerequisites for all federal projects, new construction and major renovations; OR alternatively, develop new federal performance standards/criteria for integration of EJ&E in all GSA actions as a requirement.
Support changes in national building codes and model zoning laws to align with science-based targets for carbon emissions reductions in the building sector that prioritize equity and environmental justice in the applications.
<p>Release data and share information supporting regenerative and equitable policies, practices, and innovative programs for local and state governments to follow and scale up</p> <ul style="list-style-type: none"> • Work through the new federal Hub created in next steps above to leverage existing public private tools (i.e. new CEQ screening tool, EPA EJScreen, new DOE FFOLD tool, or ESRI Racial Equity Mapping tools and/or others) • Develop outreach and website for state and local governments to use and share innovative models nationally • Hold space to cross-coordinate, measure and celebrate progress on equity indicators/real world outcomes, as well as share voices from and by the communities.
Offer transparent follow-up and more accessible resources for the public

The NAACP CESBS Initiative invites further discussion and public comments on these recommendations, which will remain [available](#) online with other CESBS resources. Questions and requests may be shared with CESBS Manager, Mandy Lee by emailing slee@naacpnet.org.

NAACP CESBS Initiative EJ&E Recommendations

Recommendations for Office of Federal High-Performance Green Buildings & GBAC for Public & Partner Engagement Approaches

RESET AND BUILD TRUST WITH CURRENT “ADDITIONAL PARTICIPANTS” BY ENGAGING US IN REDESIGNING THE STRUCTURE & PROCESS OF THE GBAC ENVIRONMENTAL JUSTICE & EQUITY ENGAGEMENT TO ENABLE A WELCOMING AND ACCESSIBLE EXPERIENCE FOR FRONTLINE COMMUNITIES WITH EXPERTISE IN ENVIRONMENTAL JUSTICE AND EQUITY AND THE SUSTAINABLE/GREEN BUILDING SECTOR, THAT IS INDEED CO-CREATED AND SELF DETERMINED RATHER THAN DOMINATED BY EXISTING MODELS.



“We cannot solve our problems with the same thinking we used when we created them.” - Albert Einstein, physicist, thought leader

“You never change things by fighting the existing reality. To change something, build a new model that makes the old model obsolete.” - R. Buckminster Fuller, architect, thought leader

“Sustainability without equity is sustaining inequity.” - NAACP CESBS member Tamara Toles O’Laughlin

Develop a standard for equitable community involvement in all GBAC activities and any Task Groups, addressing the following:	Set SMART goals for volunteer efforts that are developed collectively by participants before initiating the process.
	Enable all participants to discuss and identify their preferred roles in volunteer efforts, including the option to be official members of a task group with shared authority rather than "additional participants" or "observers."
	Develop a work plan for each task group that clearly identifies anticipated meeting topics and agendas, in cooperation with participants, and provide updates and opportunities for feedback to adapt meeting topics, expectations, and agendas as needed. Presentations should be scheduled as suggested by the group to help facilitate and provide ample time for ongoing discussions. Ensure the GBAC and each task group has enough combined EJ&E advocacy leadership, lived experience and green building/zero carbon expertise embodied in its makeup to provide the capacity to implement Justice40.
	Accommodate participants' preferred schedule and language, as well as the amount of time and any resources or compensation needed for under-resourced members for each call and for a task group's overall work timeline according to its needs and goals.
	Provide regular opportunities for one-on-one or small group meetings with task group leadership, including chairs and designated federal officials, to answer participants' more detailed questions and walk through the content and decisions of meetings that they may have missed.
	Ensure that all participants on calls are identified (including information they'd like to share about preferred gender pronouns, name pronunciation, etc.), offer time for in-depth introductions to increase transparency, build trust, and understand and agree to norms for the conversation . Qualifications and experience for this EJ&E work should be clear



	<p>Equity and sustainability work (like resilience) should not be relegated to volunteer "task groups" or "committees" that are by nature one-time and temporary, then disbanded, or easily dissolved, but should be made permanent and integral to GSA governance and organizational structure, equitably compensating women and BIPOC community members with the lived experience/ qualifications for their leadership in this critical and transformational work.</p>
	<p>Designate and train, or hire, GSA staff or consultants/special employees to conduct trauma-informed, inclusive, and consensus based facilitation of environmental and climate justice (ECJ)/Justice, Equity, Diversity, Inclusion (JEDI) committees and conversations.</p>
	<p>Develop a public training and onboarding program for people interested in participating in GSA engagement opportunities to share comprehensive information to inform and receive feedback from potential participants about expectations for these opportunities, as well as to demystify the organizational structure and processes that govern decision-making. Partner with organizations adept at reaching and engaging with frontline communities to develop awareness of and new engagement opportunities that best suit the needs and priorities of frontline communities. Conclude engagement processes with public events hosted by GSA or partners to share outcomes and next steps.</p>
	<p>Review and self-assess existing engagement approaches against the Spectrum of Community Engagement to Ownership and King County's Community Engagement Continuum in the Community Engagement Guide.</p>
	<p>As GSA is bound to the White House Council on Environmental Quality's (CEQ) Guiding Principles for Sustainable Federal Buildings, it should advocate for CEQ to add to the Integrated Design Process that significant dollars need to be allocated for community involvement (same with agency budgets).</p>
	<p>Set goals and metrics to measure the success of public engagement in terms of inclusivity, representation, and participant experience, with focused goals and metrics for frontline communities.</p>
<p>Equity shouldn't be a secondary consideration to sustainability.</p>	<p>The current (privileged white supremacy power and control) structure and process from inception seems a set-up for failure and is not conducive to achieving the purported EJ & Equity goal, nor effective in garnering volunteer "participation." Especially since there is no shared decision-making authority, nor any transparent accountability.</p> <p>Create a new standing GSA committee (or strengthen an emerging equity office) with explicit ECJ focus to further develop and support implementation of the EJ&E task group</p>



	<p>recommendations. Consider embedding multiple members of this coordinating committee in other committees or groups so that equity is NOT siloed as “someone else’s job.” Enable and resource a frontline community-led group to form with self-organized membership and leadership and support the group with federal representatives tasked to advise and share information.</p>
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Note: Given the constraints of the task group, particularly the availability of information about GSA processes and time/capacity, the below recommendations should not be considered final and should, instead, be taken up for further exploration and development through an improved process and by a group, including Additional Participants that have already invested 9 months of work, that is more fully representative of frontline communities, compensating their expertise.

OTHER EQUITY ISSUES AND POTENTIAL PARTNERS

<p>Understand the vast landscape of issues, toolkit/guidance and publications from various sources related to EJ&E and variations of “why, what, who, where, and how” the building sector can impart or center justice and equity in the built environment while meeting global climate goals of getting to zero carbon by 2030/50.</p>	<p>Consider compiling and evaluating extant and emerging guidance, policy and framework documents from various policy think tanks and environmental justice/climate justice and community-based organizations related to justice and equity in the built environment, particularly in implementing equitable electrification /decarbonization. All publications/toolkits should be evaluated with an equity lens and take into consideration: the source/authors, motivations, source of funding of the research/publication, value/benefits to those most impacted disadvantaged communities, relative pros and cons, innovation (new systems model), and any potential unintended consequences of real world implementation.</p> <ul style="list-style-type: none"> • There is a growing number of green building rating systems and frameworks or guidance on equitable building electrification, or “climate equity” and many excellent written documents or toolkits by EJ organizations and non-profit advocacy or research/policy think tanks that could be evaluated for some form of advisement and adoption by GSA after a literature review and comparative analysis. There are too many resources (80+) to list here. Review assessments from the NAACP CESBS Initiative and the American Institute of Architects for more detail.
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	<ul style="list-style-type: none"> • Too numerous to list comprehensively here are just a few of these organizations, with multiple process/guidance, trainings, and white paper/reports that could share advisement: Emerald Cities Collaborative (ECC), NAACP, Urban Sustainability Directors Network (USDN), Asian Pacific Environmental Network (APEN), Greenlining Institute, RMI, SEED Network, Pathways to Equity, and more.
<p>Collaborate with and share lessons learned with other leading local and state governmental partners, environmental justice and equity organizations, in addition to traditional green building organizations now attempting to pivot more attention towards equity.</p>	<p>There are additional potential governmental partners that already embed EJ&E in their green building program rating systems. As we heard during the task group, King County's Equity and Social Justice framework is a leading example. There may be lessons learned from other states such as California, New York, and others, as well as more local government demonstrations of emerging equitable building decarbonization programs, for example.</p> <ul style="list-style-type: none"> • Consider pilot and other social equity related "credits" or guidance from traditional professional and green building organizations rating systems including but not limited to: the American Institute of Architects, AIA Committee on the Environment (COTE)'s 'Framework for Design Excellence', U.S. Green Building Council (USGBC) and its LEED green building rating system (3 social equity pilot credits,) International Living Future Institute's (ILFI) Living Building Challenge Equity Petal, including the JUST organizational certification, EcoDistricts (a district-scale framework that provides extensive opportunities to include and engage communities from the inception of a project to its completion), and others. • Consider making some of these Equity related credits a prerequisite for GSA projects, even if it is not mandatory in the rating system to be certified. Note, some of these rating systems are already referenced in the Guiding Principles for Sustainable Federal Buildings for existing buildings and equity-related credits should be extended to include new construction. <p>Adopt a best management practice to utilize the</p>



	<p>same credits and apply them to projects even if the project isn't pursuing the respective certification, OR perhaps develop GSA's own equity requirements.</p>
	<p>Consider key equity strategies to be adopted by other projects and ultimately become prerequisites for their respective rating systems.</p>
	<p>The end result is to incentivize meeting equity goals by the design and construction team and ensure these would be an integral/mandatory part of their reaching any LEED, LBC, or Zero Energy/Carbon certification for a GSA project.</p>

Recommendations for GBAC & Public Buildings Service for Equitable Development Approaches

EQUITABLE COMMUNITY INVOLVEMENT IN BUILDING PROJECTS

<p>Develop a method for equitable community involvement in JEDI/ECJ planning and implementation within the PBS.</p>	<p>Enable a frontline community-led group to form with self-organized membership and leadership and support the group with federal representatives tasked to advise and share information.</p>
	<p>Develop a standard for equitable community involvement in all GSA projects.</p>
	<p>Consider a method of ensuring prior, informed consent and community sign-off before any projects happen.</p>
<p>Designate and train GSA staff, or hire special employees, to serve as community liaison coordinators and supervisors for each of the 9 EPA regions and to serve as internal stewards to bring about closer alignment of JEDI/ECJ efforts across GSA departments and other relevant Federal agencies.</p>	<p>Example: <i>One of my GSA lease back projects the client had a community liaison who primarily tracked conformance to set-asides during construction. They attended most meetings starting with the design phase. A position like this could be required to also monitor implementation of environmental justice and other equity requirements.</i></p>



<p>Develop a method of community-to government agreements/contracts for the development of Federal and federally-funded projects that enable frontline communities to have self-determination and ownership, based on the model of the Indian Health Service.</p>	<p>This suggestion is reflective of how the Federal government can prepare and develop an avenue to have the community LEAD the building planning, design and construction of a development that can meet the community needs in terms of job opportunities, facilitating community engagement between Federal and community stakeholders, and an opportunity to identify specific community needs at the present and future and its alignment with Federal programs and operations in the area.</p>
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EVALUATION

<p>Identify material conditions in frontline communities to be the focus of GSA's self evaluation of JEDI impacts. Evaluating project 'success' should include metrics/accountability for demonstrating the projects do not harm (at a minimum), but improve real outcomes for people of color, low-income, and frontline communities</p>	<p>Examples:</p> <ul style="list-style-type: none"> ● Increased life expectancy – eliminating health disparities based on zip code/race. ● Closing wealth and income gaps. ● Closing education gaps. ● Immediately eliminate <u>all</u> harmful emissions from federal government buildings and operations, developing a national master plan for equitable building decarbonization of federally owned properties that prioritizes centering justice and equity in its strategic implementation. ● Provide high performance buildings and green infrastructure (shade trees, green open space, stormwater management, mobility solutions) for frontline communities. ● Prevent gentrification of frontline neighborhoods that cause unwanted displacement ● Eliminate energy burden inequities ● Support community resilience in impacted neighborhoods
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<p>Develop and implement specific environmental justice requirements during site evaluation/selection/acquisition/procurement/design/construction/operations, including new standard language in RFPs and contracts.</p>	<p>Examples:</p> <ul style="list-style-type: none"> ● Project-specific community advisory groups / boards ● Joint use agreements for GSA facilities ● Public/shared environmental resources & amenities at GSA properties ● Shepherd the creation of community benefits agreements between the community and the building owner / federal government ● Require AEC/GSA partnering sessions and include equity issues and community stakeholders ● Include changes to solicitation/procurement documents that require the consulting/AE/contracting teams to have environmental justice experts as team members ● Encourage respectful work environments for construction crews; i.e., figure out how to explain to workers why they can't know what the name/function of the project is they are working on. ● Performance metrics established by community members so there is an opportunity to track and monitor ● Upgrading existing, disinvested community infrastructure (energy systems, water systems, buildings, parks, tree canopy, etc.) as a part of GSA facility construction or upgrades. In particular, foster the creation of community-based infrastructure that will collectively improve community sustainability and quality of life locally and nationally, and provide greater local economic control and power over decisions. ● Better building materials selection with respect to chemicals of concern, and avoidance from manufacturers extracting/producing toxic materials in fenceline communities. ● The NYC Climate Resiliency Design Guidelines can be referred to as a resource for the incorporation of forward looking data for new and existing buildings that are climate change responsive.
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<p>Consider evaluating proposals placing some weightage on equity goals (suggest 5% initially) that can increase as more opportunities are created for design and construction teams to address equity.</p>	<p>For this evaluation to be fair (and equitable!) to design and construction teams, goals should be clearly listed in the RFP. When teams get more opportunities to address equity in projects or in their practices, the % weightage would be evaluated and incrementally increased. The goal is that equity becomes ingrained in the culture of firms that work on GSA projects.</p>
<p>As part of proposal evaluation, consider design and construction teams' record on equity in their environmental, social and governance (ESG). The GSA has the power and leverage to build a culture of addressing equity issues in the ESG of companies they deal with.</p>	<p>Companies that participate in programs such as JUST and B-Corp that verify equitable practices via third-party show a commitment to equity in their operations. Corporate behavior can be changed by either a conscious, organic change that emerges from within, or from external nudges in the direction of positive change. With time, these positive behaviors become ingrained in the culture of the company, regardless of their origin. The GSA has the power to nudge companies into adopting equitable practices -- consider making JUST and/or B Corps certification a requirement for Prime contract holders on major projects and establish a supportive system to enable small, local, and MWBE firms to certify as JUST or B Corps and participate in GSA project work. Consider also requiring architectural firms to be signatories of the AIA Architecture 2030, (which promotes zero carbon portfolios by 2030) and structural engineers to sign on to SE 2050 (a program which promotes low embodied carbon materials).</p>
<p>Remove out-of-date sustainability requirements from RFPs and agreements, and better enable achievement of sustainability certifications.</p>	<p>Outdated requirements include arbitrary and complex RFI sign-in structures, documentation requirements, and paid for performance/milestone payment contract structures which puts fiscal burdens on MWBE and CBOs/NGOs.</p>
	<p>Include a line item for project registration/certification fees and plaque items for sustainability certifications such as LEED, etc. so projects actually get registered and consultants are able to complete all follow up submissions so projects can receive full recognition.</p>



<p>Prioritize Minority & Women Owned and other Disadvantaged Businesses, particularly those that are local, smaller-sized (SBE), emerging, and cooperative businesses. Many large contracts tend to perform with minimal threshold requirements for MWBEs. Consider flipping the script, requiring a large portion of projects to be led by CBOs/NGOs and MWBEs (incorporating capacity funds).</p>	<p>Create an equity measurement tool (ex. Oakland, CA) in contracting to ensure frontline businesses are at the forefront and at the decision-making table.</p>
	<p>Adopt High Road Contracting standards that offer real opportunities to smaller sized MWBE businesses through set-asides and target goals and, ultimately, would cultivate more MWBE prime contractors. Further resources here and here.</p>
	<p>Experiment with better targeting to ensure contracting and workforce development opportunities are reaching frontline communities who are most impacted and in closest proximity to GSA facilities, such as priority hiring by zip code.</p>

SOCIO-HISTORICAL CONTEXTS

<p>Consider including language in RFPs that acknowledge the location of the site on Indigenous land, identifying tribes that have lived there. Also include acknowledgements of injustices to BIPOC and low-income communities in the geographical vicinity of the site (for example, redlining practices that existed in the city where the site is located, etc). Consider approaches to reparations.</p>	<p>It is important to consider the local context of the project and give a concise picture or snapshot of the socio-cultural history of the place. Any building is a significant intervention that occurs in a historical continuum of the place it is located in. An RFP is an aspirational, forward-looking document. Any design solution that results from the RFP and the design process should reflect an understanding of these historical inequities. The team should begin the design process with this understanding of not only spatial but the temporal context as well.</p>
	<p>A single RFP may be prepared for several projects of a similar size and scope, for different sites. However, each site should have the socio-historical survey that equips the design and construction teams with not only data but the larger context of the site that can mold their design.</p>



<p>Consider engaging architectural historians to prepare historical (and sociological) surveys of inequities in the geographical region of the site.</p>	<p>Like technical surveys and studies (civil survey, geotech, etc) that are included, RFPs should also contain a historical survey of the site that is expansive in scope to include present inequities and past injustices that exist, socio-economic data on the population, etc.</p>
	<p>Employ project team members trained in Trauma Informed Design, which stems from Trauma-informed Care, with the goal of creating physical spaces that promote safety, well-being, and healing.</p>
<p>Consider equity issues that can be used for proposal evaluation to be specific to the project and that location. Identify programs <i>in that area</i> that can benefit from the project's equity goals.</p>	<p>A compensatory and/or market-based method, such as carbon offsets, renewable energy credits, donating to a land trust (Site Development credit in LEED), etc. is an easy and doable fix, which is why it can be problematic as it can supplant the real (and hard) work that can achieve true equity. To avoid giving to a program that does not have a measurable impact in reducing local emissions and fails to tackle the root causes of the climate crisis (for instance, planting trees on the other side of the globe and contributing to Indigenous land loss to offset carbon), RFPs should identify local and regional programs where the benefits are visible, tangible and measurable. For instance, planting more trees and providing tree canopies in historically redlined neighborhoods and low-income communities which have been proven to lack trees and tree cover in the area of the project. For projects on the coast, identifying organizations that mobilize during hurricanes - which are more severe and more frequent due to climate change - to help low income people to evacuate and fund their hotel stay until a safe return, etc. Require GSA interventions to consider impacts and potential benefits beyond their project boundaries.</p>



ACCESSIBILITY OF PHYSICAL SPACES ACROSS THE SPECTRUM OF ABILITY

<p>Consider design for disability that goes much beyond the provisions of the ADA, and is integrated fully into the design aesthetic to create truly inclusive spaces as a proposal evaluation criterion.</p>	<p>The GSA should nudge design and construction teams into thinking that exceeds the ADA minimums, integrate design for disability fully into the design from inception and not as an add-on to meet code. Both design and programming of spaces should focus on visibility and inclusion of people with disabilities. Buildings need to enfold all aspects of equity, including disability, through universal and inclusive design principles. The LEED pilot credit for Inclusive Design could be made mandatory for GSA projects. Consider making every entrance to buildings accessible, with exceptions made only for egregious site conditions.</p>
<p>Consider the requirement of accessibility to include sensory elements to make the spaces inclusive and welcoming to a neurodiverse population.</p>	<p>Unemployment among people with disabilities is easily over twice the rate of the general populace. In many instances, buildings and environments are deterrents to employment, or a factor in rapid turnover. Disabilities cover a wide spectrum, from physical to neurosensory. This under-served population is also increasing due in part to better diagnoses and understanding of sensory conditions. GSA buildings that include spaces that welcome a neurodiverse population could enable meaningful employment to many belonging to this population. Thoughtful design supports employment and a higher quality of life for neurodiverse populations.</p>

Recommendations for GSA Administrator for Structural, Procedural, Institutional, and Systemic Transformation of Government Collaboration for and Implementation of Environmental Justice & Equity Approaches

INSTITUTIONAL & PROCEDURAL RE-WORKING NEEDED TO INGRAIN JUSTICE IN GSA'S WORK AND ENABLE MEANINGFUL COMMUNITY PARTICIPATION.

<p>Recenter on justice & equity. Diversity & inclusion is an outcome of that focus.</p>	<p>“D&I” treatment is focused on internal make-up and external selection, such as minority contractors and equality. The J&E frame doesn’t just lean in on representation but also foundational justice values, organizational and systems structures, power dynamics, processes, policies and program design and implementation. Develop a set of processes for frontline community engagement in design, implementation, and evaluation, with decision-making authority throughout all GSA processes. Align with the Just Transition framework.</p>
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<p>Develop web content that is simpler, more meaningful, and easier to navigate.</p>	<p>Develop a web page and informational flyer/graphics that provide a foundation for community members seeking to understand equity and sustainability impacts of the GSA building portfolio.</p>
	<p>Develop an easy-to-use public calendar on the GSA website of all meetings and events that are open to the public.</p>
<p>Undertake a national learning tour (in person and/or virtually) in which GSA staff and committee members meet with frontline communities to learn about issues, priorities, and the past, current and potential impacts of GSA properties, asset management and procurement methods in regards to environmental justice and equity while getting to zero carbon footprints.</p>	<p>Document and publish testimonies, as well as other data about the experiences of BIPOC/low-income communities related to GSA projects, for the public to learn from those conversations.</p>
	<p>Partner with trusted community organizations to host popular education sessions to provide sufficient information to community members about GSA's impact in their communities.</p>
	<p>Identify how frontline communities wish to be in regular communication with GSA to iterate and improve relations, versus just a transactional relationship.</p>
<p>Carry out a series of pilot projects that embody what sustainable and equitable development looks like to further examine existing systems and identify points of intervention.</p>	<p>Because the most sustainable building is the one that is already built, there should be an emphasis on existing buildings. Assess highest and best use towards community building while driving to zero carbon. In general, any new facilities constructed by GSA should be community-serving and community-owned.</p>
<p>Develop a method for equitable community involvement in JEDI/ECJ planning and implementation within the Federal Acquisition Service.</p>	<p>Enable a frontline community-led group to form with self organized membership and leadership, high transparency, and support from federal representatives tasked to advise and share resources and information.</p>
	<p>Non-government participants should be compensated for participation in an advisory or supervisory capacity.</p>
	<p>Undertake a thorough assessment of procurement policies, programs, and practices to identify intervention opportunities for environmental, social, racial, and economic justice and equity.</p> <p>Hire an experienced independent firm to conduct a</p>



	<p>baseline Disparity Study to identify equity performance gaps, and conduct them after implementation of new policies to measure any progress, and report on the Hub to build accountability and trust. For an example, see one produced for the State of New York from 2017: https://www.masontillman.com/single-post/2017/10/12/new-york-state-disparity-study-findings-released</p> <p>Develop a standard for equitable procurement of goods and services for government. Examples of interventions include:</p> <ul style="list-style-type: none"> • Independent third-party individuals or groups should be hired to serve as JEDI compliance officers for GSA/projects basis, who will be tasked with ensuring compliance with rules that are created to ensure more diversity and inclusion in GSA contracting opportunities. A schedule of penalties shall be created for failing to comply with these rules. Recognition should be awarded to Prime contractors that comply or exceed inclusive contract award compliance at Justice 40 minimum levels, and premiated for greater JEDI performance • Where possible, the GSA should award direct contracts to MWBE, SBE, VBW & DBE owned companies and/or consider pre-qualifying a pool of MWBE etc. as Primes that then can partner and bring on other teaming partners. • A program should be instituted to provide financial and technical support to a group of BIPOC-owned and other emerging, local frontline companies that are new to bidding on GSA contracts. The support will help to cover the costs associated with researching, identifying and preparing bids.
<p>Federal agencies are siloed and often work in duplicity of efforts ultimately contributing to a lack of transparency, coordination, and respectful treatment of frontline communities being asked to participate in planning and implementation. GSA should advocate to join WHEJAC as an official member, NEJAC meetings, and other cross-agency efforts at the highest levels of decision making and influence.</p>	<p>Establish or designate a Federal agency hub or coordinator to align multiple agency efforts in capital improvements with local communities. Consider creating a new Department of Sustainable, Equitable, Resilient Built Environment (D SERBE) that has authority to coordinate and set sustainability/ equity/ resilience performance standards guiding all activities affecting implementation of Federal policies, legislation, codes, and expenditures involving public buildings/ built infrastructure, natural and working land use, and environmental-health-social equity impacts, to ensure sustainability, justice, equity, and community resilience on a national scale. The structure of D-SERBE could be a joint inter-agency dept. directly coordinating the primary Depts./agencies: GSA, DOT, EPA, HUD, DOD, OMB, DOI, DOE, FEMA, HHS, and Education developed as a hybrid of embedded dedicated staff, qualified with sustainability, building-transportation decarbonization, and EJ & Equity skillsets, within each department or agency, as</p>



	<p>well as more decentralized networked staff serving each state and/or EPA sub-regions.</p>
	<p>In alignment with Justice40, support development of mapping tools that enable GSA and community members to identify overall patterns in where GSA facilities are sited in relationship to “disadvantaged communities,” who are impacted (positively and negatively) by these facilities, and where gaps/negative outcomes need to be addressed. Research and leverage coordination with public and private databases/mapping tools.</p>
<p>Initiate a revisioning process for the FACA in cooperation with community led organizations.</p>	<p>Enable the meaningful, compensated participation of frontline communities in Federal collaboration opportunities.</p>
<p>Initiate a process for reparations dialogues with impacted communities and facilitated by a third-party entity agreed upon by all key parties.</p>	<p>Suggested initial focus areas include:</p> <ul style="list-style-type: none"> • The African Burial Ground National Monument in New York City in coordination with the National Park Service (do this in cooperation with the African – American descendant community, community members engaged in activism to preserve the space, and the team of Black historians/ archeologists/ anthropologists and other professionals involved in the project). • The system of incarceration infrastructure built by GSA and its involvement in prison labor (do this in cooperation with transformative & restorative justice practitioners and communities most impacted by mass incarceration). • Native land (do this in cooperation with Indigenous communities)
<p>Offer transparent follow-up and resources related to these recommendations and other opportunities available to frontline communities to participate in planning, decision-making, and implementation of environmental and other justice initiatives.</p>	<p>Relay all related recommendations to other relevant federal agencies and report back on outcomes/next steps to task group participants.</p> <p>Release data and information supporting sustainable and equitable practices for local and state governments to follow, based on effective strategies implemented by GSA and other Federal agencies. GSA should serve in the role of convener and connector to better unify states so that each state doesn't have their own goals/discrepancies and can avoid reinventing the wheel.</p>



Recommendations for GSA of Pitfalls to Avoid

FALSE SOLUTIONS TO THE CLIMATE CRISIS

[As articulated by Jacqui Patterson](#), founder of the CESBS Initiative and current Executive Director at The Chisholm Legacy Project, climate “solutions” that ignore these interrelated challenges will not be effective or just. Here are some of the all-too-common false solutions, omissions, and past patterns we must avoid:

1. **Carbon pricing**—Carbon-pricing allows polluters to pay a nominal fee, or sell and trade the “right” to emit greenhouse gases. Too often, this results in polluters increasing emissions in places where it is cheapest to pollute, intensifying the [lethal poisoning of BIPOC communities](#).
2. **Propping up polluters**—Strategies that support harmful [natural gas](#), [nuclear](#), [biomass](#), [biofuels](#), and [carbon capture and sequestration](#) are largely driven by the need to pacify powerful constituencies. Efforts to address the climate crisis will fail if they are counterbalanced by coddling of polluters.
3. **Supporting investor-owned utilities**-- It’s not just the energy sources that are problematic; we can’t continue to support a [failed utility business model](#) that lines the pockets of investors and [CEOs](#) while [heartlessly turning off energy access to impoverished people](#), often with fatal results.
4. **Technofixes**—Too many are looking for easy answers so we can [geoengineer](#) our way out of the climate crisis. But, as Martin Luther King [said](#), “All progress is precarious and the solution to one problem brings us face to face with another problem.” Tinkering with complex planetary systems—by, for example, using aerosols to control the earth’s temperature—is likely to yield unforeseen and even deadly [consequences](#).
5. **Single-issue solutions**—In the words of [Audre Lorde](#), “There is no such thing as a single-issue struggle because we do not live *single-issue lives*.” Solutions that [address multiple problems at once](#)—for example, creating well-paid jobs while building efficient, resilient homes — are both effective and politically popular.
6. **Ignoring grinding poverty**—Too many communities’ rights and wellbeing have been historically ignored and neglected in the fight against climate change, including Freedman’s settlements, unincorporated areas, deep rural communities, and some urban communities. Our definition of “disadvantaged communities” must include and prioritize them.
7. **Assuming a rising tide lifts all boats**—From [Urban Renewal](#) (known as “negro removal”) to [Opportunity Zones](#), many programs for economic development have turned out to be ineffective or even harmful—uprooting and destroying communities they intended to help. Without intentionality and [community driven planning processes](#), climate action plans could have [similar results](#).
8. **Failure to address racism and anti-Indigeneity**—Climate change and systemic racism are inherently linked as Black and brown communities bear the worst impacts of environmental harm. Continuing to [ignore treaty rights](#) and [avoid meaningful reparations legislation](#) would be a failure to address this wrong.
9. **Deploying “Weapons of Math Destruction”**—Too often, policies are driven by algorithms and formulas that reinforce inequality, such as funding community amenities from taxes that leave marginalized communities even worse off and without critical climate infrastructure. Even the upcoming [Executive Order on Climate Related Risks](#), if not anchored by equity measures, will deepen disparities.
10. **Incrementalism/low ambition**—This is no time to make small tweaks to a fundamentally flawed system. To change systemically rooted problems, we need bold, ambitious, transformational policymaking.