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**KENNETH W. COOPER**  
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January 18, 2023

**Submitted via regulations.gov**

Administrator Michael Regan  
Office of the Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

**RE: Request for Information: Climate Pollution Reduction Grants,  
Docket No. EPA-HQ-OAR-2022-0873**

Dear Administrator Regan:

On behalf of the 775,000 active and retired members of the International Brotherhood of Electrical Workers (IBEW), I write to urge the Environmental Protection Agency (EPA) to consider the policy recommendations set forth in the attached comments on EPA's Request for Information on Climate Pollution Reduction Grants. In the comments, IBEW offers policy solutions that EPA can implement on Climate Pollution Reduction grants to improve the quality of the jobs created by these investments. These policies will help EPA to honor the spirit of the Inflation Reduction Act and empower American workers for generations to come.

Of the IBEW's approximately 775,000 retired and active members, approximately 400,000 members work in electrical construction, and approximately 12,600 permanent railroad sector employees work for Class I, II and II freight and passenger railroad carriers. These hardworking IBEW members have historically served significant roles in the industries that benefit from EPA Climate Pollution Reduction Grants. IBEW railroad members work as locomotive electricians, facility maintenance electricians and telecommunication workers. IBEW construction members work in all facets of the electrical construction industry, including major infrastructure and energy projects. On behalf of IBEW's current and future members, I appreciate the significant opportunity to offer insight on how to advance the critical imperatives of the Inflation Reduction Act while promoting good union jobs in the railroad and construction industries.

As you know, one of President Biden's fundamental priorities is to protect and support workers with strong labor standards. This means expanding access to high-quality union employment that offers the dignity and security of a good, family-sustaining union job.

The EPA has the opportunity to usher in a new era of worker-centric prosperity in the railroad and construction industries. As detailed in the attached comments, consistent with the President's policies, IBEW recommends that the EPA take the following steps to integrate job quality, labor standards, and equal



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employment opportunity standards throughout the Climate Pollution Reduction grants program:

- Enter into a Memorandum of Understanding with the Department of Labor similar to that of the Departments of Transportation, Commerce and Energy to create high-quality jobs in fair and safe workplaces that offer workers free and fair chances to join a union
- Require registered apprenticeship utilization by all contractors and subcontractors performing construction work on projects funded by Climate Pollution Reduction grants
- Give preference to eligible entities that commit to funding or otherwise participating in quality pre-apprenticeship programs with organized labor to target historically underrepresented workers
- Give preference to eligible entities who are parties to, or commit to entering into, collective bargaining agreements that stipulate employees are covered by the Railway Labor Act and the Railroad Retirement Act

Through its policy influence and the federal government's power, the Biden administration has been highly effective in addressing the urgent climate crisis. The policy recommendations set forth in the attached comments can assist EPA in facilitating economic growth while implementing effective climate-forward strategies. By requiring fair labor standards that empower workers, EPA can invest in projects that reduce pollution, expand access to equitable employment opportunities, and promote the highly-skilled careers that advance the energy economy of the future, as President Biden has so often articulated.

Thank you for taking the initiative to support equity and economic justice in implementing the Climate Pollution Reduction grants program. I look forward to working with the EPA to uplift communities and create good union jobs while making the historic climate progress President Biden is delivering for the American people.

Sincerely yours,

Kenneth W. Cooper  
International President

KWC:nl  
Attachment (IBEW Comments on Docket No. EPA-HQ-OAR-2022-0873)