



Community Advisory Committee for the Milwaukee Estuary Area of Concern Response and Recommendation to The Great JTI Jobs Training Initiative

Overview

The Community Advisory Committee for the Milwaukee Estuary Area of Concern (henceforth CAC) requests the EPA and WDNR immediately pause the rollout of the GreatJTI training program in order to meaningfully incorporate the concerned feedback of the community of partners working to support this effort. Furthermore, the CAC wishes to make clear the program, as currently planned and facilitated by SKEO to date, serves to reinforce the very environmental racism and injustice the program claims to solve, counterproductive to its stated goals.

When we first learned about The Great JTI initiative as an effort that the EPA decided would be implemented in the Milwaukee Area, it presented an opportunity to work in collaboration with key partners, supporting efforts toward workforce goals in Milwaukee. The immediate feedback provided to the EPA made clear the importance of working with a paid liaison from Milwaukee who could understand the community as a local and ensure collaboration and cooperation with relevant stakeholders. Such an individual, it was explained, could connect local support systems and better learn/understand the barriers that might prevent each potential participant's personal success. To the best of our knowledge, this advice was ignored (please advise if otherwise) and a non-local consulting firm, SKEO, was brought in to lead the project in our community.

Representatives of SKEO have presented at the AOC Workforce meetings a few times and transparency seemed to be an issue due to EPA restrictions for sharing information.

Several CAC members met with SKEO, on behalf of the CAC, in January of 2023 and asked critical questions that would help the CAC understand how we could be most helpful. CAC member Shalina Ali suggested SKEO have a meeting with the CAC to discuss environmental justice and partnership support. There was no follow up from SKEO.

At our last meeting on January 30, 2024, there was a presentation that was once again vague. We learned of one partnership with Employ Milwaukee. When asked about the benefit of participation in the program, other than a paper certificate, no other clear benefits were outlined for the 40 participants



SKEO stated would go through the program. We have not seen clear evidence that the program had the capacity to enroll 40 actual participants, nor any information about the ways in which these participants would receive financial or other support (e.g., childcare) to put their lives on hold for a five-week program. There was also confusion over whether there was transportation to bring participants to training opportunities, as outlined, that are scheduled to take place outside of the City of Milwaukee.

The meeting held on January 30th mimicked past presentations that lacked transparency and concern for Environmental Justice, and disregarded stakeholders who have worked collectively to develop trust and transparency with each other. It was clear that the discovery phase of the Great JTI missed the critical opportunity to work with local people and initiatives—at every level—to increase the potential for success for participants of this program. Decisions are being made on behalf of a community by a government body and consulting firm whose practitioners are not from the area and lack the necessary lived experience of the ways in which structural racism shapes the experiences of potential program participants in this local community, which is consistently ranked one of the most segregated in the nation.

This work is in conflict with the MKE AOC Environmental Justice grant

We are additionally concerned that this work is in direct conflict with the MKE AOC Environmental Justice grant put forth by a broad coalition of local partners, a grant we have learned is likely to be funded. Within this grant, we directly create provisions for an EJ Coordinator to be hired, who would be actively involved in implementation of GreatJTI strategies. For additional information and citations, please see the supplemental section following this letter.

Recommendation

The CAC recommends and requests the temporary pause in further development and implementation of training related to the GreatJTI until it can be fully supported by the EJ Coordinator with funds to better engage community stakeholders and community members in recruitment, training, and support efforts.

Additional requests/considerations that have not been addressed in SKEO's current planning

- The Great JTI should be working with organizations such as the CAC, Milwaukee Equity Taskforce and Milwaukee Environmental Justice Alliance to determine Milwaukee needs and resources to



support a robust plan for each individual participant's success before, during and after the training program.

- Preparation - AOC Project Partners who have invested in JEDI training as an important part of the AOC work should commit to offering job interviews to JTI graduates at a minimum. There should also be a list of jobs outside of AOC projects in the Milwaukee Area for which graduates will be qualified due to their participation in this program. Ideally, potential contractors for AOC work could also be incentivized to hire employees that have graduated from this training program, and any others that might be developed for the AOC work.
- All training should be conducted by Milwaukee based trainers/businesses unless it does not exist locally. There should be an outline for each training with time for the local partners to provide feedback, which would be meaningfully incorporated into the final training. There could also be options for local partners, leaders, and thought partners to be involved in elements of these trainings, while providing local examples of people who have careers in natural resource management.
- Recruitment - There should be a clearly defined, executable/attainable and measurable recruitment strategy in place at least two months prior to program start date (ideally three). Additionally, there should be a clear outline of the tools that will be used to achieve the strategy, and these tools should be ready and available for all partners to use. Tools should include flyers, social media assets, press release templates, email templates, etc. There must also be adequate time for recruitment of participants (at least 2 months) with the strategy/tools outlined above to ensure partners are able to reach and recruit potential participants with enough lead time for participants to make the preparations necessary to put their lives on hold so they can wholly and completely participate in this program.
- Participants should receive payment for the 5 week training at a minimum of \$18-20/hour.
- Post graduation - Participants should have access to robust mentorship and holistic job search assistance (resume/cover letter assistance, interview prep and practice, ensuring participants have the tools necessary to get a job (email address, clothes, etc.), help finding/accessing job openings, etc.).
- There should be clear plans in place prior to the program start clearly detailing how the effectiveness and success of this program will be measured, including evaluation of trainings, mentorship satisfaction, diversity of program participants, and post participation job placement and retention at various points in time (2-months, 6-months, 1-year, 2-years, etc.).
- Trainers should incorporate weekly feedback from participants to improve trainings for following weeks, and meaningfully incorporate all feedback from participants, both during the training and post-program, to improve future JTI programs.



- Program leads should incorporate meaningful feedback from partners on all aspects of program partnership - recruitment process, communication with partners, training effectiveness, etc.

Thank you for the opportunity to provide this feedback. We sincerely hope it is meaningfully addressed and acted on. We look forward to working with you to improve this program to help our local communities gain employment both during the AOC cleanup and long after the AOC has been delisted.

- The Milwaukee Estuary Area of Concern Community Advisory Committee



Supplemental information regarding the MKE AOC EJ funding request

The following language is taken directly from the description of the GreatJTI as outlined in the MKE AOC EJ Funding Request proposal:

“The EPA Great Lakes National Program Office (GLNPO) GreatJTI program is closely patterned after the successful Superfund “SuperJTI” program. As a first step in developing The GreatJTI program, EPA is conducting a pilot in the Milwaukee Estuary AOC. The intent of GreatJTI is to provide training and employment opportunities for people living in and around AOCs. As many AOCs, Milwaukee included, contain EJ communities, a shared goal of the stakeholders is to help these communities develop job opportunities that engage local workforce in environmental work. The objective of these efforts is to create permanent employment long after the AOC has been restored and delisted by providing trainees with transferable skills and in-demand experience.”

“EJ Program Proposal. With the numerous projects, partners, and initiatives happening as part of the Milwaukee Estuary AOC, it is important to ensure that EJ efforts are coordinated and prioritized. Ensuring this alignment and development of EJ efforts, the WRP developed and submitted the Environmental Justice Program Initiative Proposal. The proposal represents hours upon hours of candid conversation between over a dozen community-based organizations including the nine-member Milwaukee Estuary Area of Concern (AOC) Community Advisory Committee (CAC), funders, and multiple local and state governmental entities. Together, this dedicated group met every week since October to explore and consider the question of “What Does Environmental Justice look like in Milwaukee?”.”

Additionally, the proposal included a new position in Milwaukee, an EJ Program Advisor. Two of the objectives of this position directly impacts the GreatJTI. They include:

- Develop, operationalize, and implement EJ strategies to achieve shared goals for both the GreatJTI and HIA initiatives.
- Coordinate and encourage participation of AOC stakeholder groups and community members in the GreatJTI and HIA initiatives.

In addition, funding was included in the proposal to compensate individual community members for participating in the scoping and development of the GreatJTI and HIA initiatives.