

## Environmental Justice Public Participation Guidance

This section presents the Public Participation Guidance, which builds on CT DEEP's years of experience with [public participation](#). In addition, the Guidance synthesizes research from the EPA and Connecticut's sister jurisdictions, as well as the experience and advice of residents of environmentally overburdened communities.

The Guidance is organized around four principles of public participation. Along with each principle, the Guidance includes a guiding question, a description of the principle, and specific actions the GC3 can take to create more open, accessible, transparent, and accountable public participation now and into the future.

Specifically, the Guidance relies upon the following resources:

- Input from community members in Connecticut, solicited at a public meeting on February 25, 2020.
- The EPA's [Title VI Public Involvement Guidance](#).
- The EPA's brochure on [How to Involve Environmental Justice Communities](#).
- Recommendations from Leticia Colon de Mejias, with [Green Eco Warriors](#).
- The First National People of Color Environmental Leadership Summit's [Principles of Environmental Justice](#).
- The National Environmental Justice Advisory Council (NEJAC)'s [Model Guidelines for Public Participation](#).
- Existing city, state and other governmental climate equity plans.<sup>1</sup>

### **1. Transparent and Accountable Decision-Making: *Is decision-making open, transparent, and accountable to the public at all stages?***

#### Summary

When it comes to decisions affecting their wellbeing and environment, members of the public have the right to be informed of, and included early and often in, clear, transparent, and reliable decision-making processes. Being accountable to the public requires not only eliciting, but also listening to, considering, and implementing, stakeholder input, and sharing information frequently and openly.

#### Specific Actions for Consideration

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<sup>1</sup> The city, state, and local government climate equity plans considered include the following: Los Angeles ["Green New Deal"](#) (2019); New York City ["Panel on Climate Change 2019 Report," Chapter Six](#); Minneapolis ["Climate Action Plan"](#) (2012); Oakland ["Equitable Climate Action Plan,"](#) which is ongoing; Portland, Oregon ["Climate Action Through Equity"](#) (2016); The [Transportation and Climate Initiative \(TCI\)](#) of the Northeast and Mid-Atlantic States (2019). The EEJ doesn't endorse any as the gold standard, but each presents ideas worth considering and lessons learned.

- Engage the public in all stages of the decision-making, implementation, and oversight processes (soliciting input on a near-final draft of a document under time pressure to complete a process is not sufficient). Stages to engage the public include:
  1. Planning Stage
    - a. Defining the problem or opportunity.
    - b. Establishing criteria for an effective solution (establishing goals and objectives).
    - c. Identifying and evaluating alternatives/potential pathways.
    - d. Selecting a course of action.
  2. Implementation Stage: Implementing the course of action.
  3. Evaluation Stage: Evaluating, learning from, and improving the plan and the process.

*Actions to consider **at the start of the planning stage** (listed in order of when to consider each action)*

- Use census data to account for demographics of the community. Be intentional about outreach.
- Develop (with input from key stakeholders, including but not limited to community residents and members of community-based organizations) a community engagement plan, which identifies key communities to engage, how to partner with those communities, and how to track success in partnering with those communities.
- Provide the public with clear information about the government's role, responsibilities, and goals with the project.

*Actions to consider **during the planning and implementation stages** (in order of when to consider each action)*

- Equip stakeholder communities with tools to ensure effective public involvement, including information about the issues at hand and the planned process and timeline for decision-making.
- Inform community members about their rights and role in the planning process.
- Identify appropriate metrics to reflect progress toward (a) policy objectives and goals as well as (b) implementation of the public participation plan
- Capture and share common data to measure progress towards policy objectives and public participation. This may involve training community members to collect data when appropriate.
- Ensure all data that you collect and share respects privacy concerns.

*Actions to consider **during the evaluation stage** (listed in order of when to consider each action)*

- Report progress and outcomes on policy goals and on the implementation of public participation planning in publicly shared reports.

**2. Accessible and Inclusive Decision-Making: *Is the decision-making process accessible to and inclusive of diverse populations?***

Summary

Every local context has its own cultural, environmental, political, and social background. Work actively to “meet people where they are” so the decision-making process is accessible for as many people as possible, including those who face the most obstacles.

### Specific Actions for Consideration

*Actions to consider at the start of the planning stage (listed in order of when to consider each action) . . .*

- Work with diverse stakeholders to identify community leaders and assess overall accessibility needs within the community (e.g., what languages are spoken within the community, what communication accommodations are needed, the level of access to transportation, etc.), taking into account census data on languages spoken in the relevant geographic area.
- Create a common language, with and for all stakeholders, that avoids charged language; use this common language in community and public meetings.
- Engage community leaders and local activists to help identify such language, and ensure sensitivity to race, ethnicity, gender, disability status, language, and culture.
  - Clearly define concepts, terms, and ideas, and remove jargon and acronyms from written and spoken word.
  - Providing access to unabridged documents in appropriate languages through repositories (e.g., public websites, etc.)
  - Using multilingual and culturally conscious graphics to convey information.
  - Simplify policy language and ensure that policy information is framed in a way that is relevant to the public and the local audience, to the extent possible. (For example, when discussing issues of climate change before coastal communities, be sure to emphasize the coastal implications in language that is clear and direct; when discussing issues of climate change with communities that are economically disadvantaged, be sure to acknowledge existing inequities as well as how climate change could exacerbate inequities.)
- Gather public suggestions about times, locations, and formats for participation that are most accessible. The GC3 Planning Process is taking place during the Covid 19 Pandemic. Consider how best to reach underserved communities.
  - Recognize barriers to participation specifically for those with disabilities, low or inconsistent internet bandwidth, and homelessness. Connect with these individuals and the organizations involved with providing resources and aid to these populations to inform and impact public participation methods.
  - Identify practices, in addition to public and community meetings that to solicit input from the public and to share information with the public. Examples of practices include webinars, conference calls, online feedback forms, etc.
  - Consider the use of non-digital outreach to reach those without consistent access to the internet. Examples of practices include Radio PSAs, call-in shows, interviews, direct mail inserts, and SMS messaging
- Codify policies for sharing information with the public in a timely, accessible, and understandable manner, and ensure that all levels of department personnel understand these policies.

*Actions to consider during the planning and implementation stages (in order of when to consider each action) . . .*

- Make written information readily accessible by:

- Considering literacy levels and the needs of people with disabilities and people with physical, intellectual, visual- and hearing-impairments, as well as those without access to personal computers.
- Translating documents for individuals with limited English proficiency.
- Making information available in a timely manner, and alerting the public about when and where it can be found.
- Providing access to unabridged documents in appropriate languages through repositories (e.g., public websites, etc.).
- Make all meetings, events, and information accessible:
  - Determine the types of meeting given constraints of the pandemic for in-person meetings but also limited access to digital technology (computers, Wi-Fi, etc.). Be creative with types of meetings or forums.
- Provide a phone number, web link, and/or email address for communities to learn about upcoming meetings or issues, express concerns, seek participation, or alter meeting agendas.
- Advertise the meeting and its proposed agenda in a timely manner in print and electronic media, as well as radio if appropriate.
- Select time frames that do not conflict with work schedules, rush hours, dinner hours, and other community commitments that may decrease attendance.
- For in-person meetings:
  - Provide food, especially if events are held during dinner hours.
  - Select locations and facilities that are local, accessible, convenient (e.g., reachable via public transit), of adequate size, ADA compliant, and represent neutral turf. Locations should not require participants to present official identification.
  - Provide means of transportation to bring community members to your meetings.
  - Provide tele- or video-conferencing options to increase accessibility of in-person meetings.
    - Provide assistance for people who are hearing-impaired, and translators for those with limited English proficiency.
- Provide childcare and/or family-based activities (e.g., coloring stations for children) at events.
- Gather contact information from participants to send information and follow-up.
- Provide access to computers, iPads, Wi-Fi etc. needed for virtual meetings.
- Provide the contact information of personnel who are equipped to record and share community comments, and/or creating online forums or comment opportunities.
- Consider the use of posters and exhibits, public databases, bulletin boards, surveys, telephone hotlines, training and education programs, and participation in community activities.

**3. Equal Partnerships, Co-Production, and Self-Determination: *Are community members equal partners in decision-making?***

Summary

Those whose health and environment may be affected by a decision have a right to be meaningfully involved in the decision-making process, and to play an equal role in producing ideas and plans. Strong bidirectional relationships built on trust and mutual respect are key to meaningful public participation.

### Specific Actions for Consideration

#### *Actions to consider at the start of the planning stage (listed in order of when to consider each action)*

- Develop co-planning relationships with community organizations, by explicitly telling them that you see them as equal partners, and by acknowledging that their community experiences and perspectives are valuable to inform decision-making.
- Provide the community with resources that clearly communicate your work objectives so they can effectively participate in decision-making and implementation.
- Prior to conducting your first meeting with the public, prepare norms to guide how you will collaborate with the community.
  - To develop these norms, solicit assistance from community partners and department staff, including a community steering committee if possible.
  - Norms should include recognizing that members of the public share their own personal experiences/perspectives and that all of those experiences/perspectives are valuable to the policy-making process.
- In addition to developing norms, collaborate with members from the community to learn how the community would like information presented, to solicit questions they would like answered, and to know what languages they speak.
- At your first community/public meeting share norms and frame the entirety of your project by doing the following:
  - Explicitly establish and share goals specific to the meeting, and explain how they fit with larger project goals.
  - Provide a timeline of how the meeting and goals fit into a larger agenda.

#### *Actions to consider during the planning and implementation stages (in order of when to consider each action)*

- Plan meeting agendas in partnership with the community and, at the start of each meeting, ask community members if they would like to add items to the agenda.
- Create an atmosphere of equal participation at meetings and gatherings. (e.g., avoid a head table or panel, use-seating arrangements that allow for easy dialogue, etc.).
- During meetings, provide multiple options and opportunities for community members to ask questions and identify issues of concern. Interested persons should be able to participate in the process through written or spoken means and either identified or anonymously.
- Document questions and concerns, sharing them with the appropriate people and providing clear information about next steps or follow-up.

#### **4. Respect, Efficiency, and Non-Exploitation: *Is the decision-making process respectful and streamlined to ensure the time and effort of participants are valued?***

### Summary

People have limited social, financial, emotional, and time resources. This may be especially true of environmental justice communities burdened with environmental, spatial, and/or socioeconomic

hardships. Policymakers should be respectful of people's limited resources, and avoid exploiting their time, knowledge, and energy.

#### Specific Actions for Consideration

##### *Actions to consider at the start of the planning stage (listed in order of when to consider each action)*

- Designate a central point of contact within your department to disseminate information to the community and serve as a visible and accessible advocate for community members.
- Identify partners, within the government or in other departments (or working groups) of your project, who will also benefit from community input; contact those individuals to set up a line of communication.
- Identify community leaders who are the most likely to stay engaged with your work and to provide productive feedback that represents members across the public and community, and invite these leaders to act as representatives of their community.
- Consider engaging an independent steering committee of affected community members from the beginning of the process to lead with planning, training, education, and outreach. The committee can act as liaisons between the community and the department when full public participation is not possible.
- Identify groups outside of the government that may be able to provide material and financial resources/support to your community engagement efforts.
  - The department, technical experts, and other key stakeholders (including representatives from local groups) can serve as advisors, and provide resources including financial support for facilitation, technical assistance, and capacity building, as well as meeting locations and logistical support.
- Training existing staff in cultural and linguistically appropriate community outreach techniques. Trainers and staff should be ambassadors of the community engagement process, and should, whenever possible, reflect and represent the communities with which they interact.

##### *Actions to consider during the planning and implementation stages (in order of when to consider each action)*

- Share the name and contact information of the designated point of contact early and often with the public through various channels, especially face-to-face meetings.
- Share community concerns, ideas, and feedback with stakeholders identified in other departments (or working groups) so that all working groups and departments understand and act upon community input.
- After holding a public forum or meeting, establish a procedure to follow up with concrete action to address the community's concerns.
- Alert the community when and how follow up actions are taken, and offer clear opportunities for feedback and further participation.

##### *Actions to consider during the evaluation stage (listed in order of when to consider each action)*

- Create opportunities for continued participation after the project has been implemented, and establish mechanisms to inform the community about the status of the project. Such

opportunities and mechanisms could include public in-person meetings in the community, email newsletters, a website where you post updates and solicit feedback, webinars, etc.

- Provide a clearly visible condensed Executive Summary or organized list of recommendations at the beginning of working group reports. Comments have suggested that public participation would benefit from more readable materials, as many people simply do not have the time to fully read and comment on long reports.

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## Public Participation Guidance

### City, State, and Other Government Practices

For insight into how sister states and other governmental entities have implemented public participation practices, this Part considers information from the following six locations and plans:

- Los Angeles “Green New Deal”
- New York City [“Panel on Climate Change 2019 Report,” Chapter Six](#)
- Minneapolis [“Climate Action Plan”](#)
- Oakland [“Equitable Climate Action Plan”](#)
- Portland, Oregon [“Climate Action Through Equity”](#)
- The [Transportation and Climate Initiative \(TCI\) of the Northeast and Mid-Atlantic States](#)

The following are some of the most relevant takeaways for consideration:

- **Transparent and Accountable Decision-Making:** Portland’s 2016 plan demonstrates important practices to make engagement transparent and to respond to community feedback. Such practices include continually soliciting and responding to feedback from community partners.
- **Accessible and Inclusive Decision-Making:** To cover a broad geographic area, TCI allowed the public to engage with its work through many mediums, including public meetings, online webinars, and conference calls.
- **Equal Partnerships, Co-Production, and Self-Determination:** New York City’s and Los Angeles’s plans highlight policies that city and state governments can use to devolve the development and implementation of climate programs to the community-level.
- **Respect, Efficiency, and Non-Exploitation:** Oakland has a clear, small advisory body and government office for the community to access as a point-of-contact regarding the city’s climate planning.

The table below details some sample public participation and community engagement practices. The table corresponds to the four guiding principles highlighted in the rest of this guidance document.

Principle for Public Participation	Effective Public Participation and Community Engagement Practices
<b>Transparent and Accountable Decision-Making</b>	<ul style="list-style-type: none"> <li>● <b>Portland</b> created surveys, throughout its process, to hold itself accountable to the needs of its working group. Portland adjusted its engagement practices based on the feedback from those surveys.</li> <li>● At the end of its work, <b>Portland</b> created a transparent, publicly accessible report to summarize and reflect on its engagement process.</li> <li>● Since late 2019, <b>TCI</b> has made its engagement processes transparent, particularly by publishing those processes on the internet.</li> <li>● <b>Oakland</b> has clearly communicated that its advisory committee will hold a series of public meetings and created a webpage with the dates, agendas, and audio recordings of those meetings.</li> <li>● In an appendix to its climate plan, <b>Minneapolis</b> published a dialogue of formal letters between its city council and community advocates.</li> </ul>
<b>Accessible and Inclusive Decision-Making</b>	<ul style="list-style-type: none"> <li>● <b>Portland</b> invited a diverse set of community members to nominate themselves to the working group, and its membership appears to have represented a diverse variety of communities in the city.</li> <li>● <b>Portland</b> provided funds to participating partnering organizations so that they could afford to provide their time to this work.</li> <li>● <b>TCI</b>, while criticized by environmental justice groups over the last few years, held public meetings and created other mechanisms (e.g., feedback forms, webinars, conference calls, etc.) to engage the public and is currently undertaking to expand its equity efforts.</li> <li>● <b>Oakland</b> has made its materials available online and the audio of its public meetings available online.</li> </ul>
<b>Equal Partnerships, Co-Production, and Self-Determination</b>	<ul style="list-style-type: none"> <li>● In <b>Portland</b>, the city created its community engagement process in partnership with community partners.</li> <li>● <b>Oakland's</b> advisory committee, which appears to have decision-making authority, consists of a diverse set of community representatives.</li> <li>● <b>New York City's</b> recommendations highlight government policies that provide public funds to community organizations; those organizations implement their own community-tailored climate adaptation plans.</li> <li>● <b>Los Angeles</b> uses California's Transformative Climate Communities grant program to fund community-led climate plans.</li> </ul>

<b>Respect, Efficiency, and Non-Exploitation</b>	<ul style="list-style-type: none"><li>● <b>Oakland</b> has a clear public advisory committee and governmental office for the public to contact.</li><li>● <b>Oakland's</b> public advisory committee is representative of the broader city community and has real decision-making authority.</li><li>● <b>Portland</b> created a single community-working group with direct points-of-contact in the city government.</li></ul>
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