Equity & Environmental Justice
Draft Report
September 21, 2020
For Discussion & Feedback

Photograph of first meeting of the Equity & Environmental Justice Working Group at the Sound School, New Haven, February 25, 2020.

Executive Summary[1]

Governor Lamont's Executive Order establishing the Governor's Council on Climate Change (the GC3) required that the GC3 analyze both climate mitigation progress and climate change adaptation through an equity lens. The Equity and Environmental Justice Working Group (EEJ) was charged with developing a plan and guidelines for engaging diverse stakeholders in the process and working with other working groups to evaluate recommended strategies through an equity lens. The EEJ was able accomplish the following:

- Beginning in February, together with DEEP staff, conducted outreach to engage representatives from environmental justice communities in the GC3 process, and all GC3 working groups and committees;
- Developed a concept paper on equity (at Section I, below);
- Drafted public participation guidelines and, after the pandemic hit, guidelines on remote engagement, both of which were circulated across GC3 working groups (at Section II);
- Developed recommendations with an equity lens for the creation and support for an environmental and climate justice mapping tool to provide a visual representation of the relative vulnerabilities of Connecticut's communities (at Section III);
- Provided analysis in an iterative way with other GC3 working groups to encourage and provide feedback on recommendations considering issues of equity, though this work is still in progress (at Sections IV and V); and
- Launched a webinar series on environmental and climate justice to provide context for GC3 participants and other interested parties;

EEJ subcommittees (Mitigation, Equity, Environmental Justice (EJ) & Adaptation, Public Participation and Environmental and Climate Justice Mapping Tool) provided feedback on an expedited basis to other GC3 working groups and developed recommendations for progress on mitigation and adaptation strategies. Among other things, EEJ recommends funding for municipalities to develop their own adaptation plans and both guidance and statewide data driven mapping to inform planning and implementation on a hyperlocal level.

The EEJ also provided initial feedback on presentations and preliminary recommendations offered by the other GC3 working groups. One key theme across a number of subject areas was the need to prioritize vulnerable communities for benefits to ensure that economic gains from climate mitigation and adaptation flow to communities and address rather than exacerbate inequality. Discussion with Working and Natural Lands emphasized strategies to address combined sewage overflow and build green infrastructure, among other things.

Notably, however, EEJ's review of the many working group reports and recommendations was largely compressed into a two-week period in August, limiting the ability of EEJ members to give each report the attention it deserved. At the same time, outreach and public engagement was also interrupted by the pandemic. Though EEJ and the GC3 process pivoted to online engagement, EEJ strongly recommends the development of and support for a robust public

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[1] The EEJ wants to acknowledge the leadership of Governor Lamont, the many contributions of DEEP staff, as well as members of the EEJ (listed at Appendix A) and participants in our February in-person meeting as well as our multiple online EEJ and Subcommittee meetings. We also thank our partners across the GC3 who sought, despite any number of challenges this year, to grapple with issues of equity and to create more open, inclusive and participatory processes. We are particularly excited by the areas of mutual enthusiasm and look forward to continued work together.

engagement process in 2021 to take advantage of the diverse experience and expertise of Connecticut's residents, who are critical resources for ideas and feedback on mitigation and adaption strategies.

Introduction

Executive Order 3, issued by Governor Lamont on September 3rd, 2019, required for the first time that the GC3 analyze both climate mitigation progress and climate change adaptation strategies through an equity lens. Specifically, the Executive Order required that the GC3 report on the following:

- As to progress on mitigation, "Prioritizing, integrating and advancing equitable distribution of the costs and benefits of climate change mitigation planning policies, *specifically addressing disproportionate impacts of such strategies on environmental justice communities*,"[2] and
- As to adaptation, "Recommended strategies to prioritize climate change adaptation efforts *to protect vulnerable communities that may be disproportionately impacted by the effects of climate change*."[3]

Toward this end, the Equity and Environmental Justice Working Group (EEJ) was charged with both developing a plan and guidelines for engaging diverse stakeholders into the process, including particularly people from the communities most vulnerable to climate change, and working with other groups within the GC3 process to evaluate recommended strategies through an equity lens. Specifically, the following key issues were identified for EEJ input:

- Developing a plan and guidelines to engage diverse stakeholders in the work of the GC3, including ensuring equity and EJ issues are integrated in the other working groups.
- Identifying those communities that are especially vulnerable to climate change impacts, such as childhood asthma, flooding, extreme heat, and other impacts aggravated by a lack of resources to meet basic needs.
- Identifying strategies to include diverse communities in the deployment of climate mitigation and adaptation investment.[4]

EEJ's key deliverables included:

1. Drafting a public engagement and participation plan with guidelines for conducting meetings and GC3 work in an inclusive manner, including diverse stakeholders. The Public Participation Subcommittee reviewed and evaluated these documents.

2. The Mitigation Subcommittee reviewed and evaluated the recommendations made in the [2018 GC3 report] to identify potential positive and negative impacts for low-income populations, communities of color, and other underserved or marginalized groups in

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[2] Executive Order 3, ¶4(a) (emphasis added).
[3] Executive Order 3, ¶ 5 (b)(iii) (emphasis added).
[4] GC3 "Equity and Environmental Justice Working Group Outline of Approach" (Sept. 20, 2020).

order to make new, relevant sub-recommendations to be considered for inclusion in an updated report.

3. The Equity & EJ Adaptation Subcommittee developed a narrative and recommendations for an updated statewide Adaptation and Resilience Plan "that ensure communities most vulnerable to, and disproportionately impacted by, climate change will have the opportunity to meaningfully participate in the development of adaptation strategies that meet their needs and achieve equitable solutions."[5]

4. The Environmental and Climate Justice Mapping Tool Subcommittee recruited members with expertise in Census, Geographic Information Systems and health indicators data and analysis to recommend the development of a tool to assess populations vulnerable to environmental risk and climate change.

The 25 EEJ members (for list, see Appendix A) with additional members of the public, and the support of DEEP staff members Edith Pestana, Doris Johnson and James Albis, developed, discussed, and vetted a paper discussing the meaning of equity in the context of climate change, and public participation guidance. This included, because of the changed circumstances of 2020, a supplemental guidance on remote public engagement, all of which are included in this report.   EEJ began its work with a standing room only in-person public meeting at the Sound School in New Haven on February 25th, where we discussed the mission and deliverables of the Working Group and workshopped concepts equity.[6] We subsequently pivoted to online meetings conducted via zoom for the full EEJ, including meetings on April 29th, June 18, July 29, August 10, August 20th, and September 8. In addition, given the need to provide more context on environmental and climate justice to participants in the GC3 process, EEJ and DEEP staff launched the GC3's Equity and Environmental Justice in Climate Solutions Webinar Series, which was kicked off on September 10th with a presentation by Sharon Lewis of the Connecticut Coalition for Environmental Justice on the history of environmental justice and racial policies in Connecticut. The series will run weekly through mid-November.[7]

In order to expedite work on deliverables, EEJ formed four subcommittees to focus on Public Participation, the development of an Environmental and Climate Justice Mapping Tool, Mitigation, and EEJ and Equity, EJ and Adaptation. Each of these subcommittees met via zoom between May and September as well. Draft public participation and remote engagement policies were circulated to working groups and committees throughout the GC3 by late spring as the Public Participation Subcommittee continued to discuss and finalize the recommendations that appear in this report. The Mitigation and EEJ and Adaptation Subcommittees organized to review mitigation and adaptation recommendations and provide expedited feedback on a short timetable. They presented input directly to the GC3 workgroups orally and in writing during the summer of 2020, and copies of the written feedback are appended to this report. EEJ expects to continue its review of recommendations during the public engagement period in the fall.

EEJ thanks the Governor, the Commissioner, DEEP staff, and the GC3 working groups, subcommittees and sector groups for their commitment to integrating equity and environmental justice into their analysis and recommendations. We also thank all involved for their receptivity to greater involvement of new members to their ranks and to EEJ input.

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[5] GC3 "Equity and Environmental Justice Working Group Outline of Approach" (Sept. 20, 2020).
[6] See Agenda and Minutes of the February 25, 2020 and subsequent EEJ and Subcommittee meetings at https://portal.ct.gov/DEEP/Climate-Change/GC3/Subcommittee-and--working-groups.
[7] See Exploring Climate Solutions Webinar Series, https://portal.ct.gov/DEEP/Climate-Change/GC3/Webinars.

At the same time, EEJ also notes significant limitations to public participation during the GC3 process in 2020 and strongly recommends that resources be allocated in 2021 to engage community organizations to provide input on the next stage of recommendations related to progress on mitigation and adaptation. Some of the challenges in 2020 were unpredicted and unavoidable: the pandemic and the death of George Floyd changed our lives, our means of communication, and our capacity to engage in ways unforeseen, and they had particularly devastating impacts of the very communities most vulnerable to climate change. EEJ encourages the GC3 to look to models of community engagement in other climate change planning processes that have allocated funding to support partnering community-based non-governmental organizations to design the community engagement process, receive substantive training, and co-develop recommendations to ensure meaningful input and equitable approaches to mitigation and adaptation.[8]

E&EJ Working Group Recommendation:
2021 Investment in Community Engagement

Top Priority Action

> Develop and fund a community engagement strategy to inform the 2021 GC3 planning process and implementation, including support in the form of grants for partnering community-based, non-governmental organizations to design the community engagement process, receive training, and co-develop recommendations to ensure meaningful input and equitable approaches to mitigation and adaption. Both public and private funding should be pursued.

Background: The Centrality of Equity and Environmental Justice to Climate Action

Issues of equity must be understood to be central to climate change mitigation and adaptation. Failing to listen to environmental justice communities raises the likelihood of missing key strategies and risks exacerbating inequalities in Connecticut. As the Intergovernmental Panel on Climate Change has written:

> Differences in vulnerability and exposure arise from non-climatic factors and from multidimensional inequalities often produced by uneven development processes…. These differences shape differential risks from climate change…. Please who are socially, economically, culturally, politically, institutionally, or otherwise marginalized are especially

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[8] See, for example, Foster, et al., "New York City Panel on Climate Change 2019 Report, Chapter 6: Community-Based Assessment of Adaptation and Equity,"*Annals of the New York Academy of Sciences*, (2019), https://www.researchgate.net/publication/331793205_New_York_City_Panel_on_Climate_Change_2019_Report_Chapter_6_Community-Based_Assessments_of_Adaptation_and_Equity, 28-33 (report on collaboratively produced case studies including interviews with representatives from community-based organizations in three communities that engage in local adaptation planning efforts, among other things); "Climate Action Through Equity: The Integration of Equity in the Portland/Multnomah County 2015 Climate Action Plan" (July 12, 2016), 8-9, https://www.portland.gov/sites/default/files/2019-07/cap-equity-case-study-web29jul.pdf (developing subgrants for community organizations to participate in the Climate Action Plan Equity Working Group).

> vulnerable to climate change and also to some adaptation and mitigation responses…. This heightened vulnerability is rarely due to a single cause. Rather, it is the produce of intersecting social processes that result in inequalities in socioeconomic status and income, as well as in exposure. Such social processes include, for example discrimination the basis of gender, class, ethnicity, age, and disability.[9]

Together with the Public Health and Safety Working Group, EEJ identifies the centrality of indicators of vulnerability to develop mitigation and adaptation strategies and evaluate their success. EEJ strongly recommends initial and sustained investment in a mapping tool that will provide a visual representation of the relative vulnerabilities of Connecticut's communities to climate change and inform planning and implementation at statewide and hyperlocal levels.[10]

Perhaps at no time in recent memory have the relative vulnerabilities of communities been so apparent, given disparities in illness and death resulting from COVID on the basis of race, ethnicity, occupational status, residence in detention and other congregate residential settings, and other indicia of vulnerability.[11]

The remainder of this report includes (I) a discussion of the concept of equity, (II) recommendations for public participation and remote public engagement, (III) the report and recommendations from the Mapping Tool Subcommittee, and (IV and V) high level recommendations from the Mitigation and EEJ and Adaptation Subcommittees, with more detailed feedback attached.

I. Equity & Environmental Justice

Background

A clear understanding of equity is necessary to carry out the mandate of Executive Order 3, which requires that the GC3 prioritize equity and environmental justice. To launch its work, the EEJ discussed the concept of equity, explored ways to apply that concept to issues of climate change, and articulated examples of climate equity in practice. In 2020, after experiencing racial

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[9] Intergovernmental Panel on Climate Change, "Climate Change 2014: Impacts, Adaptation, and Vulnerability: Summary for Policymakers" (2014), 6, https://www.ipcc.ch/site/assets/uploads/2018/02/ar5_wgII_spm_en.pdf (assessments of confidence and citations omitted); see also American Public Health Association, "Climate Changes Health: Vulnerable Populations, https://www.apha.org/topics-and-issues/climate-change/vulnerable-populations (describing vulnerability, climate effects, and health threats to children, older adults, communities of color, and low-income communities, and describing other vulnerable communities as including pregnant women, immigrant groups with limited English proficiency, indigenous peoples, people with disabilities, vulnerable occupational groups, and people with pre-existing or chronic medical conditions).

[10] See English, et al., "Environmental Health Indicators of Climate Change for the United States: Findings from the State Environmental Health Indicator Collaborative," *Environmental Health Perspectives* (Nov. 2019), 1673, https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.0900708 ("To develop public health adaptation strategies, evaluate their success, and project the impacts of climate change on human health, indicators of vulnerability and preparedness, along with accurate surveillance data (usually generated by state and federal environmental and health agencies) on climate-sensitive health outcomes, are urgently needed.").

[11] See, e.g., Center for Disease Control (CDC), *Health Equity Considerations and Racial and Ethnic Minority Groups,* https://www.cdc.gov/coronavirus/2019-ncov/community/health-equity/race-ethnicity.html.

disparities in the prevalence and fatalities related to the coronavirus pandemic, equity requires a clear-sighted analysis of the role of race, income levels, and other factors that result in inequalities.

What is equity?

A commitment to equity starts by recognizing that disparities in health outcomes, inequities in living conditions, and lack of political power place many communities of color, including Black, Indigenous, and other People of Color ("BIPOC"), low-income communities, people with disabilities, and other historically disadvantaged people at greater risk and limit the capacity of their communities to adapt to climate change. The principles of equity mandate that race, national origin, socio-economic status, religion, gender, sexuality, or other facets of identity do not impact a person's access to resources, including basic necessities such as safe shelter, water, food, heat, and light, as well as opportunities for safe employment to support oneself and one's family, equal access to community supports such as public education, public transportation, healthcare and mental health care. Climate change also poses a risk to future generations, who are unable to participate in decision-making today. Equitable planning includes core concepts of distributive and procedural justice: it considers existing disparities and provides communities with meaningful opportunities to participate in the policy processes meant to further climate justice and mitigate environmental racism. It requires that community perspectives and viewpoints be considered in adaptation and mitigation decision-making and planning.

How does equity relate to climate change?

Climate change poses the greatest threat to those communities that are the least responsible – particularly BIPOC communities and low-income populations. These communities already experience disparities in health outcomes, inequities in living conditions, and a profound lack of political power. Such disparities place low-income communities and many communities of color at greater risk and limit their capacity to adapt. Conversely, those who have contributed the most to climate change are better positioned to protect themselves from its impacts. These inequities are the result of historical injustices rooted in race, class, and political representation here in Connecticut and across the country. As the effects of climate change mount, so does the urgency of addressing this challenge.

Equitable approaches to policy planning start by focusing on current and historical disparities across communities.[12] Equitable policies prioritize the well-being of the most vulnerable community members. Equitable approaches to policy planning and implementation recognize that communities should have a role in creating plans that affect their well-being, values and community perspectives and viewpoints. Moreover, programs that are developed and roll out for a expedited or limited period of time often end up inequitably distributed because it takes

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[12] For principles of climate justice, see, e.g., Mary Robinson Foundation, *Principles of Climate Justice*, https://www.mrfcj.org/principles-of-climate-justice/; Equitable & Just Climate National Climate Platform (2019), https://ajustclimate.org/; Foster, et al., "New York City Panel on Climate Change 2019 Report, Chapter 6: Community-Based Assessment of Adaptation and Equity,"*Annals of the New York Academy of Sciences*, (2019), https://www.researchgate.net/publication/331793205_New_York_City_Panel_on_Climate_Change_2019_Report_Chapter_6_Community-Based_Assessments_of_Adaptation_and_Equity, 40 (finding that a framework for equitable adaptation for climate change requires incorporation of distributional, contextual, and procedural equity in adaptation planning, and consideration of the distribution of social vulnerability to climate change, among other things).

time for information to reach communities, time for residents to respond, and time to overcome other barriers to participation. Equity requires acknowledgement that people with more privilege are often able to respond more quickly. Finally, to advance equity, consultation with communities must be iterative and political representatives and the government should be accountable for advancing equity.

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If policy makers fail to consider equity in the planning processes, not only do their actions risk further exacerbating inequalities, but they also risk losing the good ideas and important perspectives of the people whose lives and futures are most on the line.

Equitable approaches to policy planning start by focusing on current and historical disparities across communities. Equitable policies prioritize the well-being of the most vulnerable community members. Equitable approaches to policy planning and implementation also recognize that communities should have a role in creating plans that affect their well-being; equity values community perspectives and viewpoints. Finally, to advance equity, consultation with communities must be iterative and political representatives and the government should be accountable for advancing equity.

Component	Description
Component	*Description*
Distributive Equity	Equitable mitigation and adaptation strategies take into account the distribution of environmental and climate-related burdens and place the most vulnerable communities at the forefront of any potential benefits a policy might create. Distributive equity starts by recognizing those disparities in health outcomes, inequities in living conditions, and lack of political power place low-income communities, BIPOC communities, and people with disabilities, and other historically disadvantaged communities at greater risk. Distributive equity strategies target resources to adaptation and mitigation strategies affecting the most vulnerable communities and provide these communities with work opportunities and quality-of-life benefits.
Procedural Equity (or Equitable Planning and Implementation)	Equitable mitigation and adaptation strategies must be planned in partnership with low-income communities and communities of color. The 1991 Principles of Environmental Justice, developed by members of the Environmental Justice Movement, include "the right to participate as equal partners at every level of decision-making, including needs assessment, planning, implementation, enforcement, and evaluation." Equitable planning and implementation require that communities have a meaningful opportunity to participate. Policy makers must collaborate with communities to learn about their perspectives so that solutions meet community needs. Equitable planning focuses on the local level and ensures that local communities have the opportunity to provide input on policies that directly affect them.
Contextual Equity	Equitable mitigation and adaptation strategies take into account that low-income communities, BIPOC communities, and people with disabilities, among others, are often more vulnerable to climate change, and the development of mitigation and adaptation strategies at statewide and local levels must take into account these disparities.

Corrective Equity	Equitable mitigation and adaptation strategies would provide communities with clear processes to hold the state accountable to its commitments to pursue equity.

Examples of Equitable Policies and Approaches

Solar Energy: An equitable approach to solar would include community solar projects that benefit all residents, including residents of low-income housing and public housing.

Tax Policy: Tax funds or ratepayer resources should not be allocated to high-income communities or businesses, while those same resources are denied to low income communities and minority-owned businesses.

Transportation: The expansion of personal electric vehicle (EV) infrastructure can only be purchased by affluent households, whereas expanded public transportation is accessible to all communities and lowers carbon emissions. The former should not be prioritized over the latter.

Green Industry: An equitable approach to green industry development would include a workforce development component, to strengthen the capacity of low-income communities and communities of color to participate.

Basic principles

Some of the key principles that flow from an equity lens include:

- All aspects of the GC3 process must be transparent to the public, accessible to diverse community members, including people who are economically disadvantaged, BIPOC, and people with disabilities, and inclusive, offering opportunities for meaningful participation.

    - The GC3 process should treat the community as equal partners, allowing communities to have a meaningful say in decisions affecting their own communities
    - The GC3 process should make it easy for communities to offer input, recognizing and respecting the other demands on people's time and resources.

    - Statewide climate adaptation and mitigation policies must consider existing inequalities, reviewing community needs and identifying which communities are the most at-risk to climate change.

- Plans must assess cumulative impacts in order to understand which communities are most vulnerable to climate change.

- The goals of any just climate action plan include should include racial and economic justice.

● The benefits of a just transition must be distributed equitably.

● Policies should prioritize the most vulnerable communities by targeting resources to vulnerable communities first and then expanding statewide.

● Costs should be equitably distributive.

● No community should be left behind; any plan must include pollution reduction in legacy communities, benefits at the community level, access to affordable energy, health monitoring, infrastructure that can withstand floods and storms, accessible housing for people who have been displaced, maintaining and protecting water resources.

● The GC3 should ensure that community members have mechanisms for monitoring policy planning and implementation and to offer questions and input.

More Detail on Components of Equity

Distributive Equity: *Placing the most vulnerable communities at the forefront of any potential benefits a policy might create; ensuring that the distribution of the benefits and burdens of climate change mitigation and adaptation are equitably distributed.*

Equitable sharing of environmental impacts by a community can be achieved by ensuring no one subset of people or socio-economic group bears a heavier burden. Equitable environmental policies and laws strive to ensure that no one group of community bears a larger, unfair share of harmful effects from pollution or environmental hazards. These policies and laws should aspire to offer support to more vulnerable communities, as measured by the social determinants of health, and ensure that they do not accidentally bear an unfair share of the cost of the work, which must occur.

Connecticut's climate mitigation and adaptation strategies should ensure that benefits and burdens are not unfairly allocated and focus on benefitting low-income communities BIPOC communities, people with disabilities and low-income populations in rural Connecticut, among other vulnerable communities.

Procedural Equity: *Planning in partnership with low-income communities and BIPOC communities.*

An equitable approach to climate change mitigation and adaptation requires the government to meaningfully partner with low-income communities and BIPOC communities. The state must co-produce its plans with those communities. Far too often, low-income communities and communities of color are not at the table to advocate for their needs.

As other jurisdictions have found, partnership with overburdened communities has led to specific mitigation and adaptation strategies that are successful.

Contextual Equity: *Assessing the vulnerabilities of communities across Connecticut to climate change, due to the legacy of racial and income inequality and other factors.*

Connecticut has an unfortunate expanding affordability gap. When it comes to energy and transportation, for example, the state's low-income population is stuck in a state of disparity with over 400,000 households unable to pay their electric bills and keep their heat on. Low-income communities are busy struggling to survive and often work more than one job, or have other pressing responsibilities. Many low-income families are dealing with serious medical issues, housing displacement, or lack of safe affordable housing, and are impacted by general lack of resources.

Each community faces a different combination of climate and other vulnerabilities. It is critical to identify special patterns of vulnerability to provide guidance on strategies that will work and on indicators that can be used to measure vulnerability and performance over time.

Corrective Equity: *Providing communities with clear processes to hold the state accountable to its commitments to pursue equity.*

Because vulnerable communities often lack traditional forms of economic resources and political influence, the state must create processes that allow those communities to hold public leaders accountable. Equitable climate mitigation and adaptation strategies would consist of clear processes that (a) allow the state to check on its progress towards its goals and (b) allow communities to hold the state accountable.

II.   Public Participation

The purpose of this section of the report is to provide the GC3 with guidance from EEJ on how to engage the public throughout the entirety of its policy-making and implementation. The GC3 may use the following language to help inform its planning and to reflect on its efforts to integrate public participation into its work.

The EEJ Public Participation Subcommittee has recommended the following principles necessary to fair public participation procedures.

Principles for Public Participation	Guiding Question to Hold Ourselves Accountable
1 **Transparent and Accountable Decision-Making**	Is decision-making open, transparent, and accountable to the public at all stages?
2 **Accessible and Inclusive Decision-Making**	Is the decision-making process accessible to and inclusive of diverse populations? Am I ensuring that members from historically disadvantaged communities – including communities of color, communities that are economically disadvantaged, people with disabilities, and others are fully participating?

3	**Equal Partnerships, Co-Production, and Self-Determination**	Are community members equal partners in decision-making? Are we asking communities for their equal input and creating policies *with them* rather than *for them*?
4	**Respect, Efficiency, and Non-Exploitation**	Is the decision-making process respectful and streamlined to ensure the time and effort of participants is valued?

ENVIRONMENTAL JUSTICE PUBLIC PARTICIPATION GUIDANCE

See Public Participation Guidance:
https://docs.google.com/document/d/1cw_GrUc7GhMwrwE5BB1TD7tNH4swB_vjLzTU1tI GTl4/edit?pli=1

Public Participation Checklist:
https://docs.google.com/document/d/1gnAIQpmYsVuQbqcref3wiJzKfvx9HjtnHGp2dSirSK 8/edit?pli=1#

Public Participation Remote Guidance:
https://docs.google.com/document/d/1vO5CuaNk74Dl7HTtG-jcWFIYyYWdBZ6o530eXdnssFg/edit?pli=1#

This guidance synthesizes research from the EPA, DEEP, and other 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.

Through this process, the GC3 will be building on CT DEEP's years of experience in public participation.

This report relies upon the following resources:

● Input from Connecticut community members, 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. [1]

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, the public has 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

- 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) . . .*

- Using census data to appropriately account for demographics of the community. Be intentional about your 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 you will go about partnering with those communities, and how you will track your success in partnering with those communities.

- Provide the public with clear information about the government's role, responsibilities, and goals with your 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 respect 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 your local audience, to the extent possible. (e.g., 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 for 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.

● Identify practices, in addition to public and community meetings that you will use to solicit input from the public and to share information with the public. Examples of practices include webinars, conference calls, online feedback forms, etc.

● 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 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 Covid 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 in appropriate given COVID recommendations

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○ 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.

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● 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.

● 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.

EEJ Draft Report, September 21, 2020

Appendix A to 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 below table details some model 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
Transparent and Accountable Decision-Making	● **Portland** 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. ● At the end of its work, **Portland** created a transparent, publicly accessible report to summarize and reflect on its engagement process. ● Since late 2019, **TCI** has made its engagement processes transparent, particularly by publishing those processes on the internet. ● **Oakland** 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. ● In an appendix to its climate plan, **Minneapolis** published a dialogue of formal letters between its city council and community advocates.
Accessible and Inclusive Decision-Making	● **Portland** 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. ● **Portland** provided funds to participating partnering organizations so that they could afford to provide their time to this work. ● **TCI,** 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. ● **Oakland** has made its materials available online and the audio of its public meetings available online.

Equal Partnerships, Co-Production, and Self-Determination	● In **Portland**, the city created its community engagement process in partnership with community partners. ● **Oakland's** advisory committee, which appears to have decision-making authority, consists of a diverse set of community representatives. ● **New York City's** recommendations highlight government policies that provide public funds to community organizations; those organizations implement their own community-tailored climate adaptation plans. ● **Los Angeles** uses California's Transformative Climate Communities grant program to fund community-led climate plans.
Respect, Efficiency, and Non-Exploitation	● **Oakland** has a clear public advisory committee and governmental office for the public to contact. ● **Oakland's** public advisory committee is representative of the broader city community and has real decision-making authority. ● **Portland** created a single community-working group with direct points-of-contact in the city government.

Environmental Justice Public Participation Checklist

Transparent and Accountable Decision-Making

- Develop a public participation plan detailing the process that will be used to engage the public and how that process will be accessible to diverse populations (see below section titled Accessible and inclusive Decision-Making).

- Provide the public with clear information about the government's role, responsibilities, and goals.

- Inform communities about the issues at hand, their role and rights, and the processes and timelines for decision-making.

- Clearly and frequently, share data that are being used to measure progress toward objectives and goals.

- Document the public participation plan and analyze its success and community opinion, in public reports.

- Ensure all personnel understand policies to share information with communities in a timely and accessible way.

- Use census data to appropriately account for demographics of the community.

- Use multilingual and culturally conscious graphics to convey information about governmental/commercial/industrial interests.

Accessible and Inclusive Decision-Making

- Work with community leaders to create common language with neutral terminology, free of jargon, and sensitive to race, ethnicity, culture, gender, disability status, and language.

- Translate/interpret documents and in-person discussions for individuals with limited English proficiency, and provide alternative options or assistance for individuals who are physically, visually, and/or hearing-impaired.

- Advertise meetings and their proposed agendas in a timely manner in popular print and electronic media sources, as well as radio, if appropriate. Provide a contact with whom communities can communicate about upcoming meetings.

- Select meeting times not in conflict with work schedules, rush hours, etc. If held during meal hours, provide food.

- Select locations that are local and accessible (e.g., reachable via public transit), of adequate size, ADA compliant, and represent neutral turf (e.g., not a government office, and not an office that requires official identification).

•   Offer tele- or video conferencing options for the public to join in-person meetings, using technology available to the public.

Equal Partnerships, Co-Production, and Self-Determination

•   Prior to conducting a meeting, form an agenda with the assistance of community representatives. Understand from the community how they would like information presented, questions they would like answered, and languages they speak.

•   Create an atmosphere of equal participation at meetings and gatherings by avoiding a head table or panel, and providing multiple opportunities and channels for the public to voice questions and concerns.

•   Document questions and concerns, providing clear information about next steps or follow-up.

Respect, Efficiency, and Non-Exploitation

•   Create relationships by collaborating with other government departments, and ensure interdepartmental coordination and communication so community concerns, ideas, and feedback are acted on in a timely and coordinated manner.

•   Establish a central point-of-contact within the department to disseminate information, resolve problems, and serve as an accessible advocate of the public's rights.

•   After holding a forum or meeting, establish and advertise procedures to follow-up with concrete action.

•   Create opportunities for continued participation and feedback after the project has been implemented, and establish communication channels (e.g., via internet updates or email newsletters, by updating community leaders, etc.) to inform the community about the status of the project.

•   Where possible, work with state agencies to identify resources to hire trainers/staff – with technical and administrative knowledge of environmental justice – who are representative of the community, and to train staff in community outreach.

Photo of breakout session to discuss concepts of equity and public engagement practices at the first EEJ meeting at the Sound School.

Guidance on Remote Engagement for Public Participation

The following proposed best practices for remote engagement synthesize a range of available literature on the use of Internet, telephonic, and other remote tools for public engagement. The chart below provides guidance for remote engagement by the GC3, separating the creation of a remote engagement strategy into three stages: 1) selecting tools and platforms for remote engagement, 2) implementing these tools and platforms in a strategic and transparent way, and 3) ensuring accessibility of any remote engagement mechanisms.

	PRACTICE	EXPLANATION	THINGS TO CONSIDER
**SELECTING TOOLS FOR REMOTE ENGAGEMENT**		
#1	**Set goals.**	Knowing the type and format of remote engagement sought is crucial to choosing an appropriate tool.	a. Are you seeking close-ended or open-ended input? b. Do you want the public to be able to interact with each other's input, or only send input directly to you? c. Do you want multiple tiers of options for engagement, so that some people can offer quick feedback and others can offer more in-depth thoughts? d. Do you need to collect feedback, responses, or opinions from remote participants in real time (e.g., in order to make a decision during a meeting?) e. What are quantitative goals for digital participation? Can the tool you are considering handle large groups of people participating at the same time?
#2	**Evaluate capacity.**	Be realistic about the amount of staff training and time needed by the GC3 or DEEP for successful implementation of an online strategy, and whether or not those staffing resources are available.	a. Consider technological capacity of participants and accessibility concerns: see points below regarding Ensuring Accessibility of online, for examples of accessibility concerns to keep in mind.
**IMPLEMENTING REMOTE ENGAGEMENT**		

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#3	Plan in detail.	Create a detailed workplan and timeline that notes the goals for remote engagement, the periods when engagement activity will be especially critical, and which online tools should be used to meet goals at appropriate times.	1. Will the tools you are considering reach the intended audiences? 2. What support will members of the public need to use the tools?
#4	Have a communication strategy.	Make sure that the plan for soliciting online public engagement is consistent with your overall communications strategy. Utilize existing communications resources to boost online opportunities. Make sure you are communicating transparently about how online tools will factor into decision making processes.	1. How will you get the word out to members of the public? 2. All public meetings must have an Americans with Disabilities Act (ADA) notice, which includes the contact information for who handles accessibility requests, and information may be provided in an alternative format upon request.
#5	Set ground rules.	Set ground rules for any online spaces in the same way you would in-person spaces, and clearly communicate these expectations with everyone engaging with the process at the outset of their engagement.	a. How will you make sure ground rules are digitally available to everyone, even if they are newcomers to the process? b. What ground rules do you need to function (for example, during a zoom meeting, whether and how lines will be muted)?
#6	Set clear expectations for staff.	Set clear roles and expectations for staff who are responsible for implementing new online tools.	a. What are the roles of staff? b. How will you communicate those goals and expectations?

#7	Solicit and respond to feedback.	Solicit feedback not only on the outcomes of procedure but also on procedural mechanisms used, such as online platforms for submitting commentary, etc. Take timely action to respond to feedback whenever possible, and communicate these changes with stakeholders.	a. How will you solicit feedback from the public? b. What is the process for tracking and responding to feedback?
ENSURING ACCESSIBILITY OF REMOTE ENGAGEMENT			

#8	Make decisions about incentives, standards, and accountability with respect to the accessibility of remote engagement tools.	All accessibility measures taken for in-person spaces should be duplicated for remote engagement. These include providing translation and interpretation services, keeping detailed records of public meetings by (when appropriate and consented-to) making public meeting minutes or recordings, and identifying and publicizing the identity of point people for handling questions and requests related to accessibility measures, and for implementing changes in response.	a. Consider whether creating financial or other incentives for participation is appropriate. Make sure to value people's time. Make decisions about incentives and outreach by developing an understanding of potential obstacles to participation faced by your primary stakeholder groups. b. A remote engagement strategy that seeks to diversify community outreach will have to account for different trends in the demographic preference for various remote tools. Different platforms for remote engagement will be frequented by, or easier to use for, different demographics. *See, e.g.,* "Civic Engagement in the Digital Age" (exploring how income, educational, age, and other demographic gaps are reflected in the use of various online or other media, especially for political purposes. c. Double check: are the tools accessible for people with disabilities and people who speak languages other than English? d. Have someone (informally) appointed as the conversation manager to facilitate turn taking. This is extremely helpful when interpreters are present and can only interpret one thing at a time.

Tools for Remote Engagement

Consistent with the **Draft Environmental Justice Public Participation Guidance,** this document organizes forms of engagement, whether remote or in-person, into three general categories: consulting (soliciting one-way feedback), deliberating (dynamic discussion and/or decision-making), and informing (broadcasting one-way communications to the public).

The following table gives some examples of tools that can be used to pursue all three of these categories of engagement via remote means. This is not an exhaustive list, but meant to help frame and ground the discussion of remote engagement in actual examples for how remote engagement is commonly facilitated.

TOOLS & EXAMPLES	CONSULTING	DELIBERATING	INFORMING
Social networking sites such as Facebook, Twitter, and NextDoor, and attached widgets like Facebook and Twitter polls	Yes	Yes	Yes
Online surveys/petitions/polls such as Google Forms, Survey Monkey, and Poll Everywhere (which allows for real-time collection of answers)	Yes	No	With limitations
Interactive gov websites or blogs where the public can post comments	Yes	Yes	Yes
Programs through which the public can access public meetings by computer or by phone, such as FreeConferenceCalls.com phone lines, Zoom, GoToMeeting, or Jit.si. These tools can also be used by the public to observe and participate in webinars (informational sessions on the Internet).	With limitations	Yes	Yes
Informational videos/graphics that can be distributed on social media, public websites, etc.	No	No	Yes

Online receptacles for the public to submit photographic, voice recorded, or video feedback, such as a dedicated email address or submission form on a .gov website	Yes	No	With limitations
Collaborate with other statewide agencies/organizations that serve specific populations.			

Abbreviated Bibliography

"The Beginner's Guide to Effective Online Engagement" [Link here]
MetroQuest (a public involvement software company)
Recommendations on best practices and promoting participation, based on observations of use metrics on the back end, as well as one case study from a project it contracted with the public Hillsborough Metropolitan Planning Organization in Tampa, Florida.

"Why Choose Online Community Engagement Platforms & Software" [Link here]
OpenGov (a public involvement software company)
Recommendations on best practices for promoting participation using remote engagement tools.

"Broadening Public Participation Using Online Engagement Tools" [Link here]
Institute for Local Government

Provides examples of actually implemented online engagement strategies and guidance on best practices, also includes advice solicited from producers of major online engagement programs/platforms.

"Civic Engagement in the Digital Age" (2013) [Link here]
Pew Research Center's Internet & American Life Project
Examines online and offline political engagement and "pays special attention to the role of social networking sites in people's political activities."

"Let's Get Digital! – 52 Tools for Online Public Engagement" (2015) [Link here]
PublicVoice (a consulting firm in New Zealand that works with local and central government agencies to develop engagement strategies)
Straightforward list of different tools available to facilitate remote engagement.

Ground Rules for Virtual Meetings and Conversations (2020) [Link here]
Everyday-Democracy.org
A starting guide for establishing ground rules for remote engagement, developed specific to COVID-19 times.

Accessibility Tips for a Better Zoom/Virtual Meeting Experience [Link here]

Deaf/Hard of Hearing Technology Rehabilitation Engineering Research Center

Improving the Accessibility, Usability, and Performance of Technology for Individuals who are Deaf or Hard of Hearing.

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[1] The city, state, and local government climate equity plans considered include the following: Los Angeles "Green New Deal" from 2019; New York City "Panel on Climate Change 2019 Report," Chapter Six; Minneapolis "Climate Action Plan" from 2012; Oakland "Equitable Climate Action Plan," which is ongoing; Portland, Oregon "Climate Action Through Equity" from 2016; The Transportation and Climate Initiative (TCI) of the Northeast and Mid-Atlantic States from 2019. See Appendix A.

Photo of breakout session to discuss concepts of equity and public engagement practices at the first EEJ meeting at the Sound School.

III.   E&EJ Working Group Recommendation: Development of a Statewide Environmental/Climate Justice Mapping Tool

Top Priority Action

> Develop, launch, and maintain a statewide environmental mapping tool that provides a visual representation of the spatial distribution of environmental and climate health vulnerabilities across Connecticut, taking into account the social determinants of health.

Low-income communities and communities of color are disproportionately exposed to environmental hazards such as air and water pollution, and as a result, are exposed to increased environmental health risks (Bullard & Johnson, 2000; Marmot, 2005; Morello-Frosch et al., 2002). These risks are further compounded by social stressors such as unemployment and substandard housing (Braubach, 2011; Brender et al., 2011; Sadd et al., 2011). Many of these stressors will be further exacerbated by climate change (Wilson et al., 2010). The heat island effect, flooding, damage to transportation infrastructure, and access to health care are a few of the clearest vulnerabilities for many Connecticut communities, but demographic and socioeconomic characteristics of communities, such as poverty rates, race, and languages spoken, are also social determinants of health. In turn, the impacts of climate change are not distributed evenly and are borne disproportionately by vulnerable populations. As the 2018 National Climate Assessment states, "People who are already vulnerable, including lower-income and other marginalized communities, have lower capacity to prepare for and cope with extreme weather and climate-related events and are expected to experience greater impacts." (4th NCA 2018)

In order to ensure that adaptation and mitigation strategies contribute to a more equitable future in Connecticut rather than exacerbating existing inequalities, climate action plans must identify vulnerable communities across the state and then prioritize actions for these populations. The Equity and Environmental Justice Working Group strongly recommends legislative and agency action to support the development, launch, and maintenance of a statewide environmental mapping tool that provides a visual representation of the spatial distribution of environmental and climate health vulnerabilities across Connecticut, taking into account the social determinants of health.

Connecticut's combination and distribution of climate impacts, environmental stressors, public health vulnerabilities, and the social determinants of health is unique and adaptation and mitigation policy must be responsive to the specific context of each community in order to avoid exacerbating inequality and, equally importantly, to target policy solutions to those most vulnerable to climate change. Mapping tools allow users to layer these factors and thereby understand in detail the challenges vulnerable communities face.

Though the EPA has released a nationwide environmental mapping tool, EJSCREEN, several sister states have developed their own state-specific EJ mapping tools in order to more effectively respond to the unique needs of their populations and to depict environmental and climate inequities at a higher resolution. These tools incorporate a variety of indicators of environmental impacts and exposures, climate change effects, sensitive populations, and socioeconomic factors in order to help state officials and other decision-makers identify distressed communities, direct enforcement of environmental regulations, and remediate contaminated sites. State legislators, government agency officers, community organizers, NGO directors, community residents, and, notably, other GC3 working groups and sector groups – from Public Health and Safety to Utility Infrastructure, have expressed enthusiastic support for the creation of such a tool for Connecticut and highlighted the crucial importance of developing the tool to climate mitigation and adaptation planning and implementation at statewide and hyperlocal levels.

Recommendations:

Codify the mandate for development and maintenance of a tool into state policy.

Recommended Implementation Action Description	Legislative enactment supported by financial support would allow DEEP, DPH and partners to create and maintain a robust tool for use in climate planning and implementation. By codifying requirements for a tool into law, the legislature would ensure the development and launch of the tool with appropriate resources in 2021 and 2022, respectively. By solidifying the tool as state policy, the tool could be provided with the concrete support needed to ensure: • Initial launch with available statewide data • Regular updates to data with the goal of releasing updated versions every two years • Full-scale maintenance • A robust public participation process, both so residents can shape the tool during its development and so that they will be trained in its use and application after its publication
Completion Timeframe	2 years for initial launch, with updates planned on a biennial basis
Implementation Entities	CT DEEP: Commissioner's Office, CT DEEP: EJ Program, Councils of Government, Municipalities, DPH, in partnership with U Conn, private entities and community-based NGOs
Climate challenges addressed	This action will visualize the unequal burdens of climate change impacts and the distribution of the benefits of climate change mitigation and adaptation strategies and promote greater funding and policy support for vulnerable populations based on the most current climate data available.
Protection of vulnerable communities	This tool will allow legislators and policy makers to better protect the communities they serve by understanding the unique combination of climate and environmental burdens they face. It also equips communities with data to better advocate for support and build solidarity across communities facing similar burdens.

References for action	Executive Order No. 3 (CT, November 3, 2019)
	Executive Order. No. 12898, 3 C.F.R. (1994).
	California. Legislature, Chapter 830. SB535, *California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Fund*. Available at. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201120120SB53; Accessed August 22, 2020.

Launch a public-private interagency effort as part of the 2021 phase of the GC3 to develop the tool.

Recommended Implementation Action Description	DEEP and DPH launch a public-private interagency effort as part of the 2021 phase of the GC3 to develop the tool. Given that the tool's development process is already underway, a beta version of the tool could be available and launched by the end of the GC3 process (December 2021). Several organizations have already expressed interest in providing the technical and outreach skills necessary to effectively carry out the development process. • Many of the indicators to be included in the tool have already been mapped by entities such as UCONN's Coastal Institute for Resilience and Climate Adaptation (CIRCA), the Department of Public Health, CT Data Collaborative and other data mapping organizations, and these stakeholders are willing to lend their efforts to integrating these maps into a statewide EJ tool. • Additionally, contacts have been identified within several environmental justice organizations who are willing to support a community outreach process that is empowering and promotes co-learning and meaningful participation from communities. It is vital that this outreach be guided by principles of inclusion and equity so that residents can take an active role in the tool's development and so the tool's content reflects lived experience. Outreach can be achieved through focus groups or other participatory engagement sessions and through qualitative interviews with key community advocates, leaders, and organizers who will use the tool to advance their work.
Completion Timeframe	Formation of effort by the first half of 2021, with ongoing activities to coordinate efforts through 2021.
Implementation Entities	CT DPH, DEEP, UCONN CIRCA, nonprofit data mapping organizations (e.g., CT Data Collaborative, DataHaven), community engagement organizations (e.g., Energy Efficiencies Solutions, Community Foundation for a Greater New Haven)
Climate challenges addressed	This action will address the hyperlocal impacts of climate change in vulnerable communities by engaging community members to help shape the tool and fully understand its application.

Protection of vulnerable communities	By engaging outreach organizations in this effort, the state can ensure that the tool is developed such that vulnerable communities can use the tool and that all available expertise on local climate effects is utilized.
References for action	Washington. 66th Legislature. SB5489, *A Healthy Environment for all.* Available at.https://app.leg.wa.gov/billsummary?BillNumber=5489&Initiative=false&Year=2019; Accessed August 22, 2020.

Stepwise Breakdown of Tool Development & Implementation Plan:

Step	Potential Partners
1. Invest in the appropriate staff and resources to successfully build an environmental and climate justice mapping tool.	DEEP DPH
2. Contract with community-based partners to conduct outreach in EJ communities.	• CT League of Conservation Voters • Eastern Pequot Tribal Council • Community Foundation for a Greater New Haven • Energy Efficiencies Solutions • CT Coalition for Environmental Justice • New Haven Adult Education Center • Western CT Central Labor Coalition
3. Leverage existing infrastructure and partnerships to develop the tool, especially around data, platform, and community engagement.	• CIRCA • CT Data Collaborative • DPH

4. Establish ground rules to guide the inclusion of indicators and data. a. Suggested ground rules: i.Data must be available statewide. i.Data must be publicly available. i.Data must be available at least at the census block group level or translatable to that level.	• Connecticut Land Conservation Council • DataHaven • CT Data Collaborative • Energy Justice Network • Yale University (School of Public Health, School of the Environment)
5. Include core basic functionalities, tailored to uses and users, in an initial version.	
6. Include indicators encompassing environmental exposures and effects, sensitive populations, and sociodemographic information.	
7. Develop an index to measure relative cumulative impacts and identify EJ communities.	
8. Budget for community engagement, data analysis and indicator selection, geospatial mapping, and policy formation, while leveraging efficiencies to manage cost.	CT DEEP Community-based CBOs and mapping experts, potentially including: • CIRCA • CT Data Collaborative • DPH • Connecticut Land Conservation Council • DataHaven • CT Data Collaborative • Energy Justice Network • Connecticut Coalition for Environmental Justice

		• Yale University (School of Public Health, School of the Environment)
9.	Incorporate the tool into mitigation and adaptation climate policy-making processes with appropriate legislation, including targeting funding streams to most affected.	CT Executive and Legislature GC3 2021 Recommendations
10.	Return to the communities engaged in the initial design of the tool and engage them using data literacy sessions with the dual objectives of 1) teaching them how to use the tool and 2) learning how the tool should be modified to better serve their needs. Modify the tool accordingly.	CTData Collaborative has particular capacity to lead this effort. Additionally... • CT League of Conservation Voters • Eastern Pequot Tribal Council • Community Foundation for a Greater New Haven • Energy Efficiencies Solutions • CT Coalition for Environmental Justice • New Haven Adult Education Center • Western CT Central Labor Coalition

For more information and recommendations for the development of a statewide EJ mapping tool for Connecticut, please see the "**Scoping and Recommendations for the Development of a**

Connecticut Environmental Justice Mapping Tool" report. Contact Marianne Engelman-Lado at marianne.engelman-lado@yale.edu if you have not yet received the report.

IV.   Mitigation Subcommittee Recommendations

Feedback from the Mitigation Subcommittee focuses in part on process, with recommendations for outreach, identifying local problems and concerns, focusing more clearly on the needs of low and moderate-income (LMI) populations, and consideration of the societal benefits of zero-carbon technologies. The Mitigation Subcommittee also offered at least initial recommendations for addressing environmental and health impacts of polluting sources in poor urban communities of color in Connecticut, ensuring that energy facilities are equitably distributed across the state, responding to the need for EEJ training in the building professions, and the development of green jobs, among other things. The report also calls for prioritizing communities bearing the greatest public health impact from emissions from transportation, a principle that should be extended across sectors. Recommendations in the transportation sector are relatively specific, including looking beyond electric cars for emissions reduction, prioritizing investment in active transportation and transit, intentional policies to expand access to electric vehicles in LMI communities, and addressing safety concerns for pedestrians, bicyclists and other vulnerable users.

Affirmative recommendations include ensuring the LMI communities have access to solar and clean energy, more broadly, starting with access to solar for renters in multifamily homes. See Appendix B for more detail.

Top Priority Action

> Prioritize mitigation strategies in vulnerable communities, including low and moderate-income communities, and ensure access to mitigation approaches, such as clean energy, for low and moderate-income communities.

V.   Adaptation & EEJ Subcommittee Recommendations

As with Mitigation, one theme in response to preliminary Adaptation reports and recommendations highlights the need for greater involvement of vulnerable populations in planning process to ensure that plans and implementation are acceptable and meeting their needs. See, for example, Appendix E (Review of Public Health & Safety), supporting the recommendation for developing standards for local heat response plans and emphasizing the need for engaging local populations. Similarly, the discussion of mental health in the draft Public Health and Safety Report is critical, and would benefit from adding a recommendation for planning for post-disaster culturally and linguistically appropriate mental health service structures. See Appendix E.

Most significantly, EEJ recommends funding for municipalities to develop their own adaptation plans and both guidance and statewide data-driven mapping to inform planning and implementation on a hyperlocal level.

Top Priority Action

> Provide funding for municipalities to develop their own adaptation plans and both guidance and statewide data-driven mapping to inform planning and implementation not only at a statewide level but also on a hyperlocal level.
>
> Apportion funding by using a system that ensures more resources for municipalities where vulnerable population reside and where plans have been developed specifically address the needs of the identified vulnerable population.

EEJ also expressed concern about cumulative impacts of environmental and climate health risks and asked whether Connecticut has or Public Health & Safety is recommending a mechanism for determining and prioritizing areas of cumulative vulnerabilities. Plans must assess cumulative impacts of existing and proposed sources of pollution in order to understand which communities are already overburdened and where mitigation efforts should be targeted and funding for adaptation prioritized. This issue should also be considered when developing indices for the Environmental and Climate Justice Mapping Tool.

Please see Appendices C (Review of Financing Adaptation and Resilience Working Group Report), D (Review of Infrastructure and Land Use), and E (Review of Public Health and Safety) for additional feedback and preliminary EEJ Subcommittee recommendations. Notably, Infrastructure and Land Use took significant steps to prioritize equity and environmental justice, recommending the establishment of a statewide climate adaptation implementation committee focused on vulnerable communities, calling for an assessment of the vulnerability of transportation infrastructure to climate change, and relying on mapping to identify vulnerable communities. The report also recognizes the need for hyper-local planning to increase the effectiveness and likelihood of implementation of climate adaptation and education efforts. EEJ also supports the goal of eliminating combined sewage overflows and the recommendation for updating housing standards. (See Appendix C).

Conclusion

Though EEJ was able to provide deliverables and offer key recommendations, there is still significant work to be done. Deliverables include initial efforts to engage members and representatives of environmental justice communities in the GC3 process, a concept paper on equity, and guidance on public participation and remote engagement. Key recommendations include the creation of an Environmental and Climate Justice Mapping Tool and support for hyperlocal planning and implementation. At the same time, public engagement in 2020 was limited by COVID and the death of George Floyd, among other things, and EEJ also strongly recommends deepening public engagement efforts in 2021. In addition, EEJ consideration of substantive recommendations by GC3 working groups was compressed into a short period of time, and EEJ intends both to remain in conversation with groups across the GC3 and provide additional ideas and feedback, especially as more of Connecticut's most vulnerable residents engage in the GC3 process.

Co-Chairs

Lee Cruz, The Community Foundation of Greater New Haven
Marianne Engelman-Lado, Yale School of Public Health/Environmental Justice Clinic, Vermont Law School

Members

Given the challenges of the pandemic, membership varied over the course of 2020 but over the course of the year has included the following people:

Alex Rodriguez, CT League of Conservation Voters (chair, Public Participation Subcommittee)
Sena Wazer, Sunrise Movement (chair, Mitigation Subcommittee)
Dr. Mark Mitchell, Center for Climate Change Communication, George Mason University (chair, EEJ & Adaptation Subcommittee)
Brenda Greer, Pawcatuck Eastern Pequot Tribe
Emily Basham, CT Green Bank
Gina Calabro, AIA CT
John Humphries, CT Roundtable on Climate and Jobs
Julie Jones, NAACP
Kathleen Donovan, PSE&G
Leticia Colon de Mejias, EES, Green Eco Warriors and Energy Efficiency for All
Lynne Bonnett, Greater New Haven Green Fund
Michael Piscatelli, City of New Haven
Orlando Velazco, CT Department of Public Health
Rev. Stanley Lord, NAACP
Sharon Lewis, CT Coalition for Environmental Justice
Shubhada Kambli, City of Hartford
Stephanye Clark, Community Foundation of Eastern Connecticut
Steve Schrag, Waterbury
Deborah Thomas-Sims, East End Community Council
Maisa Tisdale, Freeman Center
Cathy Cushman, Disability Rights Connecticut
Marissa Rivera, Disability Rights Connecticut
Maryam Elahi, Community Foundation of Eastern Connecticut
Diane Lauricella, Interreligious Eco-Justice Network

Kenny Foscue, North Haven Clean Energy Task Force

DEEP Staff:
Edith Pestana, Environmental Justice Program
Doris Johnson, Environmental Justice Program
James Albis, Senior Policy Advisor to Commissioner Dykes
Max Teirstein, Intern

EEJ Draft Report
Appendix B
Feedback on Progress on Mitigation

Governor's Council on Climate Change
Equity and Environmental Justice Working Group
Working Group Report Review Form

Name of EEJ Subcommittee Completing the Form (if appropriate): Equity and
Environmental Justice - Mitigation Subcommittee

Name of Person Completing the form: Sena Wazer

Name of Working Group Presenting Recommendations: Progress on Mitigation Strategies
Working Group

*1. What were the equity and environmental justice highlights from this working
group's action items? Please address whether and in what ways these
recommendations specifically support environmental justice communities,
including low-income and other communities particularly vulnerable to climate
change, and address inequities in the distribution of costs and benefits.*

Cross Sector

Theme 1: Carbon Pricing

- Regardless of whether a jurisdiction adopts a straight carbon fee or a cap-and-trade
  system, both approaches can exacerbate or ameliorate impacts on LMI communities.
- Ensure that the revenues generated are invested in programs that reduce the pollution
  burden on LMI communities and address any potential adverse economic impacts of the
  program.

Theme 2: Education and Outreach

- Communication needs to be a discussion with communities and stakeholders – not a
  lecture.
- Take the time to ask about local problems and concerns to identify what polices will be
  most meaningful to a particular community.
- Do a better of job of communicating local and immediate benefits that communities
  could enjoy from the implementation of specific climate policies.
- Tailor outreach efforts to the needs of the community with respect to the medium used.

- Once social distancing requirements are relaxed, it may be that in some circumstances in-person meetings may be more effective if there are barriers to access on-line meeting platforms.

Theme 3: Integrating GHG Mitigation, Adaptation and Resiliency (MAR)

- The impacts of climate change on health and health inequities are moderated by individual and community vulnerability and resilience.
- Interventions that improve the social determinants of health and population health and reduce health inequities can significantly reduce vulnerability and increase resilience to climate change, at the individual and community-levels.
- Increasing resilience to climate change will require investing significantly in the public sphere, including in social determinants of health and in public health infrastructure.
- Many climate actions bring significant health co-benefits, but some may have adverse health consequences and/or increase health inequities.
  - Some health interventions also have climate co-benefits.
  - Thoughtful implementation of actions to reduce greenhouse gas emissions and adapt to climate impacts will help maximize co-benefits and minimize co-harms.

Theme 4: Increasing Consideration of GHG Reduction Goals in State Decision Making

- As we ramp up the investment in zero-carbon technologies, we must ensure that appropriate metrics are being applied that value the full range of societal benefits delivered by such technologies, including environmental and health benefits, in addition to those direct benefits that may be ascribed to the energy system itself, such as improved resilience.
- Accounting for the public health, environmental, and economic benefits of reducing these non-CO2 pollutants should be a factor in regulatory decision-making.
- New ways to measure and report on work that improves the environmental protection and environmental justice that are inherent in our work to reduce GHG emissions at the local level would facilitate the state's ability to measure actual progress in a more granular and timely way.

Theme 5: Implementing U.S. Climate Alliance SLCP Strategies

- Not yet developed.

Theme 6: Natural and Working Lands

- Trees in urban areas can improve air and water quality, mitigate the heat island effect, and help alleviate noise. Residential and urban trees and forests also shade and cool buildings in summer and insulate them in winter, which significantly reduces energy use (and costs) of air conditioning and heating. And, generally, forests provide excellent recreational opportunities for all of Connecticut's residents.

- Urban community gardens can provide youth engagement and educational opportunities, as well as providing a source of nutritious natural foods in communities where access may otherwise be limited.

Non-energy

- Aligning sustainable development goals with the Environmental Justice Index proposed by the EEJ WG.
- Urban trees and other natural systems provide a range of physical health benefits, including improving air and water quality, mitigating the heat island effect, and helping alleviate noise.
- Trees can shield people from ultraviolet (UV) radiation, the cause or contributing factor for three types of skin cancer.
- Trees also help reduce flooding by slowing rainwater runoff.
- Over the past few years, there has been little progress in reducing the amount of waste generated or recovery of materials for recycling.
- Waste and sewage sludge facilities present significant environmental justice issues and the health impacts of other pollutants can be of greater concern than future climate impacts to communities.
  - For example, the large waste and sewage sludge incinerators in Bridgeport, New Haven, Hartford and other locations impose significant environmental damage and health impacts on poor urban communities of color.

Electricity

- The Department of Energy and Environmental Protection (DEEP) is committed to ensuring an equitable and just transition to a zero-carbon future. The electricity generation sector has a number of equity and environmental justice (EEJ) barriers that can be addressed with appropriate policy.
  - Power generation facilities produce all sorts of pollution including gases, particulate matter, light and noise pollution that can negatively impact the public health and wellbeing of residents in surrounding communities.
  - The negative impacts by power generation are disproportionately felt by populations near generation facilities. In many cases, these communities are minority, low income, or underserved areas.
  - An ACEEE report found that residents with low income, African Americans, Latinos, and renters often pay up to three times more of their annual household income on energy than do middle and higher income households.
  - Not only are these populations dealing with a disproportionate amount of negative impacts, but they are also paying disproportionately more for their energy.
  - Building and vehicle electrification reduce on-site carbon generation but shift it and all the other associated externalities to the communities surrounding electricity plants, exacerbating these energy and environmental justice issues. Even low and zero-carbon energy sources such as biomass, wind,

solar, and nuclear have negative externalities that can harm local residents. Those living around power plants must deal with the impacts of increased electricity demand without receiving the decarbonization and pollution benefits.
- o Siting new power generation facilities creates jobs and opens opportunities to develop the workforce and invest in the community. For example, port cities near offshore wind farm will grow to meet the needs of the facility and the influx of new workers. This will benefit many levels of the local economy.
- o Care must be given to siting new zero-carbon power generation facilities to ensure equitable outcomes for the host community and the state as a whole.
- o Ensuring that facilities are spread out across the state disperses the impacts and create a more resilient grid.
- o Moving forward, updated plans must also consider current and future disruptions related to COVID-19.
- o Aid or deferment of utility bill payments will help consumers, and extra incentives can stimulate the energy efficiency economy and job creation.

Buildings

Theme 1: Improve Building Performance (BP)

- General
  - o Need for EEJ training in building professions
  - o Need to understand implicit bias – in programs aimed at owners when 33% of residents are renters
  - o Health-safety- thermal comfort - financial stability are connected to BP
- Special focus
  - o Lockbox is financial and EEJ issue
  - o Physical Barriers to EE are crucial to EEJ
  - o Cost Effectiveness Test is key to EEJ disbursement of funds

Theme 2: Improve Consumer Education (CE)

- General
  - o Outreach and social media tools are being examined by EEB - but specific focus on EEJ is required (multiple barriers need to overcome) – Public Utility Regulatory Authority meetings, makeup of Energy Efficiency Board– are all positive steps
  - o Getting a response from real estate agents will take legislation
- Specific
  - o A building performance office is meant to integrate multiple threads around EE. Currently the EEB administers utility programs – but a more holistic approach is required
  - o Building concierge will allow EEJ to received advice on incentives, tech options, efficiency options, order of operation (i.e. building shell before tech)

Theme 3: Renewable Thermal (RTT)

- General
  - RTT can provide summer thermal comfort and economical winter heat but challenges of upfront cost, proper thermal barrier, and indoor air quality must be solved also to make it feasible.
  - Setting expectations and proper use and maintenance are also critical
- Specific
  - A detailed transition plan (New Rec 1) would include EEJ considerations and must go beyond just a technology discussion.
  - BioHeat (fuel oil + biofuel) is a possible bridge to carbon neutrality

Theme 4: Workforce Development for Energy Efficiency and Renewable Thermal Technology

- General
  - The potential for Green Jobs is enormous but needs focus and coordination to grow.
    - Work with Community Based Organizations (CBOs) like Habitat for Humanity, Knox, Greater Bridgeport Community Enterprises, etc. with established community trust to train and develop a pipeline for future Workforce
    - Offer grants for Building Performance Institute certification
    - Use Magnet schools and Community College Pipeline (for BPI cert)

Transportation

- Communities bearing greatest public health impact from emissions must be prioritized for benefits from a clean transportation system
- LMI households spend a greater share of income on transportation, and many cannot afford vehicle ownership
- An equitable approach to emissions reduction must look beyond electric cars
- Prioritize investments in active transportation and transit
- Must address safety concerns for pedestrians, bicyclists and other vulnerable users
- Expanding access to ZEVs in LMI communities will require intentional policies

2. What are some proposed changes or concerns EEJ or your EEJ subcommittee has about this report? How might the recommendations be strengthened to ensure equity (the equitable distribution of costs and benefits)? What are additional ideas and/or recommendations for incorporation incorporated into this working group's report? Where possible, please identify particular recommendations made in the report and/or provisions of the report and provide the corresponding comment.

Cross Sector/Non-energy

Recommendations/areas of concern:

- Ensure LMI communities have easy access to solar, and that we are utilizing roof real estate in our cities for solar and GHG. (Denise Savageau)
- Ensure that waste management plans take into consideration LMI communities and that waste plants do not continue to be placed solely in these communities. Impacts on LMI communities need to be considered upfront in waste management plans. Additionally, must prioritize waste reduction before recycling, and include local education in many languages and in an easy format for regular people to digest. Also, should consider other methods of disposal than incineration, and their equity impacts. (Marianne Engelman-Lado, Diane Lauricella, Lynne Bonnett)
- Ensure that the IRP sets targets for reduction in carbon emissions from waste management, both municipal and sewage rather than let these emissions be allowed through 2040. Ensure that we find a better methods of waste management that make beneficial use of organic waste by harvesting renewable natural gas or composting in the case of residential kitchen waste stream. (Lynne Bonnett)
- Ensure that existing polluters are incentivized to stop polluting, and raised funds are used to help impacted communities. (Kathy Fay)
- Ensure that any methane recapture program does not inadvertently incentivize the concentration of animal agriculture into larger and larger industrial facilities. (Marianne Engelman-Lado)
- Ensure that cumulative impacts are considered when issuing any type of permit. (Marianne Engelman-Lado)

Questions for team's consideration:

- Has there been consideration of an independent third-party study group for analyzing a no-waste strategy in CT? (Caitlin Daddona)
- On carbon pricing, has there been consideration of using revenues not just to ameliorate pollution in EJ communities - which in many cases can be pursued by vigorous legal pursuit of offenders - but to remedy inequitable historical investment in home energy efficiency and distributed renewable access in EJ communities? (Kathy Fay)
- There is some concern regarding carbon trading from an EEJ perspective. Has there been consideration/discussion around this? One critique of carbon pricing by the Indigenous Environmental Network can be found here https://www.ienearth.org/wp-content/uploads/2017/11/Carbon-Pricing-Final-Print-Final-HiRez.pdf . (Marianne Engelman-Lado, Leticia Colon de Mejias)
- Has there been any reports on the Regional Greenhouse Gas Initiative impacts regarding equity? (Bob Maddox)

Electricity

Overall, there was considerable concern over the electricity subcommittees lack of EEJ considerations at the beginning of the process. Concerns were also raised regarding difficulty in attending Electricity meetings, however the Progress on Mitigation Strategies Working Group has reported that the same procedures were used as in the other subcommittees, and the only difference was that there were fewer electricity sector meetings.

Recommendation/areas of concern:

- Ensure that LMI communities have access to clean energy, which requires that utilities build solar facilities in these communities. (Leticia Colon de Mejias)
- Ensure that health barriers are addressed in LMI communities, which otherwise would stop us from being able to reduce energy use in buildings. (Leticia Colon de Mejias)
- Ensure that policies that disadvantage LMI communities' access to solar are revised/changed so that renters in multifamily homes have the same opportunities to net metering as others. (Lynne Bonnett)
- Need to develop an Energy Equity definition for assessing the EEJ communities' needs. (Edith Pestana)

Questions for team's consideration:

- Has there been consideration of DEEP possibly creating an Office of Clean Energy Equity to define, and assess how to ensure that LMI communities have access to clean energy, and to assess the burdens and/or barriers that exist? (This process should be done with stakeholder input and would give real time feedback on how things are/are not working and what areas have been missed.) (Leticia Colon de Mejias)
- Has there been consideration of why shared solar is only being addressed at the utility scale and not the community scale? (Kathy Fay)
- Has there been consideration over COVID 19 and new concerns regarding air flow, and HVAC systems and how they might affect air sealing and insulation? (Marianne Engelman-Lado)
- Has there been consideration of how to do electrification when electricity in CT is already so expensive, and if the price was raised more would continue to disproportionately affect LMI communities? On the same topic of affordability, has there been consideration of how we can increase efficiency without increasing people's bills so that they become more unaffordable? (Mike Li, Gannon Long)
- Has there been consideration of escalating block pricing in both delivery and supply for LMI customers? (Bob Maddox)

Buildings

Recommendation/areas of concern:

- Ensure that adequate amounts of money are put into Energy Efficiency funds and are made easily available to LMI communities (Note: To implement EE in LMI homes, must also remove health barriers). Additionally, should make sure that ALL the benefits of demand reduction/EE are counted including, lower energy costs, less pollution, lower peak demand, etc. It also may be helpful to look at these benefits through an EEJ lens, so that we can better understand all the benefits to LMI communities. (Leticia Colon de Mejias, Marianne Engelman-Lado)

Questions for team's consideration:

- Has there been consideration around whether people at DEEP or the buildings group are following the QAP process? (Gannon Long)
- Has there been consideration of a central place to store energy and housing information and reach out to the public? This would help people access energy and housing assistance more efficiently than what is currently in place. (Gannon Long)
- Has there been consideration of what the cost/benefit analysis will include (definition of costs/benefits)? (Mike Li)
- Has there been consideration around changes to the status? Specifically, around changing the requirements for Cost Benefit/Cost Effectiveness tests (should it be based on need, percentage of income spent on energy, etc.?). (Mark Mitchell)
- Has there been consideration around when it would be cost effective to install renewable thermal to reduce electricity use during the summer? Additionally, will RTT help remove barriers (such as mold) to upgrading LMI buildings? (John Humphries)

Transportation

Recommendation/areas of concern:

- Ensure that Connecticut Council of Governments (COGS) and Conservation and Development do not incentivize more VMT growth, and rather align with climate goals and transportation investments. Also, relates to non-energy sector work. (Gannon Long)
- Ensure that polluter penalty fees or climate-based fees are equitable, just (allowing for a 100% just transition), and in line to make sure that carbon reduction targets are met.

Questions for team's consideration:

- Has there been consideration of the Climate Justice Alliance critiques of TCI (https://climatejusticealliance.org/climate-justice-equity-principles-transportation-climate-initiative/)? (Marianne Engelman-Lado)
- Has there been consideration about recommending fare-free transit? (Gannon Long)
- Has there been consideration of a plan to require or incentivize electrifying entire city fleets (garbage trucks, etc.) in addition to school busses? (Mark Mitchell)
- Hass there been consideration around amending private contracts between municipalities that have privatized their sanitation/trash truck hauling, and private

contractors to make sure that those trucks are not powered by diesel fuel? Additionally, can DEEP incentivize the transition to cleaner vehicles through the permit renewal process for transfer stations? (Diane Lauricella)

4. What items need of further discussion, investigation, and/or deliberation as the GC3 continues to meet in 2021?

Having reviewed all the recommendations and the different ways that each of the mitigation subcommittees went about incorporating EEJ considerations into their reports here are some overarching comments/suggestions:

- The transportation subcommittee incorporated EEJ recommendations into their report from the beginning. This was very helpful and resulted in the EEJ mitigation subcommittee having to spend less time reviewing their report, and the transportation subcommittee having to make less changes to their report. Moving forward if all the subcommittees could do try and do this to the best of their ability it would, I believe, be helpful for all involved, and result in a more equitable and just final report.
- Additionally, it is of critical importance that all the meetings are easily accessible. There were some concerns specifically about the accessibility of the electricity sector meetings.
- Lastly, Randall Anway made an overarching observation about how prevalent the theme of innovative policy improvements was in all the presentations. He suggested reviewing a Stamford Business School toolkit about five policies to promote innovation, and one to avoid (https://www.gsb.stanford.edu/insights/five-best-policies-promote-innovation-one-policy-avoid). He noted the opportunity to incentivize policy achievements that help mitigate climate change while also being equitable and just. This is something that Mitigation, EEJ, and GC3 as a whole should consider moving forward.

Governor's Council on Climate Change
Equity and Environmental Justice Working Group
Working Group Report Review Form

Name of EEJ Subcommittee Completing the Form (if appropriate): EEJ-Adaptation

Name of Person Completing the form: Dr. Mark Mitchell

Name of Working Group Presenting Recommendations: Financing Adaptation and Resilience WG

1. What were the equity and environmental justice highlights from this working group's action items? Please address whether and in what ways these recommendations specifically support environmental justice communities, including low-income and other communities particularly vulnerable to climate change, and address inequities in the distribution of costs and benefits.

The EJ highlights of the FARWG were the documentation of and support of funding needs for EJ organizations to support the GC3 process, EJ funding more generally and for resilient, energy efficient LMI housing. In addition, the proposal to meet with foundation leaders to discuss equitable climate adaptation and resiliency funding needs is very important to EJ.

A severe shortage of funding is the main reason that environmental justice has not flourished in Connecticut. Few foundations provide EJ funding or even the structure to evaluate EJ, environmental health, or climate justice funding proposals. Many funders have programs for health, environmental, or neighborhood funding mechanisms, or programs to fund support for low-income people. These programs usually do not allow for environmental justice funding. If GC3 were to meet with funders and explain the need for EJ, CJ, and environmental health funding programs in community and private foundations, for both statewide and regional funding, this would be a great help, even if the amounts were modest in the beginning. Whereas many local EJ organizations are very small, it would allow a mechanism for private donors, businesses, corporations and government to give to foundations for support of environmental justice organizations without them having to decide which organizations are most effective and without compromising the credibility and independence of the organizations.

The report also states the need for equity and how current systems exacerbate inequity. They also state whether funding options are inherently equitable, inequitable or indeterminate.

2. What are some proposed changes or concerns EEJ or your EEJ subcommittee has about this report? How might the recommendations be strengthened to ensure equity (the equitable distribution of costs and benefits)? Where possible, please identify particular recommendations made in the report and/or provisions of the report and provide the corresponding comment.

The Financing Adaptation and Resilience WG Report was not at all what I was expecting. However, there are good reasons for that. I was expecting them to prioritize and estimate the costs of the priority adaptation mechanisms, and propose a specific amount for the legislature to fund and list other options for funding other adaptation priorities. I was naïve. Instead, after explaining the obstacles to this approach, they took a high-level systems approach to risk identification, risk reduction, Identifying financing structures that are needed, and identifying possible financing sources. In addition, they highlighted outside processes that may help prioritize adaptation measures and added ideas for some specific projects and the funding needed for those (some in the body of the report and some in the appendix).

It would have been helpful to clearly state what is and what is not in the report, as well as to organize it better to include a table of contents and moving the recommendations closer to the front of the report. The Executive Summary was helpful. The description of the goals and funding needs of nature-based solutions was important to understand the recommendations, but the detailed description of nature-based solutions could have been put in the appendix so as not to detract from the recommendations.

The FARWG clearly spent a lot of time developing a table of potential funding sources and financing mechanisms for adaptation and resilience projects. This is very valuable. However, the presence of the table near the beginning of their report upsets the flow of the report. The report should be referenced in the body of the document, but located in the appendix. Perhaps the WG could make recommendations on how to communicate this information to the organizations and agencies that need it most, particularly to small and minority-owned businesses. This would be helpful for this chart and for notices of availability of federal and state funding for adaptation/resilience projects.

The recommendations themselves would be easier to navigate if they were in the same tabular format as in the other workgroups.

There is a section for funding requests from each of the other workgroups, although most were blank.

In the supporting documentation of the budget request in Appendix III, item 6(ii), the recommendation for climate justice training grants of $50-$75K for 6-10 organizations should be done annually, not every 5 years. This would affect the request from the EEJ WG under the Cost Estimates for Adaptation and Resilience Strategies reports from each work group.

3. What are additional ideas and/or recommendations for incorporation into this working group's report?

Several ideas were not clearly defined, such as the proposed campaign for Just Climate Change Engagement.

EJ community voices are critical to adaptation/funding prioritization and should be recommended to be part of these processes.

We will provide further specific recommendations in the coming weeks.

4. What items are in need of further discussion, investigation, and/or deliberation as the GC3 continues to meet in 2021?

Governor's Council on Climate Change
Equity and Environmental Justice Working Group
Working Group Report Review Form

Name of EEJ Subcommittee Completing the Form (if appropriate): EEJ-Adaptation

Name of Person Completing the form: Mark Mitchell

Name of Working Group Presenting Recommendations: Infrastructure and Land Use

1. What were the equity and environmental justice highlights from this working group's action items? Please address whether and in what ways these recommendations specifically support environmental justice communities, including low-income and other communities particularly vulnerable to climate change, and address inequities in the distribution of costs and benefits.

The Draft ILUWG Report is an excellent and well thought-out document. It provides bold, yet practical recommendations for implementation. It clearly incorporates and prioritizes equity and environmental justice. Its recommendation to establish a statewide climate adaptation implementation committee (G-1) focuses on vulnerable communities. A number of other recommendations also focus on EJ and vulnerable communities. Core recommendations are for the state to assess the transportation infrastructure (roads, public transit, evacuation routes and methods) for their vulnerability to climate change effects (T-1, T-2, T-3, T-4) and prioritize improvements. It clearly states that the priority for improvements should be those that build resilience for vulnerable and transit-dependent populations, relying on EEJ mapping to identify these communities. It also recognizes the need for hyper-local planning to increases the effectiveness and likelihood of implementation of climate adaptation plans and education efforts. Recommendation UI-8 reiterate the need to eliminate combined sewer overflows (CSO's), which are virtually all located in urban areas of Connecticut, where they can expose people and animals to disease from raw sewage. It also recognizes the need for updating housing standards (LUB-4) to become more climate resilient and energy efficient, especially for affordable housing; and the need for funding to do this for LMI households (LUB-8). We strongly support these recommendations and are not opposed to any of the recommendations.

2. What are some proposed changes or concerns EEJ or your EEJ subcommittee has about this report? How might the recommendations be strengthened to ensure equity (the equitable distribution of costs and benefits)? Where possible, please identify particular recommendations made in the report and/or provisions of the report and provide the corresponding comment.

Although it makes compelling justifications for many of its strong recommendations, it sometimes understates the needs in EJ communities that could further support them and the importance of including those most affected in the planning process.

The recommendation for a statewide climate adaptation implementation committee (G-1) could better emphasize the need for involving representatives of and building resilience for vulnerable populations.

For all the transportation and infrastructure recommendations, the ILUWG could strengthen its justification for protecting vulnerable populations by pointing out that these populations are more reliant on this infrastructure due to less ability to evacuate in a disaster and having significantly fewer options when the systems fail.

Recommendation T-3 on vulnerability assessments for transit operations and facilities mentions the need for bus shelters for protection from the sun. The shelters also need to protect against more frequent downpours and severe weather, as well as being handicap accessible. In areas where there is not enough usage to justify a bus shelter, the transit officials might consider bus stops near shade trees or consider planting trees near bus stops that are not currently near trees.

Regarding recommendation LUB-4, given that publicly supported housing may have occupancy waiting lists of several years, it is very difficult for people to move out of subsidized housing that may be life threatening due to asthma triggers or exposure to toxics from indoor air pollution, mold, or outdoor air pollution/pollen. In addition, maintenance is often underfunded in these properties, so repair of water leaks, mold, or other maintenance issues may be delayed for long periods. This is why it is important to have higher building standards for publicly supported housing that would increase IAQ, increase energy efficiency, and require less maintenance. In addition, these facilities are often built in less desirable land locations, such as in floodplains and next to highways. This increased the exposure to mold and air pollution. There should be standards for siting of public housing to avoid these areas.

Regarding recommendation LUB-6 on Brownfields remediation, we suggest that these lands be considered for solar arrays as an alternative to open space.

The recommendation (UI, 3) for planning and conducting drills for utility disaster response should include disabled, and other highly utility-dependent residents, and their advocates.

UI-4, about utility infrastructure, should take into account the needs of high-rise apartments, as well as other critical infrastructure and businesses, when considering microgrids and back-up electricity.

UI-5 is not clear. Please define and explain what "safe daily yield" refers to.

3. What are additional ideas and/or recommendations for incorporation incorporated into this working group's report?

Schools have many of the same issues as publicly supported housing. In addition, they have more people per square foot than any other type of building, and many of these people are children, who are more vulnerable. Therefore, schools need similar special building and siting standards as publicly supported housing, but with more emphasis on maintaining IAQ. In some jurisdictions, schools are exempt from zoning requirements (they are allowed in any zone, including that for heavy industry). Would it possible for ILUWG to review building and siting standards for schools to see if they need updating to provide more protection? This may require another recommendation or be included in LUB-4. Although these standards are local standards, there may be state guidelines for state funding support.

4. What items are in need of further discussion, investigation, and/or deliberation as the GC3 continues to meet in 2021?

Recommendation UI-11 on whether there should be a standing advisory council for infrastructure in EEJ communities, or if there is an alternative way to provide quality advice, should be further discussed in 2021

Governor's Council on Climate Change
Equity and Environmental Justice Working Group
Working Group Report Review Form

Name of EEJ Subcommittee Completing the Form (if appropriate): EEJ-Adaptation

Name of Person Completing the form: Dr. Mark Mitchell

Name of Working Group Presenting Recommendations: Public Health and Safety

1. What were the equity and environmental justice highlights from this working group's action items? Please address whether and in what ways these recommendations specifically support environmental justice communities, including low-income and other communities particularly vulnerable to climate change, and address inequities in the distribution of costs and benefits.

WG proposed standards for indoor heat for renters and government supported housing. This directly protects low-income people in publicly supported housing, who have limited control over their living conditions. It may not be as protective of renters who may not be able to afford their electric bills.

In the PHS vector control recommendation for evaluation and implementation of sustainable vector management programs, it calls for increased culturally appropriate educational efforts for those with lower SES and limited access to public health services and information. This would be very helpful to low-income people to learn about how to act to reduce risk of exposure to prevent disease and to recognize symptoms of these diseases to allow early treatment. This recommended implementation strategy should be moved up to the implementation action section of the overall recommendation rather than only being in the vulnerable communities section.

In addition, the PHS recommendation to support communication and outreach to educate residents about preparedness, response and recovery for extreme weather events was also an important equity recommendation. It discusses doing this through the Diverse Communities Working Group, which is apparently on standby to be convened in the event of an emergency that requires multilingual communications channels. This sounds like an excellent resource that should be supported and provided useful climate change and emergency response information to build resilience in Connecticut's non-English speaking communities.

Incorporating a coordinated strategy for safe evacuation of vulnerable populations in the updating of the Hurricane and Storm Evacuation Plan for Connecticut is an excellent idea. This is needed so that the most vulnerable who cannot evacuate on their own will be able to get out of harm's way. This plan should be developed with those who work with vulnerable populations and should then be supplemented with information from joint planning/exercises with those who would be needing the services on the local level in a number of communities.

Perhaps the Diverse Communities Working Group can assist with developing and publicizing this strategy. We would note that environmental justice groups are often good at reaching and educating vulnerable, hard-to-reach people.

2. What are some proposed changes or concerns EEJ or your EEJ subcommittee has about this report? How might the recommendations be strengthened to ensure equity (the equitable distribution of costs and benefits)? Where possible, please identify particular recommendations made in the report and/or provisions of the report and provide the corresponding comment.

The recommendation for developing standards for local heat response plans is an excellent recommendation. It should, however, require involvement of the most vulnerable populations in the local planning process to assure that it is acceptable and meets their needs.

The recommendations around air pollution are for research and monitoring rather than promoting action, or making current actions more equitable. We know that air pollution is harmful, is exacerbated by climate change, and is not evenly distributed. The largest sources of air pollution tend to be located in communities of color. The recommendations should be to prioritize the closure of fossil-fueled power plants in densely populated parts of the state with high rates of asthma and to prioritize renewable energy job creation in these communities.

In addition, recommendations should address decreasing exposure to existing air pollutions sources as much as possible. This is especially important for those who have limited ability to move or use air conditioning, no matter how harmful their housing may be. Those who are in government-subsidized housing may be on a waiting list for years before they can be transferred to safer housing that does not cause frequent trips to the emergency room and school absenteeism from asthma due to traffic related air pollution or indoor mold

Because of their limited options to change their circumstances, schools in low-wealth communities and government-supported housing should have standards that are more health protective of their residents. There should be zoning buffers between publicly supported housing and major highways to protect from traffic related air pollution. Schools without adequate financial support and maintenance as well as publicly supported housing should not be built in flood zones. The Connecticut Housing Finance Authority should maintain their incentives for building the highly energy efficient and high IAQ Passive House. PHS and GC3 should support this as a climate equity issue.

We do support the section of the ozone warning evaluation that explores how new ways of communication can be used to reach vulnerable populations.

The mental health sections discusses service needs for the chronically mentally ill. This is good; however, it should add a recommendation for planning for post-disaster, culturally and linguistically appropriate mental health service structures. These needs are often underestimated in disaster plans.

3. What are additional ideas and/or recommendations for incorporation incorporated into this working group's report?

EEJ is also concerned about cumulative impacts of environmental health risks. Does PHS have a mechanism of determining and prioritizing areas of cumulative climate vulnerability/impacts?

There was a request that PHS include a recommendation to eliminate Combined Sewage Overflows/Outfalls. As we get more downpours and flooding, which is likely to be greater in urban areas, we will get more release of sewage-contaminated water in basements and backyards with resultant infectious disease. This requires increased funding.

We are concerned about your recommendation to use Clean Water State Revolving Funds for rural subsurface sewage disposal system upgrades. Would this promote suburban sprawl by making it cheaper to develop the green fields? Are you proposing to restrict the funds to income eligible households? Would it be open to businesses?

4. What items are in need of further discussion, investigation, and/or deliberation as the GC3 continues to meet in 2021?

PHS may want to review the national recommendations that include siting, building, and maintaining IAQ standards for schools in low-wealth communities and government supported housing and tailor them for Connecticut.