Improving Engagement with Disadvantaged Communities

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Climate change will disproportionately negatively impact low-income, overburdened, and marginalized communities in the United States. Despite this, disadvantaged communities are seldom consulted in climate policy decisions. For example, the current leasing process for developing offshore wind energy fails to institutionalize consultations with disadvantaged communities that may be affected (<u>read more here</u>).

Excluding the feedback of disadvantaged communities can result in ineffective policy. These communities bring a necessary understanding of inequitable access to resources and opportunities to the table. Incorporating the views of disadvan-taged communities is also critical to ensuring that government policy fully represents the interests of the people it is meant to serve.

It is therefore critical for government <u>agencies responsible for establishing climate</u> <u>policy to incorporate the views of disadvantaged communities</u>. Moreover, through the <u>Justice40 Initiative</u>, the current Biden–Harris administration mandates meaningful inclusion of disadvantaged communities in the just energy transition. The following recommendations have been informed by literature review, interviews with key stakeholders from the offshore wind sector including federal and state agencies, and conversations with representatives from disadvantaged communities and environmental justice advocates. These recommendations can be used by government agencies to better incorporate the views of said communities in policy decision making processes. **1.** Hold roundtables early on in the policymaking process to collect input from disadvantaged communities. Roundtables should be held when agencies are drafting environmental assessments (EA) and environmental impact statements (EIS), which are often required by governments before a proposed action that could affect the environment is undertaken. Disadvantaged communities should be consulted early on in EA and EIS processes since they have a closer understand-ing of how a proposed action might affect their community.

2. Create an open docket for disadvantaged communities to submit feedback online. Roundtable agendas should be published before the roundtables, and attendance rosters, meeting minutes, and meeting summaries should be published within 30 days of the meeting. Publishing roundtable agendas beforehand will allow disadvantaged community stakeholders to prepare for roundtables in advance. Publishing attendance rosters and meeting minutes will allow stakeholders to better hold government agencies accountable to whether any recommendations discussed are executed.

3 • Publish disadvantaged community roundtable agendas and meeting minutes publicly to increase transparency. The above roundtables should be paired with an online, open docket for disadvantaged communities to submit feedback on ideas if they are unable to attend these roundtables or any other critical public hearings. Disadvantaged communities are less likely to show up at roundtables, hearings, or other stakeholder engagement events because they experience higher opportunity costs for prioritizing these engagements over personal and professional demands. Participatory approaches need to provide more flexibility in terms of time, location, and access to platforms collecting feedback from disadvantaged community stakeholders.

Government agencies should be sure to create a digital open docket for communities to submit feedback outside of meeting times. This docket can be modeled after those found on <u>Regulations.gov</u>, where various stakeholders are able to leave comments on notices, regulations, and other governmental proposals.

4 • Compensate disadvantaged communities for their time and expertise through grant programs such as the climate justice block grant under the Inflation Reduction Act. Disadvantaged communities have been vocal about receiving fair compensation for their expertise in informing equitable policy. By participating in roundtable discussions and open comment periods, these communities bring expertise and experience that benefits other parties. This request has been echoed by state governments as well; for example, the State of California recently submitted a comment for a proposed wind sale lease advocating for environmental justice community members to be compensated and the State of New York has

already established such a mechanism.

Governments can consider establishing environmental justice block grants for compensation. The Inflation Reduction Act has specified funding under the federal government's Environmental and Climate Justice Block Grant for this specific purpose, and should be adequately utilized.

By following these recommendations, government agencies can ensure that disadvantaged community voices are heard. Agencies can also ensure that public investments in clean energy are equitably distributed to the disadvantaged communities that have been traditionally excluded from the benefits of energy generation.