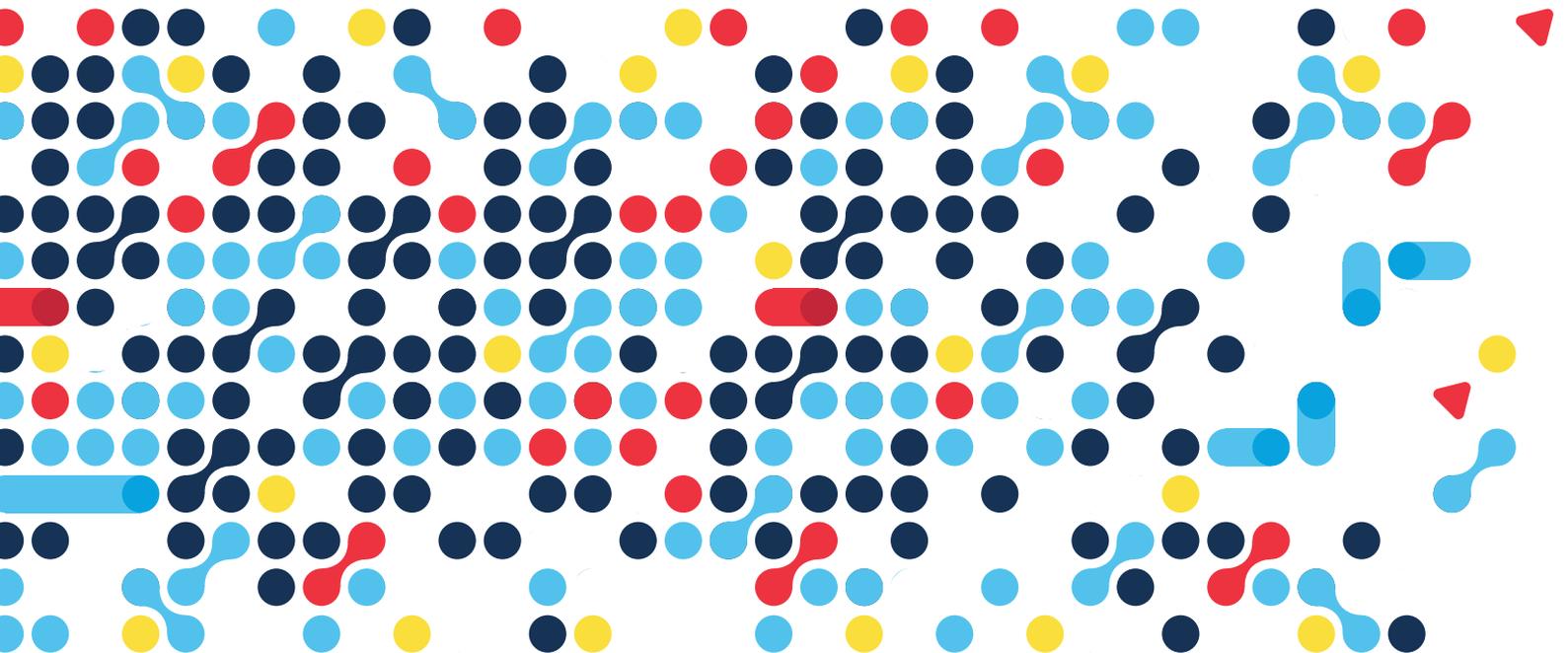


CLIMATE EQUITY FRAMEWORK AND TOOLKIT FOR AN EQUITABLE ENERGY TRANSITION IN GREATER HOUSTON

APRIL 2024



BEFORE YOU READ

This report consists of two key components: a [Framework for Community Engagement Toolkit for an Equitable Energy Transition](#).

The Framework outlines the current state of community engagement as a key enabler of climate equity in greater Houston related to decarbonization. It is informed by desktop research and interviews with ten energy companies and ten community groups that have a footprint in the region. This document describes the current state of regional community engagement related to energy projects, beginning with a description of findings from research and company interviews to provide further context, followed by a synthesis of community insight, all of which inform the Framework. The Toolkit provides resources and information for how companies can start working in or improve current practices in the climate equity and community engagement space. This work is a collaboration of the Greater Houston Partnership's Houston Energy Transition Initiative (HETI), Houston Advanced Research Center (HARC), and Sallie Greenberg Consulting (SGC).

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About



Houston Energy Transition Initiative (HETI)

The Greater Houston Partnership is dedicated to strengthening Houston's position as the Energy Capital of the World. The Partnership's Houston Energy Transition Initiative (HETI) builds on the best of traditional energy skills and systems to leverage Houston's industry leadership to accelerate global solutions for an energy-abundant, low-carbon future.



Houston Advanced Research Center (HARC)

HARC is a research and policy analysis organization dedicated to forging effective and sustainable solutions to Texas' climate resilience and climate justice challenges. The core issues of HARC's work include air quality, clean and adequate supplies of water, energy, coastal management and the preservation of green spaces for various purposes.



Sallie Greenberg Consulting

Dr. Sallie Greenberg is a scientist, strategic advisor, and engagement specialist with over 30 years of experience in the environmental and energy geosciences. Her work on diverse carbon capture and storage projects—including her time as a Principal Research Scientist on the Illinois Basin – Decatur Project—has made her a world-renowned and sought-after consultant and invited speaker for governmental organizations, institutions, and think tanks working at the intersection of science, sustainability, and society.

EXECUTIVE SUMMARY

Houston is the Energy Capital of the world. The economic vitality of our region’s economy is inextricably tied to the energy industry – an industry that is changing rapidly to meet growing global energy demands while simultaneously lowering emissions. This effort to meet our dual energy challenge is known as the energy transition. The goal is for environmental and economic benefits of the energy transition to flow to all members of greater Houston, and it is important that historical disparities are addressed in the process.

The mission of the **Greater Houston Partnership’s Houston Energy Transition Initiative (HETI)** is to drive sustainable and equitable economic growth for an energy-abundant, low-carbon future in the Greater Houston region. Critical to this objective, HETI seeks to ensure that community voices help guide climate and equity solutions to strengthen decarbonization efforts.

Community engagement is an iterative process that takes place over time, with multiple diverse and evolving stakeholders. A community can be defined as those who live in and around energy and energy transition projects or infrastructure, as well as those affected throughout Houston; there is not one set population size or geographic area that defines a community. It is critical to create an environment where open and productive dialogue can take place for the benefit of all involved, at a scale dependent on industrial projects and engagement goals. A leading best practice in community engagement emphasizes open communication, whereby a company works to understand and support local concerns, values, and goals, with a focus on mitigating disparities. Communication strategies

Community engagement is an iterative process that takes place over time, with multiple diverse and evolving stakeholders.

can vary based on engagement goals and type of company; this document focuses on two-way engagement and sustained relationships between industry and communities. Building connections with community members includes careful, inclusive outreach to representatives of impacted communities and ongoing work to maintain and strengthen those relationships to promote shared benefits.

A **Framework for an Equitable Energy Transition** and the **Community Engagement Toolkit for an Equitable Energy Transition** were developed to help foster mutually valuable relationships between leading energy companies with a presence in Houston and the communities they impact.

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This report further serves to help corporations and communities build regional capacity for climate equity through community engagement.

This **Framework and Toolkit** are based on research and help to bridge an understanding between corporate climate action, community engagement,

and the federal government's approach to diversity, equity, inclusion, and accessibility. The report can be used to support open, transparent, and meaningful dialogue, and to develop equitable solutions for the highest priority challenges as identified by communities while aligning with corporate impact objectives.

KEY FINDINGS

- **Existing Priorities** — STEM education and workforce development have been prioritized by companies in engagement activities.
- **Shift to equity** — Equity considerations have been increasingly important for companies to address in recent years. Communities are looking for authentic processes that include community input and benefits.
- **Two-Way Engagement** — Companies and communities recognize two-way engagement as a best practice that could be implemented further.
- **Meeting Community Needs** — Companies want to meet community expectations and avoid underservice, but highlighted the following challenges:
 - Concern that the benefits they can provide, which may not include direct or immediate changes, may be perceived as underservice.
 - Difficulty in navigation of processes within novel programs such as Justice40.
 - **Transparency** — Communities want transparency in the community engagement process and solutions that are tailored to each community.

The following findings and recommendations are based upon research on existing reports and guidelines, along with interviews with leading energy companies and community-based organizations in the greater Houston area.

The companies interviewed all recognize the importance of community engagement; however, each has different goals for this outreach. Community engagement work is not new to most companies, many of which have been engaging communities for decades.

However, the type of engagement the community, and federal government, wants and expects has changed. Company interviewees shared an awareness of these nuances, and they see an increased interest in environmental justice and equity. Companies want engagement strategies to address this shift in priorities and ensure community needs are acknowledged in the process.

Communities shared their experiences with current engagement practices as well as their concerns both directly and indirectly related to the energy transition.

KEY POINTS INCLUDE

- Addressing access to basic needs stands out to communities, along with reducing existing risks.
- When addressing equity, benefits must flow to those for whom access to benefits is currently inequitable.
- Community members have largely not experienced two-way engagement events or activities in their local area.
- Community leaders want company support that reduces pressures on impacted residents.
- Communities and companies may have different definitions of successful engagement, which affects perception of existing engagement activities.

ACRONYMS

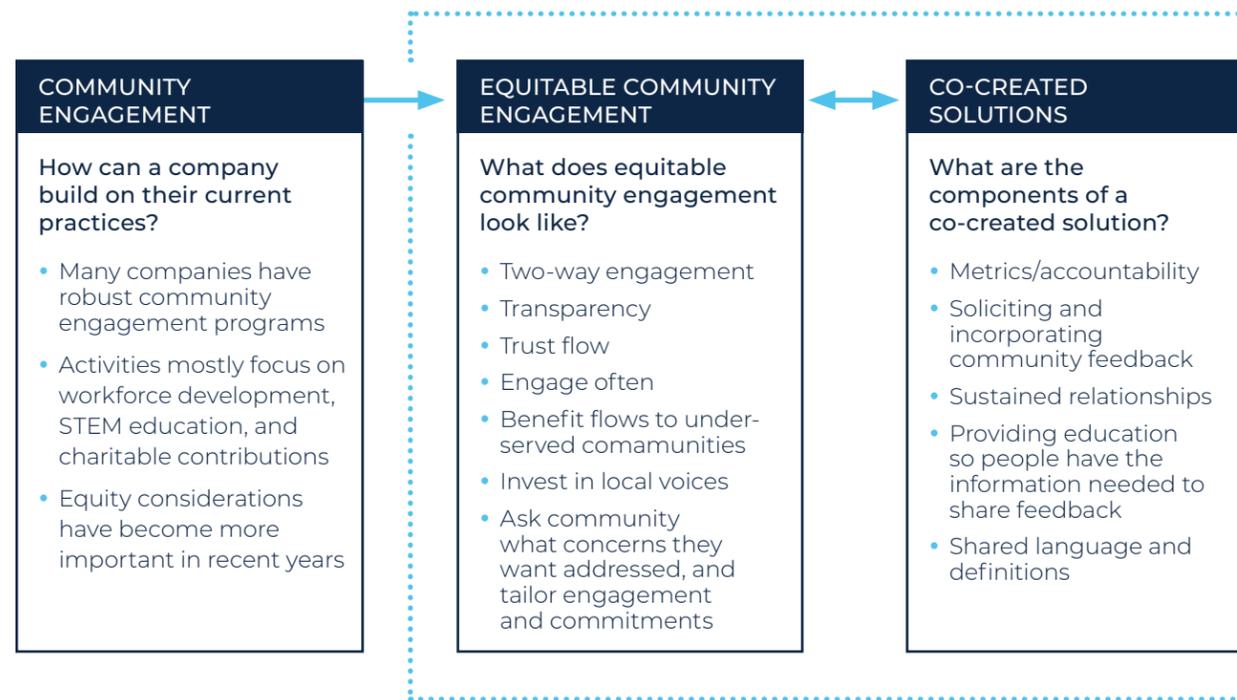
CAC	Community Advisory Councils
CBA	Community benefits agreement
CBP	Community benefits plan
CDC	Centers for Disease Control and Prevention
CEJST	Climate and Economic Justice Screening Tool
DAC	Disadvantaged community
DEIA	Diversity, Equity, Inclusion, and Accessibility
DOE	Department of Energy
EJ	Environmental Justice
EPA	Environmental Protection Agency
ESG	Environmental, social, and governance
HBCU	Historically Black colleges and universities
IAP2	International Association for Public Participation
IJA	Infrastructure Investment and Jobs Act
IRA	Inflation Reduction Act
J40	Justice40
MWBE	Minority and women-owned enterprises
NGO	Non-governmental organization
STEM	Science technology, engineering, and math

With increased focus on the energy transition and decarbonization, along with environmental justice and climate equity needs, the landscape is ripe for a paradigm shift. Houston is well-suited to lead this shift.

The Framework for an Equitable Energy Transition can be used to identify gaps and improve a community engagement approach.

The framework has three nested components for companies to address:

- How can a company build on their existing practices?
- What does equitable community engagement look like?
- What are the components of a co-created solution?



THE COMMUNITY ENGAGEMENT TOOLKIT FOR AN EQUITABLE ENERGY TRANSITION PROVIDES GUIDANCE AND RESOURCES FOR BUILDING COMMUNITY ENGAGEMENT PLANS.

The toolkit includes sections on:

- Identifying Stakeholders
- Mechanisms for Sustaining Two-Way Engagement
- Building Trust with Communities
- Community Benefits Plans and Agreements
- Evaluating Success of Engagement

CLIMATE EQUITY FRAMEWORK

PURPOSE

The **Climate Equity Framework and Toolkit** serve as a roadmap and resource guide for Houston-area energy companies to address gaps and better achieve engagement goals. The report shares insights for how Houston can lead the energy transition with equitable community engagement and co-created solutions. This work moves beyond traditional means of engagement by the energy industry, provides a Houston-focused approach, and shares resources for companies and communities, including relevant best practices and strategies that may be applied to other regions. The Framework illustrates best practices for equitable engagement and co-development of solutions, including guidance on how to incorporate equity into existing practices and opportunities to strengthen two-way, industry-community relationships.

APPROACH

In 2023, the Houston Advanced Research Center (HARC) and Sallie Greenberg Consulting (SGC) worked with HETI, energy companies with a presence in the region, and impacted community organization stakeholders and leaders, to develop a baseline understanding of current corporate climate action, community needs, and preferred methods of engagement. This research informs the development of partnerships, shared learning, understanding of needs, and solution development and implementation between companies and communities in the greater Houston region.

THE CLIMATE EQUITY PROJECT WAS CONDUCTED IN THREE PHASES, AS SHOWN IN FIGURE 1:

PHASE 1 centered on concept framing along with identifying community engagement paradigms through a literature review and preliminary interviews with energy companies.

PHASE 2 probed deeper into the current state of engagement via additional company interviews and interviews with community organization stakeholders and leaders to understand their concerns, needs, and perceptions of company engagement practices.

PHASE 3 included applying key findings to the development of the framework and toolkit documents.

Phase 1 laid a foundation for the following stages of the project as the research team identified conceptual frameworks and best practices from existing literature that would be most relevant to companies leading the energy transition. This phase included qualitative interviews with a preliminary group of energy company employees. Phase 1 interviews with companies with existing and new operations and/or facilities in Houston-area fenceline communities provided a baseline of current engagement and investment activities. The data from the preliminary interviews was combined with an extensive literature review, which identified best practices, existing paradigms, and opportunities for engagement in impacted communities.

Phase 2 provided an opportunity to interview additional companies to build on Phase 1 findings. Phase 2 also included engagement with Houston area community organizations to understand how they view traditional engagement efforts and what they would like to see change. Over Phases 1 and 2, ten company interviews and ten community organization interviews were conducted, analyzed, and cross-correlated.

All 20 interviews were conducted by one or more members from the HARC/SGC team. Each interviewee provided verbal consent to be interviewed and was asked the same set of questions. During Phase 3, responses were analyzed for themes, insights, and recommendations to apply to this report.

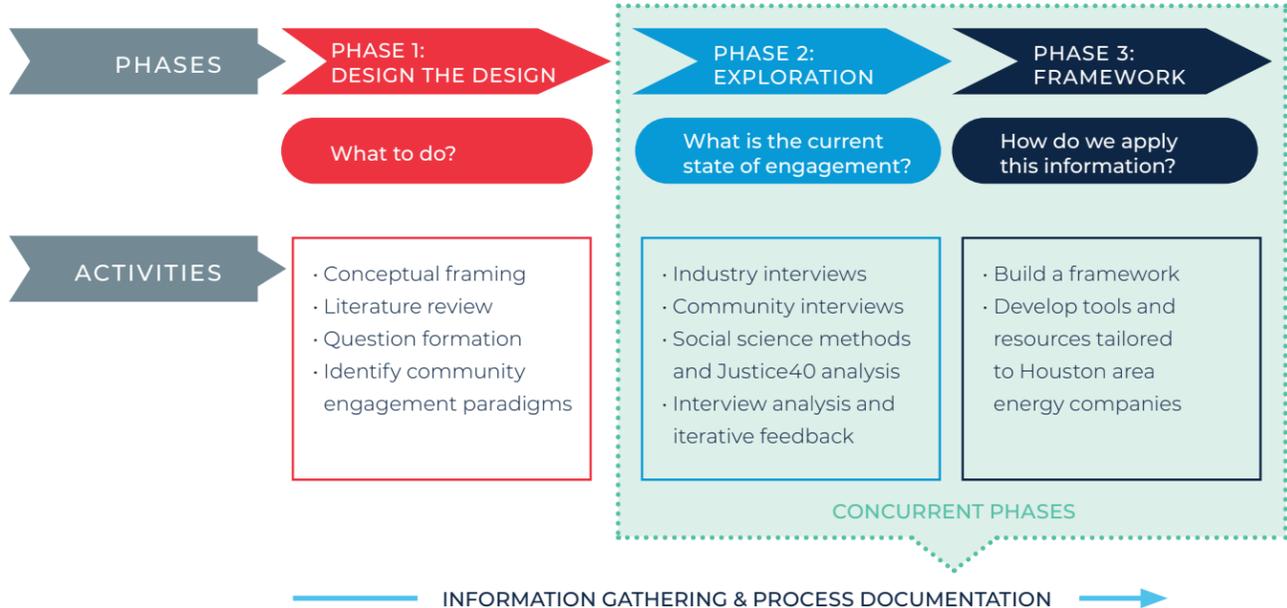


Figure 1: Climate Equity Project workflow across three phases



STUDY RESULTS

LEARNING FROM COMPANIES

The research team interviewed energy company employees to understand current community engagement methods, including priorities and budget. Companies interviewed operate and/or are headquartered in the greater Houston area and are all connected to the energy transition but vary in size and business focus.

KEY FINDINGS

- STEM education and workforce development have been prioritized by companies in engagement activities.
- Education and outreach directly related to the energy transition could be improved.
- Equity considerations have been increasingly important for companies to address in recent years. Communities are looking for authentic processes that include community input and benefits.
- Companies and communities recognize two-way engagement as a best practice that could be implemented further.
- Companies want to meet community expectations and avoid underservice, but highlighted the following challenges:
 - Concern that the benefits they can provide, which may not include direct or immediate changes, may be perceived as underservice.
 - Difficulty in navigation of processes within novel programs, such as Justice40¹.
 - Communities want transparency in the community engagement process, engagement to directly include representatives of impacted communities, and solutions that are tailored to each community.

¹<https://www.whitehouse.gov/environmentaljustice/justice40/>

Energy companies have existing community engagement and support activities that may be leveraged for climate equity efforts. Interviews identified areas of community engagement leaning heavily towards STEM education, workforce development, and charitable contributions. Existing engagement practices should be reviewed to ensure climate equity goals are established and achieved.

CURRENT COMPANY ENGAGEMENT PRACTICES AND GOALS

Companies recognize the importance of community engagement; however, each has different goals for this outreach. One interviewee mentioned wanting to help organizations be sustainable by reducing reliance on oil and gas dollars, to maintain consistent communication with communities (i.e., having someone “on the ground”), and to improve trust. Another interviewee wanted to focus on opportunities for positive corporate impacts but also mentioned the desire to share how some of its projects help

"People who are civically minded talk to each other, even groups that seem unrelated to [the energy industry] can be helpful connections."

—Corporate Interviewee

reduce carbon dioxide emissions. It was mentioned that community engagement around climate justice might be more difficult for upstream companies, and for some the focus might be to address potentially adverse issues directly with communities before they reach the courts. Similarly, some interviewees discussed the difference between engaging communities already affected by climate change or existing operations versus bringing new construction, and potentially environmental risks, to new communities. When the infrastructure is in place already, companies can learn from past challenges. Another company mentioned that a goal around community engagement is to help both the company and the community grow, for example by using local suppliers and funding education and job training programs for the immediate community.

All companies interviewed mentioned charitable contributions as part of their community engagement strategies. Examples include sponsoring local events or amenities. Corporate contributions discussed in the interviews appeared to align with a company’s mission and a focus on education, specifically programs that could serve as pipelines into employment with the companies. Many companies self-identified their community engagement work as focused locally, with many activities or funding determined by individual plants within communities.

With respect to two-way communication, where communication flows in both directions, a few companies interviewed have processes in place to get feedback





from the community and tailor engagement activities for specific locations. However, most interviewees shared that formal two-way engagement programs are in their infancy. Interviewees stated that companies support building two-way communication programs but are looking for guidance on program design. One interviewee shared that the organization they work for completes an assessment of community needs, often followed by funding, informed by meetings with neighbors on multiple scales. This approach highlights the potential for two-way engagement work to be conducted and built upon.

Companies interviewed shared a range of engagement activities currently underway; several activities were identified by multiple interviewees. Current community engagement activities identified by interviewees include:

- Charitable donations
- Educational presentations
- Listening sessions
- Community Advisory Council meetings
- Community liaison positions based near operations
- Internship programs
- Apprenticeship programs
- Job fairs
- Disaster relief
- Food drives

ACCOUNTABILITY

When measuring accountability and tracking success of engagement, companies shared a range of strategies that have been or are being practiced. Some groups collect qualitative (what attendees heard, what they liked, what they need; Facebook or Nextdoor data) and quantitative (awareness and understanding of a specific topic) data from meeting attendees, while others broadly track attendance. Understanding what data will be useful is also dependent on the scale of the community and level of engagement. Deciding the community scale should be based on the goals of engagement, number of people affected by industrial operations, cross-sectional representation of the community, representation of specific neighborhoods, and how the data will be used. Companies were also asked how they tracked the impact of their activities; some interviewees shared that they “know impact when [they] see it,” which may not provide meaningful accountability. Other interviewees see impact as both tangible and intangible. A tangible goal, for example, is hosting a specific number of meetings, while an intangible goal is to improve knowledge of programs. Community engagement work can include a wide range of activities, which introduces complexity in tracking success, and there is a need for a more systemic and consistent approach for companies. A data-driven approach measuring how engagement activities address inequalities and benefit impacted groups is helpful to understand which programs are most beneficial to the community.

SHIFTING PRIORITIES

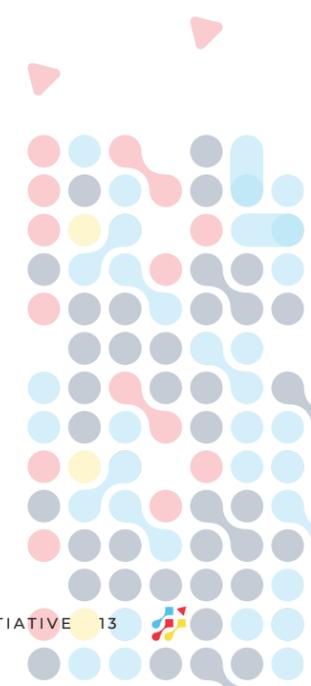
Community engagement work is not new to most companies, many have been engaging communities for decades. However, the type of engagement the community, and the federal government when funding a project, and often shareholders, want and expect is changing. Existing frameworks from the American Petroleum Institute (API)¹ and International Petroleum Industry Environmental Conservation Association (IPEICA)² provide information on community engagement for the energy industry, while newer frameworks like the Biden Administration’s Justice40 (J40) initiative build equity into strategies in novel ways.

Companies interviewed highlighted an increased interest in reaching into impacted and underserved communities or minority-serving programs and institutions to better understand their positions and needs. There is an opportunity for corporates to commit to frameworks that can help support improved community engagement efforts in environmental justice and equity. Environmental justice and equity priorities have become more important in the last five years, while for all companies interviewed, community engagement work has been underway far longer. Companies want engagement strategies to address this priority shift and ensure community needs are acknowledged in the process.

One interviewee mentioned a specific goal of engaging with community organizations or individuals who oppose them, but this strategy was not otherwise mentioned. The federal government’s Justice40 initiative has been a driving factor in bringing these concerns to the attention of companies. Multiple interviewees shared that they have applied for federal funding and are therefore following J40 guidelines for those specific projects. There are opportunities to use J40 guidelines to improve programs beyond those that are federally funded. However, some interviewees shared that without federal funding, implementing those programs will be difficult. A genuine commitment to equity and community benefits is necessary for the frameworks to be successfully implemented.

¹ <https://www.api.org/oil-and-natural-gas/wells-to-consumer/exploration-and-production/hydraulic-fracturing/community-engagement-guideline>

² <https://www.whitehouse.gov/environmentaljustice/justice40/>



"It is hard to get individual engagement, but you may need that for a real pulse."
—Corporate Interviewee

Multiple interviewees shared that they have not had experience building a Community Benefits Plan (CBP). A CBP is required for federal funding, which outlines four pillars: investing in the American workforce, engaging communities and labor, advancing diversity, equity, and inclusion, and implementing Justice40. The goal is for these standards to collectively support the equitable flow of project benefits. Interviewees also shared that the learning curve of creating something similar to a CBP is difficult to tackle without the support from and requirements that come with receiving federal funding.

Even if an initiative is not federally funded, Justice40 provides a useful set of guidelines for designing community engagement and climate equity programs. Regardless of funding source, tools like CBPs reflect a commitment to equity and community benefits. With increased focus on the energy transition and decarbonization, along with environmental justice and climate equity needs, the landscape is ripe for a paradigm shift. Houston is well-suited to lead this shift.

EXAMPLES OF IMPROVED COMMUNITY OUTREACH AND ENGAGEMENT ACTIVITIES

Existing company community engagement work provides a strong foundation for the framework for an equitable energy transition. Leveraging current work and adding connections to community interests will improve outreach and engagement. Companies have several opportunities to build equity into current work to provide greater community benefits. Below are some examples for how companies can further community outreach and engagement activities:

- Define community area and population based on engagement goals
- Communicate to larger market segments (websites, media, social media, and those without internet access) in multiple languages
- Charitable projects and community investment programs developed in consultation with communities related to:
 - Skill development and workforce training
 - STEM education for many age levels, supporting underrepresented groups
 - Training and education on equity, unconscious bias and/or cultural competency
 - Disaster relief
 - Healthcare access
 - Increasing community participation and representation in engagement activities

- Addressing systemic racism and inequality
- Climate action and energy access
- Community consultations and meetings structured as two-way dialogues
- Accessible local business engagement (economic development groups, chambers of commerce, and related forums) in all impacted communities
- Local employment opportunities
- Employee volunteerism aligned with community needs
- Community Advisory Committees (CACs) aligned with community needs
- Open houses and facility tours
- Customer satisfaction surveys and community grievance mechanisms
- Town hall meetings that are inclusive and constructive
- Forums with employees about customers, suppliers, community members, cultural heritage, race and racism.

ADDITIONAL RESEARCH ON CORPORATE APPROACHES

A review and analysis of sustainability reports and disclosures published by leading companies of varying sizes that represent all segments of the energy industry was completed to better understand corporate approaches to community engagement. Provided below are examples of Community Engagement Goals, linkages with the United Nations

Sustainability Development Goals (SDGs)⁴, and related Global Reporting Initiative (GRI) disclosure standards⁵. These results give an indication of overall sustainability awareness and implementation of best practices throughout the energy industry. A McKinsey study shows that companies with higher performance in the environmental, social, and governance (ESG) areas, consistently outperform the market in the mid and long-term.³

Sustainability reports demonstrated variation in how companies discuss engagement goals and practices as well as their involvement in communities and how this is incorporated into their sustainable business practices. While sustainability practices differ among companies, a closer look at reports revealed the following common key characteristics:

- A statement or pledge to actively engage communities where the company's facilities are based.
- An expression of openness and desire to build trust with communities through relationships.
- Conscious effort to be good neighbors by contributing to community well-being and minimizing potential negative impacts from operations.

Companies also detailed their approach to measuring the impact of their community engagement work in their corporate sustainability reports. Key performance indicators of community engagement referenced by companies include:

³ <https://www.mckinsey.com/~media/McKinsey/Business%20Functions/Sustainability/Our%20Insights/Profits%20with%20purpose/Profits%20with%20Purpose.ashx>

⁴ <https://sdgs.un.org/goals>

⁵ <https://www.globalreporting.org/standards/>



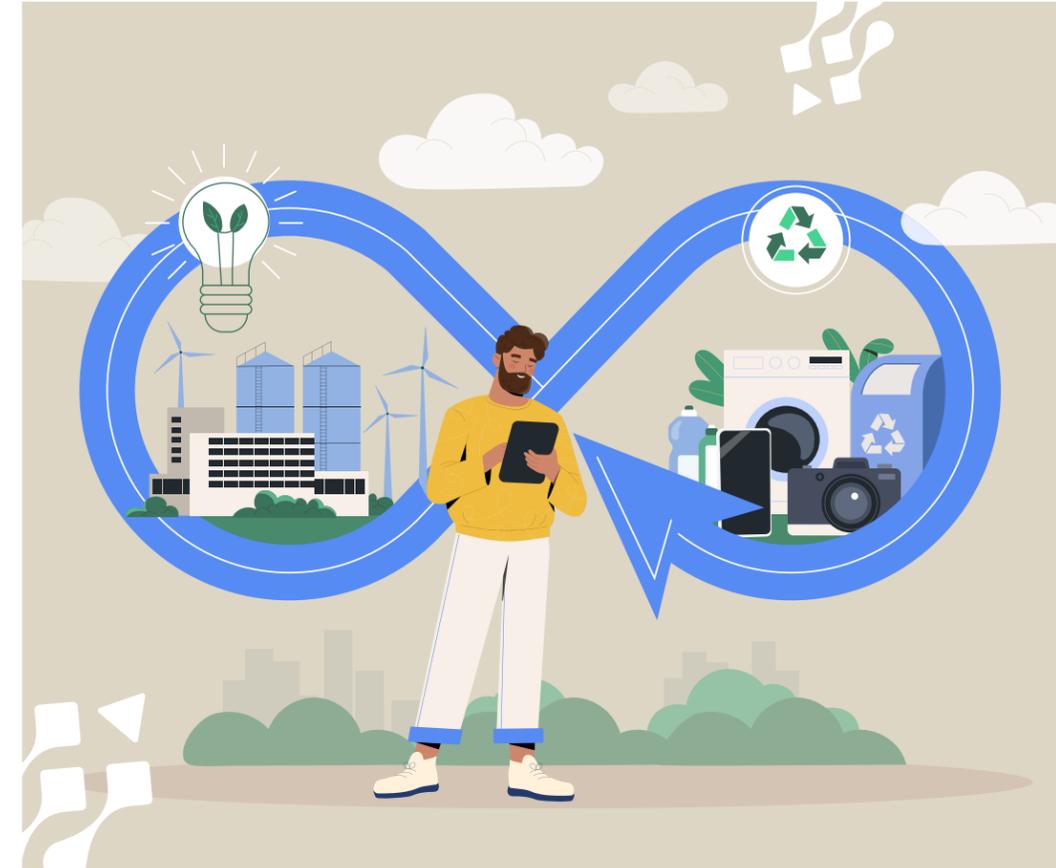
- Total charitable contributions
- Volunteer service hours
- DiversityInc Top 50 Companies for Diversity list⁶ ranking
- Local hiring
- Dollar amount invested in communities
- Workforce development opportunities provided
- Grievance mechanism results
- Increased workforce diversity to reflect the communities in which they operate
- Support of local skill development

A few companies discussed using a third-party vendor to measure project outcomes using standardized models to measure the portion of those impacts attributed to the company.

Some companies also referenced how their activities correlate to the United Nations Sustainable Development Goals (SDGs). SDGs are a collection of seventeen interlinked objectives used as a “universal call to action to end poverty, protect the planet, and ensure that by 2030 all people enjoy peace and prosperity.” Figure 2 illustrates which SDGs were referenced in the corporate sustainability reports reviewed in this study.



Figure 2: United Nations Sustainable Development Goals related to this study



In addition to SDGs, several companies also disclose information related to community engagement and benefits through the Global Reporting Initiative (GRI). GRI standards are designed to help companies understand their impacts on the economy, environment, and society to increase accountability and enhance transparency on their contribution to sustainable development and are built upon a foundation that communities have individual and collective rights. The following GRI standards can be considered by a company to report quantitatively and qualitatively on its impact

on equitable community engagement and community benefits:

- **GRI 202-2.** Proportion of senior management hired from the local community
- **GRI 204-1.** Proportion of spending on local suppliers
- **GRI 413-1.** Operations with local community engagement, impact assessments, and development programs
- **GRI 413-2.** Operations with significant actual and potential negative impacts on local communities

⁶ <https://www.fair360.com/top-50-list/2023/>

LEARNING FROM COMMUNITY

Interviews with community organization leaders, completed during Phase 2, highlighted a gap between company and community perceptions of engagement. Community members shared their concerns and how best to address them. The community interviews acknowledge and underscore an existing “trust deficit”, where over time the community has felt that companies do not meet their expectations for engagement or overcome the trust deficit. While industry can bring economic benefits to communities, the communities may feel the costs of issues, like identified environmental problems, have offset such benefits.

Energy Transition Perceptions

Findings from interviews with community-based organizations highlight pressing problems, such as the ability of residents to meet basic needs, that may prevent communities or community members from engaging with ideas around the energy transition. These issues were shared by community leaders across neighborhoods and city-wide, representing different scales of engagement within a community. Several individuals interviewed did not have a clear understanding or definition of the term “energy transition”. Definitions for the energy transition that were mentioned in the community member interviews include:

- Clean energy coming from wind or water
- A change in how things are powered
- A new way to provide resources needed to function as a country

- A shift to lower carbon sources for energy generation
- A way to revolutionize energy as part of the solution to climate change and environmental justice issues
- Low-carbon energy being in greater and greater demand

Defining and sharing terminology related to climate equity is necessary, as some terms may not be commonly understood by all parties. These incongruencies must be addressed to align the objectives of communities and industry.

Individuals interviewed who stated an awareness of the energy transition indicated that while they personally thought that their communities could benefit from it, they were not sure that the average person understood what it was or how they would benefit. These individuals emphasized the need for broad community outreach and education on the topic.

While several interviewees shared visions of potential benefits from the energy transition that could come to their communities, many more mentioned concerns. These concerns included ensuring that the existing energy workforce retains employment and job training opportunities for new employees. While job opportunities do not resolve all community problems, they do address multiple pressures and are an important benefit. Other community leaders are concerned that some of the technologies, specifically carbon capture, continue the dependence on fossil fuels, rather than an investment in clean energy.

Current Engagement Practices

Community perceptions of company engagement efforts were generally poor. Several people interviewed were not aware of any engagement or outreach efforts by companies in their community. This low awareness suggests that there is a gap between community members' knowledge and views of engagement and what companies consider successful engagement. For example, is a neighborhood on Houston's east side likely to consider sponsorship of a charity event as productive engagement? This highlights the importance of understanding what community or companies you hope to reach. If aiming for a cross-section of a large area, outreach or advertising will need to be widespread. If instead, a project is focused on a specific neighborhood, advertising can be focused on key areas within the community where members gather, like community centers, schools, or churches. As companies strive to broaden engagement efforts, there are significant opportunities to partner with community organizations, local leadership, and individuals to better understand community needs and concepts of benefits. For example, one

organization mentioned that to date they have not been contacted by industry or energy companies to help get the word out about community events, a role they would be willing to support. Several other community organizations interviewed mentioned that they would welcome more engagement from industry and energy companies if it is done in good faith. This idea of good-faith can be addressed with a focus on transparency and trust-building. When asked how companies can rebuild trust, community members highlighted the importance of consistent visits, spending time in communities, directing funds and resources to local leaders, and demonstrating an understanding of the historical inadequacy of past community engagement efforts including previous harms that the community has experienced.

"We need to start with inclusion, and work toward a tangible asset that the community yields."
—Corporate Interviewee



Interviews with community organizations show a gap between community perspectives and corporate actions. A factor that may be contributing to community groups' perception of limited company engagement efforts could be related to the community members and organizations with which companies engage. One comment from an interviewee indicated that companies will often develop close working relationships with political leaders and other influential members of the community. This comment is corroborated by findings from the Phase 1 interviews, when one company mentioned an engagement goal was to be one of the first to meet with newly elected officials. Interviewees indicated that outreach needs to go beyond the top level of influencers to engage all community segments, especially representatives of impacted, historically marginalized communities. Another individual cautioned that charitable giving to larger organizations may not reach specific neighborhoods or communities where a company has operations. Focusing on giving to events or organizations with broad name

recognition could result in a lack of awareness of these efforts in local or fence-line communities.

Other respondents noted that most of the engagement they experience from companies revolves around the permitting process and meetings or communications that are required by law. In other words, representatives from community groups felt that engagement by companies with communities was transactional rather than relational. Based on community experiences shared in interviews, companies likely need to go above and beyond required engagement and engage earlier than the permitting process demands.

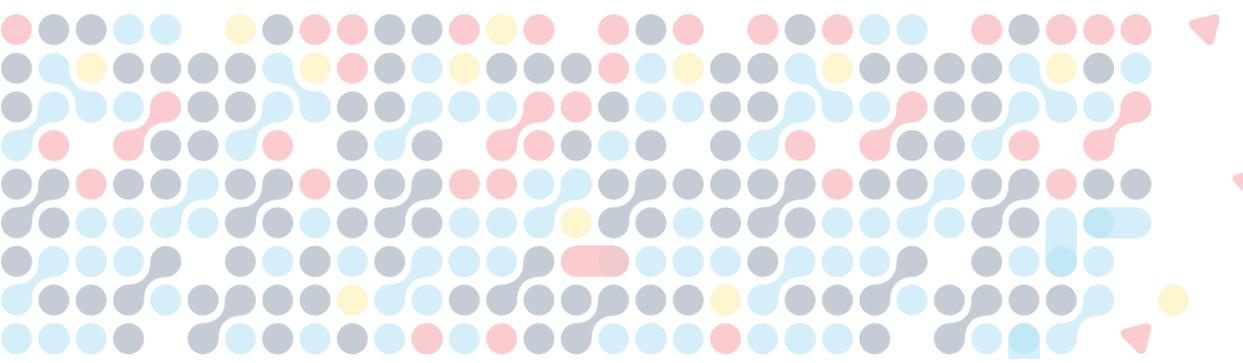
Two-way Engagement

Most people interviewed indicated that they were not experiencing or aware of two-way engagement or effective engagement from companies. They indicated that two-way engagement would be more than a town hall meeting; it would involve working closely with communities to understand how they

want to be engaged in efforts and whether they prefer decision-making authority. The following suggestions are examples of what interviewees shared for how companies could improve engagement to make it more effective.

- Provide education (using non-technical language) on the issue before asking for feedback or input
- Invest in local voices to help educate the community (community health workers listed as an example)
- Ask communities and individuals what issues they want to see addressed
- Be honest and transparent
- Use community advisory boards (which companies commonly use, but could consider expanding membership in frontline communities)
- Build trusting relationships
- Understand that engagement takes time
- Start engagement well before an ask is made of communities

The results from the community interviews suggest that more targeted engagement and education about the energy transition is needed and yield insights into specific areas that community groups felt could be improved. These include partnering with smaller, more local groups to plan and share information about the energy transition beyond what is required for permits and spending more time up-front to learn about community needs and wants and establish relationships. Advisory boards were specifically mentioned as an effective practice, with the caution that participants should be representative of the community, compensated for their time, and engaged throughout multiple stages of project implementation.



FRAMEWORK

The findings from this study show existing interest in and work toward community engagement, and new interest in climate equity work by industry, though there is progress to be made. Communities have had long-term interest in both engagement and climate equity. However, there is a mismatch between ongoing efforts and perceived benefits in the community. This research can be applied to a framework for a company to take stock of current engagement practices and consider to incorporate equity in a way which leads to co-created solutions.

This framework has three nested components for companies to address:

- How can a company build on their existing practices?
- How does equitable community engagement look?
- What are the components of a co-created solution?

THESE COMPONENTS CAN BE ORGANIZED INTO A FLOW CHART (SEE FIGURE 3) WHERE COMPANY NEEDS CAN BE IDENTIFIED FOR EACH QUESTION. THE FRAMEWORK CAN THEN SERVE AS A GUIDING DOCUMENT FOR COMMUNITY ENGAGEMENT AND CLIMATE EQUITY WORK.

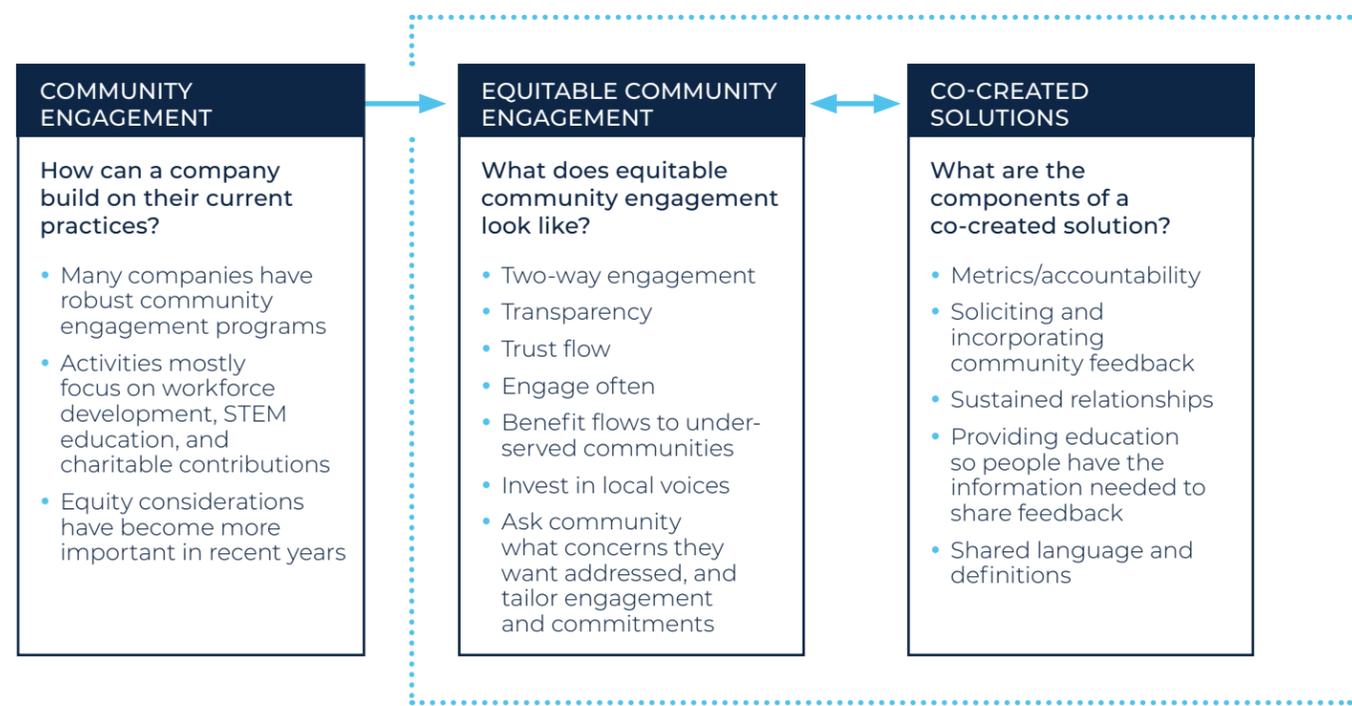


Figure 3: Climate Equity Framework for use by companies to expand community engagement and climate equity work.

The first step is to outline the current engagement processes, taking time to identify what has been done well and where gaps exist. A holistic approach to community engagement, meaning addressing multiple concerns and aiming for co-benefits, will help to address equity concerns. The second step is to identify how to equitably address gaps and build and maintain relationships with community leaders and members. Companies can and should work directly with the community to build co-created solutions, meaning concerns and feedback from multiple stakeholders are addressed when designing solutions while also building trust and focusing on

transparency. In Figure 3, findings from this study illustrate the framework.

It is worth noting that completing this framework will be an iterative process, and something to revisit throughout the design and implementation of new and existing community engagement activities. Building co-created solutions will support a system viable to companies and communities, with benefits for both stakeholders and shareholders. In addition, the framework is designed to be feasible for industry to enact by building on current practices to better and more efficiently support community needs.

CONCLUSION

This framework, when paired with the community engagement toolkit, provides a guide to begin and improve existing community engagement work. It is important to understand which best practices outlined in the framework are represented in the current engagement work of an organization, and where it is best to supplement existing work or build anew. Recommendations for sustained community engagement and specific practice for Houston-area energy companies are outlined in detail in the **Community Engagement Toolkit for an Equitable Energy Transition**.

A COMMUNITY ENGAGEMENT TOOLKIT FOR AN EQUITABLE ENERGY TRANSITION

Houston is leading the transition: developing and scaling technologies, creating, and servicing markets, and focusing investments to bring forward an energy-abundant, low-carbon future. The dynamic nature of the transition necessitates a paradigm shift in how companies engage with the community.

Industry has the opportunity and responsibility to use this dynamic transition to address the experience of underserved communities, referred to as disadvantaged communities (DACs) by the federal government, and improve climate equity. Houston has the potential to set a nationwide example for how to amplify energy equity and benefits while driving economic productivity across the region. Companies and communities have an opportunity to collaborate to build regional capacity and align solution creation for the energy transition. Equitable engagement and co-created solutions can help define triple bottom line benefits and advance industry goals. This toolkit provides tools, resources, and recommendations for industry to build upon current community engagement efforts with focused equity considerations. The tools and resources contained in this document are curated from best practices and tailored to the Houston region, based on findings from industry and community

interviews. The goal of the information in this toolkit is to help companies and communities leverage existing best practices and support the implementation of equity and co-development in projects and initiatives on a foundation of partnership, shared learning, understanding of needs, and solution development and implementation. Rather than a checklist to be completed, this toolkit is designed to be used as a guide to help develop lasting community and company relationships, increase investment in impacted communities, where appropriate, and solidify best practices for regional community and economic development activities focused on climate and environmental justice.

Additional resources, including a list of helpful environmental justice tools (including demographic, socioeconomic, and environmental screening and mapping tools) and a glossary defining key terms are included as appendices.

IDENTIFYING COMMUNITY STAKEHOLDERS

Stakeholders are individuals, groups, or entities that have an interest or concern in a particular project and can impact or be impacted by outcomes of the project.

Stakeholders can include a wide range of entities, such as:

- Employees and executives
- Government departments and agencies
- Regulatory bodies
- Elected and appointed representatives
- Nonprofits and non-governmental organizations (NGOs)
- Community organizations
- Residents
- Local businesses
- Media outlets
- Religious groups

This (non-exhaustive) list is intended to help project teams start the process of identifying and engaging relevant individuals and organizations. Project teams may also consider the following categories of community stakeholders. Representation of these groups can help encourage open and meaningful dialogue to align solution development for high priority challenges as identified by the communities themselves and corporate impact objectives.

Example categories of community stakeholders include:

1. People who live, work, play, or worship in areas neighboring an industrial operation or facility
 2. People interested in the project and related outcomes
 3. People who have the influence or power to impact project success
 4. People who fund relevant activities or are otherwise relevant to the objectives of a project
 5. People who represent residents or are legally responsible for public resources potentially impacted by a project
-

This can seem like a lot of people and groups to engage in dialogue about a potential energy transition opportunity. Defining the corporate community to engage early can help focus efforts within this list of groups. Especially when entering a new market, start with an initial list of local leaders and players active in the local energy market and look to build a potential stakeholder list from there. If the organization plans to engage a large group, it may also be productive to host a larger number of small meetings rather than one large meeting. This will enable more voices to be heard while still collecting information from a true cross-section of the community. The broader the stakeholder participation, the more capacity building, knowledge sharing, and mutual understanding can occur, all of which can help cultivate shared visions and successful achievement of mutual goals.

GRASSROOTS AND GRASSTOPS ENGAGEMENT

Successful stakeholder engagement practices include outreach and relationship building with affected individuals and communities. Grassroots stakeholder engagement focuses on the voices and perspectives of a broad base of people and communities most affected by projects. Often these individuals and groups can help identify issues and perspectives important to groups that may be marginalized due to location, socioeconomic class, race, gender identity, sexual orientation, age, physical ability, or language. Grassroots stakeholders are everyday people and are often viewed as authentic by members of the community. In contrast, grasstops stakeholder

engagement is an approach where influential members and leaders of a community or organization are engaged to help share information and mobilize support.

Both grassroots and grasstops engagement are important components of a comprehensive community engagement effort. A grassroots approach can build trust between a company and the community at large and create a pathway for broader stakeholder identification through recommendations and introductions from community members. Engaging community leaders and influencers can also help companies connect to the appropriate people, and initiatives and understand the context of local issues and needs. While some grass tops organizations work closely with impacted, historically marginalized communities, representatives of those communities should be at the table to represent themselves.

It is important to have a community-based participatory approach, which includes co-learning, actions that mutually benefit the community and project developer, and a long-term commitment from all project partners². This approach also includes inviting grassroots stakeholders, especially those who are near-neighbors, to join collaborative discussions focused not only on the opportunities but also the potential risks of a project because these are the individuals that will experience the biggest day-to-day changes as a result of the project. This on-the-ground work, which can be time-consuming, is critical as no one can better speak to the

opinions of residents than the residents themselves. Elevating community voices can help improve public opinion of the company and create a sense of transparency and trust between the project team and the community. If company is having difficulty identifying grassroots stakeholders, it may be helpful to make connections and collaborate with organizations that serve as trusted community gatekeepers, or people that have strong roots in the community and can provide inroads for engagement. Examples of gatekeepers might be a

program officer affiliated with one of the local neighborhood associations, civic club organizations, religious leaders, Historically Black Colleges and Universities (HBCUs), and other organizations with a focus on community-based approaches to address localized problems. Once a foundation of trust is built, which takes time, these organizations will be able to connect companies to additional community groups. These partnerships are most fruitful when they are built on trust, where conversations are not just a one-time occurrence, but relationships built over time.



² Holkup PA, Tripp-Reimer T, Salois EM, Weinert C. Community-based participatory research: an approach to intervention research with a Native American community. *ANS Adv Nurs Sci.* 2004 Jul-Sep;27(3):162-75. doi: 10.1097/00012272-200407000-00002. PMID: 15455579; PMCID: PMC2774214.

ENGAGING TRADITIONALLY UNDERENGAGED OR MARGINALIZED GROUPS

Not all stakeholders have the same voice or level of influence, so it is important to ensure that methods of stakeholder identification do not neglect marginalized groups with vested interests in project outcomes. Under engagement has historically affected impacted communities, fenceline communities, and other individuals who may belong to grassroots organizations' relevant to the decision-making processes. Organizations or individuals that may strongly oppose some or all project work have also been overlooked for engagement due to their potential opposition.

Although it may be uncomfortable to engage (potential) opposition groups, intentionally and authentically prioritizing engagement can:

Expand stakeholder categories.

Those who protest the establishment or expansion of projects may also own a local business, live, or work nearby, or pay taxes that contribute to government subsidies and benefits to the project.

Demonstrate due diligence.

When opposing groups are or feel excluded from conversations, it may signify an incomplete assessment of community opinions, even if groups were unintentionally left out.

Build credibility.

Stakeholder tension can be intimidating but addressing it can benefit companies. This strain shows that others feel passionately about the project and care to find compromises and solutions

that benefit the community. Hearing, acknowledging, and responding to negative feedback or project criticism demonstrates a good faith effort on the part of the company to fully understand the situation and the impacts of its project. It also creates an opportunity for the company to address common concerns and provide its own perspective on these opposing stances during community meetings or other outreach activities.

Improve project outcomes.

Involving all concerned groups on the front-end of a project can reduce the likelihood of project delays, lowers opposition, and lead to outcomes more acceptable to everyone impacted. Grassroots and grassroots groups or individuals that traditionally are less engaged often bring unique ideas and solutions to the table, and their support may make a difference in regulatory decisions impacting the project made by representatives and governments.

EQUITABLE STAKEHOLDER MAPPING

Conducting a visual representation using a mapping exercise can help project teams clarify the roles of and impacts on stakeholders' interest level and perceptions of the power and influence of various stakeholders. Due to the complexities of the social, economic, and environmental impacts of an energy project, an approach that includes a power mapping exercise to identify those being influenced and considers the surrounding systems and needs may be highly valuable. Traditional stakeholder mapping as shown in Figure 1, left, places the focus of the vertical axis on levels of power which skews who should be part of the stakeholder engagement process.³

Adjusting the vertical axis (please see Figure 1, right) to represent the level that the stakeholder has been or could be impacted instead of their current level of power or influence on a project prioritizes equity, inclusion, and representation in the process. This adjustment helps create a visual representation of potential stakeholders based upon the assessment of the level of impact or interest/influence. A detailed analysis of the stakeholder map is necessary to identify the various impacted groups or categories and can help to spotlight stakeholders that may have previously been underserved and underrepresented.

Prioritization of each stakeholder category can help determine resource allocation and efforts to engage partners that may be critical or have more influence or impact on the success of a project. Stakeholders least likely to be impacted may be considered lower priority stakeholders and the engagement strategy could involve making project information

transparent and publicly available. Low impact stakeholders with more interest would appreciate opportunities to voice their concerns, stay informed on project developments, and provide information as the project progresses. Provide a space for stakeholders most likely to be highly impacted in project design and evaluation to provide leadership and expertise and aim to include integrating community needs and assets into the process. Those with low perceived interest may need additional incentives, such as on-site food, childcare, transportation or other compensation, to facilitate engagement and reduce barriers. Those already demonstrating high interest may desire participation in more formal structures, such as community advisory councils or boards to provide feedback, and potentially even oversight, for aspects of a community-facing project.

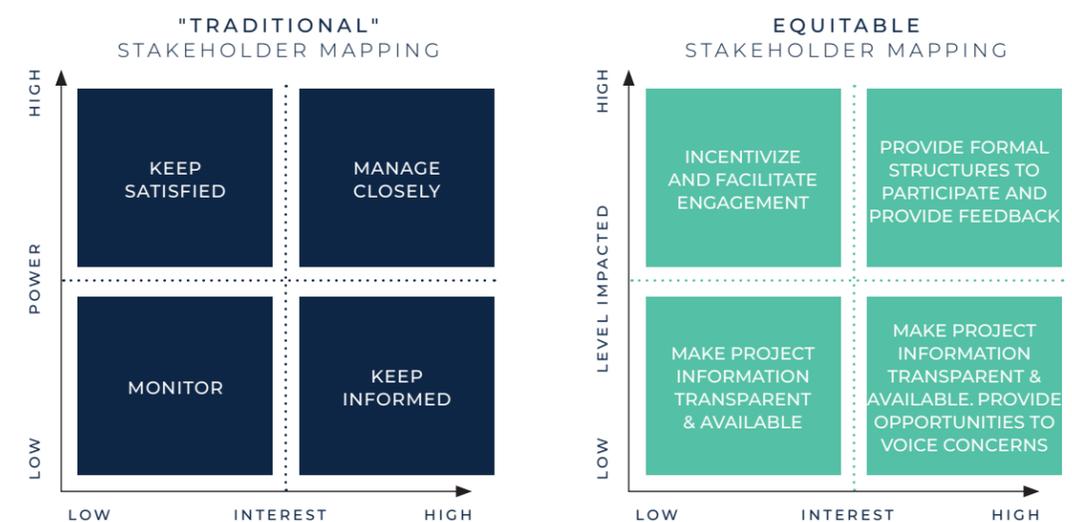


Figure 1: Traditional stakeholder mapping relies on power, which leaves out marginalized groups who are still impacted and interested as stakeholders.

³ <https://www.boreal-is.com/blog/stakeholder-mapping-identify-stakeholders/>

MECHANISMS FOR SUSTAINING TWO-WAY ENGAGEMENT

Open and transparent⁵ communication is the best practice for equitable community engagement and sustaining relationships between industry and communities. **Two-way engagement** is a form of open and active communication between two parties where information flows in both directions. Two-way engagement involves mechanisms to incorporate feedback from stakeholders to inform decisions and encourages discussions where both parties can share their viewpoints and work together to find solutions.

Building positive relationships with community members includes careful outreach to start a relationship and ongoing work to maintain those relationships. When asked what constitutes effective engagement, several Houston-area community organizations shared the following insights:

- Begin engagement before something is needed from the community. Before

project development, build relationships with impacted communities to build a more solid foundation to solicit feedback or support on project construction or other activities.

- Successful engagement is iterative and organic with regular time and effort made to include community members in projects and activities. This is consistent with API's principle on

PROPOSED QUESTIONS TO HELP IDENTIFY STAKEHOLDERS

Following is a list of questions⁴ that can be used as a starting point to help a team start or expand its stakeholder list:

- What geographic regions will be potentially impacted?
- Who are the individuals and organizations that can provide first-hand knowledge on how an issue impacts community members?
- Where are the stakeholders who understand the energy industry and are open to development?
- Where are the stakeholders who may have potential concerns located?
- What are the demographics of the area that will be potentially impacted, and are all groups represented?
- What type of events occur in the community? Who hosts the events?
- What makes this community unique?
- Who are the largest employers? Are workforce development strategies in place? Labor organizations? Is there an opportunity to consider a Community Workforce Agreement (see **4. Community Benefits Plans and Agreements**)?
- What are the main concerns stakeholders may have, and is there a way to engage with them to alleviate those concerns?
- What pre-existing partnerships exist, and how can they be leveraged to create new relationships?
- Where does funding for stakeholder groups originate?
- Where does funding for the project originate?

⁵ <https://organizingengagement.org/principles/transparency/>; <https://www.hfsresearch.com/research/transparency-is-the-only-way-for-oil-and-gas-companies-to-regain-trust/>

⁴ Adapted from API, <https://www.api.org/-/media/files/policy/infrastructure/2020/api-community-engagement-guidelines>

integrity⁶, which recommends continued engagement to maintain trusting relationships.

- Presenting solutions to a community before allowing them to share their concerns and problems makes engagement feel less open to input. Strive to understand the perspectives, needs, and expectations of all involved parties by inviting discussions prior to initiating a project.

THE SPECTRUM OF PUBLIC PARTICIPATION

When designing new programs and activities, the spectrum of public

participation⁹ can be a useful tool to evaluate new or current engagement strategies to better achieve company goals.

- There are five levels of public participation in the spectrum that correlate with increased impact: Inform, consult, involve, collaborate, and empower. Though one end of the spectrum represents increased involvement, all activities across the spectrum are important, and it may be appropriate to focus on a single level depending on the situation. Further, the spectrum is not a checklist; completing an activity at each level does not mean engagement is ready to conclude.

QUESTIONS TO CONSIDER WHEN DESIGNING A TWO-WAY ENGAGEMENT STRATEGY⁷

Below is a list of questions⁸ to consider asking when designing a two-way engagement strategy internally as well as during initial discussions with gatekeepers or community organizations:

- How many public meetings will be needed to discuss goals, solutions, gauge support, and hear and respond to concerns?
- Will multiple, smaller groups be more productive for discussion?
- How can companies help stakeholders feel comfortable and enable discussions about concerns or support?
- How will companies incorporate community feedback into a project?
- Will community members be able to define the challenges and suggest solutions? Are there information or resource gaps that must first be addressed? If so, what are the capacity building opportunities?
- What are the opportunities for community-driven decision making?
- Will companies be able to share what was heard, via meeting notes or recordings, and how those ideas were incorporated, or why they were not able to be incorporated?
- What are the project reporting plans? How will the community stay apprised of the project? How will transparency be maintained?
- How will stakeholders be continually engaged throughout the duration of the project, including operations?

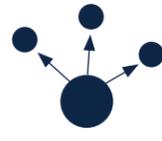
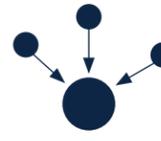
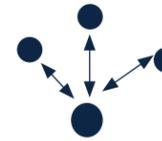
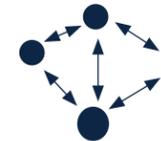
⁶ <https://www.api.org/oil-and-natural-gas/wells-to-consumer/exploration-and-production/hydraulic-fracturing/community-engagement-guidelines>

⁹ <https://www.iap2.org/page/pillars>

⁷ Adapted from Houston organization interviews as well as <https://energy5.com/communication-strategies-for-effective-natural-gas-project-engagement#anchor-1> and <https://www.fundacionseres.org/lists/informes/attachments/1118/stakeholder%20engagement.p>

⁸ Informed by interviews with Houston area community organizations

TABLE 1: DEFINING LEVELS OF PUBLIC PARTICIPATION

					
	Inform	Consult	Involve	Collaborate	Empower
One-way or Two-way engagement:	One-way, from company to community	One-way, from community to company	Two-way communication between company and community	Two-way involving interactive partnership	Two-way, but examples can include one-way (i.e., a referendum led by a community group)
Example	Education event where information is presented to community and questions are answered, but feedback is not solicited	A town hall meeting hosted late in a project, where feedback is unlikely to alter the project	Community Advisory Councils (CAC) or standing community meetings	Hire community liaisons	Grant program where community decides how to spend community engagement funds, co-production of a project
Community role in decision-making	No opportunity for the public to influence decision-making	Obtain feedback from community on decisions or alternatives	Work with community through concerns while maintaining decision-making authority	Partner in each aspect of the decision, but decision-making still lies with company	Placing final decision-making power in the hands of public
Resources required	Fact sheets, presentations, website, etc. to provide objective information that helps them understand the problem, opportunities, and solutions	Surveys, focus groups to solicit input	Not a single event, a continuous relationship throughout the project to understand and consider community concerns	Will require increased resources for a long-term commitment to incorporate recommendations to the "maximum extent possible"	Will require increased resources and time

BUILDING TRUST WITH COMMUNITIES

Effective two-way engagement and relationship building depends on trust. There is a well-documented trust deficit between the community and the energy industry.^{10,11,12} While industry provides economic benefits and jobs to many communities, underserved communities have traditionally received fewer benefits. Impacted communities disproportionately experience the negative effects of industrial development, such as poor air quality, fewer parks and greenspace, fewer opportunities for high paying jobs, and lower quality infrastructure. Community members may perceive regulatory limits or enforcement practices to be inadequate, which may add to their concerns that community health has limited support.

Building trust will include engaging with communities early, which can be difficult when projects are in the planning stages. Many companies are hesitant to engage when details are uncertain, and representatives may not have answers to community questions. Communities can feel that companies are not forthcoming, while companies truly do not have answers to all questions. Transparency and honesty over time will build trust and reduce this tension. Community benefits have long been connected to economic prosperity and job opportunities in regions with heavy industry presence. For some community members, increased concerns for environmental justice and public health may outweigh potential economic benefits. These experiences with companies and government can potentially affect the current sentiment in communities which must be addressed during engagement work.

KEY INGREDIENTS TO BUILD TRUST¹³

1. CREATE SAFE SPACES FOR ENGAGEMENT

- Practice two-way communication (See 2. **Mechanisms for Sustaining Two-Way Engagement**).
- Get to know the community and stakeholders.
- Develop relationships with community gatekeepers (leaders, churches, civic clubs).
- Avoid jargon and develop a shared language that is digestible, easy to understand, and can address community's concerns.
- Consider ways to provide confidentiality for stakeholders.
- Consider research ethics to help avoid missteps
- Consider an open-door policy to allow people who want to be part of the solution to be engaged.

2. FOSTER TRANSPARENCY

- Do not be afraid to say if you do not have an answer right now but do follow up with the person who asked.

- If you cannot incorporate feedback given, share reasons why, including what can be done.
- Full transparency may not always be possible (e.g., proprietary information), but transparency where possible can make up for that.
- Share data that enables the community to measure and verify potential impacts
- Develop a community advisory council or board to promote accountability.

3. FOLLOW THROUGH

- Revisit stakeholder groups
- Keep promises and demonstrate accountability for your work by communicating when community goals are met or being transparent about failures and plans to rectify them. This can be done by sharing project updates in the same manner as original outreach, or through project websites, newsletters, social media, etc.

¹⁰ <https://www.epa.gov/sites/default/files/2020-11/documents/epa-guidance-on-participant-support-costs.pdf>

¹¹ <https://www.ipsos.com/en/trust/trustworthiness-oil-and-gas-sector#:~:text=Albeit%20from%20a%20low%20level,huge%20changes%20for%20the%20sector.>

¹² <https://www.hfsresearch.com/research/transparency-is-the-only-way-for-oil-and-gas-companies-to-regain-trust/>

¹³ Adapted from <https://www.oecd.org/daf/inv/mne/OECD-Guidance-Extractives-Sector-Stakeholder-Engagement.pdf> and <https://www.fundacionseres.org/lists/informes/attachments/1118/stakeholder%20engagement.pdf>

COMMUNITY RECOMMENDATIONS FOR (RE)BUILDING TRUST

- It is helpful when companies engage community groups to develop a relationship prior to asking something from the community.
- Identify key grassroots and grassroots stakeholders and proactively reach out from time to time as building relationships takes time.
- Ensure that engagement is broad and deep; there is a perception that some Houston-area communities get disproportionate attention from industry.
- Consider how negative sentiment experienced by a community can be reduced by industry engagement and support, even those caused by pressures that are external to industry.
- People can be forgiving and want to be on good terms to be part of the solution. Involve communities more often and to a greater degree.
- Improve outreach/advertisement of events by advertising in multiple community spaces, like places of worship, community centers, and using different types of media like newspapers, email, social media, or event websites.
- Consider utilizing events beyond town halls for engagement. Collaboration sessions can be facilitated by activities such as participatory mapping. Industry representatives can also engage the community by attending events hosted by stakeholders and local non-profits. Often a neutral, third-party facilitator can help organizations and communities constructively engage.

AVOID EXTRACTIVE ENGAGEMENT

When engaging with stakeholders and communities, it is important to avoid practices that seem extractive. For example, collecting data, conducting interviews, or other processes that take something without an exchange of information or without sharing results may be seen as extractive. Sharing a plan to provide results to community members may be perceived as transparent and less extractive.

Additionally, if community stakeholders are providing valuable information, it is important to consider a plan to compensate or otherwise incentivize participants for their time and knowledge as subject-matter experts on their community. These participant support costs are shared as a best practice by the EPA, so this should be considered as an addition to current and future activities. There are various methods, including stipends, gas cards, or prepaid Visa or Mastercard debit cards, and the EPA can provide guidance on what can be covered under participant support costs¹⁴. These prepaid cards or stipends can help incentivize community members to participate in meetings, focus groups, or other one-time or lower commitment events where their input is needed. Providing meals, childcare, or transportation can also provide incentives or reduce barriers for certain community members to participate in engagement with your company.

Longer-term commitments, such as participation in a community advisory council or service as a community liaison, may require increasing the stipend amount and frequency. An equitable hourly wage for a community liaison may be the median wage for their location. Consider consulting with a community gatekeeper to better understand local recommendations for community advisory or liaison compensation.

QUESTIONS TO CONSIDER WHEN DESIGNING A COMMUNITY-CENTERED ENGAGEMENT ACTIVITY

Below is a list of questions¹⁵ to consider asking community groups during initial community-centered engagement discussions:

- What is your experience as a stakeholder in this community?
- What do you like about your community? What would you like to see enhanced or added?
- How has industry affected your community in the past? What do you perceive to be the major issues in the community? (Note: this answer may differ from project goals).
- What are your concerns for the community that you would like to be addressed (generally speaking)? What are your specific concerns about the proposed project?
- What are potential project risks and opportunities for community benefits?
- What kind of support do you believe your community needs?
- What concerns do you believe companies can address as good corporate citizens?

- What are potential benefits programs the company is considering (See “4. Community Benefits Plans and Agreements”)? Are the programs of interest to the community; do the programs support the community? What could a company do in addition to or instead to better support the community?
- How can industry best support the community? Do you believe a potential company sponsorship would most help the community?
- What benefits does the community expect from this project? Would the community find it most beneficial for industry to sponsor an event, and/or underwrite the construction of a new local amenity or infrastructure? Would additional funding be better off supporting local schools, healthcare, job training, or something else?
- How can this project best engage the community and advance the local workforce?
- How can industry advance diversity, equity, inclusion, and accessibility in this project?
- How does the community prefer to be engaged?

¹⁴ <https://www.epa.gov/sites/default/files/2020-11/documents/epa-guidance-on-participant-support-costs.pdf>

¹⁵ Informed by interviews with Houston area community organizations

COMMUNITY BENEFITS PLANS AND AGREEMENTS

Industry has a history of leading extensive community engagement work, particularly in terms of workforce development and charitable contributions¹⁶. Charitable contributions can be an important component of a company's community engagement strategy. Corporations traditionally provide funding to local plants or facilities to disburse in the surrounding community to support food banks and local schools, for example. Projects may also be identified and recommended by internal subcommittees or external community advisory councils (CACs) that facilitate discussions to help increase industry awareness of community interests and help community members understand what the industry does and how it works. Workforce development initiatives such as scholarships, internship programs, and job training may also link to industry community engagement strategies, particularly to prepare local youth and adults for good paying jobs at industry facilities.

Community benefits plans (CBPs) and community benefits agreements (CBAs) are frameworks that companies should consider to help ensure community engagement including workforce development programs are reaching the desired audiences and equitably reinvesting benefits from the energy transition. CBPs can help increase community support for a company's upcoming project by embedding specific deliverables that provide tangible project outcomes or co-benefits prioritized by the community. For example, CBPs can be designed to help make high earning jobs available to local low-income residents, residents from DACs, and residents from under-represented backgrounds and marginalized groups.

CBPs should be co-developed by community organizations and companies to outline the community priorities for a project and the company's commitment to those priorities. Multiple conversations with community groups, as many as are feasible, before and during the development of CBPs are key to identifying priorities. Community benefits will vary depending on the nature of the project and the needs of each community. CBPs should articulate a shared vision of

priorities and have the potential to foster a mutually reinforcing relationship where each party (e.g., companies/developers, communities, and government entities) stands to gain unique benefits.

COMPONENTS OF A COMMUNITY BENEFITS PLAN

While CBPs can vary, the Department of Energy (DOE) is currently requiring CBPs for any grants and loan applications made available in the [Infrastructure Investment and Jobs Act](#) (IIJA) and [Inflation Reduction Act \(IRA\)](#).¹⁷ DOE provides CBP templates for each funding opportunity. This CBP framework can also be adapted for projects developed from non-federal sources. It is worth noting that the CBP framework is an emerging and changing space, which requires iteration and evaluation of early work to refine the CBP process. Measures used to monitor progress continue to evolve with CBPs and indicators that are readily understood, relevant, and related to existing data are available.

A strong CBP explains how the company has engaged or will engage with local stakeholders and how the project will benefit local workers and residents (specifically those from underrepresented

groups). See "[2. Mechanisms for Sustaining Two Way Engagement](#)" for how to coordinate with stakeholders and community members on program development.

The [DOE CBP framework](#), consists of four equally scored categories or priorities:

1. **Implementing Justice40:** Meet or exceed the objectives of the Federal Justice40 initiative that 40% of the benefits flow to DACs.¹⁸
2. **DEIA (Diversity, Equity, Inclusion, and Accessibility):** Equitable access to wealth building opportunities (teaming, access to good jobs, business, and contracting opportunities, etc.)
3. **Good Jobs:** Create/retain high-quality jobs and attract, train, and retain skilled workers.
4. **Workforce and Community Agreements:** Meaningful engagement with community and labor partners leading to formal agreements.

COMMUNITY BENEFITS AND WORKFORCE AGREEMENTS

One possible outcome of meaningful community engagement in a CBP is a Community Benefits Agreement (CBA). The goal of the CBA is to give the community a voice in shaping projects, solidify community and labor public support for a proposed project and benefits that the company will contribute to the local community if a project moves forward, and provide authority to enforce benefits. CBAs are agreements between private parties and are negotiated for each individual project. CBAs can include a range of legally binding agreements between a

company or project developer, impacted community groups, and relevant labor unions to ensure that specific benefits will flow to communities. The enforcement mechanisms vary depending on the provisions of the agreement, which could include specifying a project's commitments to the community, developing a collective-bargaining agreement (specifying wages, benefits, health, and safety standards), providing workforce education and training (and other terms of employment) with a labor union, or a combination of the above.

EXAMPLES OF POTENTIAL COMMUNITY BENEFITS PROGRAMS

Each community has different needs and priorities; what works for one community may not work for the next one that is engaged. Through dialogue and partnerships with community-based organizations, companies can identify programs that will provide the most community benefits including comprehensive support services to reduce barriers to access to business and employment opportunities for members of DACs.

The following programs are examples of potential programs areas that may provide benefits to a community. Confirm with the relevant local community before implementing:

Local Small business and MWBE support

Establish procurement preferences and incentives for local small businesses and minority and women-owned enterprises (MWBE).

¹⁶ This history was documented through interviews with companies.

¹⁷ <https://www.energy.gov/infrastructure/about-community-benefits-plans>

¹⁸ DAC census tracts are identified by the White House CEJST tool, located at <https://screeningtool.geoplatform.gov/>

Workforce development

Prioritize strategies that develop local talent and underemployed youth, especially from DACs that neighbor these facilities. One example of this is the [Vernon Parish School Board “Capturing Better Futures” Initiative](#) co-sponsored by CapturePoint Solutions and the United Association of Plumbers and Pipefitters to offer career training and job opportunities for high school students in Vernon Parish, Louisiana.

Early childhood education

Support or develop high-quality early childhood education programs like [United Way Bright Beginnings](#) to help prepare children from DACs to start and succeed in school.

STEM education

Support K-12 science, technology, engineering, and math (STEM) education

and extracurricular programs that develop workforce skills that engage and inspire the future energy workforce.

Community health and safety

Collaborate with local public health organizations to develop a public health or safety program that helps address a particular community need.

Enhanced environmental monitoring

Support or develop [community air monitoring initiatives](#) to engage local stakeholders and residents in monitoring and assessing air quality. Some companies currently work with partners for monitoring, such as Cheniere Energy and Gulf Coast Growth Ventures (GCGV) that sponsored the establishment and maintenance of [three air-monitoring stations in the Gregory-Portland area](#) near Corpus Christi in partnership with the local school district and the University of Texas.

ENVIRONMENTAL JUSTICE RESOURCES

Environmental justice (EJ) as defined by the Environmental Protection Agency (EPA) is “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.” Addressing environmental justice is helpful to human health, as marginalized communities are disproportionately affected by environmental hazards. Improving benefit flows through community engagement as demonstrated in this toolkit should include considerations of environmental justice. Marginalized communities are often also environmental justice communities, and there are resources to quantify concerns and vulnerabilities.

HOW CAN COMPANIES IDENTIFY EJ CONCERNS TO HELP BENEFITS FLOW EQUITABLY?

There are multiple free geospatial tools with data from census tracts to use to identify EJ communities and which criteria lead to vulnerability in the community. The data can be used to prioritize areas of focus (engagement locations) and types of known issues (e.g., energy burden, flooding, unemployment) and to look for partners who are already working on these issues in the DACs or nearby DACs. This helps to prioritize under-resourced neighborhoods and target specific areas of vulnerability. Access to this data also allows companies to identify variables of interest or use vulnerability indices; this helps to improve measurability and evaluation of climate equity work. Using these resources falls within Justice40 obligations but are useful even if not required by the project funding source. Multiple tools may be used to get a more holistic picture. Engagement can confirm whether these data are aligned with local experiences and help identify root causes or solutions to these issues.

mapping and screening tool where a user can choose a geographical area and the tool provides demographic socioeconomic and environmental data for the area. The tool displays the information and allows the user to combine multiple indicators into EJ indices.

- **Climate and Economic Justice Screening Tool (CEJST)**²⁵: Created by the Council on Environmental Quality and brings in data from multiple other tools. The tool has an interactive map and uses datasets that are indicators of burden in climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. The tool can help identify communities experiencing burdens and the types of burdens community is facing.
- **DOE Energy Justice Dashboard**²⁶: A data visualization tool that displays DOE cost data, indicators from EJSscreen, and overlays energy burden using data from DOE’s Low-Income Energy Affordability Data (LEAD) tool. This tool helps to identify DOE investments with a Justice40 focus.

Individual states also have their own tools. These can provide details which may or may not be present in federal data and serve as additional sources to confirm areas of need.

Federal databases include:

- **EJSscreen**²⁴: EPA’s environmental justice

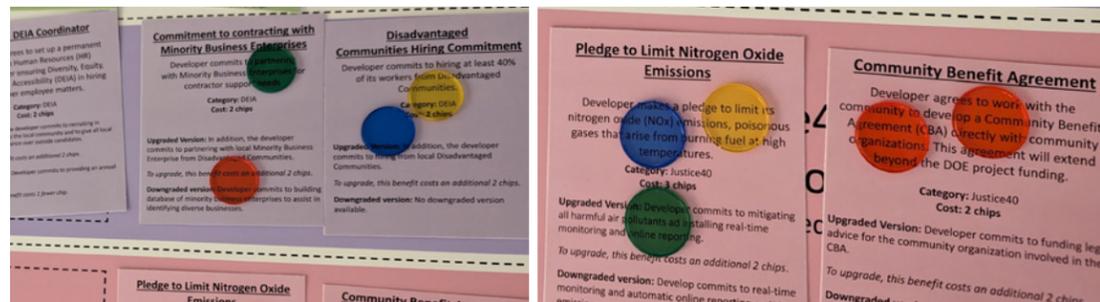


Figure 3: Photograph of Community Benefits Plan collaborative tabletop exercise at a Community Benefits Plans workshop hosted by DOE Office of Energy Justice and Equity in Port Arthur, TX on November 13, 2023.

²⁴ <https://www.epa.gov/ejscreen>

²⁵ <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>

²⁶ <https://www.energy.gov/justice/energy-justice-dashboard-beta>

STATE	EJ COMMUNITY DEFINITIONS		STATE EJ MAPPING TOOLS	EJ BUREAUCRACY	
	DOES IT EXIST?	INCLUDE CRITERIA		ENVIRONMENTAL JUSTICE ADVISORY BODIES	EJ GOVERNMENT STAFF
CALIFORNIA	Yes (Explicit)	Income, Pollution	CalEnviroScreen	Environmental Justice Advisory Committee	Attorney General – Bureau of Environmental Justice CARB – Executive Office
COLORADO	Yes (Explicit)	Race, Income	N/A	N/A	CDPHE – EJ Program
CONNECTICUT	Yes (Explicit)	Income	2020 EJ Communities	N/A	DEEP – Environmental Justice Program
DELAWARE	Yes (Explicit)	Race, Income	N/A	N/A	N/A
ILLINOIS	No	N/A	Illinois EJ EPA Start	Illinois Environmental Justice Advisory Group	Illinois EPA – Commission on Environmental Justice
LOUISIANA	No	N/A	N/A	CITE – Equity Advisory Group	N/A
MARYLAND	Yes (Implicit)	Race, Income	MD EJSCREEN	Commission on Environmental Justice and Sustainable Communities	N/A
MASSACHUSETTS	Yes (Implicit)	Race, Income	MA 2020 EJ Populations	Governor’s Environmental Justice Advisory Council	EEA – Director of Environmental Justice
MICHIGAN	Yes (Implicit)	Race, Income	N/A	Michigan Advisory Council on Environmental Justice	EGLE – Office of the EJ Public Advocate
MINNESOTA	Yes (Implicit)	Race, Income	MPCA – Understanding Environmental Justice in Minnesota	MPCA Environmental Justice Advisory Group	MPCA – Environmental Justice Coordinator
NEW JERSEY	Yes (Implicit)	Race, Income	NJDEP – EJ Mapping Tool	Environmental Justice Advisory Council	NJDEP – Office of Environmental Justice
NEW MEXICO	No	N/A	NM OpenEnviroMap	Environmental Justice Task Force	N/A
NEW YORK	Yes (Implicit)	Race, Income	Maps & GIS Tools for Environmental Justice	Environmental Justice Advisory Group (EJAG) and Interagency Coordinating Council	NY DEC – Office of Environmental Justice
NORTH CAROLINA	No	N/A	Mapping system	NC DEQ – Environmental Justice and Equity Board	N/A
OREGON	Yes (Implicit)	Race, Income	N/A	The Governor’s Environmental Justice Advisory Board	OR DEQ – Environmental Justice Coordinator
PENNSYLVANIA	Yes (Implicit)	Race, Income	Environmental Justice Areas Viewer	Environmental Justice Advisory Board	PA DEP – Office of Environmental Justice
RHODE ISLAND	Yes (Implicit)	Race, Income	RIDEM Environmental Resource Map	N/A	N/A
VERMONT	Yes (Implicit)	Race, Income	N/A	ANR Diversity & Equity Committee	N/A
VIRGINIA	Yes (Implicit)	Race, Income	N/A	Virginia Council on Environmental Justice	Environmental Justice Interagency Working Group
WASHINGTON	Yes (Implicit)	Pollution	Washington Tracking Network	N/A	Governor’s Interagency Council on health Disparities

Figure 4: Table outlining state specific environmental justice definitions, databases, and bureaucracy.

EVALUATING SUCCESS OF ENGAGEMENT

The evaluation process provides critical information that can help companies determine if engagement goals are being met. Collaborative evaluation planning, where the community and other stakeholders are included in the evaluation process, can also build trust, enhance accountability, improve communication, and foster a collective sense of ownership. Providing an opportunity to improve by incorporating evaluation mechanisms in the planning phase of a new program or activity, enables community and stakeholder feedback incorporation early and allows time, staff, and resources to be dedicated for evaluation.

PROGRAM EVALUATION

Program evaluation is the systematic collection of information about the activities, characteristics, and outcomes of programs to make judgements about the program, improve program effectiveness, and inform decisions about future program development.¹⁹ Several widely used frameworks for program evaluation have been developed by organizations such as the Center for Disease Control and Prevention (CDC), the Joint Committee on Standards for Education and Evaluation, the World Health Organization, and the American Evaluation Association. All

these evaluation frameworks provide a structured approach to program evaluation. However, the CDC’s framework²⁰ is especially relevant due to its emphasis on engagement and the utilization of evaluations to improve programs. One key factor in this framework is iteratively soliciting and incorporating community and stakeholder feedback at each step in evaluating community-oriented programs. This regular interaction helps to create a shared narrative and maximizes the impact of the program. It may also be helpful to assess the final impact and outcomes of a program at the end of a program.

¹⁹ CDC/ ATSDR Principles of Community Engagement, 2011

²⁰ CDC Framework for Program Evaluation in Public Health, 1992.

STEPS IN THE EVALUATION PROCESS

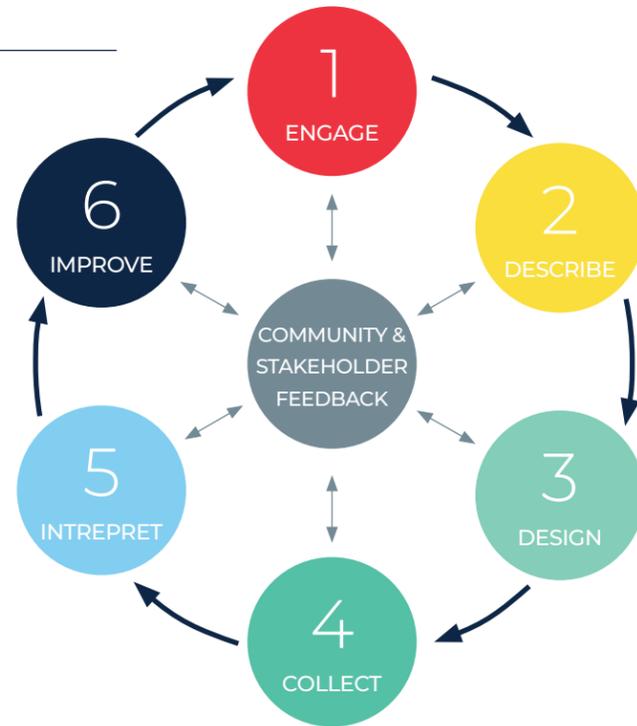


Figure 5: A potential framework based on the CDC’s (Center for Disease Control) Framework for Program Evaluation in Public Health for community and stakeholder-engaged program evaluation. This focuses on continuous improvement and provides feedback to refine the program during development and implementation.

- 1. Engage** – It is important to identify and involve relevant community members and groups that stand to benefit from or be impacted by the program. Community and stakeholder input and buy-in help ensure that evaluation criteria and structure align with program goals and address their needs (See **Identifying Stakeholders Tool** for more information.)
- 2. Describe** – Before a program or activity can be evaluated, its purpose, components, and desired outcomes or impacts need to be clearly articulated. Logic models or flow charts may be helpful for this step.
- 3. Design** – The evaluation design can be collaborative and helps identify the goals of the evaluation as well as how the evaluation will be used. This step is where a company decides which components or activities to evaluate, how much time and money will be spent on the evaluation, the questions to ask, and the methods to use.
- 4. Collect** – The data collected in this step was identified in the design phase. Data

can come from surveys, interviews, and observations, as well as records and documents. Quantitative data, which includes numerical information, and qualitative data, which encompasses stories and personal experiences may both be considered. It is important that the data collected is reliable and relevant to the evaluation’s goals. Table 2 provides examples of different types of data that can be used to evaluate community engagement activities.

- 5. Interpret** – In this step, evaluators analyze the data collected in the context of the program’s objectives and evaluation questions. Conclusions about the program’s effectiveness, efficiency and relevance can be made by looking at the patterns, trends, and insights uncovered by the data analysis.
- 6. Improve** – The final step in a program evaluation involves sharing the results with community members and stakeholders and working collaboratively to determine how the findings and recommendations will be implemented to improve the program.

TABLE 2. ADVANTAGES AND DISADVANTAGES OF DIFFERENT DATA COLLECTION METHODS USED TO EVALUATE COMMUNITY ENGAGEMENT PROGRAMS.²¹

DATA COLLECTION METHOD	ADVANTAGES	DISADVANTAGES
RECORDS & DOCUMENTS <ul style="list-style-type: none"> • Examples might include meeting attendee lists, grantee reports, meeting minutes, annual reports (e.g. Environmental, Social, and Governance (ESG) reports), and press releases • Databases: Census data, Bureau of Labor Statistics website 	<ul style="list-style-type: none"> + Data is easy and often cost effective to obtain + Unobtrusive + Data on quantity and frequency 	<ul style="list-style-type: none"> – May be incomplete or unavailable – Analysis may be complex
Example: Recording names and affiliations of attendees on sign-in sheets or registration forms at community meetings can help document if diverse entities are represented.		
OBSERVATION <ul style="list-style-type: none"> • Facilitators, instructors, and participants at meetings and events • Written notes, videos, drawings, or photos can be used to record observations 	<ul style="list-style-type: none"> + Data is easy to collect + Helps identify patterns across observations + Provides context 	<ul style="list-style-type: none"> – Potential for evaluator bias – Need multiple observations – Data can be difficult to interpret
Example: Observations about how different groups interact at meetings can help provide insights on level of trust and group dynamics.		
SURVEYS <ul style="list-style-type: none"> • Attitude or opinion surveys • Behavior or skill surveys • Satisfaction or climate surveys • Knowledge surveys 	<ul style="list-style-type: none"> + Easy to administer + Easy to aggregate responses + Efficient + Can be anonymous 	<ul style="list-style-type: none"> – Surveys take time and skill to develop – Open responses take time to analyze – Questions can be misinterpreted – Can have low response rates
Example: A survey can be used to help identify community assets, needs, concerns, and perceptions.		
INTERVIEWS AND FOCUS GROUPS <ul style="list-style-type: none"> • Individual, in-person interviews • Individual, telephone, or virtual interviews • Focus group interviews 	<ul style="list-style-type: none"> + Can probe for details + Can yield unexpected insights + Group interactions can enrich data 	<ul style="list-style-type: none"> – Expensive – Requires skilled interviewer – Analysis takes time – Scheduling logistics
Example: Interviews can provide nuanced and detailed information on community perceptions or concerns about a new project.		

GLOSSARY

RECOMMENDATIONS FOR
EFFECTIVE PROGRAM
EVALUATION

Program evaluation is a dynamic, multidisciplinary field that incorporates perspectives from social science research, government accountability, educational assessment, public health, and many other disciplines. Regardless of the type of program being evaluated, or the method being used, the following recommendations may be considered as best practices for community-engaged program evaluation:

- Engage community members and other stakeholders throughout the evaluation to ensure their voices, needs, and perspectives are considered.
- Fairly compensate or incentivize community members to demonstrate the value of their participation and input. For example, offering to cover childcare costs for the duration of meetings or providing food for participants can incentivize and reduce barriers to participation.
- Foster collaboration and co-learning between the evaluation team and the community to build trust and develop a shared understanding of goals for the evaluation. It is easier to build this trust when starting earlier in the project, rather than engaging stakeholders for the first time when seeking their opinions for evaluation.
- Prioritize equity and inclusivity by addressing power imbalances, make sure that meetings and materials are accessible to all participants, and ensure that groups that may not typically have a voice are heard.²² This can be encouraged by specifically calling on individuals or groups to provide their input during conversations, which empowers them to speak their opinions.
- Cultivate cultural sensitivity and competence in the evaluation design to respect diverse community contexts. This means that all evaluation instruments and questions are appropriate and relevant to the community being served. If appropriate, given the goals of the evaluation, consider training and hiring community members to conduct components of the evaluation.
- Use mixed methods, a combination of quantitative and qualitative techniques, to capture both statistical and narrative data, offering a comprehensive and nuanced understanding of the program.²³ This information can come from methods such as hosting focus groups, conducting surveys, and analyzing key performance indicators (KPIs).
- Uphold ethical considerations by obtaining informed consent, protecting participants' privacy, and ensuring that data are used responsibly.
- Consider using third-party evaluators, to measure project outcomes using standardized models.

²² Reflections on Applying Principles of Equitable Evaluation (wested.org)

²³ Combining Quantitative and Qualitative Methods for Program Monitoring and Evaluation: Why are Mixed Method Designs Best? Available at: World Bank Document (minedu.gob.pe).

Climate equity is the goal of recognizing the disproportionate impacts of climate change on certain communities with the intent of addressing these burdens and ensuring everyone benefits from climate action (EPA 2023).

Community refers to those who live in and around energy and energy transition projects or infrastructure, as well as those affected throughout Houston (SGC/HARC 2023).

Community advisory councils (CACs) are facilitated meetings between industry representatives (e.g., plant managers, operations managers, and community relations managers) and community members (who live, work, or attend school in the community), and representatives of organizations or government entities serving the community. Topics of discussion are industry-related issues of community interest or concern related to environment, safety, health, security, emergency response and communications, hazardous materials transportation, education, and the local economy.

Community Benefits Agreements (CBAs) describe a range of enforceable, legally binding contracts between a project developer, impacted community groups, and relevant labor unions.

Climate equity: <https://www.epa.gov/climateimpacts/climate-equity>

Community: HARC, SGC

Community Advisory councils: <https://www.ehcma.org/page/Outreach-CACS-CAPS>

CBA: <https://www.energy.gov/justice/community-benefit-agreement-cba-toolkit>

CBP: <https://www.energy.gov/infrastructure/about-community-benefits-plans>

Community engagement: https://www.api.org/-/media/files/policy/exploration/100-3_e1.pdf

Co-benefits: <https://www.who.int/teams/environment-climate-change-and-health/climate-change-and-health/capacity-building/toolkit-on-climate-change-and-health/cobenefits>

DACs: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

Community Benefits Plans (CBPs) incorporate Justice40 goals and community engagement into project proposals and applications to ensure prosperity and co-developed solutions in the energy transition (DOE).

Community engagement is the process of interacting with the local community and is built upon the principles of integrity, safety, health and environmental responsibility and two-way communication (API, 2014). Goals relevant to this project include achieving sustainable outcomes, involving community members in decision-making, deepening trust and forming long-lasting relationships with the community.

Community Gatekeepers are trusted groups and individuals with strong relationships in a community that can help open doors for outside entities to engage grassroots stakeholders.

Co-benefits are beneficial outcomes that simultaneously meet several interests or objectives at one time.

Disadvantaged communities (DACs) are defined by [Executive Order \(EO\) 14008](#) on Tackling the Climate Crisis at Home and Abroad, as “marginalized, underserved, and overburdened by pollution.” There are several federal screening tools that identify and characterize disadvantaged communities.



Environmental Justice as defined by the Environmental Protection Agency is “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.”

Energy transition refers to the shift in the energy system to bring forward an energy abundant, low carbon future.

Fenceline communities are neighborhoods that are immediately adjacent to a company, military base, industrial or service center, and are directly affected by the noise, odors, chemical emissions, traffic, parking, or operations of the company.

Grassroots stakeholders are individuals and groups directly affected by projects (e.g., residents and community leaders) Grassroots stakeholders are influential members of a community or organization.

Justice40 (J40) is an initiative from the Biden administration that aims for at least 40% of the benefits of federal investments flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution.

Marginalized groups are communities that experience present-day disparities as a result of an unequal distribution of resources and historical practices that created systemic disadvantages. This often includes Black, Hispanic, Indigenous, rural, low-income, and immigrant communities.

Stakeholders are individuals, groups, or entities that have an interest or concern in a particular project and can impact or be impacted by outcomes of the project.

Two-way engagement is a form of open and active communication between two parties where information flows in both directions, involves mechanisms to incorporate feedback from stakeholders to inform decisions, and encourages discussions where both parties can share their viewpoints and work together to find solutions.



EJ: <https://www.epa.gov/environmentaljustice>
Energy transition: <https://htxenergytransition.org/our-story/>
Fenceline communities: <https://www.climateRealityproject.org/frontline-fenceline-communities>
Grassroots stakeholders: https://us.sagepub.com/sites/default/files/upm-assets/110517_book_item_110517.pdf
J40: <https://www.whitehouse.gov/environmentaljustice/justice40/>
Marginalized groups: HARC SGC
Stakeholders: HARC, SGC
Two-way engagement: HARC, SGC





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