

October 24, 2025

Office of Environmental Justice and Equity
Executive Office of Energy and Environmental Affairs (EOEEA)
100 Cambridge Street, 9th Floor
Boston, MA 02114

Written Comments on Draft Standards and Guidelines for Community Benefits Plans and Agreements

To the Massachusetts Office of Environmental Justice and Equity:

Thank you for the opportunity to provide written testimony to the Office of Environmental Justice and Equity (OEJE) in response to the draft Standards and Guidelines for Community Benefits Plans (CBPs) and Agreements (CBA). Acadia Center appreciates the opportunity to provide commentary and shape the development of the draft Standards and Guidelines on CBBPs and CBAs as your office works to finalize and implement them.

About Acadia Center and Overview of Comments

Acadia Center is a non-profit research and advocacy organization that advances transformative clean energy solutions, promoting a livable climate and a more equitable economy at the state, regional, and community levels, primarily in the northeastern U.S. and eastern Canada. By collaborating with stakeholders — government, business, and communities — Acadia Center pursues ambitious yet pragmatic strategies to ensure an inclusive and sustainable energy future for all. Acadia Center is deeply involved in Massachusetts policymaking and advocacy on clean energy and climate issues. Through rigorous data analysis and strategic partnerships, Acadia Center advocates for policies that significantly reduce carbon emissions and address systemic energy challenges.

Acadia Center thanks OEJE for all its work thus far in developing these guidelines. Acadia Center is strongly supportive of the spirit of equitable community engagement and the importance of tools like CBPs and CBAs — Massachusetts has emerged as a leader on these issues, and Acadia Center recognizes the OEJE's efforts to date.

Feedback on the Draft Standards and Guidelines

Acadia Center applauds the Office of Equity and Environmental Justice (OEJE) for developing draft Standards and Guidelines for CBPs and CBAs. These resources can and should play a significant role in improving equity and environmental justice outcomes and resource flows for any community energy project, and Acadia Center is glad to see them incorporated formally into the energy facility siting application process. Done right, these resources can materially assist in promoting responsibly developed projects with meaningful community benefits and a higher likelihood of timely/expedited approvals and a path to operation.

Understanding that the CBPs and CBAs are only part of a robust permit application process, Acadia Center strongly recommends that the OEJE and relevant state agencies emphasize the necessity of the CBPs/CBAs and the importance of project developers working with community partners to develop these plans and agreements. A key step in achieving this is mandating that developers undertake CBPs and CBAs as part of the Energy Facility

Siting Board (EFSB) project application. This necessary step will play a significant role in addressing the non-enforceable nature of the draft CBPs.

Acadia Center supports OEJE's recommendation that the community engagement process for CBPs & CBAs begin early. The timeframe for this community engagement process should be initiated at least six (6) months before an application is submitted to the EFSB, to ensure the CBAs and CBPs are thoroughly prepared and developed. Additionally, as part of the early engagement process, Acadia Center recommends additional guidelines on stakeholder mapping and community identification. On community identification, Acadia Center recommends that guidelines for identifying all impacted communities in specific project areas include a guide to a mapping database and other resources (from OEJE, EEA, and EFSB) that developers can use to outline the project's geographical coverage accurately. Also, the mapping of key stakeholders for the Community Benefit Agreement and Plan process is another critical aspect of the draft CBPs and CBAs. The detailed stakeholders included in the draft plan, as a key example, are essential. For CBP and CBP to meet the expectations of a specific community, the four broad categories in which community benefits take shape (as stated on page 6 of the plan) must be considered when assembling the key stakeholders involved in a CBP engagement process. Acadia Center recommends including Minority and Women-owned Business Enterprise (MWBE) in the mapping of key stakeholders, recognizing that the demographics of minority-owned businesses may vary across communities. It is vital that an established key stakeholder group accurately reflects the community it is set up to represent.

Another vital action in the Step-by-Step Engagement Process is the co-creation of an advisory committee when required. A community advisory committee (CAC) can play a significant role in providing expert advice for a Community Benefit Plan and Agreement. However, as Acadia Center has reported in a [study about equity advisory councils](#), these advisory committees could easily become limited in providing expert advice because of factors including, (1) A lack of legal backing or mandate of the Community Advisory Committee (CAC) to ensure that the guidance of the advisory committee could be taken into account within a Community Benefit Plan, and (2) A lack of compensation and other barriers that could support full participation of a Committee Advisory Committee members. Thus, Acadia Center recommends that, when a Community Advisory Committee (CAC) is established, stipends and other needed accommodations be made available to support the committee's efforts. Acadia Center advises that measures be put in place to adequately incorporate the advisory committee's input into the Community Benefit Agreement and Plan.

Community Benefit Plans and Community Benefit Agreements are necessary because they involve direct engagement with a host community before an energy project is fully sited and developed. For this reason, engagement with communities must be well documented, with continuous feedback reconciled and documented throughout the process and beyond. To this end, Acadia Center recommends that community feedback be included as a component of the Community Benefit Plan and Agreements. This section can convey the process of engagement, negotiations, and reconciliation established during the process.

Acadia Center also wishes to point out that while a growing body of research exists on best practices for solar, wind, and energy storage facility CBA/CBPs, there is less research on best practices for transmission projects, which can span many more communities due to their linear nature. Acadia Center recently contributed to a report intended to fill this research gap and compile best practices, entitled *Community Powered Progress: A*

*Pathway to Greater Community Participation in Transmission Infrastructure Projects.*¹ Acadia Center would be glad to share more about the development and findings of this report and the project examples it contains with OEJE if that would be of value and interest.

Conclusion

Acadia Center reiterates its appreciation for the opportunity to provide written comments on the draft Community Benefit Plans and Community Benefit Agreement standards and guidelines developed by the Office of Environmental Justice and Equity (OEJE). Acadia Center remains committed to our mission and to supporting OEJE in meeting its goals for promoting improved environmental justice and equity outcomes, both in general and with specific respect to the updated siting and permitting regime now being implemented in the Commonwealth. Please do not hesitate to contact Acadia Center with any further questions.

Respectfully submitted,

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¹ Available online at: <https://www.northeastgrid.org/publications>.