

# Environmental Justice Council

Meeting #20 • June 12, 2025 • 6:30 pm



## LOGISTICS

- ➔ Language Interpretation is being offered in: Español, Kreyòl ayisyen, 普通话, Português, Kriolu, Tiếng Việt, and American Sign Language (ASL).
  - To participate in English, click the “Interpretation” icon and select English.
  - Para entrar no canal em português, clique no ícone “Interpretation” e selecione “Portuguese”
  - Si alguien desea interpretación en español, haga clic en “Interpretation” y seleccione “Spanish”
  - Pa partisipa na Kriolu, klika na íkone "Intirpretason" y silisiona "Cape Verdean Creole".
  - Pou rantr nan chanèl kreyòl ayisyen an, klike sou ikòn “Interpretation” an epi chwazi “Haitian Creole”
  - 要以普通话参加会议，请单击口语图标并选择 “Chinese”。
  - Để vào kênh bằng tiếng Việt, hãy nhấp vào biểu tượng “Interpretation” và chọn “Vietnamese”.

- ➔ Please speak slowly.
- ➔ All attendees must select a language channel, even if viewing the presentation in English.



- ➔ If you would like a translated version of the slides, please go to the EJC website at: <https://www.mass.gov/service-details/environmental-justice-council-ejc-meetings>

**THIS MEETING IS BEING RECORDED**



# Environmental Justice Council

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Meeting #20

Thursday, June 12, 2025, 6:30 pm

In Person location: Pittsfield, MA

Berkshire Innovation Center

*45 Woodlawn Ave, Pittsfield, MA 01201*



# Logistics and Agenda

# Logistics

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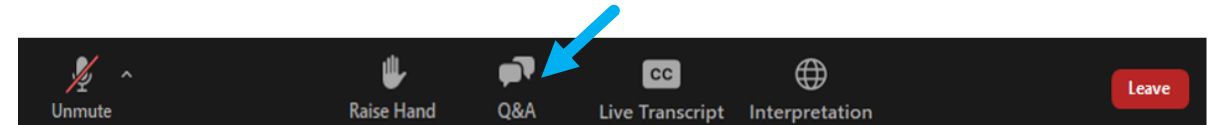


➡ For a translated version of the slides, please go to the EJC website at: <https://www.mass.gov/service-details/environmental-justice-council-ejc-meetings>

➡ All lines will be muted during the presentations.

➡ The line will be open for oral comments after the presentations.

➡ If you have a clarifying question or a logistical or technical issue during the presentations, please type it into the Q&A box.



➡ Contact the ERG webinar lead **Kecil John** at [meetings@erg.com](mailto:meetings@erg.com) with any technical issues or questions.



**THIS MEETING IS BEING RECORDED**

# Agenda

	<u>Approximate Time</u>
▪ Overview of Meeting, Logistics and Agenda	6:30 PM
▪ Roll Call and Approval of Prior EJC Meeting Minutes	6:35 PM
▪ Questions and Comments from the Public	6:40 PM
▪ Cumulative Impact Analysis & Community Benefit Plan	6:50 pm
▪ Questions and Comments from the Public	7:50 PM
▪ Response to Comments (when appropriate)	(if time allows)
▪ Next Steps and Adjourn	8:00 PM



## Approval of March 13, 2025, Meeting Minutes & Roll Call: EJ Council Members

- Kalila Barnett
- Madeline Fraser Cook
- Melissa Harding-Ferretti
- Cheryll Holley
- Caroline Hon
- Lydia Lowe
- Marcos Luna
- Peter Maathey
- María Belén Power
- Sofia Owen
- Jen Salinetti
- Patricia Spence
- Ari Zorn
- Miles Gresham

# Public Comments and Questions

*Please limit each comment to two minutes to  
allow time for others to speak*

# **Cumulative Impact Analysis & Community Benefit Plan**





**Commonwealth of Massachusetts**  
**Executive Office of**  
**Energy and Environmental Affairs**

# **EJ Council Meeting #20**

June 12, 2025, Berkshire Innovation Center  
Hybrid Meeting



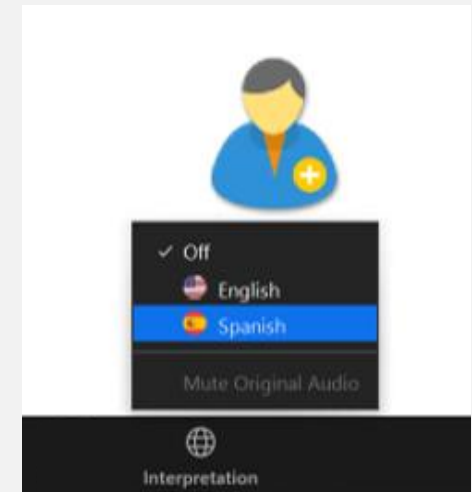
# Interpretation Logistics

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- “Arabic” تم اختر "الترجمة الفورية" للمشاركة باللغة العربية اضغط على أيقونة
- Чтобы принять участие на Русский языке, нажмите на ярлык «Устный перевод» и выберите “Russian”.
- ដើម្បីចូលរួមជាភាសាខ្មែរ សូមចុច រូបតំណាងការបកស្រាយ ហើយជ្រើសរើសភាសា”Khmer”។
- 한국어로 참여하려면 "통역" 아이콘을 클릭하고 “Korean”를 선택하세요.
- Pour participer en français, cliquez sur l’icône « Interprétation » puis choisissez « French ».

➞ Please speak slowly.

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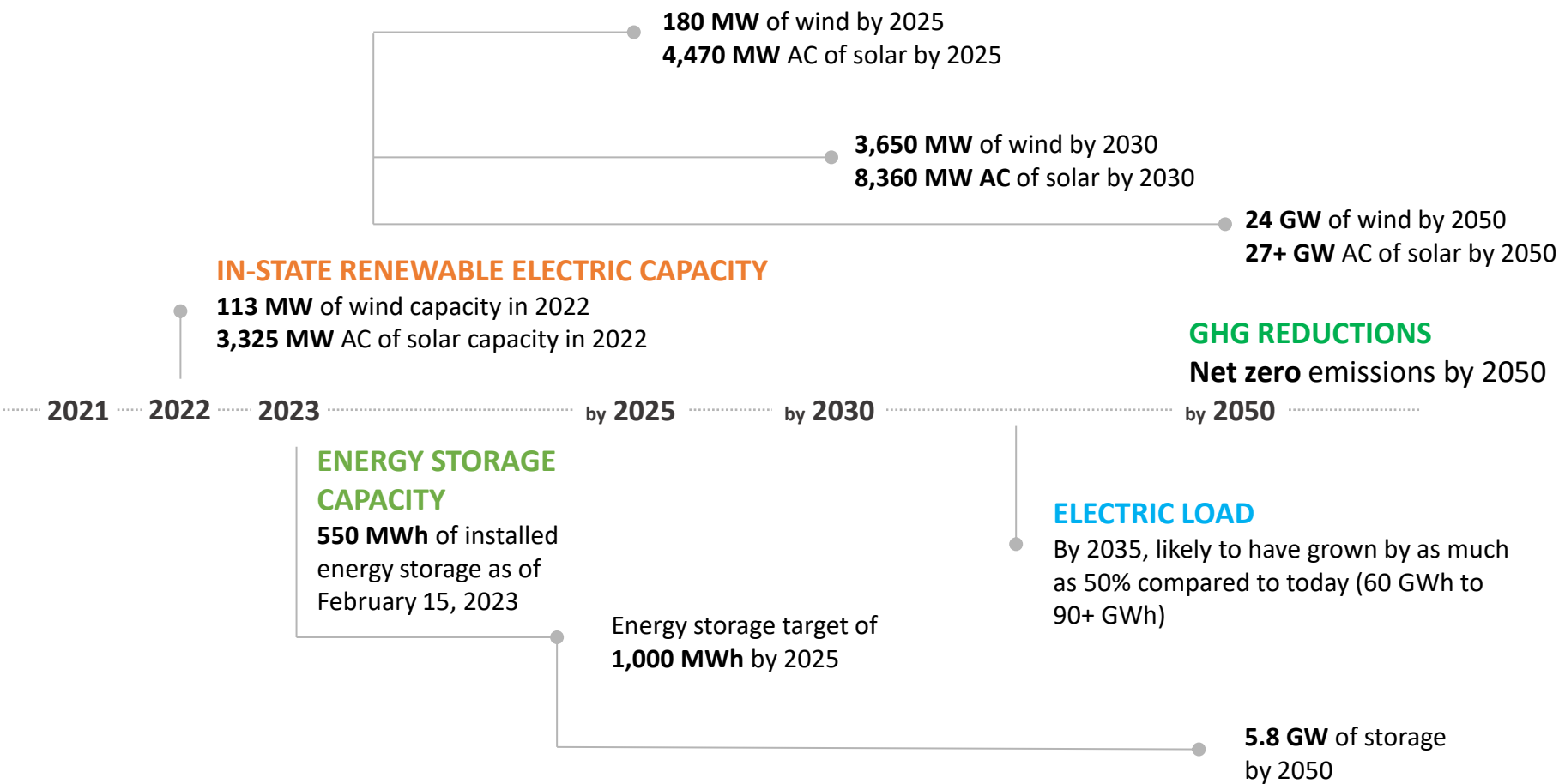


## TODAY'S AGENDA

- 6:30: Opening Remarks – María Belén Power, Undersecretary of Environmental Justice & Equity, EEA
- 6:35: Overview of 2024 Climate Act – Michael Judge, Undersecretary of Energy, EEA
- 6:45: Overview of EFSB – Staci Rubin, Commissioner, DPU and Veena Dharmaraj, Director, Division of EJ and Public Participation, DPU
- 6:55: Standards and Guidelines on Cumulative Impact Analysis - María Belén Power, Undersecretary of Environmental Justice & Equity, EEA
- 7:10: Standards and Guidelines on Community Benefits Plans – Syenna Mashmasarmi, Environmental Justice Liaison, Office of Environmental Justice and Equity, EEA
- 7:30: Discussion



# Massachusetts Clean Energy Needs





# Challenges with Existing Permitting Procedures

- Permitting processes are lengthy, unpredictable, and sometimes duplicative.
  - Timelines vary significantly and some projects have taken up to a decade to complete.
  - Historically, it has taken the Energy Facilities Siting Board (EFSB) between 1 and 4 years to issue approval to construct, after which the project still needs to obtain all state and local permits individually.
- Opportunities for appeal of each separate permit can cause years of delays.
- Communities feel they often do not have sufficient or impactful input into the siting of major infrastructure projects.
- Communities may not have the resources necessary to fully engage in permitting processes.
- **Massachusetts will not meet our GHG reduction limits without reforms.**



# Commission on Energy Infrastructure Siting and Permitting

- Commission was established by [Executive Order 620](#)
- Required to advise the Governor on:
  1. **accelerating the responsible deployment of clean energy infrastructure through siting and permitting reform** in a manner consistent with applicable legal requirements and the Clean Energy and Climate Plan;
  2. **facilitating community input** into the siting and permitting of clean energy infrastructure; and
  3. **ensuring that the benefits of the clean energy transition are shared equitably** among all residents of the Commonwealth.
- Two public listening sessions held and over 1,500 public comments received.
- Recommendations sent to Governor Healey on March 29, 2024.
- The Commission's recommendations were largely passed into law through *An Act promoting a clean energy grid, advancing equity, and protecting ratepayers* (2024 Climate Act), signed by Governor Healey in November 2024.





# Consolidated State Permitting

- All state, regional, and local permits for Large Clean Energy Infrastructure Facilities combined into **one consolidated permit** issued by the EFSB.
- All state and local agencies that would otherwise have a permitting role are able to **automatically intervene and participate** by issuing statements of recommended permit conditions.
- All projects must submit cumulative impact analysis as part of application to EFSB.
- Permit decision must be issued in **less than 15 months** from determination of application completeness.
- EFSB decisions can be appealed directly to the Supreme Judicial Court.



- Applies to generation facilities >25 MW, storage facilities >100 MWh, offshore wind related infrastructure, and large new transmission projects



# Consolidated Local Permitting

- Local governments (municipalities and regional commissions such as the Cape Cod and Martha's Vineyard Commissions) **retain all permitting powers for projects not subject to review by the EFSB.**
- Local governments **may continue to run separate approval processes** concurrently (e.g., wetlands, zoning, etc.), but are required to **issue a single permit** that includes individual approvals for clean energy infrastructure.
- Permit decision must be issued in **within 12 months.**
- Local governments can refer permitting review directly to the EFSB if they do not have sufficient resources.
- Permit applications can also be reviewed by EFSB following a local government's final decision if a review is requested by parties that can demonstrate they are substantially and specifically impacted by the decision, then further appealed directly to the Supreme Judicial Court.
- DOER is responsible for **creating a standard municipal permit application and a uniform set of baseline health, safety, and environmental standards** to be used by local decision makers when permitting clean energy infrastructure.



- Applies to generation facilities <25 MW, storage facilities <100 MWh, and non-EFSB jurisdictional transmission and distribution projects





# More Meaningful & Just Community Engagement

- Formal establishment of the Office of Environmental Justice and Equity in statute, with a specific mandate to develop guidance regarding community benefits agreement and cumulative impact analyses.
- First-ever mandatory community engagement requirements, including documentation of efforts to involve community organizations and demonstration of efforts to develop community benefit agreements.
- New Division of Public Participation at DPU to assist communities and project applicants with engagement and process questions in DPU and EFSB proceedings.
- New Division of Siting and Permitting at DOER to assist communities and project applicants with engagement and process questions in local permitting.
- Intervenor financial support is available to under-resourced organizations that wish to participate in an EFSB proceeding and are granted intervenor status. Municipalities with a population of 7,500 or less are automatically eligible for financial support.



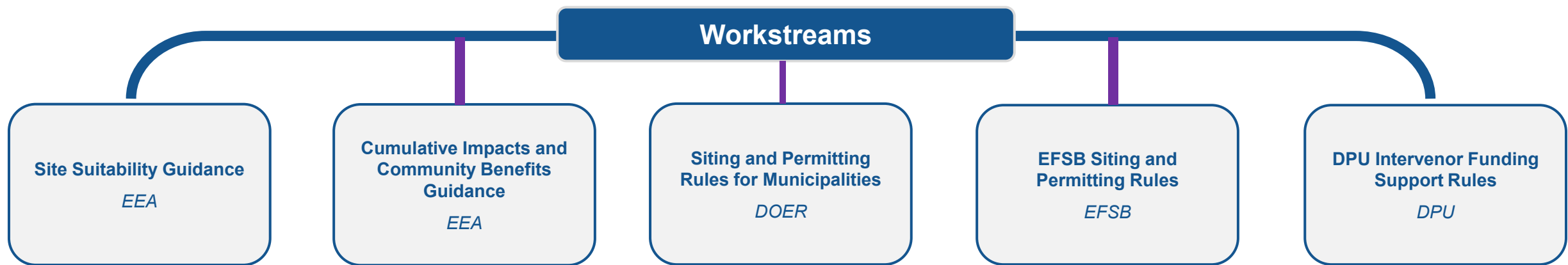
# Additional Reforms

- EEA required to establish site suitability methodology and guidance to inform state and local permitting processes about the suitability of sites for clean energy development, and help developers to avoid, minimize and mitigate environmental impacts.
- Five new seats on EFSB:
  - Commissioner of Department of Fish and Game;
  - Commissioner of Public Health;
  - Representative of Massachusetts Municipal Association;
  - Representative of Massachusetts Association of Regional Planning Associations; and
  - Representative with expertise in environmental justice and/or Indigenous sovereignty.
- EFSB-jurisdictional clean energy infrastructure exempted from Massachusetts Environmental Policy Act (MEPA) review.
- Legacy DPU siting authority (e.g., comprehensive zoning permits and eminent domain for transmission and pipelines) transferred to EFSB.



# Roles and Responsibilities

- There are five workstreams that stem from the bill that are being administered by three different agencies: EEA, DPU, and DOER
- Most of these are interrelated in some way but each serve a separate purpose and meet specific statutory requirements
- All three agencies are in close communication with each other
- Other state agencies that have significant energy permitting roles have also been consulted as proposals are being developed





# Next Steps

- Regulations are required to be promulgated by March 1, 2026.
- Draft regulations will be released for public comment likely in late summer/early fall.
- More information on process can be found at: [www.mass.gov/energypermitting](http://www.mass.gov/energypermitting)
- Questions can be directed to [energypermitting@mass.gov](mailto:energypermitting@mass.gov)



# **DPU/EFSB Siting and Permitting: 2024 Climate Act Implementation**

Environmental Justice Council - Hybrid Meeting  
Berkshire Innovation Center, Pittsfield and Zoom  
June 12, 2025



# 2024 Climate Act: Reform of Siting/Permitting for Clean Energy Facilities at EFSB/DPU

- Expands the Siting Board from nine to eleven members: adds Commissioners of Department of Fish and Game and the Department of Public Health (and reduces DPU to one seat); increases public member seats to four: Mass. Association of Regional Planning Agencies; Mass. Municipal Association; environmental justice/Indigenous sovereignty; and labor
- Establishes a new mandate, scope of review, and required findings
- Creates a new category of infrastructure: clean energy infrastructure (CEI) facilities, which includes energy storage systems (BESS)
- Creates two Consolidated Permit programs, which can include all state, regional, and local permits that would otherwise be needed to construct and operate a CEI project.
  - Large CEI - Consolidated State and Local Permit - issued by the EFSB
  - Small CEI - Consolidated Local Permit - issued by the municipality
- Provides a deadline for review of CEI, and constructive approval if the deadlines are not met
- Establishes new requirements for applicants of all energy facilities reviewed by EFSB:
  - Pre-filing consultation and engagement - administered by the DPU Division of Public Participation (DPP)
  - Cumulative Impact Analysis (CIA)
- Establishes Intervenor Grant Support Program for DPU and EFSB proceedings, administered by the DPP
- Other DPU Siting functions (such as zoning exemptions) are transferred to the EFSB no later than March 1, 2026



# Cumulative Impact Analysis Requirements in 2024 Climate Act

## ■ Cumulative Impact Analysis Report

- A written report produced by the applicant assessing impacts and burdens, including but not limited to any environmental burden and public health consequences impacting a specific geographical area (SGA) relating to a proposed energy facility and any prior or current private, industrial, commercial, state or municipal operation or project
- Purpose: to identify “disproportionate adverse effect” from a proposed project and propose potential remedial actions
- Similar statutory language to requirements in 2021 Climate Roadmap Act that led to MEPA’s Protocol for Analysis of EJ Impacts, but new focus on “unfairly burdened areas”
- Massachusetts Office of Environmental Justice and Equity (OEJE) to develop guidance and standards for CIA; Siting Board to promulgate CIA regulations based on OEJE guidance



# Potential CIA Indicator Categories

## Potential Indicator Categories for CIA:

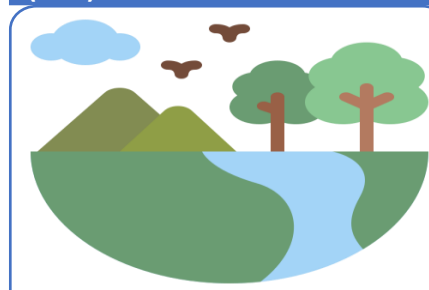
- **Population Characteristics (PC):** indicators characterizing public health, socio-economic conditions, sensitive populations, and cultural resources
- **Built Environment (BE):** addressing major pollution sources
- **Climate Change (CC) Impacts:** addressing flooding, sea level rise, wildfire, heat exposure
- **Natural Environment (NE)** – Addresses ecological integrity, connectivity, and biodiversity



Population  
Characteristics  
(PC)



Built  
Environment  
(BE)



Natural (NE)  
Environment

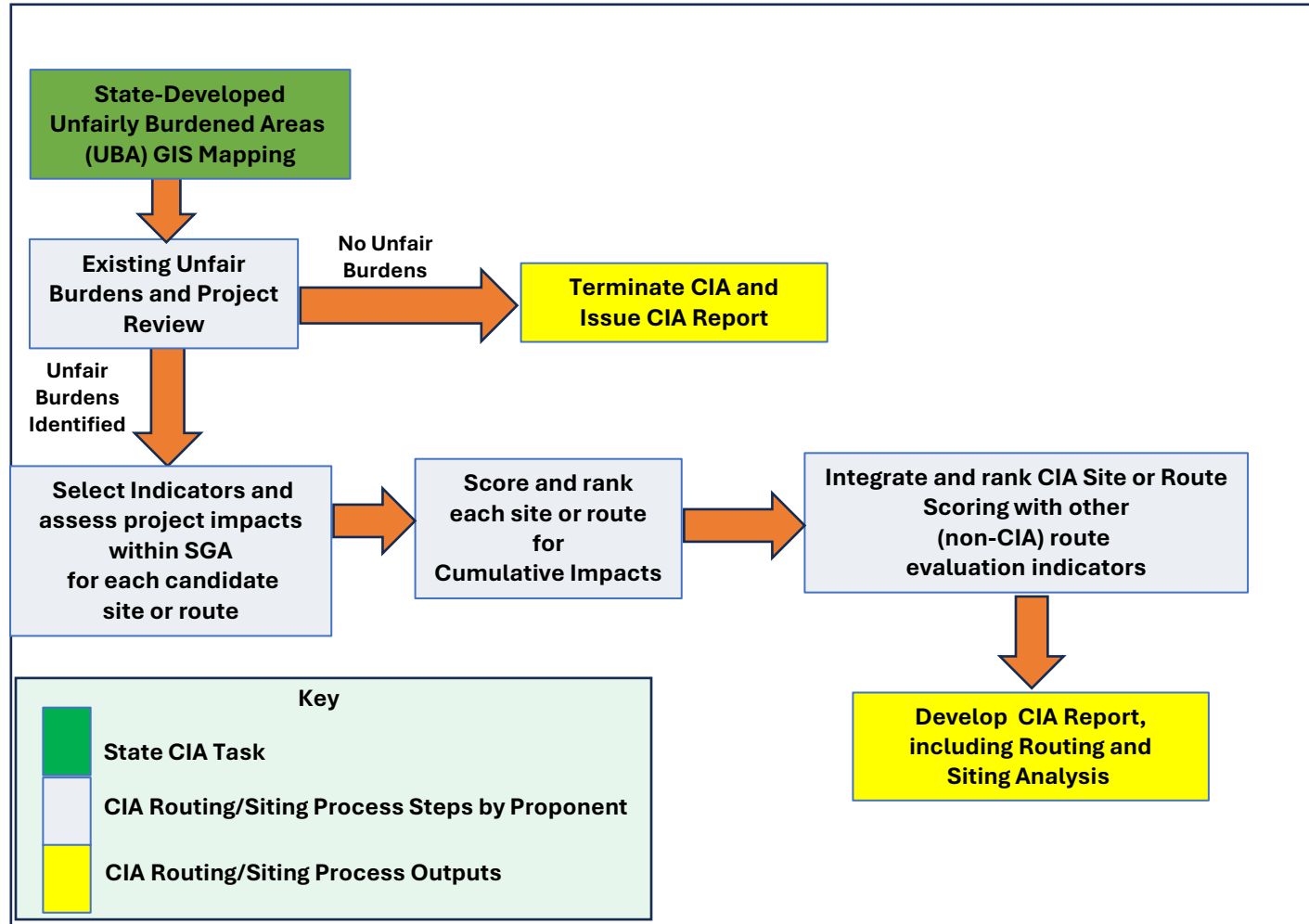


Climate (CC)  
Change Impacts





# Flow Chart of Possible CIA Approach





# Pre-Filing Requirements

## EFSB Pre-filing Requirements

- Requires the EFSB to establish pre-filing requirements. G.L. c. 164, § 69T
  - Calls for pre-filing consultations with permitting agencies and the Massachusetts Environmental Policy Act (MEPA) office.
  - Requires public meetings and other forms of outreach before the applicant submits its application to EFSB.
- Requires applicants to provide evidence that all pre-filing consultation and community engagement requirements have been satisfied.

## Role of the DPU Division of Public Participation

- Creates the Division of Public Participation (DPP) at the DPU to:
  - Assist stakeholders in navigating and clarifying pre-filing requirements in coordination with EEA's Office of Environmental Justice and Equity (OEJE); and
  - Facilitate dialogue among stakeholders involved in the permitting process.



# Intervenor Grant Support Program



1. Whether an applicant lacks financial resources



3. How the applicant proposes to substantially contribute to the proceeding



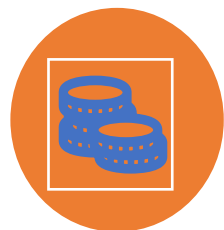
5. Whether the applicant has a unique perspective not adequately represented by other parties to the proceeding



2. Whether the applicant has previously intervened in a proceeding or participated since creation of the Program. Municipalities with a population  $< 7,500$  are exempt from this criterion



4. Whether the applicant proposes an achievable, reasoned, and clearly stated plan for participating in the proceeding



6. The amount and reasonableness of funds requested and proposed budget items



# Cumulative Impact Analysis (CIA)

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**Executive Office of Energy and Environmental Affairs (EEA)**  
**Office of Environmental Justice and Equity (OEJE)**



# Overview

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- Key Concepts
- Purpose of Guidance
- How to Develop a Cumulative Impact Analysis (CIA)
- Principles
- Resources
- Questions & Answers / Discussion



# The Office of Environmental Justice and Equity

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- The **Massachusetts Office of Environmental Justice and Equity (OEJE)** is responsible for implementing environmental justice principles, as defined in the General Laws, chapter 30, section 62, in the operation of each office and agency under the executive office. Environmental justice principles are:
  1. the meaningful involvement of all people with respect to the development, implementation and enforcement of environmental laws, regulations and policies, including climate change policies; and
  2. the equitable distribution of energy and environmental benefits and environmental burdens.
- The **2024 Climate Act** enshrined OEJE into statute, with a specific mandate to develop standards and guidelines governing the potential use and applicability of community benefits plans and agreements, and cumulative impact analysis.



# Key Concepts

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- ✓ **Environmental Justice (EJ):** Environmental justice is the equal protection and meaningful involvement of all people and communities with respect to the development, implementation, and enforcement of energy, climate change, and environmental laws, regulations, and policies and the equitable distribution of energy and environmental benefits and burdens
- ✓ **Indicators:** Specific indicators or stressors are used to assemble quantitative and/or qualitative measures of conditions and trends to assess the state of the environment, public health, socioeconomic, cultural and built environment to gauge progress toward specific goals
- ✓ **Just Transition:** Economic and social shift to clean energy that centers equity, environmental justice, workers and frontline communities
- ✓ **Meaningful Engagement:** Early, continuous, accessible, and culturally competent public involvement that allows for community input to inform decision-making and public policy
- ✓ **Unfairly Burdened Area (UBA):** An area or population that is impacted by existing “unfair or inequitable” environmental burden and related public health consequences as compared to the general population of the state.



# What is a Cumulative Impact Analysis (CIA)?

- The 2024 Climate Act required OEJE to develop standards and guidelines governing **cumulative impact analysis**.
- A “**cumulative impact analysis**” (CIA) is a written report produced by the applicant assessing impacts and burdens, including but not limited to any **existing environmental burden** and **public health consequences** impacting a specific geographical area in which a facility, large clean energy infrastructure facility or small clean energy infrastructure facility is proposed from any prior or current private, industrial, commercial, state or municipal operation or project; provided, that if the analysis indicates that such a geographical area is subject to an existing unfair or inequitable environmental burden or related health consequence, the analysis shall identify any:
  - (i) **environmental and public health impact** from the proposed project that would likely result in a disproportionate adverse effect on such geographical area;
  - (ii) potential impact or consequence from the proposed project that would **increase or reduce the effects of climate change on such geographical area**; and
  - (iii) **proposed potential remedial actions** to address any disproportionate adverse impacts to the environment, public health and climate resilience of such geographical area that may be attributable to the proposed project.





# Purpose of this Guidance

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- The purpose of this guidance is to establish a **clear and consistent framework** for evaluating the combined effects of burdens from a multitude of sources, including energy infrastructure projects on communities, particularly those already experiencing existing unfair or inequitable burdens
- Outlines **core principles** of the newly required CIA and provides a **practical roadmap** for integrating those principles in the regulatory and decision-making processes of the EFSB
- Advances environmental justice, **mitigates inequities** for unfairly burdened areas, and **fosters sustainable and inclusive outcomes** in energy and utility decision-making



# How to Develop a CIA

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- Evaluate the combined effects of environmental stressors, social determinants of health, and historical inequities on communities, ensuring that energy projects do not exacerbate existing disparities or add new burdens
- Establish a clear methodology for identifying and addressing cumulative impacts, the EFSB will promulgate regulations that align with the 2024 Climate Act, environmental justice goals, protect vulnerable populations, and support Massachusetts' clean energy objectives
- Highlights the importance of thoughtful planning and community engagement in fostering inclusive progress
- Key components:
  - ✓ Identifying State and Community Baseline for Comparison
  - ✓ Indicators and Stressors
  - ✓ Understanding Existing and Foreseeable Future Projects and their impacts
  - ✓ Geographical and Temporal Boundaries



# Identifying Community Baseline for Comparison

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- A foundational step in a CIA is establishing a clear baseline of existing environmental, health, and socioeconomic conditions within a community and as it relates to a statewide baseline
- The Office of Environmental Justice and Equity developing a screening tool similar to California's *CalEnviroScreen* - a standardized resource to identify baseline conditions, highlight disadvantaged communities, and support consistent evaluation across projects and geographies
- This baseline enables regulators and project proponents to compare proposed project impacts against current conditions and identify the extent to which a project may exacerbate existing burdens or create additional burdens
- The mapping tool uses standard population risk model, which is a formula for cumulative impact = existing burden X population vulnerability
- By integrating a mapping tool like the *CalEnviroScreen* into the cumulative impact analysis process, project proponents will have access to a reliable, data-driven foundation for understanding existing community burdens, informing more equitable assessments of project impacts



# Indicators and Stressors

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Many candidate indicators identified; currently assessing additional indicators:

- **Built Environment:** Strain on or changes to infrastructure, land use, housing, and essential services that support daily life and community functioning
- **Climate Change Impacts:** Impacts from flooding, sea level rise, storm surge, wildfire, heat/extreme temperatures, and other climate-related impacts
- **Natural Environment:** Impacts on and access to ecosystems, natural resources, and overall environmental quality, connectivity, including changes to air, water, land, and biodiversity
- **Population Characteristics:** indicators characterizing public health (impacts on physical and mental health outcomes resulting from environmental exposures, health disparities, and access to care), socio-economic (influences on economic opportunity, community stability, and social equity, particularly for disadvantaged communities, and recognizes disruptions to cultural heritage) conditions, sensitive populations, and cultural resources



# Examples of Potential Indicators

Built Environment	Climate Change
<ul style="list-style-type: none"><li>• MassDEP air permit facilities</li><li>• M.G.L. c. 21E sites</li><li>• “Tier II” toxics use reporting facilities</li><li>• Wastewater treatment plants</li><li>• Traffic proximity and volume by block group</li><li>• Airports, Ports, Freight Rail Yards</li><li>• Hazardous Waste Treatment, Storage, Disposal Facilities</li><li>• MassDEP sites with AULs</li><li>• MassDEP groundwater discharge permits</li><li>• Underground storage tanks</li><li>• Road Infrastructure and Transportation Infrastructure</li><li>• Energy Generation and Supply</li><li>• Large Quantity Toxic Users</li><li>• Transfer Stations (Large and Small)</li><li>• Transmission lines</li><li>• Brownfields</li></ul>	<ul style="list-style-type: none"><li>• Ozone summer seasonal average of daily maximum 8-hour concentration in air in parts per billion (ppb)</li><li>• Area within sea level rise inundation above Mean Higher High Water Level</li><li>• Area under Special Flood Hazard Zone</li><li>• Climate Risk Rating</li><li>• Area under Moderate to Low Flood Risk</li><li>• Flood Factor/ Flood Risk</li><li>• Storm surge</li><li>• Maximum annual daily rainfall within overall project useful life</li><li>• Area within mean High Water shoreline</li><li>• Area within the 1% annual coastal flood exceedance probability</li><li>• Urban Heat Factor</li></ul>



# Examples of Potential Indicators

Natural Environment	Population Characteristics
<ul style="list-style-type: none"><li>• Index of Ecological Integrity</li><li>• Ecological Connections</li><li>• Increase in Impervious Land Cover Area</li><li>• Change in Open Water area</li><li>• Change in Protected Open Spaces</li><li>• Change in Recreational open spaces</li><li>• Decrease in Wetland Area</li><li>• Decrease in Forest Area</li><li>• Impacted Priority Habitats of Rare Species</li><li>• Impacted Areas of Critical Environmental Concern</li><li>• Impacted Surface Water Supply Watershed area</li><li>• Impacted Sole Source Aquifer Area</li><li>• Impacted Wetland Resource Area</li><li>• Protected Open space impacted</li><li>• Recreational Open area impacted</li><li>• Area within FEMA Q3 flood zone boundary</li></ul>	<ul style="list-style-type: none"><li>• Ultrafine Particulate and Particulate Matter (PM) 2.5 Levels</li><li>• Diesel PM level and state percentile</li><li>• Air toxics Cancer Risk and Respiratory Hazard Index</li><li>• Annual nitrogen dioxide levels</li><li>• Heart Attack Hospitalization</li><li>• Childhood Lead Exposure</li><li>• Low Birth Weight</li><li>• Childhood Asthma Emergency Hospital Visits</li><li>• Current Asthma</li><li>• Low Life Expectancy</li><li>• Chronic Obstructive Pulmonary Disease</li><li>• Median household income</li><li>• Unemployment rate</li><li>• Persons with Disabilities</li><li>• Families below poverty</li><li>• Persons with education less than high school diploma</li></ul>



# Awareness of Combined Impact

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- No resident lives a single-issue life. Impacts from different sectors create burdens and benefits. By fostering an awareness of how various stressors interact and compound over time, the EFSB can properly assess disparities, require appropriate mitigation, and ensure that its decisions promote environmental justice, mitigate inequities for unfairly burdened areas, and protect vulnerable populations
- Each stressor category should be assessed cumulatively - meaning not just based on one project, but in combination with past, present, and reasonably foreseeable actions in a given specific geographic area or affecting a particular population
- CIAs provide a vital framework for understanding how multiple stressors intersect to affect communities, particularly those already facing systemic inequities, and can help contribute to a just transition
- Recognizing these combined impacts is critical to creating policies that balance development goals with equity and sustainability
- While this guidance does not provide an exhaustive list of indicators, the selection should be rooted in evidence-based research, locally relevant data, and community input. Emphasis should be placed on stressors that have a known or likely compounding effect when layered with new project impacts



# Understanding Existing and Foreseeable Future Projects

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- CIAs must account for not just the proposed project, but also the impacts of other existing or planned developments in the area
- Evaluating reasonably foreseeable future projects helps identify potential compounding impacts and avoid blind spots in project assessments
- Ensures combined effects of multiple developments, both current and planned, are thoroughly assessed to identify potential stressors and inequities.
- By evaluating the potential interactions and cumulative stressors resulting from multiple projects, the EFSB can mitigate adverse outcomes, promote equitable solutions, and align infrastructure planning with environmental justice principles





# Geographical and Temporal Boundaries

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- Establishing clear geographic and temporal boundaries is a fundamental component of cumulative impact analysis
- These boundaries help define the scope of analysis, ensuring that assessments appropriately capture the spatial extent and timeframe of environmental, social, and public health impacts
- Geographic boundaries allow the EFSB to focus on specific communities affected by existing or proposed projects, while temporal boundaries account for historical, current, and reasonably foreseeable future impacts over time



# Principles

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Grounding principles to serve as guidelines for EFSB's cumulative impact analysis policy design include:

- 1 Applicable to new and modified energy infrastructure
- 2 Engaging the Community Early and Often in the Process
- 3 Tools and Methods for Assessing Cumulative Impacts
- 4 Cumulative Impact Analysis Process
- 5 Cumulative Impact Analysis Report



# Principle #4: Cumulative Impact Analysis Process

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**Step 1:** Gather Baseline Data

**Step 2:** In Consultation with Communities, Identify Potential Impacts of the Proposed Project

**Step 3:** Evaluate the Significance of Impacts

**Step 4:** Score and Rank Each Site or Route for Cumulative Impacts

**Step 5:** Assess Mitigation and Management Strategies

**Step 6:** Share Draft Report for Feedback and Finalize (develop draft report and update it during the EFSB siting and permitting process)

**Project proponents should be engaged in meaningful and consistent collaboration with community-based organizations, municipal representatives, and residents most impacted.**



# Community Benefits Plans (CBP)

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# What is a Community Benefits Plan?

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A Community Benefits Plan outlines **commitments** by project developers to provide meaningful, measurable benefits to communities—especially those who are historically disadvantaged, overburdened, and underserved.

Community benefits are the **tangible and lasting outcomes** that a project delivers in response to the priorities, needs, and concerns of the communities it impacts.



# CBP vs. CBA

Community Benefits Plan (CBP)	Community Benefits Agreement (CBA)
<ul style="list-style-type: none"><li>• <b>Non-legally</b> enforceable plan created by a project developer, in consultation with the affected community</li><li>• Summary of <b>community engagement</b></li><li>• Outline a developer's <b>commitment</b> to the community's needs (e.g., affordable housing, job creation, increased access to green spaces, etc.)</li><li>• <b>Begin development</b> during the Energy Facilities Siting Board (EFSB) or municipal consolidated permit <b>pre-filing process</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Legally binding</b> agreements negotiated between municipalities or community organizations and developers</li><li>• Outline <b>specific benefits</b> that the developer will provide to the community</li><li>• <b>Enforceable in court</b>, which gives communities a stronger guarantee that the developer will follow through on their commitments</li><li>• <b>A CBA can be an outcome of a CBP</b></li></ul>



# Why CBPs Matter

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- Historically, disadvantaged communities have borne the brunt of fossil fuel energy infrastructure and related pollution while lacking access to the benefits.
- **CBPs reframe development of clean energy projects to:**
  1. Center community voices
  2. Reduce harm and displacement
  3. Build local wealth and capacity
  4. Reduce legal, political, and community risk for developers



# Community Engagement Process – Core Principles

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- ✓ **Begin Early:** Communities should be engaged early in the project development process — before decisions are finalized—to shape meaningful outcomes.
- ✓ **Ensure Inclusion:** Impacted disadvantaged communities and those historically marginalized should be prioritized. Participation should be accessible and equitable.
- ✓ **Build Trust Through Transparency:** Open, honest communication about project goals, risks, benefits, and limitations fosters trust and credibility between communities and project proponents.
- ✓ **Respect Cultural Relevance:** Engagement efforts should reflect and respect the community's language, values, history, and communication styles to be meaningful and accessible.
- ✓ **Make Engagement Ongoing:** Engagement is not a checkbox—it's a continuous, iterative, two-way dialogue throughout the project development, siting and permitting.
- ✓ **Embed Accountability:** Create mechanisms to track progress, honor commitments, and empower community oversight.





# Step-by-Step: How to Develop a Strong CBP

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While every community is different and may require different needs, this structure ensures a consistent approach to transparency, inclusion, and accountability. Each step is intended to be flexible enough to adapt to local context, while rigorous enough to ensure the process leads to real, measurable community benefits.

- 1 Stakeholder Mapping and Community Identification**
- 2 Develop a Community Engagement Plan**
- 3 Conduct Pre-Filing Community Outreach**
- 4 Co-Create Benefit Commitments**
- 5 Develop a Written, Public CBP**
- 6 Formalize Accountability**



# Turning Commitments into Action

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## A well-structured CBP should:

- Clearly describe each proposed benefit, including what is being delivered and who it is intended to serve.
- Provide a clear timeline for delivery, aligned with project phases (i.e., pre-construction, construction, operations).
- Identify responsible parties for implementation.
- Outline the funding sources and budget for each benefit, providing transparency into how resources are allocated and sustained.
- Include **SMARTIE** milestones for each commitment, ensuring that goals are:  
**Specific // Measurable // Achievable // Relevant // Time-Bound // Inclusive // Equitable**



# Examples of Effective & Meaningful Commitments

These examples reflect common priorities such as environmental justice, economic development, infrastructure, sustainability, and environmental protections. Commitments made will depend on the type and size of the project, the impacts on the community and be adapted to the context of each community’s goals and challenges.

Environmental Justice and Equity	Economic Development and Workforce
<ul style="list-style-type: none"><li>• A local hiring plan with clearly defined goals for participation from EJ Populations.</li><li>• Funds for the installation of air quality monitors and a community-led environmental health monitoring program.</li><li>• A Community Advisory Council, including labor, Tribal, and environmental justice representatives.</li></ul>	<ul style="list-style-type: none"><li>• Project Labor Agreements (PLAs)</li><li>• Workforce development investments, including critical supportive services.</li><li>• Training and apprenticeship programs.</li><li>• Investments in affordable housing.</li></ul>



# Examples of Effective & Meaningful Commitments (cont.)

## Infrastructure and Community Support

- Investment in transportation and access improvements (e.g., bus lanes and bus shelters, public transit infrastructure, road upgrades, public access routes).
- Co-development with the community of community infrastructure (e.g., broadband expansion, community-owned microgrids, public EV charging, shared EVs).
- Investment in public open and green spaces.
- Investment in community centers and parks, local community organizations, mental health and substance abuse services, etc.

## Environmental and Public Health Protections

- Support for long-term energy efficiency programs, such as retrofitting buildings to meet higher energy performance standards, installing solar panels, or supporting community-based renewable energy cooperatives.
- Integration of wildlife and habitat protection into the development plan, such as creating wildlife corridors, preserving wetlands, or planting native vegetation to restore natural ecosystems.
- Systems for monitoring environmental impacts, including air, water, and soil quality.
- Designation of an environmental compliance officer for the project.



# Oversight & Accountability

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- A CBP is only as strong as the systems in place to monitor and evaluate its implementation. To maintain public trust and ensure follow-through, CBP plans should include commitments to regular, transparent reporting and open communication with the community.
- Proponents should establish clear accountability mechanisms that may include:
  - a monitoring and reporting schedule, aligned with project milestones
  - designated point(s) of contact for community members and regulatory bodies
  - public-facing progress reports, published at least quarterly and made available in multiple languages and accessible formats; or
  - opportunities for community to review progress—through advisory committees, listening sessions, or other forums
- **Proponents are encouraged to take the next step by entering into Community Benefit Agreements (CBAs) with community-based organizations, municipalities, or coalitions that reflect the interests and needs of impacted residents.** These agreements can help solidify expectations, clarify roles, and provide a legal or contractual framework for follow-through.

# Public Comments and Questions

*Please limit each comment to two minutes to  
allow time for others to speak*



WHAT'S  
NEXT?

## Next Steps & Adjourn

Information on the EJC and its meetings can be found at

<https://www.mass.gov/orgs/environmental-justice-council-ejc>