

# Standards and Guidelines for Community Benefit Plans and Community Benefit Agreements

Executive Office of Energy and Environmental Affairs

Office of Environmental Justice and Equity

March 2026



# Table of Contents

- I. Introduction ..... 2
  - A. Overview ..... 2
  - B. Key Terms ..... 2
  - C. The Importance of Community Benefit Plans ..... 3
  - D. Consideration of CBPs and CBAs in Consolidated Permit Process ..... 5
    - i. Development Process ..... 5
    - ii. Enforcement Capabilities..... 6
- II. Defining Community Benefits..... 7
- III. Community Engagement Process ..... 8
  - A. Core Principles of Effective Engagement ..... 9
  - B. Step-by-Step Engagement Process ..... 11
- IV. Turning Commitments into Action ..... 13
  - A. Accountability Through Structure ..... 14
  - B. Ensuring Flexibility While Maintaining Integrity..... 14
- V. Structuring a Community Benefit Plan ..... 14
  - A. OEJE’s Recommended Components of the CBP ..... 15
  - B. Tone and Accessibility..... 16
- VI. Examples of Meaningful Commitments ..... 16
- VII. Oversight and Accountability ..... 18
- VIII. Long-Term Sustainability..... 19
- IX. Building Trust, Delivering Impact ..... 20
- X. Case Studies & Additional Resources ..... 20

# I. Introduction

## A. Overview

---

*An Act Promoting a Clean Energy Grid, Advancing Equity and Protecting Ratepayers* (“2024 Climate Act”) requires the Office of Environmental Justice and Equity (“OEJE”) at the Executive Office of Energy and Environmental Affairs (“EEA”) to develop standards and guidelines governing the potential use and applicability of Community Benefit Plans (“CBPs”) and Community Benefit Agreements (“CBAs”), as well as Cumulative Impact Analyses (“CIA”), to be conducted by project applicants. As part of the required meaningful engagement, CIA, and mitigation hierarchy (avoid, minimize, and mitigate), project applicants should work with communities to develop CBPs or CBAs to support this process. OEJE encourages project applicants to identify opportunities to invest in the long-term well-being of impacted communities.

CBPs and CBAs can play a crucial role in ensuring that the implementation of energy projects align with EJ principles by fostering inclusive participation and ensuring the benefits and burdens of the transition are equitably distributed. EJ principles include: (i) 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 (ii) the equitable distribution of energy and environmental benefits and environmental burdens. These standards and guidelines emphasize proportionality, recognizing the scale of commitments should correspond to the size of a project. In doing so, they provide a framework that is both equitable and practical for different scales of investments, setting the stage for clear and consistent implementation.

## B. Key Terms

---

- **Community Benefit Plan (CBP):** A non-legally binding document which outlines how a project applicant will engage with and benefit local communities during development, construction, and operation of an energy facility.
- **Community Benefit Agreement (CBA):** A legally binding, negotiated agreement between a project applicant and a community, often represented by a coalition, community groups or a local government body, which outlines benefits the communities will receive.
- **Cumulative Impact Analysis (CIA):** An analysis assessing cumulative impacts and burdens required to be completed by certain energy infrastructure facility project applicants in accordance with G.L. c. 164, § 69G and 980 CMR 15.00.
- **Energy Benefits:** The access to funding, training, renewable or alternative energy, energy efficiency, or other beneficial resources.

- **Environmental Benefits:** The access to clean natural resources, including air, water resources, climate regulation, natural habitat, open space, constructed playgrounds and other outdoor recreational facilities and venues, clean renewable energy sources, environmental enforcement, improved human health, training and funding.
- **Environmental Justice (EJ) Principles:** Principles that support protection from environmental pollution and the ability to live in and enjoy a clean and healthy environment, regardless of race, color, income, class, handicap, gender identity, sexual orientation, national origin, ethnicity or ancestry, religious belief or English language proficiency, which includes: (i) 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 (ii) the equitable distribution of energy and environmental benefits and environmental burdens.
- **Key Stakeholders :** Members of the public including local residents, public interest groups, organizations within the local community in the vicinity of a proposed project that could be affected by a proposed project, project abutting residents (both owners and renters) and businesses, community-based organizations, elected or appointed municipal officials (e.g., mayor or town/city manager, relevant Council/Select Board members, Chair(s) of the Conservation Commission, Planning Board, Zoning Board, and Head of the Department of Public Works), regional planning officials, and federally recognized, state-acknowledged or state-recognized Tribal organizations.
- **Meaningful Engagement:** Early, continuous, accessible, and culturally competent public communication that allows for community input to shape decision-making and public policy.

## C. The Importance of CBPs and CBAs

*CBPs and CBAs can avoid or reduce community opposition and delays while accelerating project development and implementation.*

A reliable, affordable, and resilient energy supply is essential to the health and welfare of residents and businesses across the state. Clean energy projects – generation, storage, and transmission – advance this public good by reducing greenhouse gas emissions, improving long-term air quality, supporting energy affordability, and strengthening grid reliability statewide.

While these benefits are shared broadly, the physical impacts of new infrastructure are mostly felt locally. Land disturbance, construction activity, visual changes, noise, traffic and the land use opportunity cost primarily impact the communities hosting these facilities. In communities already facing

cumulative burdens, even beneficial projects that address statewide needs and goals can compound existing burdens to some degree. CBPs and CBAs help balance these statewide and local considerations. A CBP is a non-legally binding document that outlines how a project applicant will engage with communities and deliver meaningful benefits during development, construction, and operation. CBPs create an early foundation for transparency, communication, and trust, and can inform the development of a legally binding CBA. A CBA is a legally binding, negotiated agreement between a project applicant and a community, often represented by a coalition, community groups or a local government body, which outlines benefits the communities will receive

**Table 1. Key differences Between CBPs and CBAs**

Community Benefit Plan (CBP)	Community Benefit Agreement (CBA)
<ul style="list-style-type: none"> <li>• <b>Non-legally</b> enforceable plan created by a project developer, in consultation with the impacted community</li> <li>• Summarizes <b>community engagement</b></li> <li>• Outlines the developer's <b>proposed benefits or commitments</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Legally binding</b> agreement negotiated between project developers and municipalities/community representatives</li> <li>• Outlines <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>

These tools are intended to center community priorities, elevate local lived experience, and provide a clear, actionable framework for defining and delivering local benefits tied directly to clean energy development. Beyond documenting localized benefits, CBPs and CBAs also provide important procedural advantages for project delivery. They create a structured process that surfaces community priorities early, reduces uncertainty, minimizes delays, and fosters stronger, more durable relationships between the relevant parties.

CBAs should be negotiated primarily between project developers and community coalitions, ensuring that the voices and priorities of impacted residents are central. Local governments should play a supportive role for community coalitions or community groups, by providing facilitation, legal guidance, and assistance with enforcement. CBPs and CBAs may not be applicable in every project context. Nonetheless, these tools

should always be discussed with Key Stakeholders, as defined in 980 CMR 16.02, to ensure transparency and allow communities to determine whether a CBP or CBA is appropriate for their circumstances. OEJE strongly encourages the development of CBPs and CBAs in communities identified as Burdened Areas, as defined in 980 CMR 15.02, as these communities have been identified as experiencing disproportionately higher levels of cumulative environmental and social burdens, making it especially important to consider localized benefits. These tools should always be considered a means to address local priorities and concerns.

## D. Consideration of CBPs and CBAs in a Consolidated Permit Process

---

CBPs and CBAs can be valuable tools to reflect community input and needs, and project proponent commitments. While the applicability of a CBP or CBA may vary depending on project scale, type, or community needs, these tools should always be considered and discussed with Key Stakeholders. The outline below reflects potential incorporation of CBPs in the EFSB and municipalities' siting and permitting processes.

### i. Development Process

---

In alignment with the EFSB's and DOER's pre-filing engagement requirements, project applicants should demonstrate meaningful engagement with residents, municipalities, and CBOs. As part of this process, OEJE recommends that applicants develop and discuss a draft CBP with Key Stakeholders during the pre-filing stage. Early discussions should make communities aware of the potential impact of the proposed project on public health and environmental indicators, as well as any proposed mitigation measures. Applicants should work with Key Stakeholders to identify local needs, concerns, and priorities that can inform the development of proposed benefits. In some circumstances, the community and applicants may collaboratively determine not to pursue a CBP. These circumstances may include limited project scale, sufficient existing mitigation, community capacity constraints, or other practical considerations. Even when a CBP is not pursued, transparent engagement and discussion of potential benefits remain a critical part of the pre-filing process.

*Equitable projects begin with meaningful community involvement—they actively include community members in shaping priorities and benefits.*

If the community and project applicant decide to pursue a CBP, the draft plan should be refined through ongoing engagement to reflect local priorities, concerns, and proposed benefits. Once this collaborative process has been completed, the draft CBP should be submitted with the project application to the EFSB or relevant municipalities. For linear infrastructure projects that span multiple municipalities, a single, coordinated CBP

addressing shared regional priorities should be developed and submitted. This ensures that decision-makers – whether at the state or local level – have the most up-to-date record of community feedback and proposed benefits at the start of their review process.

In the context of an EFSB proceeding, the CBP should be part of the formal application record and reviewed alongside other project materials during the agency’s adjudicatory and public comment processes. For municipal or other local permitting processes, the CBP should similarly be shared with the relevant boards, commissions, or departments to inform their review and to ensure that local decision-makers have a complete understanding of the proposed community benefits.

Whether under EFSB or a municipality’s jurisdiction, project applicants should continue meeting with community representatives after the draft CBP is submitted to respond to feedback, adjust commitments as appropriate, and maintain transparency about how the plan is evolving. These discussions should address how proposed benefits align with identified community needs, complement any mitigation measures, and are structured for long term follow-through.

Project applicants should finalize the CBP prior to the conclusion of the review process. In some cases, the CBP may be formalized into a CBA, which can be completed after the completion of the EFSB or municipal review process. In other cases, the CBP itself will serve as the guiding document for benefit delivery without a formal agreement. While final project approval is not contingent on having a CBA, applicants are strongly encouraged to have a finalized CBP – and, when feasible, a conditional CBA – in place before the end of the review process. A conditional CBA should be structured to take effect only upon final project approval by the EFSB or the relevant local government representative.

By completing this process, applicants confirm their readiness to deliver community benefits as promised, reinforcing trust, accountability, and long-term positive relationships with the communities hosting the project.

## ii. Enforcement Capabilities

---

The EFSB welcomes applicants' efforts to engage in discussions with municipalities hosting infrastructure and affected Key Stakeholders regarding avoidance, minimization, and mitigation of impacts, including discussions regarding a CBP or CBA. The EFSB considers a CBP or CBA as evidence for how a project will provide additional benefits to the host community. However, the EFSB does not approve or enforce CBAs; enforcement responsibilities rest with the parties who signed the agreements.

Local permitting and enforcement processes may differ, especially where a municipality is a signatory to a CBA. In such cases, the municipality may have a direct role in ensuring that the terms of the agreement are fulfilled. Municipalities should also establish a clear process for monitoring and reporting on compliance. Where

commitments are not met, municipalities may exercise their enforcement authority, including penalties or corrective actions. Municipalities are strongly encouraged to work in coordination with CBOs to ensure transparency and accountability.

## II. Defining Community Benefits

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. When community benefits are designed in partnership with communities, they can help build trust, address inequities, and ensure that the clean energy transition delivers on its promise of EJ and equity. In developing community benefits, all parties should recognize any practical limitations of implementing community benefits. Transparent discussions about the scope and cost of proposed benefits help ensure that commitments are both meaningful for communities and feasible for project developers.

*Community benefits, designed with and for impacted communities, are key to advancing decarbonization and environmental justice.*

### Meaningful Benefits

Benefits should be defined through direct dialogue with the community, recognizing that needs vary across geographies, cultures, and contexts. For some communities, a meaningful benefit may be workforce training and job opportunities; for others, it may be improved air quality, access to renewable energy, investments in local infrastructure, or funding for community-led initiatives. A project proponent may also propose a benefit that improves the score of an indicator not directly impacted by the proposed project.

**What matters most is that benefits are responsive to the community's own stated goals.**

To support a consistent understanding of potential areas of impact, OEJE recognizes four broad categories where community benefits often take shape:

- 1. Environmental Justice and Equity:** Addressing historical harms, reducing environmental burdens, and ensuring that the most burdened communities receive priority access to energy, climate and environmental benefits, clean energy, public health protections or other improvements.
- 2. Economic Development and Workforce Creation:** Creating good-paying, accessible jobs for local residents, supporting small and minority-owned businesses, building long-term economic opportunities or other local opportunities.
- 3. Infrastructure and Community Support:** Investing in the physical and social infrastructure that communities need to thrive - such as affordable housing, transportation access, broadband, childcare facilities or other infrastructure to support community activities.

- 4. Implementation of Environmental and Public Health Protections:** Protecting people’s health and the natural environment through preservation efforts, pollution prevention and controls, land and habitat conservation and restoration, climate resilience measures or other protections.

### **Determining Relevant Benefits**

Not every benefit will apply to every project and projects may have benefits not included within these categories. Whether a benefit is relevant will depend on the particulars of the project and location, the CIA report or site suitability assessment (as applicable), as well as the priorities and needs of impacted communities. To the greatest extent possible, applicants should work with impacted communities early and often to define what benefits are most relevant to them. CBPs should clearly explain how benefits were identified in collaboration with the community, how they address specific needs or harms, and how they will be delivered and measured over time.

Community benefits should be proportional to the scale and nature of the project’s impacts. Clean energy projects typically do not create the same level of long-term negative effects as legacy fossil fuel facilities. At the same time, it is important to recognize that communities, particularly Burdened Areas, face disproportionately higher levels of cumulative burdens. On-the-ground conditions should be considered when identifying and prioritizing benefits. Incorporating this context ensures that CBPs and CBAs are meaningful and responsive to community needs and priorities.

### **Trackable Benefits**

Finally, benefits should be more than aspirations and promises. A meaningful CBP and CBA includes clearly defined commitments, specific implementation strategies, timelines, and metrics for accountability. Mitigation and benefits are not the same in these processes. Mitigation refers to actions taken to avoid, minimize, or reduce the specific adverse impacts of a project on the environment or community. These measures should be required as part of the standard conditions within a project permit. By contrast, benefits should contribute to the overall well-being, stability, and resilience of the community in ways that reflect local priorities. A project proponent should consider designating an environmental compliance officer, accountable to the community, who is responsible for tracking mitigation measures, maintaining transparent documentation, and who regularly provides this information to communities within the geographic area of the project.

## **III. Community Engagement Process**

Effective community engagement is the foundation of a strong CBP. It ensures that community voices, especially those disproportionately burdened by energy and environmental harms, are centered in the decisions that affect them. In these guidelines, “community” refers not only to municipal governments or elected officials, but also the full spectrum of people and organizations who live, work, or are otherwise

directly impacted in the geographic area by energy infrastructure projects. This includes CBOs that represent the diverse constituents within a neighborhood or region. Many of these groups serve as trusted messengers and longstanding stewards of public health, environmental quality, and social equity in their communities. Rather than relying solely on fragmented or siloed outreach, this process should convene Key Stakeholders collectively, allowing space for residents and organizations to share information, build consensus, and advocate for community-defined priorities.

The following section provides a clear framework for community engagement grounded in equity and accountability. It offers guiding principles, essential steps, and best practices designed to ensure that every stage of the engagement process is transparent and community driven.

## **A. Core Principles of Effective Engagement**

---

Before outlining specific steps, it's essential to understand the values that should guide all community engagement efforts. These principles are the foundation for equitable, trust-based relationships between project applicants and communities. Every aspect of community engagement should be measured against these values to ensure that the process is accessible, just, and responsive to community-defined priorities.

**Engagement should begin early**, ideally at the concept stage -- well before an application is submitted to the EFSB or municipalities. Early engagement allows communities to shape not only the benefits they receive, but also key aspects of the project itself such as site location, design, and mitigation measures.

**Inclusion is essential.** Engagement strategies should be designed to reach those who are often the least likely to be at the table but most likely to be impacted by the outcomes. CBPs should prioritize outreach to Burdened Areas, areas where low-income communities and communities of color, Tribal governments, communities with limited-English proficiency reside, as well as rural areas, and other communities who have historically been left out of decision-making processes.

**Transparency builds trust.** All project-related information shared with the community should be accurate, timely, and easy to understand, including translation into the relevant languages for a given area (adhering to the EFSB Language Access Plan or the municipality's local language access protocol). In addition, applicants should be forthcoming about uncertainties, limitations, and potential risks. Transparency also means making decision-making processes visible -- so community members know how their input will be used and who is accountable.

**Cultural relevance is critical** to meaningful participation. Engagement efforts should be adapted to the cultural and linguistic context of the community. This means creating spaces and processes that reflect and respect community norms, values, and realities -- such as providing interpretation and translation services and holding meetings in familiar and accessible locations. Consideration should also be given to the structural

barriers residents may face, including transportation, childcare, and inflexible work schedules. By addressing these challenges and communicating in ways that resonate with the community – free of industry jargon and aligned with preferred methods of information-sharing – project applicants can foster inclusive, equitable participation that empowers community voices.

**Engagement should be ongoing**, not a one-time event. Building authentic relationships requires regular, two-way communication throughout the lifecycle of the project - from pre-application, construction, through operations. Continuous engagement allows communities to monitor progress, raise concerns, and help adjust benefit delivery as needs evolve over time.

**Accountability should be embedded in the process.** Project applicants should document how community feedback shaped their decisions and show measurable progress toward the commitments made in the CBP or CBA. This includes regular reporting, third-party evaluations where appropriate, and opportunities for the community to raise concerns and seek redress when agreements are not fulfilled.

**Distributive justice supports equity.** Project applicants should consider distributive justice when designing and implementing CBPs or CBAs. Distributive justice is the fair allocation of benefits, resources and opportunities. For example, low-income communities should not be offered nor receive benefits significantly lower than those offered in wealthier communities. Municipalities that are not well resourced often lack political and economic power to negotiate and secure meaningful community benefits for their residents. Burdened Areas should not be treated less than communities with more economic and political power.

Together, these principles reflect a shift from transactional outreach to transformative engagement where communities are not just informed but consulted and empowered to co-lead the decisions that shape their environment and future.

## B. Step-by-Step Engagement Process

---

Building on the core principles, the following steps provide a practical roadmap for conducting meaningful engagement throughout project development. While every community and project is different, 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. The process should also reflect the project's scope and scale. These steps below are meant to complement the EFSB's and DOER's pre-filing engagement regulations.

1

### Step 1: Stakeholder Mapping and Community Identification

- Identify all impacted communities in the specific geographical area of the project, as defined in 980 CMR 15.02.
- Map Key Stakeholders such as, but not limited to:
  - Residents and neighborhood groups
  - Faith-based and cultural organizations
  - Local government agencies
  - Public health providers
  - Small business owners
  - Youth and elder advocacy groups
  - Environmental Justice organizations
  - Environmental organizations
  - Labor unions and workforce development agencies (or by proxy local labor councils and building trade councils)
  - Federally-recognized, state-acknowledged or state-recognized Tribes with a presence in Massachusetts, or other Tribal and Indigenous organizations
- Stakeholder mapping should prioritize Key Stakeholders, unless additional parties are invited or endorsed by the local community.

2

### Step 2: Develop a Community Engagement Plan

- Each CBP should include a Community Engagement Plan, which should detail:
  - Goals of engagement
  - Outreach strategies
  - Timeline and milestones
  - Language access and accessibility accommodations
  - Mechanisms for collecting and incorporating input and feedback
  - Resources allocated for community participation (e.g., stipends, transportation, childcare, etc.)

3

### **Step 3: Conduct Pre-Filing Community Outreach**

- Host public meetings in accessible, community-centered locations.
- Schedule meetings at various times of day and days of the week to accommodate various Key Stakeholders.
- Provide interpretation and translation services.
- Share preliminary project information, including potential impacts and benefit concepts.
- Invite feedback and record community concerns and ideas.
- Offer multiple channels for engagement. For example:
  - In-person meetings
  - Online webinars
  - Surveys (digital and paper)
  - Door-to-door canvassing
  - Multimedia communication, including local and multilingual newspapers
  - Pop-ups at local events or community spaces
- Work with local leaders, faith communities, and grassroots organizations to increase participation and build trust.
- Build capacity by partnering with local organizations to offer training, technical assistance, or education about the siting process and energy development.

4

### **Step 4: Document and Respond to Input**

- Track and publish community input, identifying recurring themes, concerns, and recommendations.
- Demonstrate how feedback informed:
  - Site selection, if applicable
  - Project design and mitigation measures
  - Community benefit commitments
- Summarize in a Community Engagement Summary section of the CBP.

5

### **Step 5: Co-Create Benefit Commitments**

- In partnership with the community, define benefit priorities (which may include but are not limited to local training and hiring, environmental and public health protections, and infrastructure investments).
- If requested, establish a Community Advisory Committee (“CAC”) composed of diverse local residents and organizations to guide and oversee benefit development and implementation.

6

### **Step 6: Maintain Engagement Through Project Lifecycle**

- Facilitate regular check-ins with the community at major project milestones (e.g., permitting, construction, operation).
- Maintain two-way communication through:
  - Project websites with multilingual updates

- Hotlines or text alerts
- Quarterly public meetings
- Community liaisons or ombudspeople
- If established, a CAC should meet quarterly to assess progress on CBP implementation.

## 7

### Step 7: Report and Reflect

- Publicly report on:
  - Engagement activities conducted
  - Key themes raised by the community
  - How feedback influenced decisions
  - Lessons learned and changes made
- This information should be shared with the community through multilingual and accessible formats (e.g., flyers, community radio, social media, videos).

This engagement framework ensures that CBPs are grounded in equity, accountability, and community leadership, fulfilling both the letter and spirit of EJ principles (meaningful engagement and equitable distribution) in the energy transition.

## IV. Turning Commitments into Action

Once community benefit priorities have been identified through engagement, the next critical step is transforming those ideas into concrete, actionable commitments. Too often, vague promises or loosely defined goals lead to confusion, mistrust, and limited impact. This section outlines how to design commitments that are specific, measurable, and accountable - ensuring that plans move beyond good intentions to meaningful, trackable results.

### Well-structured commitments should:

- Clearly describe each proposed benefit, including what is being delivered and who it is intended to serve.
- Include **SMARTIE** milestones for each commitment to ensure that goals are:
  - **Specific:** Goals should be clearly defined, leaving no room for ambiguity.
  - **Measurable:** Goals should have quantifiable criteria or benchmarks to track progress and determine success.
  - **Achievable:** Goals should be realistic and attainable.
  - **Relevant:** Goals should align with the community's priorities and contribute to a larger purpose.
  - **Time-Bound:** Goals should have a clear deadline or timeframe to create a sense of urgency and accountability.
  - **Inclusive:** Goals should be designed to ensure meaningful and accessible participation.

- **Equitable:** Goals should advance the equitable distribution of environmental and economic benefits and mitigate disproportionate burdens.
- Identify responsible parties for implementation.
- Outline the funding sources and budget for each benefit, providing transparency into how resources are allocated and sustained.
- Provide a clear timeline for delivery, aligned with project phases (i.e., pre-construction, construction, operations).

## A. Accountability Through Structure

---

Each benefit should be paired with:

- **Progress indicators:** Metrics to show whether implementation is on track (i.e., number of residents hired, dollars invested in infrastructure).
- **Monitoring mechanisms:** Identify who will track and evaluate progress, how often, and how results will be shared with the public.
- **Community oversight:** Roles for community members, community organizations or advisory bodies in reviewing progress and raising concerns.
- **Contingency planning:** Steps that will be taken if a milestone is missed or outcomes fall short.

## B. Ensuring Flexibility While Maintaining Integrity

---

While plans should be specific, they should allow room for adaptation. Community needs may evolve, and certain aspects of the project may shift. CBPs should include provisions for revisiting and refining benefit commitments through continued dialogue with the community.

At its core, this stage of the process is about making clear, achievable commitments that communities can count on. By grounding commitments in community-defined priorities, backing them with resources, and tying them to trackable milestones, project applicants can deliver outcomes that reflect shared responsibility and mutual benefit.

## V. Structuring a Community Benefit Plan

Once community priorities have been identified and clear commitments have been established, project applicants should organize this information into a CBP. The following is a template with core components that every plan should include, along with guidance on how to approach each section. OEJE recommends that a draft CBP be a required component of a project's application to a municipality and EFSB.

## **A. OEJE's Recommended Components of the CBP**

---

### **1. Executive Summary**

- a. A concise overview of the project, the engagement process, key benefit outcomes, and intended outcomes.
- b. A highlight of the most significant benefits and burdens resulting from the project.
- c. A summary of how benefits respond to burdens and align with community priorities. In addition, noting here that benefits from a CBP should not be in lieu of mitigation, rather be in addition to mitigation under the cumulative impact analysis.

### **2. Identified Community Priorities**

- a. A summary of the needs, concerns, and priorities expressed by community members and Key Stakeholders.
- b. Organize priorities into themes (e.g., health, workforce, infrastructure) to show how input translated into action.

### **3. Benefit Commitments**

- a. The core of the CBP: a clear, organized list of commitments
- b. Each commitment should include:
  - i. A description of the benefit
  - ii. Target population or geographic area
  - iii. Implementation timeline
  - iv. Funding allocation or resource commitment
  - v. Delivery partners (if applicable)
  - vi. SMARTIE milestones and performance indicators
- c. Group commitments by category (e.g., EJ, Infrastructure, Economic Development, etc.) for clarity.

### **4. Monitoring and Accountability Framework**

- a. Describe how progress will be tracked, reported, and evaluated over time.
- b. Include:
  - i. Monitoring schedule and responsible parties
  - ii. Public reporting mechanisms (e.g., dashboards, newsletters, community meetings)
  - iii. Role of any advisory bodies or third-party reviewers
  - iv. Process for community members to submit concerns or complaints
  - v. Contingency or corrective action plans for missed milestones or commitments

### **5. Sustainability and Long-Term Impact**

- a. Describe how benefits will be sustained through life of the facility (construction, operation, and decommissioning).
- b. If applicable, include plans for trust funds, long-term partnerships, endowments, or recurring investments.

### **6. Appendices (optional)**

- a. Supporting documents such as letters of support, community engagement materials, survey results, need-based analysis for facility or energy infrastructure, maps and designs of project, or partnership agreements should be included.

## B. Tone and Accessibility

CBPs should be written in plain, accessible language that community members can easily understand. Avoid industry jargon. Technical terms should be clearly defined, and translated versions should be provided for communities with limited English proficiency. Visuals, such as charts, maps, and timelines, can help clarify complex information and make the plan more engaging.

## VI. Examples of Meaningful Commitments

CBPs and CBAs are not a “one size fits all” solution. Every community is unique with its own set of priorities and challenges. Community benefits should be proportional, tangible, and locally meaningful while also operationally feasible for the developer. As such, developing an effective CBP requires meaningful engagement between the developer and the community to ensure the issues most important to Key Stakeholders are being addressed.

*There’s no one-size-fits-all solution. Community Benefit Plans should reflect each community’s unique priorities, challenges, and goals.*

Benefits will naturally vary depending on the scale of the project. Large clean energy infrastructure projects typically have greater resources and broader impacts, enabling more extensive community investments. Smaller projects can provide equally meaningful benefits on a more targeted scale. CBPs and CBAs should be designed to the scale and impact the project.

The following examples reflect common priorities such as environmental justice and equity, economic and workforce development, infrastructure and community support, and environmental and public health protection. These examples are illustrative, not prescriptive. Not all may be appropriate in a given context. This list should not be treated as a set of requirements. Moreover, these examples are not mutually exclusive – benefits typically associated with smaller projects may also be appropriate for larger facilities. Benefits should be tailored to the community’s priorities, needs, and circumstances.

Priority Area	Large Clean Energy Infrastructure Facility	Small Clean Energy Infrastructure Facility
<b>Environmental Justice &amp; Equity</b>	<ul style="list-style-type: none"> <li>Establish a CAC with decision-making power and compensation for members</li> </ul>	<ul style="list-style-type: none"> <li>Create a local liaison role to keep communication open during construction and operation</li> </ul>

Priority Area	Large Clean Energy Infrastructure Facility	Small Clean Energy Infrastructure Facility
	<ul style="list-style-type: none"> <li>• Fund a multi-year community engagement program with translation and interpretation services</li> <li>• Commit to avoid siting on or near culturally significant lands and co-develop mitigation plans with Tribal governments</li> <li>• Land stewardship agreements with Tribal governments or local community land trusts, especially if cultural or historical lands are involved</li> <li>• Fund or retrofit a public building (i.e. library, community center) with solar and battery backup</li> </ul>	<ul style="list-style-type: none"> <li>• Create expanded recreational opportunities</li> <li>• Apply community solar bill credits to electric utility customer accounts or otherwise lower energy costs in the host municipality</li> </ul>
<b>Economic Development &amp; Workforce</b>	<ul style="list-style-type: none"> <li>• Guarantee local hiring goals (e.g. 30-50% of construction jobs from within X miles)</li> <li>• Support pathways to registered apprenticeship and fund pre-apprenticeship programs</li> <li>• Prioritize minority-owned, women-owned, and local small businesses in procurement</li> <li>• Commit to Labor Peace Agreements for Operations</li> <li>• Commit to Project Labor Agreements for Operations</li> </ul>	<ul style="list-style-type: none"> <li>• Hire local contractors for construction and maintenance</li> <li>• Prioritize the utilization of contractors that pay prevailing wages and utilize registered apprenticeship programs</li> <li>• Offer paid internships or training slots for local youth interested in renewable energy</li> <li>• Provide small business redevelopment grants linked to project operation</li> </ul>
<b>Infrastructure and Community Support</b>	<ul style="list-style-type: none"> <li>• Co-invest in road, sidewalk, or port upgrades needed for project logistics that also benefit the community</li> </ul>	<ul style="list-style-type: none"> <li>• Improve local road access and safety measures near the facility</li> <li>• Add dark skies compliant lighting or street beautification with native</li> </ul>

Priority Area	Large Clean Energy Infrastructure Facility	Small Clean Energy Infrastructure Facility
	<ul style="list-style-type: none"> <li>• Improve stormwater and drainage systems in project-impacted neighborhoods</li> <li>• Expand broadband or communications infrastructure in rural areas along transmission corridors</li> </ul>	<ul style="list-style-type: none"> <li>• plant species along project access routes</li> <li>• Provide Wi-Fi hotspots or small-scale broadband support</li> <li>• Incorporate public electric vehicle charging stations, powered by the facility, offered free or at reduced rates for local residents</li> </ul>
<b>Environmental &amp; Public Health Protection</b>	<ul style="list-style-type: none"> <li>• Fund air and water quality monitoring networks and make data public in real time</li> <li>• Implement comprehensive habitat restoration or conservation offsets for disturbed land</li> <li>• Offer residential energy efficiency upgrades or solar rooftop grants to reduce household energy burden</li> <li>• Partner with Indigenous knowledge holders to guide stewardship practices, especially for habitat restoration, and water protection</li> </ul>	<ul style="list-style-type: none"> <li>• Provide noise-reducing design features for facilities near homes</li> <li>• Plant tree buffers to reduce dust, heat, and visual impacts</li> <li>• Support community garden or green space projects for local food and shade</li> <li>• Improve local habitat</li> <li>• Improve outdoor air quality by displacing emitting source</li> </ul>

## VII. Oversight and Accountability

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, project applicants should commit to regular, transparent reporting and open communication with the community. OEJE can work in partnership with the DPU’s Division of Public Participation to support proponents and Key Stakeholder in the development and discussion of CBPs or CBAs as requested. For assistance, please contact OEJE at [EJ.inquiries@mass.gov](mailto:EJ.inquiries@mass.gov).

*Monitoring and transparency are key. Project applicants must report regularly and engage openly with the communities they serve.*

Applicants 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.
- A post-construction review or report to assess whether the commitments are being delivered as agreed to and capture any lessons learned
- Public-facing progress reports published at least quarterly and made available in the languages spoken within the municipality or municipalities and accessible formats.
- Opportunities for the community to review progress either through advisory committees, community listening sessions, or other forums; and/or
- Approaches for transitioning community stewardship across generations, ensuring that local leadership isn't dependent on a few individuals. This might involve youth mentorship, compensated advisory roles, or rotating governance structures.

Applicants are strongly encouraged to enter into CBAs with municipalities, community representatives, and/or coalitions of community members that reflect the interests and needs of Key Stakeholders. CBAs provide a clear framework for accountability, clarifying roles, responsibilities, and expectations. They should also include remedies for non-performance, such as escrow releases, financial penalties or other consequences, to ensure the commitments are delivered and maintained as needed.

## **VIII. Long-Term Sustainability**

While many community benefits are delivered during the early phases of project development, the most meaningful outcomes are those that endure throughout the life of the facility. Sustainability, in this context, means ensuring that benefits remain responsive, resilient, and effective.

Applicants should design their CBPs and CBAs with adaptability in mind, recognizing that continued engagement is critical to keeping benefits aligned with community priorities and expectations.

To support long-term success, CBPs and CBAs should:

- Include built-in review points to ensure benefits remain relevant.
- Identify any recurring investments or ongoing commitments.
- Ensure there are mechanisms for the community to propose adjustments or raise concerns as the project evolves and advances.

While formal trust funds or long-term endowments are not required, applicants are encouraged to explore creative approaches to sustaining benefits, such as partnerships with local institutions, reinvestment strategies, or revolving grant programs.

Sustainability is not about maintaining a static list of benefits but rather about building flexible, durable relationships that can support shared progress over time.

## IX. Building Trust, Delivering Impact

The clean energy transition presents a historic opportunity—not just to build a modern and reliable grid, but to build a more just, inclusive, and resilient future. CBPs and CBAs can play a critical role in this process, helping to ensure that the benefits of the transition are more widely shared. When effectively designed and implemented, CBPs and CBAs can move beyond compliance and compensation to become vehicles for investment, collaboration, and community power.

*Community Benefit Plans and Agreements are tools for transformation—when grounded in equity, trust, and respect for community voices, they can deliver lasting change.*

Realizing that potential requires more than checking boxes. It takes deep listening, long-term relationships and trust building, and a genuine commitment to equity. It means recognizing the knowledge and leadership that already exists in communities and co-creating solutions that reflect shared values and visions.

These standards and guidelines offer a framework to help project applicants meet those goals with clarity, consistency, and accountability, but the responsibility to make these plans meaningful lies with every actor in this process. OEJE urges applicants to approach this work with humility, transparency, and a willingness to learn.

By centering communities, following through on promises, and planning for long-term success, project applicants can be true partners and help ensure that energy development not only powers homes, but uplifts neighborhoods, creates opportunity, and supports a healthier, more equitable world.

## X. Case Studies & Additional Resources<sup>1</sup>

- **[Community Benefits Resource Inventory](#)**: The Clean Air Task Force has compiled a comprehensive table of resources on community benefits. This collection includes reports, webpages, white papers, and guides that share lessons learned, shortcomings, and best practices for developing CBPs and CBAs.
- **[Step-By-Step Guide to Creating a Community Benefit Plan](#)**: The Emerald Cities Collaborative People’s Justice40+ Community Benefit Playbook offers low income, rural, Black, Indigenous, and People of Color (“BIPOC”), frontline and

---

<sup>1</sup> OEJE is providing these additional resources for informational purposes and does not necessarily endorse the statements within.

fenceline communities, and community-based organizations that serve these communities, guidance for developing CBPs.

- **[Expert Insights on Best Practices for Community Benefits Agreements](#)**: The Sabin Center for Climate Change Law's report outlines 35 recommendations for developers and host communities when negotiating and drafting CBAs. These recommendations come from interviews with attorneys and other experts who have collectively negotiated dozens of CBAs for climate infrastructure and other types of projects.
- **[US Clean Energy Projects Need Public Buy-in. Community Benefits Agreements Can Help](#)**: This article published by the World Resources Institute explains how CBAs and other types of project agreements can be designed to respond to each community's unique needs.
- **[State Legislative Requirements for Community Benefits Agreements in Renewable Energy Projects](#)**: The Initiative for Energy Justice published research to provide people with practical tools and knowledge with lessons learned from diverse community benefit approaches to inform more just and responsive energy policies.