

Creating a Community and Stakeholder Engagement Plan

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Introduction

The Community and Stakeholder Engagement Plan (Engagement Plan) shall set forth the applicant’s plans and actions to engage with community-based organizations representing local residents and businesses, labor unions and worker organizations, local government, communities with environmental justice concerns, disadvantaged communities, and Tribes/Alaska Native Corporations. Communities, meaning both local communities—towns, cities or counties in geographically proximal areas to a project—and broader groups of interest, will need to be identified and scoped as part of the Engagement Plan. In some cases, there will be multiple communities to engage with — e.g., a project may be developed by a community, like a community-organized co-op or a local municipality. Still, this project would need to identify and engage with relevant other communities.

Engagement Plans can include the following:

- Descriptions of how stakeholders will be identified.
- Methods of engaging stakeholders.
- Mechanisms for continued and ongoing engagement.
- Plans for community access to data on project impacts.
- Plans for negotiating Community Benefits Agreements.
- Strategies for incorporating feedback from stakeholders and communities to continually improve engagement.

Here, an engagement plan differs from a plan for an event (though the plan will likely reference holding events). It also differs from a communications plan, as traditionally understood as a developer simply reaching out and providing information. **Community and stakeholder engagement is about relationship building.** One way to think about the plan is as a plan for creating and maintaining a relationship.

This might sound fuzzy, but real-world shovels in the ground (or not) can hinge on how this is approached. Moreover, the success of these relationship-building efforts bear not just on the relationship between a particular project and its host community; they impact the future deployment of carbon management technologies domestically and globally. Public engagement can make a difference: NETL’s [Best Practices: Public Outreach and Education for Geologic Storage Projects](#) offers some case studies of how public engagement helped align carbon management projects with community priorities.

What is expected in an Engagement Development Proposal?

Important: *This question only applies to projects which do not require a full Engagement Plan at the time of application. If your Funding Opportunity Announcement (FOA) Area of Interest (AOI) requests an Engagement Plan at application, skip to the next page and look at “Process for Creating an Engagement Plan.” If your FOA AOI asks for an Engagement Plan Development Proposal, read this information first.*

Some projects are not expected to have an Engagement Plan at the time of application. Instead, applicants should scope what resources they will need to develop their plan. Generally, these scoping documents will be much shorter than the Engagement Plan, around 3-4 pages, and should include the following elements.

1. A description of prior engagement efforts by the project team (in other words, the first element of the Engagement Plan).
2. A description of the research that will need to be done to develop a detailed plan, including scoping data sources for incorporation into Engagement Plan (existing data sources as well as datasets that need to be developed)
3. A timeline for developing the Engagement Plan
4. A description of personnel working on the Engagement Plan, including training or qualifications that may need to be acquired
5. An estimate of financial resources required for developing the Engagement Plan.
6. A brief discussion of resources, references, or community partners that will be useful in developing the Engagement Plan

One should read the complete guidance documentation for the Engagement Plan to best gauge the resources required for creating and implementing it later on.

Process for creating an Engagement Plan

Creating a an Engagement Plan involves six basic steps:

1. **Perform a social characterization analysis.**
2. **Identify stakeholders.**
3. **Discuss goals** for community and stakeholder engagement.
4. **Choose methods** of stakeholder engagement suited for those goals and **prepare a timeline** for implementing the methods that track your projects or research activities.
5. **Specify roles** for who will be responsible for conducting engagement activities and continuing relationship-building.
6. **Identify feedback strategies** that will let you know if your engagements are successful in the eyes of your organization as well as the community members and stakeholders with whom you are working with.

In what follows, we will offer suggestions and resources for how to do each of these steps.

Deliverables for the Engagement Plan

Some of these steps map directly onto the requested content of the Engagement Plan, as presented with your application (or that will be developed if creating an Engagement Plan Development Proposal).

There are eight required elements. You may include other elements as desired and references supporting your work.

The content of the Engagement Plan is summarized in the table below. The rest of this document offers further detail and advice on each of these elements. We also recommend making a slide deck, factsheet, or another communication tool you can use to communicate your Engagement Plan and get feedback on it internally and externally, which can be added as an appendix.

Element	Description	Suggested length
1. Background	Description of prior engagement efforts by the project team.	Half a page - 1 page
2. Social Characterization Summary	A brief writeup of outputs from conducting a social characterization assessment.	Half a page - 1 page
3. Initial Stakeholder Analysis Summary	Brief writeup of outputs from doing a stakeholder analysis that describes how stakeholders were identified and who they are.	Half a page
4. Engagement Methods and Timeline	This is the core of the Engagement Plan. It includes: (a) a description of specific methods that will be used to engage communities, stakeholders, and Tribal nations and organizations, (b) an explanation of how these methods are matched to engagement goals, and (c) a timeline that matches the methods to specific project phases. It should also include at least one SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) milestone.	2-5 pages
5. Two-way Engagement Statement	A statement that discusses specific elements of two-way engagement, including how engagement activities can shape the project and how feedback from the community will be addressed. See page 12 for specifics.	2-3 pages
6. Project Agreements Statement	A brief statement describing any plans to negotiate a Community Benefits Agreement, Good Neighbor Agreement, or similar agreement. See page 14.	1 page
7. Engagement Evaluation Strategy	Description of how feedback on community and stakeholder perceptions of the engagement process will be elicited and addressed.	Half a page - 1 page
8. Resource Summary	Summary of project resources dedicated to implementing the plan, including staff, facilities, capabilities, and budget.	Half a page - 1 page

Background

The background section describes prior efforts by members of this project team to engage communities and stakeholders relevant to this proposed project. It could include some of the following:

- Which individuals, organizations, and communities have been engaged? What is its history of engagement, if any, with other organizations and groups? Were these local, state, or national groups? On what scales has engagement happened? What methods have been used in engagement?
- What's been the timeline of this engagement?
- Would these engagements be characterized as one-way (e.g., communication of materials or information) or two-way (listening to ideas, creating a dialogue)?
- What are some key lessons learned that will shape your approach to engagement now?

If there has not been any engagement to date, this would be noted here with a brief explanation.

Output: A narrative description; recommended length from half a page to a page.

Social Characterization

Social characterization provides greater context for the project’s sociocultural, economic, and environmental implications. A social characterization analysis (SCA) attempts to map influential and conflicting interests and establish proactive engagement around major projects.

Doing a SCA sounds a lot like stakeholder analysis or stakeholder identification, which applicants may be more familiar with — and there are some natural overlaps. Think of SCA as a first step of “getting to know the area” before making a more structured stakeholder identification. Traditionally, stakeholder analysis can sometimes produce lists of top-of-mind stakeholders who applicants are already familiar with, but it can leave out traditionally excluded stakeholders. A SCA is a way to first look more at the history and context of the area, which will inform stakeholder analysis. (For more information, see WRI’s report [Guidelines for Community Engagement in CCS Projects](#) and [NETL’s Best Practices: Public Outreach and Education for Geologic Storage Projects](#), section 2.5.)

The SCA uses a variety of methods (e.g., desk research, stakeholder interviews, media analyses, and representative surveys) to provide social context for the project’s affected area. The SCA will also identify the influence of private interests (property owners, industry, etc.), history of trust/distrust between community, government, industry and other sectors, experience with disasters, how the area is planning for climate change, and strength of local media.

Applicants will need to map out (geographically and conceptually) their project-affected area(s). This could include, but is not limited to:

- The physical footprint of the facility;
- Additional land required for facility operation (including required buffers and energy sources);
- Necessary inputs for the project (e.g., water);
- Utilized infrastructure (e.g., transportation routes);
- Expected local and regional workforces and the areas they would be commuting from; and
- Range of air, noise, and light pollution.

Below is a non-exhaustive list of resources and activities to help applicants carry out an SCA. *Some of these will overlap with activities you may want to do for Justice40 Plans, and it is recommended to read this concurrently with the Justice40 Plan Guidance.*

- Use the [EPA’s EJScreen](#) and DOE’s [Energy Justice Dashboard](#) to identify disadvantaged communities in your project’s affected area.
- Use to U.S. census data to examine the demographic and socioeconomic characteristics of the affected area (e.g., race and ethnicity composition, median income, poverty rate, educational attainment, unemployment rate, employment by industry, etc.).
- Conduct a literature review of similar projects, outcomes, challenges, and opportunities using academic, grey, and popular sources.
- Review local and regional media outlets (newspapers, radio, television, etc.), municipal and county archives (websites, meeting notes, etc.), and industry and advocacy sources (websites, blogs, press releases, recorded presentations, etc.) for information related to energy, environmental, justice, and climate change topics (broadly defined).
- Conduct preliminary interviews with existing contacts and identified stakeholders to discuss the social aspects of the project landscape.
- Conduct public opinion surveys representative of the community as a whole and oversample historically underrepresented populations.
- Contact stakeholders of similarly situated projects to discuss their engagement strategies and challenges they faced in the planning process.

Output: You are asked to include a summary of the process and key takeaways; recommended length is half a page – 1 page plus tables, maps, etc.

Below is a non-exhaustive list of ways to present information that could also be included in this summary:

- Maps and other geospatial analyses showing the distribution of various social, economic, and environmental variables across space and time.
- Tables that illustrate the social characterization of the affected area, possibly comparing disadvantaged communities, industry, and decision-maker positions on various project-related issues.
- Conceptual map of the linkages between various stakeholder groups, highlighting points of agreement and contention.
- The timeline of key social, economic, and environmental developments that have impacted the affected area. This allows the applicant to speak to cumulative effects.

Stakeholder and Community Identification

Applicants are expected to cast a wide net in identifying stakeholders and communities for engagement efforts. Clear stakeholders and communities include industry and technical experts, federal, tribal, state, and local decision-making bodies, and representatives of local communities, including disadvantaged and tribal communities. Stakeholders and communities should represent various sectors: government, industry, business, advocacy, disadvantaged communities, tribal communities, environmental non-governmental organizations, education, public health and safety, community planning, and concerned members of the public.

In addition, the identifying of key stakeholders and communities must take into account project inputs, outputs, and the stakeholders and communities directly and indirectly impacted by the project. By recognizing a broader geographical and conceptual project-affected area during the SCA, applicants can more readily identify all potential stakeholders. In addition, a more comprehensive social characterization analysis helps identify stakeholders and communities who are often overlooked or ignored because they are not included in traditional project supply chains or decision-making processes. Not only will the SCA lead to more inclusive engagement, it will also allow applicants to consider the various levels of influence and power that stakeholders and communities wield and the historical context of major development transactions and decision-making processes.

Below is a non-exhaustive list of ways to identify potential stakeholders and communities (in addition to the initial stakeholder identification that occurred during the SCA):

- Undertake a spatial overlay analysis that overlays the project-affected area with geospatial datasets representing various indicators and communities. For example, this could include overlaying the project-affected area with the DOE's Disadvantaged Communities dataset, EPA's Brownfield Properties dataset, and BIA's Indian Lands dataset. This can be done in conjunction with the Justice40 Plan.
- Identify fenceline communities (those communities adjacent to industrial sites) using spatial overlay analysis. Once identified, applicants can engage directly with members of that community or can search for organizations that represent various interests of that community. This can be done in conjunction with the Justice40 Plan.
- Map, both geographically and conceptually project inputs (like water). Then identify the people and communities that rely on those inputs.
- Use county assessor records to identify some of the area's largest property owners.
- Use state and local government websites to identify offices and officials in the affected area (e.g., municipal planning and development representatives, county public health workers, etc.).
- Use city and county meeting minutes to identify organizations that routinely attend meetings and discuss related issues.
- Make Website and media outlet searches for individuals and groups that work in or around the affected area or work on the topic of interest (broadly defined).

How do we “include traditionally excluded stakeholders and communities”?

The first step, done through social characterization and stakeholder identification, is to gather information on which stakeholders are traditionally excluded and why. This may include reaching out to people one-on-one to learn about barriers to involvement. Some of these barriers may be logistical (meetings held in places without public transport or at inconvenient times, no access to information about meetings, with the information provided only in English). How to address these barriers should be relatively straightforward (select different locations, provide childcare at meetings, offer information and facilitation in multiple languages). However, other disincentives to engage might come in terms of the content and structure of previous meetings, the power dynamics, and so on. These challenges may require further discussions with traditionally excluded stakeholders to identify and address.

Do we need a stakeholder analysis matrix?

This is not required. However, the applicant can also take steps to categorize stakeholders if desired. For example, stakeholders can be grouped into sectoral and geographic buckets, or the stakeholders can be placed in a sectoral and geographic matrix (or other matrices of the applicant's choosing). Applicants can use power versus interest grids to map out the characteristics of stakeholders. In addition, applicants can create stakeholder influence diagrams that map out the relationships between stakeholders.

Output: Brief description of how stakeholder analysis was done and description of stakeholders (can be a list or table).

Engagement Methods and Timeline

Applicants should develop an engagement project schedule that includes when and how they will engage stakeholders, communities, and Tribal nations, as well as the objectives for the engagement. This should include a description of specific methods that will be used to engage stakeholders and communities, as well as informal engagement and formal consultation with Tribal nations. The applicant should match methods to both the **project phase** and **goals**. For example, goals may include: learning about community concerns and understanding community interests, seeking input, addressing input and concerns, and providing information, depending on the project's stage.

Applicants should describe how these methods will be extended to include traditionally excluded stakeholders. Applicants should also describe how they will ensure that demands for engagement will not unduly burden shareholders and communities. Part of this involves simply talking to people about how they would like to be engaged (mediums, locations, timing, etc.) to design less burdensome engagement. This is a resource that discusses participant fatigue in community-based research, with applicable lessons for engagement more broadly: [Unit 5: How to Limit Research Fatigue - Energy Communities | Montana State University](#)

Setting engagement goals

Internal goals for stakeholder and community engagement are important, as well as discussing what goals stakeholders and communities have for the engagement process.

Key background questions for an engagement goals discussion are:

- **What parts of this project (location, technical characteristics, implementation, etc.) can be changed according to community input?**
- **Where are the opportunities for community input to shape what happens in the project?**

Goals will vary based on technological readiness but might include:

- Seeking input on alternative project characteristics.
- Listening to concerns, including comments regarding cumulative impact and siting, in order to do research / provide information on them and collaborate on how to address those concerns.
- Learn what communities identify as the potential social and environmental impacts of the technology if/when it scales
- Discussing how communities want to access or participate in creating data about the project and its impacts
- Understanding what communities identify as potential benefits and determine strategies to achieve those benefits, including through Community Benefit Agreements or other agreement structures (see also page 13)

While community and stakeholder engagement may be a way to mitigate financing, construction, or reputational risks, if the community is not the project developer, these are probably not the goals the community has. And while project developers often desire the complete social acceptance of a project, this is rarely the best goal for stakeholder and community engagement for many reasons. First, there is not usually one entity that can grant acceptance; some communities within a geographic area might support it, while others do not. Second, social acceptance is not something that is achieved and then fixed; rather, it can fluctuate and even be lost. That said, project developers should seek and obtain acceptance for the project from a majority of stakeholders engaged as a measure of effective community and stakeholder engagement.

An Engagement Plan may want to specify a time for internal discussion of goals (including who needs to participate from the organization in these discussions), as well as external discussion of goals with the identified stakeholders and communities. The latter can be done as “pre-engagement” conversations or folded into the agendas of initial engagement activities.

Choosing methods of engagement and building a timeline

At this point, you should have an analysis of stakeholders and communities that considers historical context and power issues, traditionally excluded stakeholders and communities, and other problems or concerns within the community that might intersect with the project. This analysis, along with your planned project schedule, will enable you to build an engagement timeline that matches particular methods to (1) project phases (understanding the potential for these to change, including based on engagement activities) and (2) engagement goals.

Establishing a match between the project phase and engagement method is important for budgeting time and funds and ensuring engagement covers the full project life cycle (pre-project, during project, and post-project periods). Building relationships with stakeholders and communities takes time and transparency. Thus, an Engagement Plan must make time for relationship building, incorporating or responding to community input, and sharing the results of engagement with the community.

Different methods of engagement correspond to different project goals. Each method will require additional investments of time and funding. Applicants should identify when engagement is expected to occur in the project timeline and what type of engagement is planned. For example, applicants might focus on community outreach, education, and information gathering in the pre-project phase. The method of engagement could involve information sharing on a project website or social media account or participation by the project team at community events (e.g., setting up a booth at a community health fair or farmer's market).

As the project develops and stakeholder identification matures, the applicant can carry out more targeted engagement activities like focus groups with specific sectors or participatory mapping exercises with disadvantaged communities. As engagement activities become more involved, applicants must have a plan to receive, analyze, and incorporate or respond to stakeholder input.

It is increasingly the standard to offer a mix of virtual and in-person engagements; bear in mind that each may be more or less accessible to different groups. Some methods of engagement can be adapted from WRI's Guidelines for Community Engagement in Carbon Dioxide Capture, Transport, and Storage Projects, including:

Public hearings: Formal public hearings are often required by regulation. They can involve logging questions from public members or a designated time allotment for people to comment.

Town hall meetings: More of an open forum than a formal public hearing; they can be convened by the developer, government, or regulator.

Open house: Often includes information or education about a project; may be done before town hall meetings and public hearings.

Informal, targeted chats: These involve short presentations to targeted audiences (e.g., local businesses, environmental NGOs, etc.), followed by open discussion.

Focus groups: A way to learn more initial reactions and ideas from a select group. On the one hand, these can be very valuable in the early stages when developing more concrete engagement plans; on the other hand, if only selected people are invited (which may be inevitable because of the small size), they can be viewed as exclusionary.

One-on-one meetings: These can be valuable for developing relationships, but the best practice is to conduct them transparently because perceptions of a developer secretly meeting with people can undermine trust.

Mediated discussions: These involve third-party facilitation, usually by someone trained in dialogue.

Virtual workshops: These can combine aspects of the above formats (open houses, informal chats, town hall meetings).

Further Advice on Methods and Execution:

- Don't have a formal meeting (e.g., as required by the National Environmental Policy Act) as the first engagement. Establish a different sort of engagement earlier in the process.
- Use a combination of methods, but do so with complete transparency (e.g., one-on-one meetings without disclosure or equal chances to participate in such a method can be perceived as going behind the backs of some groups).
- When you receive questions, have a person whose job it is to follow up with those questions if they cannot be answered on the spot.
- Consider involving third parties who can weigh in on the robustness and validity of the information you provide during engagements.

Establishing roles and responsibilities

Defining roles in your Engagement Plan will be highly specific to your organization and project timeline. You will want designated personnel to serve as representative(s) to liaise with the community; you may also want to hire an outside person to conduct relationship-building. Things to consider when defining roles include: preserving institutional knowledge (i.e., it is hard to maintain a relationship if the person responsible keeps changing), training, and interpersonal skills. If contracting with external parties for stakeholder engagement support, consider the different strengths of different types of stakeholders.

Make sure to list any planned partnerships with community organizations, institutions, nonprofits, and local businesses, including a description of what the partnerships entail.

Crafting SMART milestones

The plan should nominally include at least one Specific, Measurable, Achievable, Relevant, and Time-bound (SMART) milestone per year.

In project management within DOE, SMART milestones have historically been related to technical achievements. But more generally, the formula has been adapted to various goals within management studies.

Some tips for SMART milestones:

- For “specific,” make your goals narrow and concrete—this will enable the measurability of the goal.
- For “measurable,” identify what data or evidence you can use to assess whether you are progressing towards or achieving your goal.
- For “achievable,” knowing your benchmarks and where other companies or organizations are at can help you calibrate what is achievable. This should also take into account the time and resources you have available to implement this goal.
- For “relevance,” consider the goals you have identified for engagement.
- For “time-bound,” consider setting interim milestones on the way to a larger goal.

An example of a series of SMART milestones that could be a part of an Engagement Plan are:

- By month three of the project, host a listening session, invite at least four community-based organizations concerned with environmental justice, and host a second listening session if less than five of these organizations do not participate.
- By month five of the project, publish a presentation and written fact sheet in at least two languages that address questions heard in the above-mentioned listening session.
- By month seven of the project, present these materials at least twice (at least one in-person and one virtual) and receive feedback using transcribed and digitally posted comments to record feedback. The total audience of these presentations should be at least fifty people not affiliated with the project and should reflect at least five different community-based organizations.

- By month nine of the project, receive written and oral comments from the community on how the project could change to respond to community concerns that surfaced in the listening sessions and host an internal meeting to evaluate the engagement findings.

Include your SMART milestone(s) in this section of your Engagement Plan.

Outputs: Method and timeline of engagement can be illustrated in various ways, including engagement Gant charts, tables, or more descriptive matrices. For example, for each project stage, applicants could convey information in a table modeled on the following:

Stage of project	Community / Stakeholder	Objective of engagement	Method	Communication about event	Attendance targeted	Materials required	Follow-up strategies

However, there is no required or preferred template; choose a style of presenting the plan that fits your project.

Two-way Engagement Statement

This is a written discussion of how the engagement process can shape project outcomes. Previous engagement and research, including a request for information (RFI), have shown that environmental justice groups and community-based organizations have monitoring and consent-based siting as priorities and that two-way engagement and opportunities to influence the project are strongly desired.

The two-way engagement statement should include a discussion of the four points below.

- a. **A description of how the project incorporates principles for an effective consent-based project siting process and the extent to which the host community or communities have already given consent for the siting of a carbon management project.** The principles appear in a table below.
- b. **List the points in the project where engagement can impact project decisions or project characteristics.** Are stage-gate milestones incorporated into the Statement of Project Objectives (SOPO) that influence project direction based on community engagement results?
- c. **Is there a pathway for the project to propose multiple sites or consider changing the target site based on project learnings from implementing the J40 Plan or societal considerations?** If so, please describe.
- d. **A discussion of community participation and access to monitoring.** What plans exist to support platforms allowing community members to access or share data on project impacts, e.g., plans for participatory and third-party monitoring, including monitoring post-closure if relevant? What plans are there to add technical or monitoring capabilities that the community requests to increase community benefits or reduce the risk of impacts? [**Note:** This information should be consistent with what is contained in the Justice40 Implementation Plan.] This discussion could include things like:
 - What sort of equipment and resources are required for monitoring
 - Prospective organizations with which to partner
 - Platforms on which data can be accessed and analyzed
 - Process for collaborating on monitoring scope and activities
 - And more

Output: A written discussion with subheaders for each of the four points, with a recommended length of 2-3 pages.

What is consent-based siting?

An Engagement Plan should describe how the project incorporates principles of consent-based siting. This does not mean that it is expected that there will be a unitary actor that gives “consent” to everything about the project. Instead, it means there are examples of things the project can do to incorporate these principles to help foster community acceptance and support.

There are multiple reasons for aligning with these principles, including research, experience, and RFIs where communities say they want more say in project decisions, including siting. Right now, over 100 local jurisdictions in nearly every state of the country have passed ordinances restricting the deployment of renewable energy, according to [research by the law school at Columbia University](#). This illustrates the risks to the energy transition if communities feel that new infrastructure is being imposed upon them without actual benefits. Using the principles of consent-based siting makes it more likely that there will be social support for new projects. Some of this will be covered in the Justice40 Plan. The items particularly relevant to the Engagement Plan include numbers six through 12 below.

DOE Principles for an Effective Consent-Based Project Siting Process

1. **Prioritization of Safety** – The highest priority will be to site, design, construct, and operate the proposed facilities in a safe and secure manner that is protective of human health and the environment.
2. **Environmental Responsibility** – The siting process will support the development, construction, and operation of facilities that successfully transport and store CO₂ and use best practices with respect to rigorous planning, implementation, and monitoring.
3. **Regulatory Requirements** – The siting process will support the development of facilities that meet or exceed applicable regulatory requirements. Regulatory requirements will be applied rigorously and transparently.
4. **Trust Relationship with Indian Tribes** – The siting process will respect tribal sovereignty and self-determination, lands, assets, resources, treaty and other federally recognized and reserved rights. The process will take into account siting impacts on sacred tribal lands and other areas and resources of religious or cultural significance.
5. **Environmental Justice** – The process will pursue fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income. The process will also embrace environmental justice principles and comply with federal requirements and guidance on these issues.
6. **Informed Participation** – Consent is not meaningful unless it is informed. This means that the implementing organization will share information and provide financial and technical resources to communities as needed to enable effective participation and provide for informed decision-making.
7. **Equal Treatment and Full Consideration of Impacts** – The siting process will be conducted in a manner that is considerate of parties who are or may reasonably be affected, identifies and shares information about potential impacts, and makes explicit the role of fairness and equity considerations in its decision-making.
8. **Community Well-being** – Communities will want to weigh the potential opportunities and risks of hosting a facility, including the social, economic, environmental, and cultural both positive and negative effects it may have on the community. To ensure that the siting process is fair and durable, consideration of all these impacts and benefits will be integral to the siting process.
9. **Voluntariness/Right to Withdraw** – Participation in the consent-based siting process will be voluntary. Further, a community that volunteers to be considered for hosting a pipeline or storage facility reserves the option to reconsider and withdraw itself from further participation up to the point that a binding agreement has been signed. Provisions specifying when and on what grounds agreements could be terminated or amended beyond that point could be negotiated as part of the agreement.
10. **Transparency** – The siting process will be open to input throughout and transparent with respect to how decisions are made. Every effort will be made to share information with all participants and explain how this information and input is being considered.
11. **Stepwise and Collaborative Decision-Making that is Objective and Science-Based** – The process will be implemented in discrete, transparent, and easily observed and evaluated steps in consultation with the public, interested stakeholders, and affected parties. Decisions will be based on sound science and siting considerations and regulatory requirements will be applied rigorously and transparently. The siting process will recognize the value of supporting robust participation, encouraging multiple applications, and keeping options open, especially in the early phases of the siting process.
12. **A flexible and adaptive process** - Experience in the United States and elsewhere suggests that siting processes, especially for complex and controversial facilities, are inherently unique. That means the steps taken may not occur exactly in the sequence described by Doe or elsewhere and may need to be modified—in duration or scope—based on the particular needs of potentially interested communities and on the nature of the facility itself.

Project Agreements Statement

This brief statement describes any plans to negotiate a Community Benefits Agreement, Good Neighbor Agreement, or similar agreement. Such agreements facilitate community input and social buy-in, identify how concerns will be mitigated, and specify the distribution of community benefits, including access to jobs and business opportunities for local residents, thus reducing or eliminating project risks.

If there are opportunities for co-ownership or a community stake in the project, this should be discussed.

What are Community Benefit Agreements / Project Agreements?

A Community Benefit Agreement (CBA) is a contract between a developer and a representative coalition of community organizations. The coalition provides conditional support for a project so long as the developer ensures certain project conditions are met and certain economic or social project benefits flow to the community. CBAs have a two-decade history in urban planning. They can be found in a variety of projects (e.g., stadiums, new developments), as well as in extractive and energy projects, from offshore wind to solar. Things that have been included in CBAs are funding for new infrastructure, emergency services and equipment, broadband to local schools, new housing, cultural and entertainment facilities and programs, and more. Regarding renewable energy, some areas, like New York State, offer discounts to ratepayers.

While CBAs are legally enforceable contracts, other types of agreements are not. In our FOAs, it is requested that project-specific agreements between developers and community organizations should include provisions on how a project will help the community, such as by paying wages and benefits at or above the prevailing rate when not already required, committing to recruit and hire local workers, especially from underserved communities, including workers from low-income neighborhoods, and sending job opportunity notices to and recruiting from local residents and organizations.

Often, CBAs might arise from grassroots community organizing. However, project developers can also begin to explore the possibility through engagement, and they should think early about what might be possible.

CBAs are not without controversy, as they can be done poorly and end up failing to serve the community as intended. One major pitfall is when the community group negotiating the CBA does not actually represent the community. Another pitfall is that if a developer has too strong a hand, there can be optics – or reality – of “buying off” the community. However, when negotiated and executed well, CBAs can be a tool to deliver tangible benefits — which will be necessary to build the community and public support required for carbon management to scale.

Further resources on CBAs:

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

Output: A written statement, recommended length of 1 page.

Engagement Evaluation Strategy

The evaluation strategy should include plans for activities to evaluate the success of stakeholder engagement, including assessing community and stakeholder perceptions of the progress.

Incorporating feedback on each event and throughout the engagement process is vital in improving the plan over time. NETL's *Best Practices: Public Outreach and Engagement for Geologic Storage Projects*, section 2.10, has some suggestions about program assessment.

Ways of collecting insight include:

- Post-event questionnaires and surveys, though these may have a low response rate.
- Targeted one-on-one follow-ups – it is important to include both stakeholders who seemed very engaged and stakeholders who seemed less engaged.
- Feedback from an advisory board of stakeholders.

Questions for these feedback sessions could include:

- Do stakeholders feel their views are being heard and incorporated?
- Do the engagement mechanisms work for all parties?
- Would particular logistical matters (related to technology, event planning, venue and access, timing) make engagement smoother and more accessible?
- Are there stakeholders missing from the engagements?

Make sure to develop a system for tracking feedback so that changes can be detected over time.

IMPORTANT: There are times when some of these activities might not be appropriate. Understanding that systematic ways of collecting data from people also have ethical dimensions is essential. For example, people may be concerned about how their data is used or shared. There is also the dimension of participant fatigue (i.e., we do not want to increase the engagement burden on community members to satisfy reporting requirements we have generated). At the same time, failing to evaluate or check in about how the engagement process is going could mean missed opportunities for improving it. We recommend carefully selecting evaluation methods and getting input from an advisory council about the best mechanisms for a “do no harm” approach. It is also critical to be clear about how the feedback/data from any structured approach will be shared, whether it’s anonymized, etc., so participants can decide whether they want to provide this feedback. Anytime you gather something that could be interpreted as data from someone – even if you don’t think of it as data or research – it is better to be familiar with and follow the principles of informed consent. More on the treatment of human subjects in research can be read here: <https://science.osti.gov/ber/human-subjects/Education-and-Resources/Informed-Consent> and here: <https://www.hhs.gov/ohrp/regulations-and-policy/belmont-report/index.html>.

Output: Written discussion of mechanisms for eliciting, addressing, and tracking feedback; recommended length half a page to a page.

Resource Summary

This is a summary of project resources dedicated to implementing the plan. The project should include information about staff (number, time on project, and experience), facilities, capabilities, and budget (both federal and cost share) that will support implementing the plan.

Output: This can be presented in any format, as long as it includes the required items.

Further questions

We already have a strategy for stakeholder engagement; how does it need to be modified for this FOA?

If the pre-existing strategy includes the specifics mentioned above, it may not need to be modified. In this instance, it would be helpful to include a short reflection on how the engagement process is going and any lessons learned.

We have a Communications Plan; does that fit here?

Both legacy and social media play a role in engagement, especially in spreading the word about engagement events and creating an inviting space. Resources should be allocated in the Engagement Plan for this. However, an engagement plan is not a communications plan, despite the functional overlap. If you have a communications team, they would naturally be involved in outreach about events.

How do we know if our Community and Stakeholder Engagement plan is well developed?

An inadequate plan will have vaguely defined aims or reiterate the existing landscape and social characterization without fully specifying strategies for implementing the plan.

A good plan will define the scope, schedule, personnel and budget to enact the plan, and mention key community partners.

A good plan will also be two-way, meaning that project developers respond to community concerns and make decisions based on them.

What are some resources for Tribal engagement?

Increasing Tribal engagement is an administration priority, as described in the White House “Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships”:

American Indian and Alaska Native Tribal Nations are sovereign governments recognized under the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions. It is a priority of my Administration to make respect for Tribal sovereignty and self-governance, commitment to fulfilling Federal trust and treaty responsibilities to Tribal Nations, and regular, meaningful, and robust consultation with Tribal Nations cornerstones of Federal Indian policy. The United States has made solemn promises to Tribal Nations for more than two centuries. Honoring those commitments is particularly vital now, as our Nation faces crises related to health, the economy, racial justice, and climate change — all of which disproportionately harm Native Americans. History demonstrates that we best serve Native American people when Tribal governments are empowered to lead their communities and when Federal officials speak with and listen to Tribal leaders in formulating Federal policy that affects Tribal Nations.

As sovereign nations, tribal communities do not operate like other stakeholders. They have a distinct legal, administrative, and cultural status that requires proactive and well-planned outreach and engagement (NOAA Toolkit, USDA Roadmap). As applicants seek to engage with tribal communities, clearly communicating their motivations and engagement plan is key to building meaningful relationships (see reference “Relationships First and Always” below). These relationships are necessary for fully capturing the benefits, risks, and impacts involved with the full project.

As tribal communities are not a monolith, there is not a one-size-fits-all approach to engagement. It is the responsibility of applicants to identify tribal communities in their area and perform significant background research on the community before initiating engagement. Listed below are a number of resources that can assist applicants in different aspects of engaging with tribal communities:

- <https://www.doi.gov/oepec/resources/environmental-justice/resources> The first go-to resource; offers many resources from federal agencies.
- <https://www.epa.gov/environmentaljustice/environmental-justice-tribes-and-indigenous-peoples> EPA page on environmental justice for Tribes and Indigenous peoples.
- [Relationships First and Always: A Guide to Collaborations with Indigenous Communities | Indigenous Governance Database \(arizona.edu\)](#) Oriented towards scientific researchers; offers guidelines for relationship-building.
- <https://www.climatealliance.org/info/meaningful-engagement> Oriented towards climate practitioners and researchers; offers consideration on data sovereignty and traditional ecological knowledge, but also many background resources.
- <https://www.fs.fed.us/research/docs/tribal-engagement/consultation/roadmap.pdf>. Tribal Engagement Roadmap, Forest Service Research and Development, USDA.
- <https://marineprotectedareas.noaa.gov/toolkit/tribal-indigenous-communities.html>.

Further resources

[*Guidelines for Community Engagement in Carbon Dioxide Capture, Transport, and Storage Projects*](#)

[*Best Practices: Public Outreach and Engagement for Geologic Storage Projects*](#)

[CCUS Guidance from the White House CEQ](#)

[Stuck on coal and persuasion? A critical review of carbon capture and storage communication](#)

[The role of social factors in shaping public perceptions of CCS: Results of multi-state focus group interviews in the US](#)

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