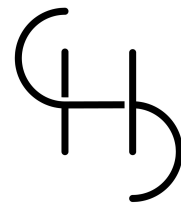


Building a Stakeholder/Community Engagement Program

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Current Climate

Environmental Justice (EJ)

- ▶ EJ initiatives are “in motion” across the country
- ▶ It provides community stakeholders a “voice,” a channel, and analytical data that can (and is) impacting facility owners & operators
- ▶ Facilities should recognize the need for:
 - ◆ Increased understanding of surrounding community
 - ▶ Demographics, neighboring sources, local impacts, data and tools
 - ◆ Increased community engagement can be required
- ▶ EJ is impacting:
 - ◆ Legislation, rules, policies
 - ◆ Permitting (construction & operation/renewals)
 - ▶ Admin reqmts, approval timing, additional analyses, more stringent requirements
 - ◆ Compliance, enforcement
 - ▶ Monitoring, inspections

How is EJ influencing permitting & compliance?

▶ EJ risk, exposure assessment

- ◆ Screening, advocacy assessment, risk benchmarking

▶ High-profile projects &/or aggressive EJ jurisdictions

- ◆ Deliberate, disciplined “contested case” approach
 - ▶ Community indicators analysis
 - ▶ Permitting, regulatory & compliance applicability
 - ▶ Impact assessment
 - Additional internal analyses (criteria, toxics, health risk reviews)
 - Modeling
 - Monitoring
 - ▶ Emissions & controls consideration
 - ▶ Options / alternatives consideration
 - ▶ Community engagement

How is EJ impacting Agency Professionals & Elected Officials?

- ▶ **Legislation, Rule Development, & Policies**
- ▶ **Agency Procedures**
 - ◆ Tools & methodologies for identifying EJ communities
 - ◆ Public participation, community engagement
 - ◆ Impact assessment
 - ◆ Monitoring
 - ◆ Inspections & enforcement
- ▶ **Litigation**
 - ◆ **Title VI Civil Rights Act complaints, petitions, lawsuits**
- **Funding & Direction of Resources**



How is EJ impacting Public Participation?

- ▶ Publicly available Resources, Tools, Insight
- ▶ Voice / Seat at the Table
- ▶ Funding
- ▶ Avenue for Litigation
- ▶ EJ Education

Arizona Updates

- ▶ New Offices and increased staffing at ADEQ
- ▶ ADEQ's focus on proactive community engagement
 - ◆ Community meetings outside of a formal public comment period/process
 - ◆ Voluntary Monitoring using portable monitors
 - ◆ Extension of public comment period upon request from stakeholders beyond the 30 days
 - ◆ Addressing pollutants outside of regulated air pollutants/regulated authority
- ▶ EJ Analysis - part of air permitting
- ▶ Interactive Maps - <https://azdeq.gov/emaps>

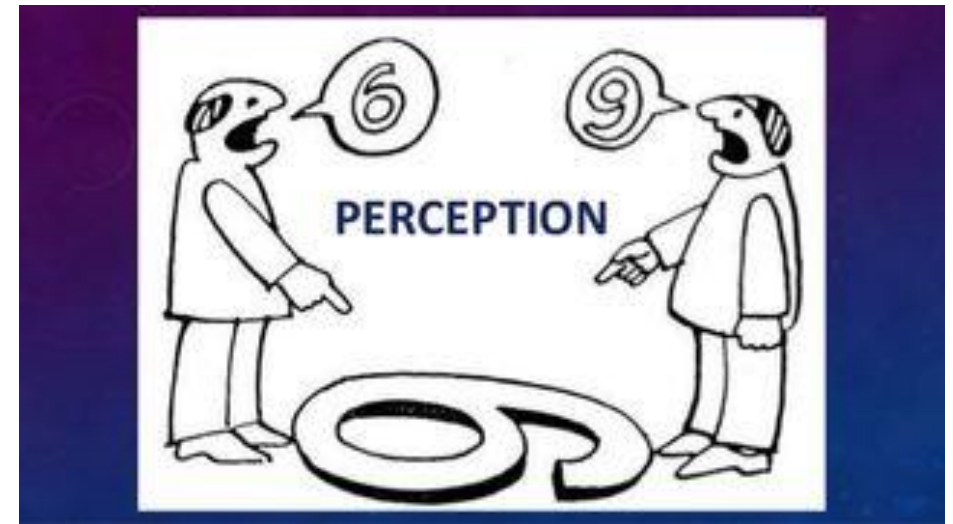


How can you prepare?



Perception vs Reality

- ▶ Reality is the state of things that actually exist – perception is an interpretation of experience.



Identify Potential Drivers for Public Engagement





Compile all publicly available compliance information

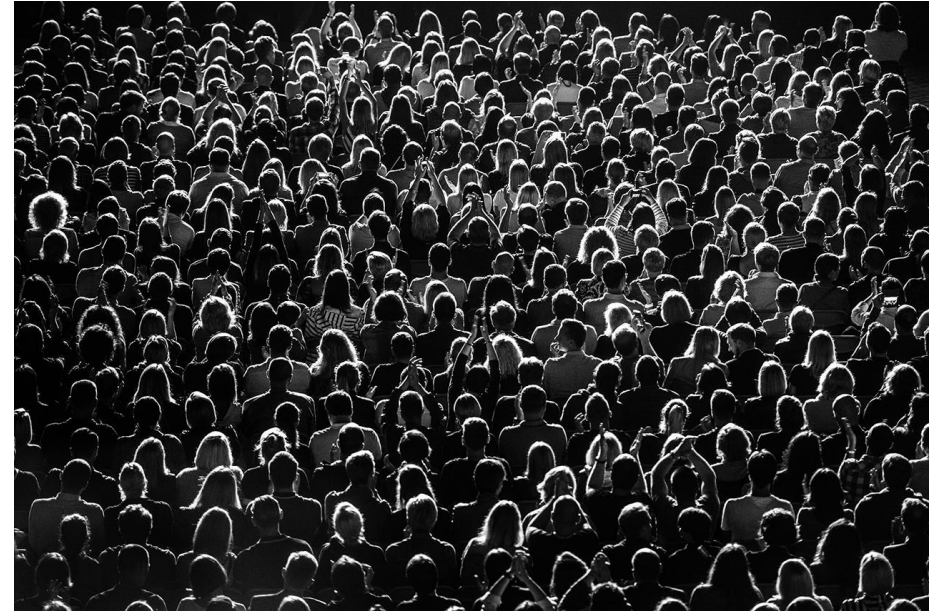
- ▶ Facility Information (emissions/permits, process safety, traffic volume)
- ▶ Online and readily available compliance history, inspection reports, inspector notes, inspection findings, fines, etc?
- ▶ Online access to permits and applications?
- ▶ Availability of annual emission inventories, discharge monitoring reports, etc?

Characterization of Other Factors

- ▶ Surrounding Community Features & Vulnerabilities
- ▶ Topography, Meteorology
- ▶ Neighboring Industrial and Commercial Sources
 - Think about cumulative impacts
 - ◆ Neighboring sources; air, water, waste, traffic, noise...
 - ◆ How does this relate to your operations / projects?
- ▶ State / Local EJ Initiatives
- ▶ Federal EJ Implications
- ▶ Local Political Landscape
- ▶ Industry Sector Considerations

Interested Parties Analysis

- ▶ **Identify your stakeholders**
 - Minimize uncertainties and business risks
 - Stakeholder mapping and identification
 - Social and traditional media monitoring
 - Observe and listen!
- ▶ **Identification of Applicable Agencies**
 - Federal
 - Regional
 - State
 - Local
- ▶ **Gather related information**
 - Contact information
 - Group's focus, priorities, cause
 - Settlements, cases, press



Example Stakeholders

- Elected officials
- Business and trade organizations
- First responders
- Rural cooperatives
- Minority business associations
- Homeowners, tenants, and neighborhood watch groups
- Labor organizations
- Civic associations
- Universities, colleges, vocational and other local schools
- Community and social service organizations
- Individuals and groups that have commented on local permitting actions
- Environmental and EJ organizations
- Federal NGOs
- Legal aid providers
- Civil rights organizations
- Libraries
- Senior citizens groups
- Public health agencies and clinics
- Religious organizations
- Other places where people gather in the community

Effective Communication Strategy



Effective Communication: Why It Matters

Benefits of Good Communication:

- Enhanced Trust
- Operate business without distractions
- Reputation management by demonstrating who you are
- Focus on the achievement of desired outcomes

Risks of Poor Communication

- Short-term headaches, potentially damaging ability to operate business
- Long-term reputational damage that could affect future opportunities
- Resource and employee drain

The Two Pillars Of Communications:

Crisis vs. Proactive

No communication is not a communication strategy.

Proactive Communication

1. What is the relevant information?
2. What are the actual concerns?
3. How do we actually address those concerns- context matters
4. Who is your audience?
5. All internal communications could be become external- proceed with caution!

Developing Your Message

- What is your core message and goal(s)?
- Is your message clear and concise?
- Is your message timely?
- Is your message accessible?
Practice putting everything into the lens of “Would a 5th grader understand this?”

Rules of Communicating Effectively

- Develop 3 key points (no more, no less) & address every issue using **ONLY** your 3 key points
- Stick to the data and facts
- Emotions and triggers are unhelpful
- Listen: Heard, Seen, Valued, Rule
- Why “I don’t know but I’ll find out” is sometimes the best answer
- Provide a channel for feedback & be responsive

Media Inquires

- The media can be your friend – how are you using it?
- Incoming inquiries
 - When to respond
 - How to respond
 - The essentials: who/what/when/topics/format
- Making every media interaction productive
- Always proceed with caution

Social Media

- Provide positive messages
- Moderate comments
- Choose platform carefully
- Be aware of, but do not respond directly, to others social media
- If it doesn't provide value, question the use and act accordingly

Print

- Before you say yes...
 - Identify the reporter's goals – unsure? Ask!
 - Identify key messages, potential challenges & opportunities
- It's okay to get questions in writing & provide responses verbally or in writing
- Ask if the interview is being recorded – AZ law
- Give a time limit upfront – can always engage again
- Ask when the story will run and in what formats

Community Events & Meetings

Before the event/meeting:

- Identify key messages
- Understand the format, etiquette and any time constraints
- Practice

During the event/meeting:

- Read the room
- Don't debate
- Maintain control and composure
- Know your exit strategy

How to have Meaningful Engagement with Communities

- ▶ Public notice (newspaper, other media, physical postings, social media)
- ▶ Permitting/construction/operation online dashboard that tracks activities
- ▶ Ongoing/consistent open houses on project activities (live and recorded)
- ▶ Collaboration with community groups/religious institutions
- ▶ One-on-one meetings with key stakeholders (leaders)
- ▶ Listening sessions, public meetings at times & locations convenient for EJ communities
- ▶ Social media and YouTube videos
- ▶ Local media outlets (radio/television/newspapers)
- ▶ Outreach at bus depots, supermarkets, laundry mats
- ▶ Door-to-door canvassing
- ▶ In-person “office hours” as convenient for EJ communities (e.g., nights/weekends)
- ▶ Focus groups
- ▶ Community advisory panels (CAPs)
- ▶ Virtual engagement
- ▶ Hiring environmental justice engagement and outreach coordinators

*Council on Environmental Quality's (CEQ) Environmental Justice Guidance Under the National Environmental Policy Act (CEQ, 1997) and Promising Practices recommend using **adaptive approaches to overcome linguistic, institutional, cultural, economic, historical, or other potential barriers to effective participation***

Document Engagement with Communities

- ▶ Document interactions
- ▶ Utilize technology (e.g. GIS database management systems and interactive web-based tools) to manage & document interactions
 - For example - Provide an online tool with specific parameters such as tracking date, time which can be used to compare with your operational data
- ▶ Helps address future complaints

Meaningful engagement builds trusting relationships and facilitates understanding community priorities

Trainings

- ▶ Provide instructional training on facility operations and information on environmental compliance internally
 - Consider posting information online
 - Share materials at community meetings
- ▶ Develop internal training on how to communicate with external parties for your employees
- ▶ Develop materials to improve communications & interactions with your community, regulators, elected officials, management, and shareholders





What Trinity Can Offer?

- ▶ Perform preliminary and comprehensive **Risk Assessment** enabling:
 - ◆ Identification of risk/exposure
 - ◆ ID applicable:
 - Agencies & jurisdictional EJ policies
 - Local activists, EJ-interested parties
 - ◆ Outreach to EJ communities to be more effective and focused
- ▶ **Risk Mitigation** support
 - ◆ Clean up assumptions, reports
 - ◆ Perform refined impact assessments
 - ◆ Change the narrative
- ▶ Community Engagement Plan
- ▶ Management, Environmental, and Public Relations Training
- ▶ Comparison with Peers and Industry Benchmarking
 - ◆ ECHO database risk comparison / risk profiles



Case Studies

- ▶ There is an odor emanating from a waste treatment facility. Despite multiple attempts to remediate the issue, the neighbors are still complaining and asking for city intervention on the smell.
- ▶ A company wants to come in and build a manufacturing facility, but there are concerns their operation may not comply with air quality standards or will cause the area to go into nonattainment.
- ▶ A local operation dealing with waste materials has been producing a significant amount of dust and the community is concerned about the affects this dust may have on their health.
- ▶ Within a municipality, water customers have received important information regarding the city's drinking water in the mail informing them that the water has exceeded the limit on certain organic materials. How would you rollout a description of what happened and assure residents that their safety is still being met?



Contact Us



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Questions?

