

Summary of Community Benefits Agreement

Part 2 working session

October 23, 2024, at John Marshall High School, Rochester

This document includes a summary of the feedback heard from attendees at the Cumulative Impacts working session on October 23, 2024, and does not constitute decision/s by MPCA for the final Cumulative Impacts rule.

Participation

On October 23, 2024, the Minnesota Pollution Control Agency (MPCA) hosted a working session for the Cumulative Impacts Rulemaking at John Marshall High School in Rochester, MN. Approximately 20 people attended this event and shared their feedback and ideas with MPCA staff. Participants represented communities in Rochester, industry, and community and environmental advocacy groups.

After the working session, the MPCA also received 6 comments on Community Benefit Agreements (CBAs) through the Smart Comment webpage between October 24 and November 20, 2024.

Many of the participants were not aware of the Cumulative Impacts Rulemaking effort prior to this working session so some of the small group discussion time was used to provide background information. Similar to the first CBA working session, held on August 14, 2024, participants voiced the importance of utilizing different mediums and organizations to disseminate information, and having open meetings, transparency and accountability.

Community's role

Overall, participants expressed the importance of transparency by both the agency and industry when it comes to impacts by facilities. Many of the suggestions for engaging community mirrored what participants voiced at the first CBA working session.

Representing community

In general, participants were not opposed to the idea of a neighborhood advisory council (NAC), like that found in the City of Detroit's community benefits ordinance. They expressed concerns about who would serve on a NAC and the amount of time needed to create one. In general, participants in this working session had concerns about local government staff/administration serving on and/or picking representatives for an advisory group but were supportive of ward representatives, youth and impacted residents. They suggested that neighborhood associations could select members but cautioned that they may not be representative of an entire community.

There were mixed opinions about using existing community groups; some participants felt this would expedite the process while others felt these groups do not necessarily represent the full community. When asked if a group like a NAC or a public comment period was preferred for providing input on a CBA, participants wanted both because they felt it would provide the most opportunities for input.

Industry representatives suggested that current local processes and approvals be utilized for community representation in the CBA process, as well as a public comment period, in line with the current process for air permits.

Engagement

Participants suggested engaging/disseminating information through:

- **Open meetings** – to increase transparency.
- **Neighborhood leaders and associations/organizations/clubs** – to reach community members.
- **Post signage in public buildings, places of worship, newspaper and on social media** – to have a wide reach.
- **Announce meetings well in advance** – to allow people to plan to attend.
- **Door knocking and mailers** – to reach a broad audience.
- **Table at community events** – to allow for information exchange in a less formal setting.

Significant community participation

Participants explained what significant community participation looked like to them.

- Having elected officials serve on a group like the NAC since they will be held accountable to serve their people.
- Having opportunities for the public to comment – CBAs should be brought up and talked about at school board, county board, and city council meetings to cover all bases.

Benefit categories and prioritization

Overall, participants supported the benefit categories and prioritization. Participants provided examples of benefits that they would suggest for a CBA and discussed what categories they would fit into. Similar to the first CBA working session, participants expressed the importance of tangible benefit/s over monetary compensation to community fund/s or community members.

Industry representatives submitted comments outlining concerns about the feasibility and reasonableness of benefit categories that go beyond the direct impacts of the permitted facility developing the CBA.

Categories

Participants suggested the following benefits:

Benefit	Category 1	Category 2	Category 3	Category 4	Category 5
Facility tour or virtual tour for community			X		
Provide easily accessible information on facility emissions			X		
Remediate past impacts of closed facilities			X	X	X
Noise mitigation			X	X	
Public health service			X	X	
Community revitalization			X	X	
Emission reductions	X	X			
Create green space			X	X	X
Install heating and cooling centers				X	
Beneficial land use	X				

Categories:

1. Measures to avoid facility contributions to stressors.
2. Onsite measures to minimize facility contributions to stressors.
3. Offsite measures to reduce stressors to which the facility will contribute.
4. Offsite measures to reduce stressors to which the facility will not contribute.
5. Offsite measures to provide a net environment benefit.

Prioritization

Participants voiced what benefit types were most important to them and how the categories should be prioritized to promote the benefits most important to community.

- Prioritization should focus first on mitigation of direct impacts, followed by indirect impacts, and then on a net environmental input.

Outreach and public meeting requirements

Participants expressed the importance of utilizing multiple avenues for disseminating information and collecting community input.

Public meeting notices

In addition to the requirements listed in the handout, participants requested other information to be included.

- **Who and why is the community affected** – may encourage participation if community members know ahead of a meeting if they are affected and how.
- **Maps** – showing impacted area and factors (i.e., wind).
- **Emphasize need for community input** – community members may be more willing to participate if they know they have a voice.
- **Share through neighborhood associations, social media, local government and newsletters** – to increase outreach.

Public meetings

Participants defined what robust community engagement looked like to them.

- Certain number of participants, one example: 20+ people.
- Information sharing between local government and nonprofits.
- Captive and engaged audience, including local leaders, from nonprofits and other groups.

Participants expressed the importance of using different methods for public meetings and documentation.

- **In person (locally) and virtual** – having different options for attendance is important.
- **Meeting notes, minutes, transcripts, and video** – provide accountability.
- **Presence of MPCA** – should be required at all meetings between permit holder and community.
- **Accessibility** – ensure language is clear, specific, and have a contact for questions.

Public meeting comments

Participants said information should be collected and shared through various options.

- **Email** – using concise and plain language.
- **Electronic** – allow people to provide video comments.