

Audubon Washington (Csenka Favorini-Csorba)

Audubon Washington is supportive of the Clean Energy Siting Council's efforts to provide developers with clear guidance on equitable engagement practices, and to provide information to Tribes and communities that can support their engagement in clean energy siting processes. Audubon recognizes that early and meaningful engagement with Tribes and communities can lead to better outcomes for all parties, as well as for the land and ecosystem that a project may be sited within. This draft toolkit provides a strong roadmap for developers to follow, and Audubon appreciates the Council's work on it.

If there was an area for improvement in the draft toolkit, it could better acknowledge the relevant expertise and experience that Tribes and some community members may have in identifying and stewarding local wildlife, habitats, and natural resources that could be impacted by project sitings. While environmental considerations and protection are handled through other formal processes, it is a missed opportunity not to acknowledge in this document that communities' interests in clean energy siting may go beyond any direct socioeconomic impacts to incorporate interest and expertise in protecting their local environment. Developers should seek Tribal and community input on environmental considerations as much as they should community benefit agreements or other socioeconomic considerations.

Language suggestions are included in the attachment.

Thank you for the opportunity to comment.

Audubon Washington suggested language for Clean Energy Siting Council draft EJ Toolkit

On pg. 29 under “Building Block #1: Learn about the host communities in and around the area being considered for development,” there is an opportunity to include mention of environmental conditions. See below:

“Before engaging any potentially impacted community, developers should learn about the current and historic socioeconomic and ~~geographic~~ environmental conditions of the communities in and around the area being considered for development. A baseline understanding of these conditions and which elements of the surrounding ecosystems communities value and are invested in protecting will help developers form an initial understanding of how a clean energy project may be perceived by or affect a community, which in turn will indicate the types of community leaders to engage who can further that understanding. Positive engagement can create effective solutions by drawing on local knowledge from a diverse group to create solutions that are effective, relevant, and practical. Further, developers should take the time to research and understand the local economy and job sectors, including potential local unions. Developers should also take the time to research and understand the natural resources, wildlife, recreation opportunities, and conservation areas that may be important to local communities.”

On page 30, the following additions may also be valuable:

“Research prior infrastructure and industrial development processes that occurred in the community to better understand the community’s relationship with development and developers. For these past projects, attempt to identify and assess who benefitted, who was negatively impacted, and how, as well as how the projects may have impacted key environmental conditions important to the community.”

Finally, on page 59, under “Building Block #3: Connecting with local organizations for resources,” consider adding “local wildlife and conservation groups” to the list of groups for potential outreach.

Thank you for the opportunity to comment.