



State of Oregon Department of Environmental Quality

Plan to Develop a Cleaner Air Oregon Community Engagement Protocol

Contact: Joe Westersund
700 NE Multnomah St, Suite 600
Portland, OR 97232-4100

DEQ and OHA proposed detailed and prescriptive Cleaner Air Oregon community engagement requirements in the 2017 draft regulations. Sources would have been required to develop a community engagement plan and hold public meetings. However, SB 1541 mandated that DEQ hold all CAO community meetings. As a result, DEQ has removed detailed requirements for community engagement from the draft rules and replaced them with shorter rules that outline how DEQ will conduct basic levels of community engagement.

By early 2019, DEQ expects to hire a Cleaner Air Oregon Community Engagement Coordinator who will work with OHA experts to develop a Community Engagement Protocol that can be flexible and responsive to the needs of local communities for information and involvement in the risk assessment and permitting processes. These agencies will draw from community engagement best practices to develop the Protocol and seek public and stakeholder input on its development. Compared to having a prescriptive process in the regulations, this approach will allow for greater detail and flexibility to tailor the community engagement process to the needs of individual communities.

Scope

The anticipated scope of the Community Engagement Protocol is a non-regulatory document for public involvement in communities potentially impacted by emissions from sources above Cleaner Air Oregon risk action levels. In general, the protocol will guide the process of assessing communities that may be affected by industrial air toxics emissions, designing and implementing effective community engagement plans, and reporting out and evaluating the engagement results. Communities potentially impacted by sources regulated under Cleaner Air Oregon are very demographically, geographically and economically diverse, and the protocol is intended to result in the use of effective engagement practices designed to meet the specific needs of each community.

Enhanced community engagement work is occurring in the Cleaner Air Oregon program for several reasons. In the first version of the rules, DEQ proposed that sources implement public engagement; however in SB 1541, the legislature mandated that DEQ perform all Cleaner Air Oregon public engagement. To meet this requirement, the legislature provided funding for a DEQ Community Engagement Coordinator and OHA staff with public health education and engagement expertise. While all types of pollution can impact public health, air pollution has been determined to cause the most health risk, and is associated with health inequity. There is currently a high level of public demand for effective community engagement concerning toxic air pollutants.

Cleaner Air Oregon community engagement implemented by the DEQ coordinator and OHA positions is currently limited to work and activities conducted under the Cleaner Air Oregon program. DEQ recognizes the need for improved community engagement work in all DEQ programs that impact public health, and if further funded, could establish best practices in permitting programs beyond Cleaner Air Oregon

Development Process

When hired, the Community Engagement Coordinator will work with OHA experts, DEQ staff and affected stakeholders to prepare a plan for stakeholder engagement during development of the Community Engagement Protocol. Potential steps could include:

- Assembling a draft framework document summarizing steps and best practices;
- Gathering initial input from the Cleaner Air Oregon Rules Advisory Committee, and people who commented on community engagement issues in the draft CAO rules;
- Completing a draft Protocol and publishing it on DEQ's website;
- Sending a broad notice to interested persons statewide about an opportunity to comment;
- Taking comments for a set period of time;
- Scheduling meetings and discussion forums based on interest, communication needs and consideration of geographic representation, including review by the Environmental Justice Task Force; and
- Finalizing the Protocol taking into consideration all comments and stakeholder input.

Timing

If Cleaner Air Oregon regulations are adopted by the Environmental Quality Commission in November 2018, the demand for community engagement work is likely to follow soon after. DEQ anticipates that the new community engagement coordinator will begin developing the Community Engagement Protocol in early 2019. This process will take time and input from stakeholders. The agencies plan for a final Community Engagement Protocol that is ready for use by October 2019, concurrent with the expected timeline for the source call in process.

Example Table of Contents for a Community Engagement Protocol

Below is an initial draft of an example Table of Contents for a Community Engagement Protocol to provide an overview of topics for further consideration.

Table of Contents

FOREWORD

ABOUT CLEANER AIR OREGON

INTRODUCTION AND BACKGROUND

Goals, Objectives, and Principles of Community Engagement

Environmental Justice and Health Equity

SCOPE

When does CAO invite community participation

HOW TO USE THIS DOCUMENT TO BUILD AN ENGAGEMENT PLAN

Step 1: Assess level of community impact

Step 2 : Identify appropriate types of community engagement, draft objectives

Step 3: Select engagement methods

Public Notices

Web and Social Media

Door to Door

On site Activities

Public Availability/Meeting

Public Comment

Step 4: Develop community involvement plan and tools

Site History

Community Concerns

Timeline

Step 5: Implement Engagement Plan

Operational Details

Risk Communication

Conflict

Overcoming barriers to engagement

Step 6: Report-out and Evaluate the Plan

REFERENCES

APPENDICES & TOOLS

Definitions/Acronyms- Dictionary

CAO Engagement Timeline

CAO Infographic

CAO Factsheets

Public Meeting Materials