

CASCO BAY ESTUARY  
PARTNERSHIP  
EQUITY STRATEGY



June 1, 2023

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## Introduction/Context

The purpose of the equity strategy is to ensure that Casco Bay Estuary Partnership (CBEP), part of the U.S. EPA National Estuary Program, is reviewing potential projects that use Bipartisan Infrastructure Law (BIL) funds through the lens of equitable and fair access to the benefits from environmental programs for all communities. This equity strategy outlines how BIL funds will be used to sustain and increase investments in underserved and underrepresented (UU) communities (including tribes), and the benefits that flow to them. These strategies are intended to meet the goals of Executive Orders 14008 and 13985 – Justice40 and EPA’s Equity Action Plan respectively.

## Governance Overview

Casco Bay Estuary Partnership (CBEP) successfully acts as a facilitator of work on behalf of Casco Bay, Maine. CBEP leadership helps bring together resources from multiple sources to address priorities identified in the *Casco Bay Plan*. We work as a catalyst for creative solutions on behalf of the Bay. CBEP serves a key role in the region as an "honest broker" of information. We are widely recognized as a source of credible scientific and technical information about the Bay and issues related to the Bay.

Over the past five years, CBEP’s staff have taken on increasingly visible leadership roles in regional efforts on climate change, coastal resilience, ocean acidification, river continuity (fish passage restoration), tidal marsh restoration, and more. We are recognized as regional experts who combine broad perspective, technical expertise, and practical on-the-ground experience. CBEP staff shares expertise with our partners to provide technical assistance – often behind the scenes – in support of numerous environmental projects each year.

CBEP is currently hosted by the Catherine E. Cutler Institute (Cutler) of the University of Southern Maine (USM). All CBEP staff are formally employees of USM. The Cutler Institute has been a supportive and largely hands-off host for CBEP. Cutler is a wide-ranging academic research institute, with significant strengths in Children, Youth and Families; Disability and Aging; Population Health and Health Policy; Economics and Workforce Development; Justice Policy; and Environment and Social Resilience. This broad portfolio is possible because most Cutler programs, including CBEP, are granted significant autonomy. The University has shown no interest in shaping CBEP priorities.

Cutler and the University provide substantial administrative support for CBEP, especially through the Research Services Center, and University Procurement, Human Resources, and Research Compliance offices. CBEP staff participate in University governance, and CBEP must comply with University personnel, procurement, data security and other policies.

## CBEP’s governance structure consists of four interconnected entities

**The Partnership.** The Partnership consists of all individuals and organizations who contribute to our work on behalf of Casco Bay.

**Management Committee.** The Management Committee is the most important oversight body for the work of CBEP. Most formal decision-making authority rests with the Management Committee. Decisions are ordinarily made by consensus, although voting may be used if a decision becomes deadlocked. Members of the Management Committee represent individuals and organizations with a stake in the

work of the Partnership, including citizens, federal and state agencies, local government, and nonprofit organizations. Individuals are appointed to overlapping three-year terms and can be reappointed. While some members of the Partnership serve on the Management Committee, others (such as land trusts and lake associations, and most local governments) are not directly represented. CBEP's Operating Guidelines (we do not call them bylaws because we are not an independent corporation, but they serve the same purpose) identify a number of organizations that have historically been important to the work of the Partnership that should "ordinarily" be represented on the Management Committee. The Management Committee, which constitutes our "Management Conference" as required under Section 320 of the Clean Water Act, meets at least quarterly.

**Executive Committee.** The Executive Committee meets monthly with the CBEP Director to provide advice and direction. Members are selected by the Management Committee from among their ranks. The Executive Committee is empowered to act on behalf of the full Management Committee when issues need to be addressed in a timely manner.

**Staff.** The CBEP Core Staff consists of a Director, Program Manager, Habitat Program Manager, and Community Engagement Coordinator. This staff is supported by additional administrative support, seasonal interns, graduate interns, and fellows.

## Practices

The Management Committee is considered an advisory body to the University of Southern Maine. Accordingly, meetings do not operate under the full requirements of Maine's Open Meeting Law. As a matter of practice, however, meetings are open to the public and publicized via our website.

Annual workplans and budgets are developed by staff based principally on input from the Management Committee. Staff reaches out to other organizations for discussion of emerging project concepts. Draft workplans are revised in January and February based on review and comment by the Executive Committee. A draft is reviewed by the full Management Committee at our March meeting. Any suggested revisions are addressed, and a final version is developed by staff and approved by the Executive Committee before being submitted to EPA.

In recent years, CBEP has funded two grant programs, the Habitat Protection Fund and Community Engagement Grants. Three new grant programs are described in our five-year BIL spending plan, but have not yet been fully implemented. These include grant funds to support resilience project implementation, municipal planning assistance, and monitoring infrastructure. Requests for Proposals (RFP) for each program are released publicly, announced on our website and social media, and sent out to large lists of likely grantees. In each case, a Committee reviews any responses to the RFP, and recommends which proposals to fund, based on available resources. The committees include CBEP staff, at least one Management Committee member, and often other Partners with relevant expertise. Committee members must recuse themselves from any discussion of projects with which they or their organizations are associated.

CBEPa also hosts numerous long-term forums and ad hoc working groups. These are intended as structures for sharing information or evaluating regional priorities.

CBEP's management structure consists principally of the Management Committee and an Executive Committee. CBEP also relies on less formal meetings, working groups and committees to help guide the

organization. People participating in meetings and committees generally have a professional role in science or management of Casco Bay. Invitations are largely by word of mouth, through professional networks. Almost all CBEP meetings are held during regular work hours. These practices influence the people and voices that have a seat at the table shaping CBEP priorities.

CBEP has recently contracted with Integrative Inquiry, a Maine-based consulting firm, to assist with an internal diversity, equity, inclusion and justice (DEIJ) review of our policies and practices. Insight from that review will be shared with the Management Committee this fall, in advance of an in-depth review of CBEP governance.

## Integration of this Equity Strategy with other CBEP Planning Efforts

The Casco Bay Plan, a “Comprehensive Conservation and Management Plan” or “CCMP,” guides the work to maintain and improve the ecological integrity of Casco Bay. The Plan was first written in 1996, subsequent to the 1990 designation of Casco Bay as an estuary of national significance, and it was updated in 2006. Most recently, the Plan was revised in 2016. The 2016 Management Plan is organized under the following four interconnected goals:

- Goal 1: Protect, restore, and enhance key habitats that sustain ecological health
- Goal 2: Improve Casco Bay’s water quality by reducing nutrient pollution and its impacts, including coastal acidification
- Goal 3: Foster resilient communities and their connections to Casco Bay
- Goal 4: Mobilize collective knowledge and resources to support Casco Bay

We are currently updating our CCMP. While the titles of those four Goals are likely to change, the overall focus of each (on Habitat, Water Quality, Community and Collaboration, respectively) will remain unchanged. Diversity, equity, inclusion, and environmental justice themes and actions are being interwoven into the updated CCMP. We have already begun to incorporate related actions in EPA core funding and infrastructure workplans and the BIL five-year spending plan. In parallel with these planning efforts, we have been actively looking for opportunities to develop partnerships with communities we have not worked with previously to identify needs, find intersections with our programs, and support on-the-ground project implementation.

## CBEP’s DEIJ Commitment

In 2021, CBEP’s Board and staff engaged in a professionally facilitated four-part webinar and discussion series on Equity in Conservation. Board and staff attended DEIJ training sessions aimed at conservation professionals and engaged in deep conversation and learning. From that early work a DEIJ working group was launched that includes CBEP Management Committee members and staff. The DEIJ working group meets monthly.

The initial task of the working group was to develop a CBEP Diversity, Equity, Inclusion and Environmental Justice Statement. The following statement, adopted by the CBEP Management Committee on September 14, 2022, reflects our current thinking and approach. It may be adapted and revised in the future as our learning and programming evolves.

*Clean water, clean air, and access to natural spaces are necessities for human health and well-being. Historic and ongoing water pollution, habitat degradation, and climate change disproportionately affect people of color and other marginalized groups. Casco Bay Estuary Partnership (CBEP) recognizes and acknowledges that those systemic inequities have an*

*enduring negative economic and social impact on communities of color and other marginalized groups, including but not limited to the Wabanaki peoples of Maine, low-income communities, people with disabilities and the LGBTQIA+ community within and outside the Casco Bay watershed.*

*As an organization CBEP will strive to inform, empower, and connect individuals, partners, and communities to conserve and protect the ecological integrity of the Casco Bay watershed while also addressing the environmental justice needs of people of color and other marginalized groups in the watershed. Our hope and vision contemplate a future with clean water, healthy ecosystems, and thriving communities. CBEP must become its own catalyst for a diverse, equitable, inclusive, and welcoming organization for people of color and other marginalized groups and interact with these new partners on the same basis of equality and respect we extend to our current partners.*

*CBEP is committed to identifying and addressing systemic inequities within our own organization and its work-related practices. We will allocate human and financial resources to develop an active dialogue with these new partners and to encourage the adoption of mutually beneficial solutions both to address nagging water pollution challenges and the degradation of the watershed's habitats, and also to build community resilience to mitigate the consequences of climate change.*

*Over the next two years, CBEP has pledged to:*

- *Integrate DEIJ statement and related goals/objectives into the upcoming 2023 Casco Bay Plan update, a strategic planning document.*
- *Commission an internal organization assessment to analyze CBEP's current governance structure, its programs, and decision-making processes to better understand the DEIJ deficiencies within the existing organization; develop specific recommendations for changing our programs, practices and processes; and submit them to our Management Conference.*
- *With Environmental Protection Agency and University of Southern Maine guidance, align CBEP hiring, contracting, grantmaking and recruitment processes to establish an inclusive workplace culture committed to environmental justice.*
- *Evaluate community engagement strategies with underserved, under-represented, and under-resourced communities, and identify and introduce viable solutions to increase their opportunities for meaningful engagement on matters of importance to them.*
- *Actively encourage and invite communities of color and other marginalized groups to lend their voices and narratives to our planning efforts, work groups, and programs.*

## Definition of “Disadvantaged Communities” or Alternative Term(s)

In their Equity Strategy guidance document, the EPA explains

“There are several related terms used to describe communities facing hardship or who have historically benefitted unevenly from federal funds, including disadvantaged, overburdened, underserved, and underrepresented. Under Justice40 EPA is using the term “disadvantaged” for consistency with E.O. 14008 and other programmatic terminologies. EPA notes that this terminology is distinct from “environmental justice” community, which is defined as a community facing disproportionate environmental, public health, and other burdens that reduce quality of life. These terms should not be used interchangeably. Most environmental justice communities are also likely disadvantaged (depending on the criteria set for the latter’s definition), but not all disadvantaged communities are environmental justice communities.”

There are many approaches to defining and identifying communities who are considered disadvantaged. For example, the Justice40 Initiative<sup>1</sup> refers to historically marginalized, overburdened, and underserved communities as “disadvantaged” communities. **CBEP plans to use principally the terms “underserved” and “underrepresented” (or, UU) to refer to these populations.** By underserved, we mean populations who receive inadequate or inequitable services, who experience quality-of-life disparities, and who by design have little power or influence over outside decisions that impact their daily quality-of-life. By underrepresented, we mean a subgroup of the population whose representation (for example, in programming or projects) is disproportionately low relative to their numbers in the general population. The intent of using these alternative terms is to identify the same populations as intended under E.O. 14008, however many of the people and communities we will work with or reach do not think of themselves as disadvantaged, and the term can carry pejorative connotations. Alternate terminology will better serve CBEP’s outreach, engagement, and communication needs.

The Casco Bay Estuary Partnership serves a large and diverse study area, geographically, socially, economically, and from a climate perspective. The Casco Bay watershed includes urban coastal communities, suburban neighborhoods, inhabited islands, isolated coastal peninsulas, inland service center areas, tourism-dependent lakeshore communities, and largely forested inland areas. Defining UU communities within the study area requires a set of indicators that reflect the diversity, scale, and distribution of the communities within the region as well as the range of social, environmental, climate change, and economic burdens that residents face.

## Existing Definitions and Tools

### Geographic Tools

[The EPA EJScreen Supplemental Demographic Index](#)

EPA created agency-specific Supplemental Indices Threshold Maps for use when implementing Justice40 related efforts in cases where program-specific definitions do not exist. The updated EPA EJScreen tool includes a new five-factor Supplemental Demographic Index which offers a different perspective on community-level vulnerability. The supplemental demographic index averages the following indicators:

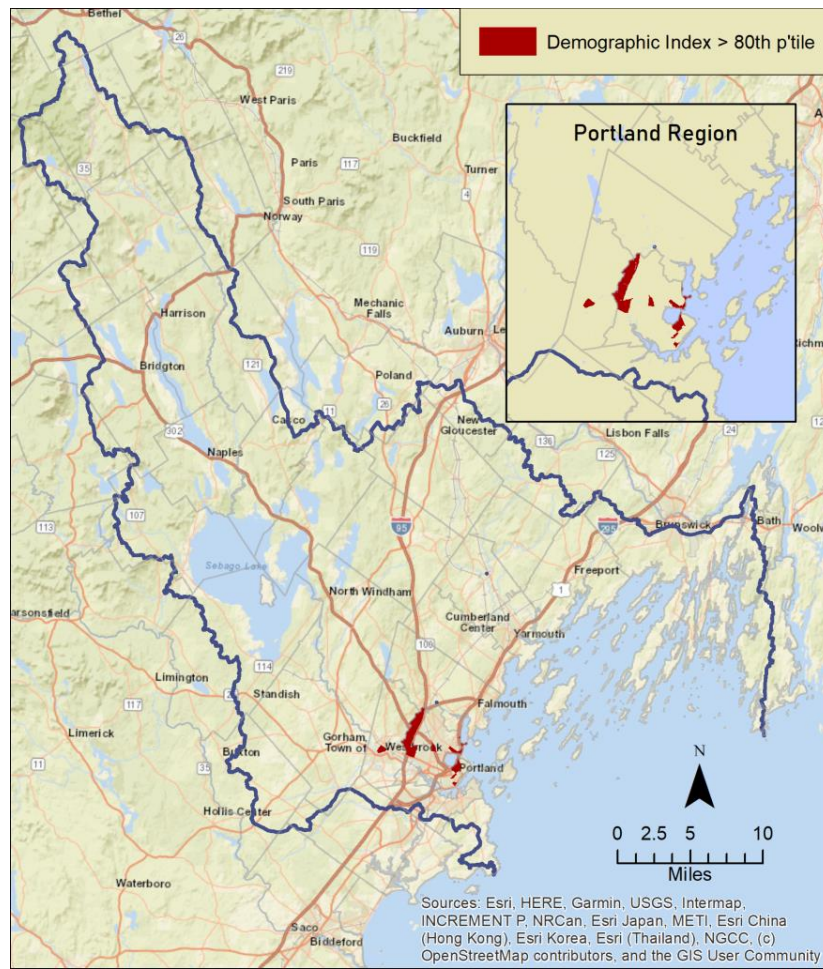
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<sup>1</sup> <https://www.whitehouse.gov/environmentaljustice/justice40/>



- Percent low-income;
- Percent limited English speaking;
- Percent less than high school education;
- Percent unemployed; and
- Low life expectancy.

If the Supplemental Demographic Index in a census block group<sup>2</sup> exceeds the national 80% percentile, that area would be identified as a disadvantaged community under EPA’s default approach for the purposes of establishing baselines in each NEP’s equity strategy, and for tracking Justice40 investments and benefits.<sup>3</sup>



**Figure 1: Census Block Groups touching the Casco Bay Watershed that exceed the national 80th percentile for the Supplemental EJScreen Demographic Index.**

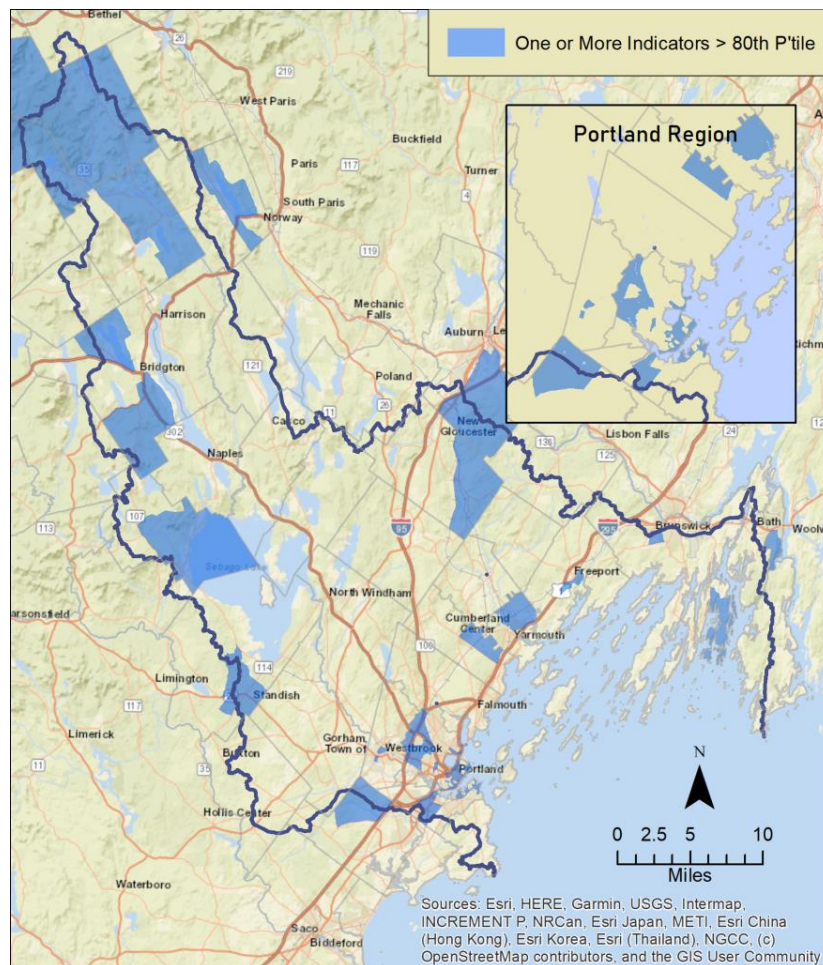
<sup>2</sup> A census block group is a geographic unit used by the U.S. Census. It is smaller than a census tract, and typically contains between 600 and 3000 residents.

<sup>3</sup>[https://www.epa.gov/system/files/documents/2022-07/NEP%20BIL%20Implementation%20Memo%20FY22-26\\_July%202022\\_signed.pdf](https://www.epa.gov/system/files/documents/2022-07/NEP%20BIL%20Implementation%20Memo%20FY22-26_July%202022_signed.pdf)



Only a handful of locations in the Casco Bay watershed exceed the 80th percentile on EJScreen’s Supplementary Demographic Index. All are located in the City of Portland or adjacent City of Westbrook. With so few locations identified, this metric provides little effective guidance for how CBEP can expand our work with underserved or underrepresented communities.

The data from EJScreen can be used in other ways to identify disadvantaged communities. CBEP also mapped census block groups where any one of the five sub-components of EJScreen’s Supplemental Demographic Index was at or above their respective national 80th percentile values. The results highlight census block groups in and around the Portland Metropolitan area, the upper watershed, some middle watershed towns to the west of Sebago Lake, and a scattering of other census blocks in generally well-off coastal towns.



**Figure 2: Census block groups touching the Casco Bay Watershed that exceed the national 80th percentile for one or more of the components of EJScreen’s Supplemental Demographic Index.**

[The CEQ Climate and Economic Justice Screening Tool](#)

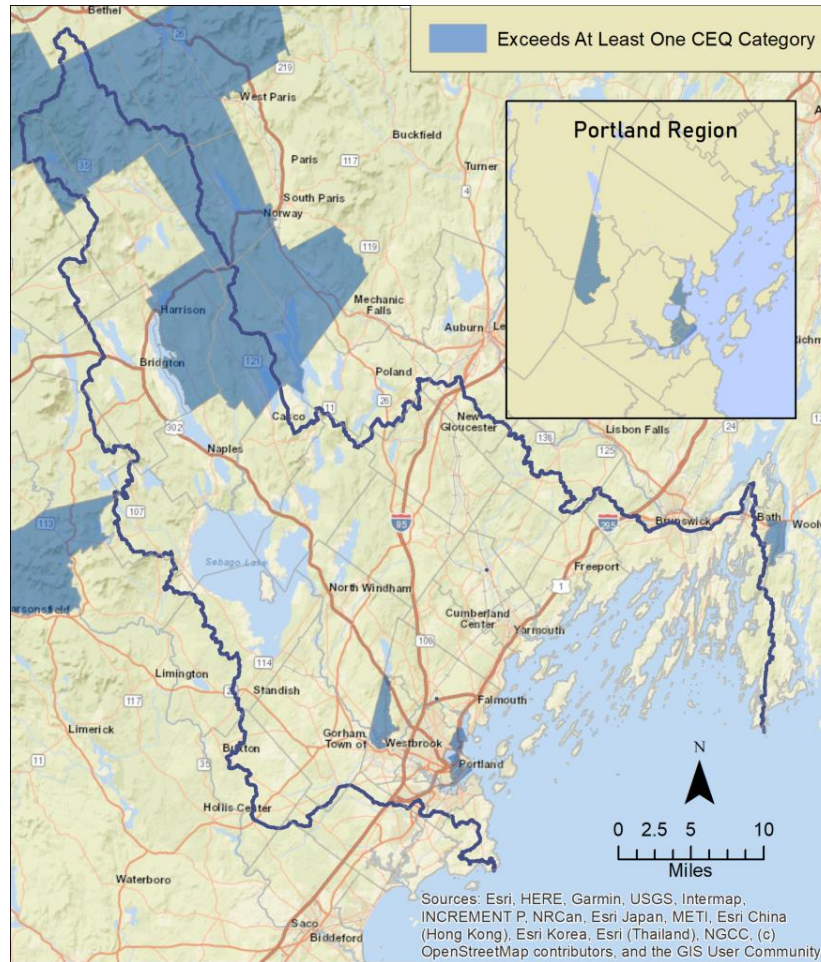
The Council on Environmental Quality (CEQ) developed the Climate and Economic Justice Screening Tool (CEJST) in response to President Biden’s Executive Order 14008. The tool includes datasets that are indicators of environmental burdens in eight categories:

- Climate Change – if a community is at or above the 90th percentile for:
  - Expected agriculture loss rate, or
  - Expected building loss rate, or
  - Expected population loss rate, or
  - Projected flood risk, or
  - Projected wildfire risk.
  - AND are at or above the 65th percentile for low income.
- Energy – if a community is within a census tract that:
  - Is at the 90th percentile for energy cost or PM2.5 in the air.
  - AND are at or above the 65th percentile for low income.
- Health – if a community is within a census tract that:
  - Is at or above the 90th percentile for asthma OR diabetes OR heart disease OR low life expectancy.
  - AND are at or above the 65th percentile for low income.
- Housing – if a community is within a census tract that:
  - Experienced historic underinvestment OR is at or above the 90th percentile for housing cost OR lack of green space OR lack of indoor plumbing OR lead paint
  - AND is at or above the 65th percentile for low income.
- Legacy pollution – if a community is within a census tract that:
  - Has at least one abandoned mine land OR Formerly Used Defense Sites OR is at or above the 90th percentile for proximity to hazardous waste facilities OR proximity to Superfund sites (National Priorities List (NPL)) OR proximity to Risk Management Plan (RMP) facilities.
  - AND is at or above the 65th percentile for low income.
- Transportation – if a community is within a census tract that:
  - Is at or above the 90th percentile for diesel particulate matter exposure OR transportation barriers OR traffic proximity and volume.
  - AND is at or above the 65th percentile for low income.
- Water and wastewater – if a community is within a census tract that:
  - Is at or above the 90th percentile for underground storage tanks and releases OR wastewater discharge.
  - AND is at or above the 65th percentile for low income.
- Workforce development – if a community is within a census tract that:
  - Is at or above the 90th percentile for linguistic isolation OR low median income OR poverty OR unemployment.
  - AND fewer than 10% of people ages 25 or older have a high school education (i.e., graduated with a high school diploma).

CEJST uses census tracts<sup>4</sup> (larger than census block groups) to identify disadvantaged communities. A tract is considered disadvantaged if it meets at least one burden threshold AND an associated socioeconomic threshold.

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<sup>4</sup> A Census tract is a geographic unit used by the U.S. Census. Census tracts are relatively permanent statistical subdivisions of a county. Tracts are composed of one or more block groups. The population of a census tract ranges from 1,200 to 8,000.



**Figure 3: Census tracts identified by CEQ’s Climate and Economic Justice Screening Tool as vulnerable to one or more burdens.**

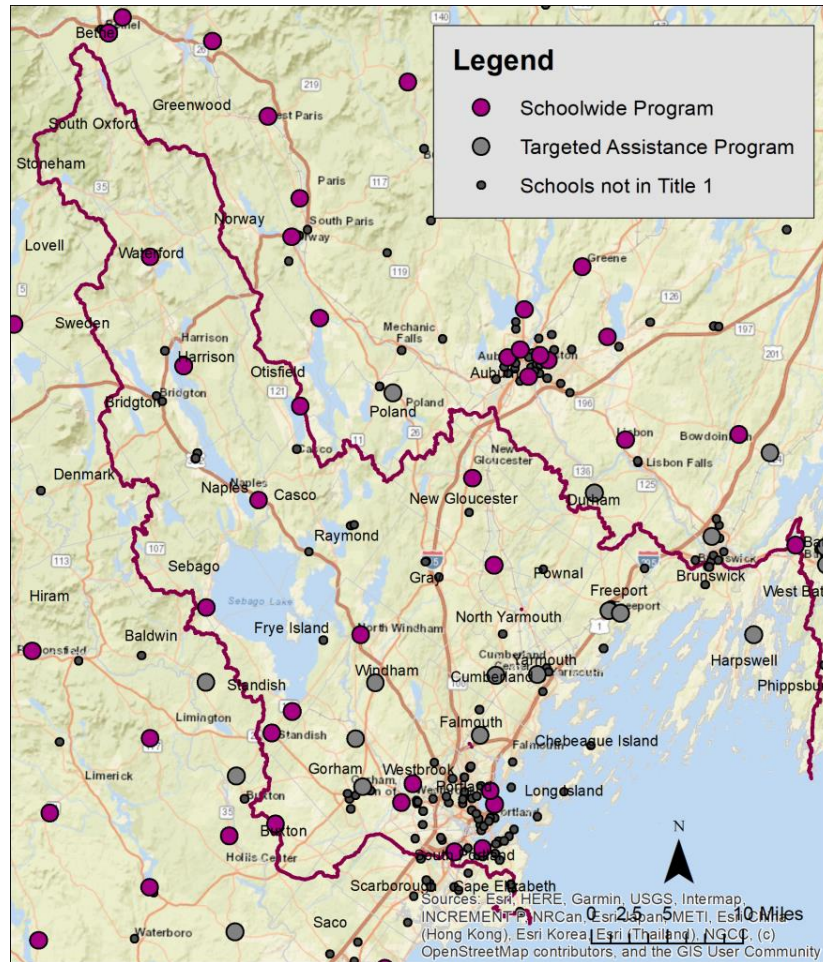
CEJST identifies a small number of locations in the Casco Bay watershed as disadvantaged. The tool identifies locations in the Cities of Portland and Westbrook, and several towns in the upper Casco Bay watershed. All the upper watershed communities face significant transportation and energy concerns (a few also face health and housing challenges). The towns identified by CEJST as burdened also exceed CEQ’s 65% threshold of low income people (but poverty in adjacent communities is often similar).

### Supplemental Geographic Tools

#### Title 1 Schools

Title I, Part A of the Elementary and Secondary Education Act supports programs and resources for disadvantaged students in order to “provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.” Title I funding is designed to aid districts in closing the achievement gap by placing highly qualified teachers in classrooms and by providing supplemental services to students. Funds are available to school districts and schools based on a measure of poverty (e.g., schools in which children from low-income families make up at least 40 percent of enrollment).





**Figure 4: Title 1 Schools in the CBEP Study Area**

Schools operate either as a school-wide Title I program (SWP), where Title I funds can be combined with state, local, and other federal funds to serve all students in the school, or targeted assistance Title I program (TAS), where funds are targeted towards specific Title I staff and activities to serve students who have been identified as most at-risk of not meeting state standards.

The overall pattern of Title 1 schools reinforces the lessons from looking at EJSscreen and CEJST. On the whole, public schools in wealthier coastal communities, like Yarmouth and Falmouth, are enrolled in targeted assistance programs while schools in the Portland metropolitan region, and in the middle and upper Casco Bay watershed, are enrolled in school-wide assistance programs.

Limitations of mapping tools and census data

The EJSscreen and CEJST maps offer a useful starting point for identification of UU communities, but they are of reduced value in the largely rural geography of Maine. Because of low population densities, census block groups in most of the region are large. Except for in and around Portland’s urban core, census block groups and census tracts correspond to entire townships and sometimes larger, multi-town areas. Smaller areas with distinct economic and social identities are bundled together into township-scale census data. At that spatial scale, pockets of disadvantage (especially rural poverty) are obscured because they are blended with wealthier communities nearby. Outside of the Portland area, the

geography of poverty and disadvantage in our region does not line up well with the geography of census data.

Data on Title 1 schools is slightly more nuanced, because it reflects presence of impoverished students within a school district, which may better reflect economic conditions of young families. Schools with school-wide Title 1 programs are concentrated in and around the Portland Metropolitan area, as well as in smaller, more rural communities in the middle and upper watershed.

Census block group or census tract data also do not identify dispersed disadvantaged communities. By definition, these communities are defined by condition or circumstance, not geography and thus cannot be identified based on geographic data alone.

### Alternative Definitions

EPA states that, “If the screening tools available do not reflect any disadvantaged communities in the study area NEPs/GEOs should describe their alternative definition within their equity strategy and explain why they are using this approach.” CBEP plans to employ an alternative approach to identifying UU communities, combining the available quantitative, geographic tools with more qualitative guidance provided by the state of Maine. The Maine Climate Council, supported by the Governor’s Office of Policy Innovation and the Future, developed an approach to identifying UU communities in the context of how climate change impacts the state’s geographies and demographics.

#### Maine Climate Council Equity Subcommittee

On December 1, 2020, the Maine Climate Council released *Maine Won’t Wait*<sup>5</sup>, the state’s four-year Climate Action Plan. Following release of the plan, the Equity Subcommittee was established to support ongoing planning and implementation of the state’s climate strategies to ensure shared benefits reach diverse populations in Maine. In March 2023, the Equity Subcommittee released a report<sup>6</sup> with recommendations focused on goals, actions, and metrics for ensuring equitable outcomes to climate action. The report identifies specific people, workers, communities, and businesses as “priority populations” for climate action, “because of their vulnerability to climate change impacts, limited resources or capacity to respond and adapt, or because of intersections between these vulnerabilities.” These priority populations include the following:

- **Individuals and Households:**
  - Households with low-income individuals, older adults (age 65+), people with asthma or other health vulnerabilities, people with disabilities, people with limited access to transportation, Black, Indigenous and People of Color (BIPOC), people with limited English proficiency, low-income residents of rental housing (especially multifamily), mobile home residents, low-income homeowners, unhoused individuals, and families. Individual worker characteristics include employment and work authorization status, students, people with limited English proficiency including New Mainers, gender, people transitioning from prison or in recovery, and/or migrant workers.

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<sup>5</sup>[https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/MaineWontWait\\_December2020.pdf](https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/MaineWontWait_December2020.pdf)

<sup>6</sup>[https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Climate%20Council\\_Equity%20Subcommittee%20Final%20Report\\_March%202023.pdf](https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Climate%20Council_Equity%20Subcommittee%20Final%20Report_March%202023.pdf)

- **Geographic Areas and Communities:**
  - Low-income communities, rural communities, small towns with limited staff capacity, disadvantaged communities, climate-frontline communities, and/or Tribal and Indigenous communities.
- **Businesses:**
  - Businesses in the natural resource industries like agriculture, forestry, and fishing, clean energy industry (including energy efficiency), small businesses, minority- or women-owned business enterprises (MWBES).

This approach provides ways to identify underserved, underrepresented, and/or under-resourced communities that are not tied solely to geography, but are tied to functional categories of disadvantage relevant in the context of Maine’s geography, demographics, and economy. It recognizes that demographic and economic disadvantage adheres to individuals and families (who may or may not be aggregated into disadvantaged communities). It highlights the effect of Maine’s strong “home rule” political traditions on the capacity (or lack thereof) of smaller communities to respond to climate change and other environmental risks. It also highlights the importance of Maine’s economic dependence on natural resources, like forestry, fisheries, and nature-based tourism.

This definition encourages a holistic evaluation of axes of disadvantage that complements geographic tools, by focusing on:

1. disadvantage at smaller, more dispersed geographic scales;
2. lack of capacity to respond to climate change and other environmental threats; and
3. economic dependence on natural resources that are themselves at risk due to climate change.

This methodology provides a useful complement to geographic analysis for identifying “priority populations” for CBEP work with UU communities considered to be “disadvantaged” in the context of this Equity Strategy.

## Casco Bay Estuary Partnership Criteria and Methodology

CBEP will consider communities to be “underserved or underrepresented” if they qualify under one or more of the following four tests:

1. Geographically defined communities based on one or more EJScreen or CEJST tests;
2. Communities with schools that participate in the Schoolwide Title 1 Program;
3. Small rural towns that lack planning capacity; and
4. Dispersed populations and individuals that qualify as “priority populations” under the Maine Climate Council’s definition or meet certain other criteria.

### Geographically defined communities

- **A community within a census block group that meets or exceeds the (national) 80th percentile in any *ONE* of the indicators used in EPA’s EJScreen Supplementary Demographic Index:**
  - Percent low-income
  - Percent limited English speaking
  - Percent less than high school education
  - Percent unemployed
  - Low life expectancy

- **A community within a census tract identified by CEJST as “Disadvantaged.” Disadvantaged communities are communities that meet one of the CEJST environmental burden tests, along with an associated socio-economic threshold.**
  - Climate Change
  - Energy
  - Health
  - Housing
  - Legacy pollution
  - Transportation
  - Water and wastewater
  - Workforce development

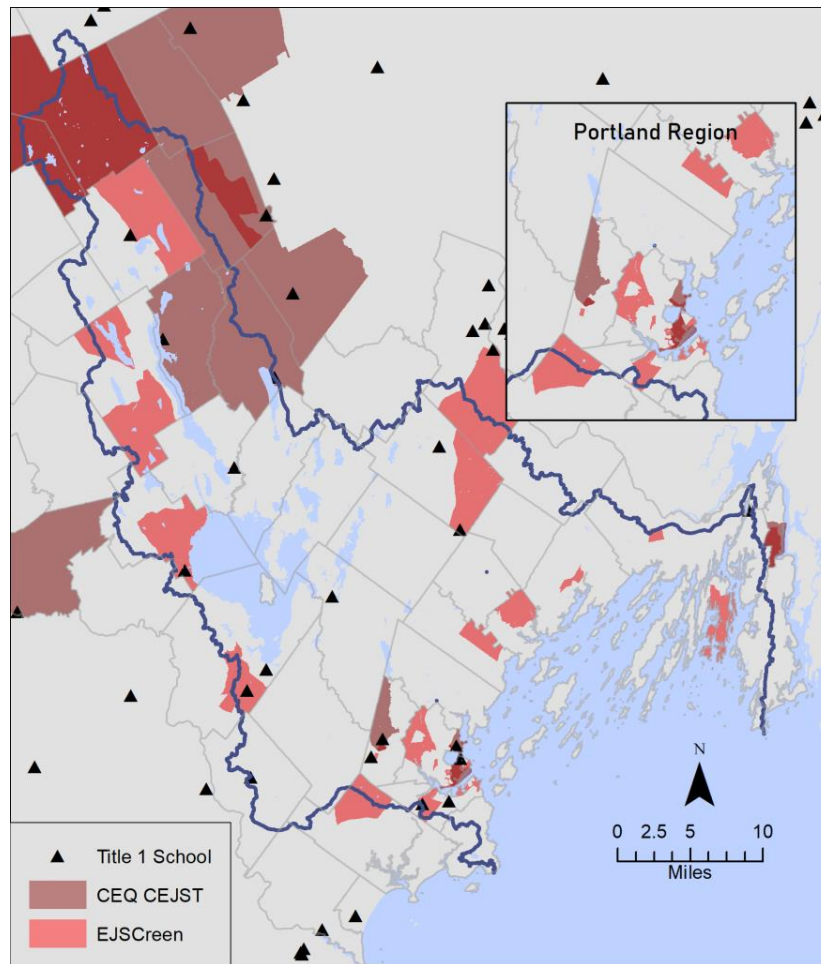
[Communities with a school that participates in the school-wide Title 1 Schools Program](#)

These communities will generally be considered to qualify as underserved, but application of this test requires some care. In the upper watershed, schools typically serve entire towns or even several towns, so schools draw from a wide geographic area. In the lower watershed, especially in the core cities of the Portland metropolitan area (Portland, South Portland, Westbrook) schools serve neighborhoods, and thus it would be inappropriate to use the presence of Title 1 Schools to extrapolate to conditions throughout the municipality. In our urbanized areas, school-wide Title 1 schools are almost always located within census block groups or census tracts identified as “disadvantaged” in EJScreen, CEJST, or both.

Priority areas identified in the FOLLOWING map include areas exceeding the national 80th percentile for at least one indicator in the EJScreen Supplementary Demographic Index or meeting CEQ CEJST criteria for disadvantaged communities (CEJST data based on census tracts, EJScreen data based on census block groups).

(See Map on next Page)





**Figure 5: Composite map of EJSreen and CEJST “disadvantaged” geographies with schools in the Schoolwide Title 1 Program in the CBEP Service Area (Dark red areas show where the EJSreen and CEJST results overlap)**

*Small, rural towns with limited staff capacity*

The CBEP study area touches 48 municipalities, ranging from Maine’s most urban metropolitan region to rural, unorganized territories. Many of our rural, island, and peninsular towns have small year-round populations. These small towns generally have few municipal staff, so they lack capacity to prepare for climate change threats, apply for federal and state funds to enhance community resilience, or develop local policies that protect water resources.

In agreement with the Maine Climate Council, CBEP’s Management Committee considers it a priority to use BIL funds to increase resilience of these small, rural towns. CBEP plans to assist these communities by providing planning assistance, helping them apply for federal and state funds to support community and habitat resilience projects, and assisting with local resilience project implementation.

CBEP will consider any town that (a) has a population under 4000<sup>7</sup> or (b) lacks professional planning staff to be underserved and underrepresented for purposes of defining disadvantaged communities.

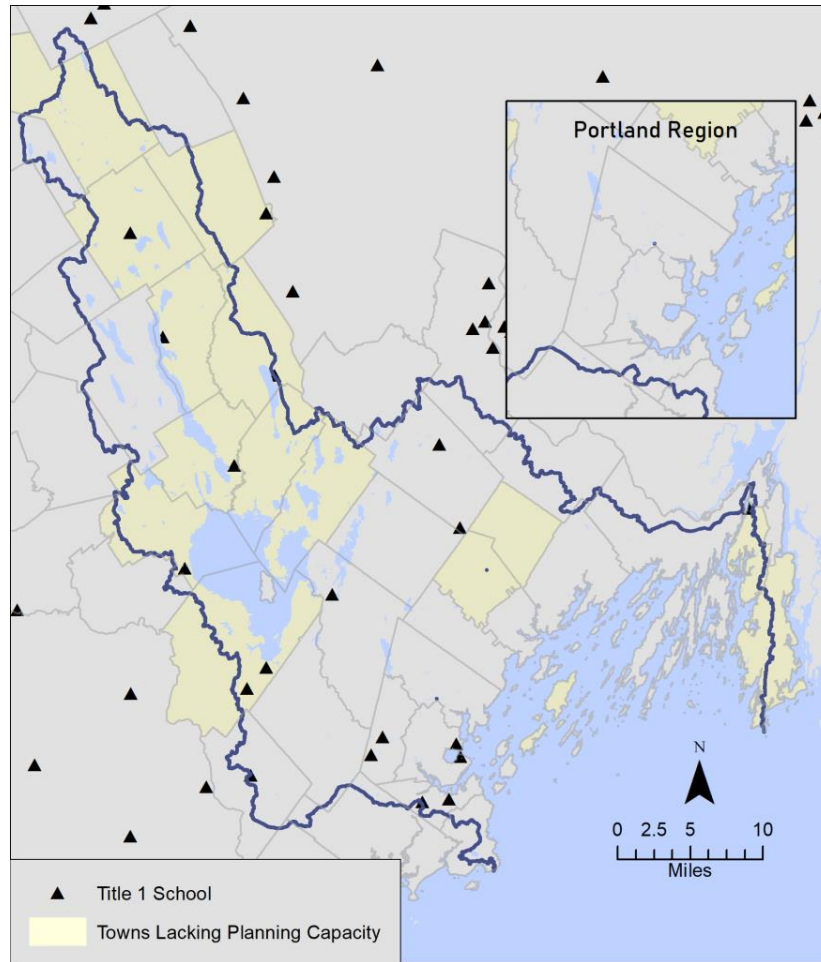
The following table and map provide a sense of which towns qualify as underserved using this definition. Note that outside of the Portland Metropolitan area, this definition of an underserved community tends to align with towns with schools that participate in Schoolwide Title 1 Programs.

**Table 1: Casco Bay watershed towns that lack staff planning capacity.**

Town	Population	Regional Planning Commission (RPC)	Comments
Casco	<b>3,646</b>	<b>GPCOG</b>	
Chebeague Island	<b>3,41</b>	<b>GPCOG</b>	
Harrison	<b>2,447</b>	<b>GPCOG</b>	
Long Island	<b>234</b>	<b>GPCOG</b>	
Naples	<b>3,925</b>	<b>GPCOG</b>	
North Yarmouth	4,072	GPCOG	
Norway	5,077	AVCOG	Lower capacity RPC
Otisfield	<b>1,853</b>	<b>AVCOG</b>	<b>Lower capacity RPC</b>
Phippsburg	<b>2,155</b>	<b>MCOG</b>	<b>Lower capacity RPC</b>
Pownal	<b>1,566</b>	<b>GPCOG</b>	
Raymond	4,536	GPCOG	
Sebago	<b>1911</b>	<b>GPCOG</b>	
South Oxford	<b>591</b>	<b>Unorganized Territory</b>	<b>No local, incorporated municipal government</b>
Standish	10,244	GPCOG	
Waterford	<b>1,570</b>	<b>GPCOG</b>	
West Bath	<b>1,910</b>	<b>MCOG</b>	<b>Lower capacity RPC</b>

Bold = Population fewer than 4000

<sup>7</sup> This matches the Maine Community Resilience Partnership’s threshold for “Highest Social Vulnerability.” See <https://www.maine.gov/future/climate/community-resilience-partnership>.



**Figure 6: Towns with limited staff planning capacity**

#### Geographically dispersed communities

We will also include the following indicators representing geographically dispersed underrepresented/underserved communities:

- Indigenous Peoples
- People with disabilities
- People with limited access to transportation
- Aging Mainers
- New Mainers / immigrants
- Businesses / workers in the natural resource industries like agriculture, forestry, and fishing

For these indicators, we will be focused less on where dispersed community members are located, and more on how our work benefits underserved or underrepresented community members. For example, work done to increase access to natural areas will take into account walking distance for community members who may lack transportation as well as accessibility needs for people with disabilities.

Maine has a complex legal and historical relationship with native Wabanaki Tribes. Currently, there are four federally recognized Tribes in Maine, including the Passamaquoddy, Penobscot, Maliseet, and

Micmac. While the entire Casco Bay region was once home to Wabanaki peoples, they were displaced from this region of Maine by settler populations early in the state's history. Today, none of the federally recognized Tribes hold significant lands in the CBEP service area. However, members of these Tribal communities live off-reservation, residing throughout the state, including the CBEP region. Thus work in our region with indigenous peoples is likely to focus on welcoming indigenous voices into conversation with CBEP and our Partners, and providing indigenous populations opportunities for stewardship and access to traditional resources. Maine's land conservation community has taken important steps in this direction via "First Light" programs<sup>8</sup>.

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<sup>8</sup> <https://www.mltn.org/first-light/>

## Baseline Analysis of UU Communities

### EPA Baseline Analysis

**Table 2: EPA Analysis of CBEP Recent Activities Supporting UU Communities**

Year	2017	2018	2019	2020	2021	Total
# of Habitat Projects in Disadvantaged Communities	0	0	0	0	0	0
Total Habitat Projects	3	8	5	7	7	30
% of Habitat Projects in Disadvantaged Communities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Section 320 Funds Invested in Disadvantaged Communities through Habitat Projects (\$)	0	0	0	0	0	0
Total Section 320 Funds Used in Habitat Projects (\$)	8,900	33,672	47,000	25,000	30,000	144,572
% of Section 320 Funds Invested in Disadvantaged Communities through Habitat Projects	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Habitat Project Costs Invested in Disadvantaged Communities (\$)	0	0	0	0	0	0
Total Habitat Project Costs (\$)	781,550	561,900	4,865,800	3,076,141	7,198,246	16,483,637
% of Habitat Project Costs Invested in Disadvantaged Communities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

### CBEP Complementary Analysis

EPA's baseline analysis of recent NEPORT data suggests that none of CBEP's recent habitat-related projects occurred within the borders of "Disadvantaged Communities." As we demonstrated above, this is because only a few urban areas in our region have EJScreen's Supplemental Demographic Index values above the national 80th percentile.

This analysis understates past benefits of CBEP activities that accrued to UU communities because of the following:

- It uses a restrictive definition of who qualifies as underserved (as described above).
- It fails to account for program benefits not related to habitat projects reported in NEPORT. CBEP supports the work of our municipal and urban partners addressing urban water quality

challenges, including wastewater, stormwater, and combined sewer overflows. Many of these projects occur within the borders of geographically-defined underserved communities.

- It fails to account for indirect benefits of CBEP activities. For example, land conservation projects in the upper Casco Bay watershed benefit all Portland Water District ratepayers by protecting the Water District’s existing filtration waiver, and keeping water rates low.

CBEP lacks ready access to geographic locations of many past activities that benefit UU populations, so we are unable to provide a detailed breakdown of many projects, especially those conducted by CBEP Partners with our direct or indirect assistance. We do, however, maintain a database of all habitat protection projects funded in whole or in part by CBEP’s Habitat Protection Fund. An analysis of Habitat Protection Fund funded projects (some of which have not yet closed, and so have not been reported to NEPORT) shows that approximately one quarter of CBEP recent HPF projects have occurred within geographic areas considered UU communities using the geographic methods outlined above.

**Table 3: CBEP Equity Analysis of Habitat Protection Fund Projects**

Equity Analysis Categories	Recent Projects (2017 - 2023)	All HPF Projects (2000 - 2023)
Total Projects	28	73
EPA EJSCREEN (Any of five metrics)	3	10
CEQ CEJST	4	7
Either EJScreen or CEJST	7	17
Percentage of Projects	25%	23%
Within 2.5 miles of Title 1 School	2	7
All (EJScreen, CEJST or close to schools)	8	20
Percentage of Projects	29%	27%

## Numeric Targets (Justice 40)

### Numeric Targets

CBEP will work to ensure that a minimum of 25% of program benefits from BIL funds accrue to underserved or underrepresented communities.

### Strengths

CBEP has been working for several years to increase our understanding of equity issues in our program and region. We have an active Diversity, Equity and Inclusion Working Group drawn from members of our Management Committee. Last year, we adopted a DEIJ Statement. We recently commissioned a contractor to help us conduct a DEIJ review of our programs, policies, and practices. All CBEP programs are evaluated internally to look for opportunities to benefit underserved or underrepresented communities. Our Management Committee has been strongly supportive of using BIL funds to expand efforts to serve inland communities. CBEP has been an active member of the Sebago Clean Waters Coalition, which focuses on conservation of forestland in the upper Casco Bay Watershed.

### Challenges

We face several challenges in ensuring that 25% of program benefits reach underserved or underrepresented communities. Maine's geography and demographics means that many priority populations are dispersed. Historically, CBEP has played a supporting role on most projects in Portland's urban core where UU populations are easiest to identify. CBEP's working relationships are strongest with federal and state agencies, local government, and environmental organizations. We have few working relationships with members of UU populations or with organizations that represent them. Building new, robust working relationships with new people and organizations will take time, which may slow program delivery.

## Key Activities

Many populations – often indigenous peoples, people of color, and low-income and rural communities -- have less access to resources and experience more burdens than others due to factors such as poverty, systemic racism, and lack of access to political power. In developing our strategy for identifying projects for BIL funding support we are following our CCMP framework (with our existing four Goals), but also looking at the broad foundation of equitable and fair access in our targeted under-resourced and underserved communities, including the following types of equitable access:

- Reducing disparities in **fair and equitable physical access to open spaces**, conservation land, and recreational amenities for human health and mental well-being, lessening the health equity gap.
- Providing **equitable access to scientific data and technical information**. Provide incentives for community participatory approaches, when possible, and share data that is locally relevant and meaningful to target audiences and share it in an accessible way. Value traditional and community-gathered environmental knowledge. Integrate and support community science.
- **Removing barriers to access to programming and information**. Increasing access includes removing barriers to participation, such as providing more flexibility when programming is held



and removing financial barriers. Information should be provided in messaging language and formats that will connect with targeted audiences.

- Increasing **equitable access to grant funding and capacity building**, incorporating equity considerations into grant scoring, and offering partnership and resources to local community groups, local boards and committees, and municipalities. Providing technical assistance, capacity building and partnership development to ensure under-resourced communities can access funding opportunities.
- Developing more **meaningful opportunities for participation in policy development**, planning, and implementation processes. This includes, but is not limited to, creating fair and accessible opportunities for public participation, access to information, and ensuring language access is not a barrier to participation.

## CCMP Goal 1: Protect, restore and enhance key habitats that sustain ecological health

(Draft revision in CCMP Update: Protect, restore, and enhance the resilience of key habitats that sustain ecosystem health )

Goal 1 encompasses CBEP’s commitments to conserve priority habitats (including upland areas that protect water quality), restore coastal and aquatic habitats such as tidal marshes and eelgrass beds, and enhance connectivity among aquatic habitats. As our work under Goal 1 has evolved, it has come to focus more and more on protecting and enhancing resilience of aquatic habitats while also enhancing community resilience to emerging climate change stressors.

While CBEP’s habitat-related projects protect the water quality and health resilience of Casco Bay (thus providing dispersed community benefits), other benefits of habitat-related activities are local. The location of habitat projects influences who receives the broadest benefits. Attractive lands for habitat protection and restoration such as tidal marshes are often located in wealthy coastal communities. These same communities often have town government and conservation organizations with the capacity to work with CBEP. As a result, many of our habitat-related projects have been conducted in communities that do not qualify as disadvantaged.

Today, permanently protected habitats are unevenly distributed in the Casco Bay watershed. Some towns (usually coastal and less urbanized) have high percentages of their total land area in permanent protection. Nearby towns, generally those of lower socioeconomic status, have much lower percentages of their land in permanent protection.

### Related Seven Year Spending Plan Programs

- **Habitat Conservation**
- **Resilience Project Implementation**

We plan to take several steps to increase habitat protection, restoration and resilience projects that benefit underserved populations and provide more equitable access to funding related to land conservation. These will include altering how we develop partnerships, identify potential partners, and review grant proposals. This will involve actions like:

- Allocating increased staff time to provide technical assistance to towns and local organizations in the middle and upper watersheds to catalyze on-the-ground projects that meet community needs while also achieving habitat and resilience goals;
- Cultivating new relationships with local organizations, especially in the middle and upper watershed (for habitat protection, restoration and resilience actions);
- Publicizing habitat protection and resilience implementation grant opportunities more broadly;
- Streamlining grant submission requirements; and
- Altering Habitat Protection Fund (HPF) criteria so that future grants are more likely to address access concerns, such as for people with limited access to transportation, people with physical disabilities that limit access to natural areas, and small businesses that rely on public access to our shores and waters.

We also will include a 20% set-aside within CBEP's HPF to support habitat protection within communities where access to public natural areas is limited, or for projects that increase access to protected areas for disadvantaged or underserved populations.

#### Seven-year Equity Targets

- Three habitat protection projects completed by 2028 that increase access to protected areas for UU populations
- Implement restoration / resilience projects completed with three different Partners including at least one new Partner by 2028
- One or more habitat restoration / resilience projects underway or completed in an underserved community by 2028

## CCMP Goal 2: Reduce nutrient pollution and its impacts, including coastal acidification

(Draft revision in CCMP Update: Address the cumulative water quality impacts of human activity)

Goal 2 represents the core of our work addressing water quality in Casco Bay and the Casco Bay watershed. Activities under this Goal include programs to improve understanding of nutrient pollution, and also work to address specific water quality concerns like stormwater and combined sewer overflows.

Much of the on-the-ground work conducted under Goal 2, especially activities led by the Cumberland County Soil and Water Conservation District (CCSWCD), the Interlocal Stormwater Working Group (ISWG) and municipalities that face MS4 permit obligations, occurs in urban or suburban areas and thus in close proximity to urban disadvantaged communities.

Urban communities in our region, however, have municipal staff that often includes town engineers, sustainability coordinators and planners. These professionals have training and responsibilities related to environmental, planning, and water quality concerns. Our larger towns are also regulated by Clean Water Act permits, such as municipal stormwater (MS4) permits. As a result, our large and mid-sized municipalities generally understand their water quality challenges. Many of our small towns do not.

The water quality challenges facing small towns differ from those facing urban and suburban communities. Our cities and mid-sized towns are served by municipal water and wastewater systems. Our rural communities (and rural areas within many of our suburban municipalities) are not. Septic

tanks and permitted “overboard discharges” are almost absent from our larger towns, but are used extensively in our rural communities.

### Related Seven Year Spending Plan Programs

- **Casco Bay Model Infrastructure**
- **Onsite Wastewater Initiative**
- **Watershed Planning Initiative**

CBEP is tapping BIL money to fund a new high-resolution coastal ocean model of water movement in Casco Bay. The model will provide three-day forecasts of ocean conditions in Portland Harbor and surrounding areas, including predictions of water levels, ocean flooding, and water temperature, and salinity.

CBEP is working to develop novel tools to share model output on a timely basis with a variety of public audiences, including at-risk communities and marine-dependent businesses. A primary goal of these efforts is to democratize access to ocean data. CBEP has already been expanding ties with community partners, especially along the Portland Waterfront, who could benefit from insights from ocean models. In the future, we will expand these efforts to work with small-scale marine harvesters and aquaculture operators to understand how access to ocean models might benefit them.

Onsite wastewater systems can have significant impacts on water quality both in coastal waters and in inland areas. Most urban and suburban areas are served by municipal sewers, so on-site systems tend to be concentrated in rural, island, and peninsula communities (most of which are either identified as disadvantaged by CEJST or EJScreen, or lack local planning capacity). Many onsite systems (especially in lower income areas) are decades old and have been poorly maintained. Addressing pollution from inadequate or failing onsite wastewater systems could reduce bacterial contamination of lakes and coastal waters, allow reopening of clam flats, and reduce health risks from swimming, and thus provide direct benefits to these communities.

Formal watershed plans are required for communities to access many EPA funds for nonpoint source pollution protection and watershed restoration. This applies to most funding disbursed by Maine DEP through the “Nonpoint Source Water Pollution Control Grants” program. Yet the number of active (unexpired) watershed plans in our region is dwindling. Lack of active plans is fast becoming an impediment to funding watershed protection initiatives. Many urban watershed plans were developed in our region in the early 2010s. These plans, however, are expiring, making it more difficult to fund urban watershed protection activities. Furthermore, costs of watershed plan development have also climbed, placing these plans out of reach for our smaller communities.

### Seven-year Equity Targets

- An ocean model that serves community needs, along with tools to extend access to model output to community members, especially those in natural resources-dependent industries like fishing and aquaculture.
- Report on number, location, and condition of onsite wastewater treatment systems. At a minimum the report will look at septic systems and overboard discharges in municipalities of the Casco Bay watershed below Sebago Lake.
- Initiate regional program to improve small-scale wastewater infrastructure and address water quality impacts of poor onsite wastewater systems.

- Development of four watershed plans, at least one of which will address water quality concerns affecting underserved communities.

## CCMP Goal 3: Foster resilient communities and their connections to Casco Bay

(Draft Update: Engage communities and provide information and tools to support decisions to protect and restore Casco Bay)

Goal 3 includes most of CBEP’s active community engagement work, including public outreach and education; but also community engagement grants, municipal education and training programs, and climate resilience planning assistance.

Many of CBEP’s activities under Goal 3 benefit UU populations. For example, CBEP’s work on climate resilience planning often centers on smaller coastal communities that have limited planning capacity. One climate-focused project that CBEP participated in, the “Social Resilience Project,” addressed coordination between various sectors that serve vulnerable populations (rural, low-income, isolated and elderly) and opportunities for improvement to help vulnerable residents plan for and recover from storm events.

The Cumberland County Soil and Water Conservation District (with funding through the Interlocal Stormwater Working Group from communities with MS4 permits) and Portland Water District are among the most important groups providing environmental, watershed, and water quality education to schools in our region. The two programs deliver watershed education programming to most public middle schools in our cities and larger suburban towns. Some of these middle schools participate in school-wide Title 1 programs, but almost all participate in either school-wide or Targeted Title 1 activities. Many of these schools also serve growing immigrant, or “New Mainer,” populations. Dozens of languages are spoken within the Portland public school system alone.

Low-income populations, people of color and indigenous communities, rural and geographically isolated communities, and other UU populations are often more vulnerable than other people to the impacts of climate change or water pollution. These communities often do not have the same access to resources and information as other communities. They are faced with additional barriers to engagement and participation in local institutions.

CBEP plans to expand our knowledge of and connections with UU communities in the Casco Bay by:

- Strengthening our efforts to build relationships with underserved individuals and organizations that work with these communities (see discussion below, under Stakeholder Engagement Plan);
- Working with partners to ensure that we are inviting collaboration and providing equitable access to information and resources to a broader audience within our watershed; and
- Expanding funding opportunities and technical assistance to help communities address these challenges.

### Related Seven Year Spending Plan Programs

- **Resilient Communities Planning and Assistance**

Our inland communities are more dependent on clean water than our larger coastal communities, with fishing, hunting, boating and tourism representing a large share of economic activity. Several of our

island and peninsula communities are similarly dependent on tourism (and thus water quality) for economic activity and jobs. These same communities usually lack the institutional capacity to address water quality and resilience challenges.

The BIL funding offers CBEP an opportunity to engage more fully with these communities on the dual challenges of community resilience and water quality protection. Challenges in these communities include lack of community capacity, rapid land use change, aging infrastructure, and a range of legacy water quality challenges (from soil erosion to agriculture, camp roads to failing septic systems).

CBEP will work at the community level in close association with regional Partners, especially municipalities, CCSWCD, and Greater Portland Council of Governments (GPCOG), to address water quality and resilience challenges. The initial focus will be on working in smaller communities (islands and towns in the upper watershed) and municipalities in the Presumpscot and Stroudwater watersheds with impaired rivers and streams.

#### Seven-year Equity Targets

- Provide technical or planning assistance to three or more underserved towns by 2028
- Work with three UU communities to support locally adopted municipal open space, water quality, and resilience policies or related programs by 2028
- CBEP technical assistance offered to a minimum of five towns and ten projects by 2028

## CCMP Goal 4: Mobilize collective knowledge and resources to support Casco Bay

(Draft Update: Mobilize knowledge and resources to support Casco Bay)

Goal 4 is focused on strengthening the Partnership, especially via acting as an institutional anchor for regional efforts that benefit Casco Bay, strengthening scientific understanding of the Bay, reporting periodically on the State of Casco Bay, and enhancing environmental monitoring. Our Updated CCMP will also include Actions under this Goal to help make CBEP a more equitable and inclusive organization.

The work of CBEP's DEIJ Working Group has highlighted a number of ways that existing CBEP structure, policies and procedures make CBEP less equitable and inclusive than we would like. CBEP's governance structure leans heavily on a Management Committee composed principally of water resources professionals. We tend to conceive of our work principally in terms of government action at local, state, and national levels. We hold most of our meetings during regular working hours. We have no Citizens Advisory Committee that highlights community-driven priorities for CBEP consideration. Those things limit who has a seat at CBEP's table and who has a voice in determining CBEP priorities. We are committed to doing better.

In the next five years, CBEP will work to make the organization more inclusive by:

- Completing a formal internal DEIJ review of CBEP structure, policies, procedures and programs and forward findings and recommendations to our Management Committee;
- Considering changes in CBEP governance that could make it easier for underrepresented voices to have a say in CBEP priorities;
- Strengthening efforts to build long-term connections with organizations that work with underserved communities;

- Inviting participation in CBEP’s governance by a broader range of stakeholders; and
- Publicizing all CBEP grants broadly, and revising grant processes to facilitate applications for funding from UU communities and populations.

### Related Seven Year Spending Plan Programs

- **Casco Bay Data Infrastructure Project**
- **Monitoring Infrastructure Grants**

CBEP recognizes the importance of implementing these BIL-funded programs with an eye towards equity, especially data equity and equity in access to funding.

Data equity is a framework for guiding work with data through a lens of equity and inclusion. While the concept is usually considered in the context of data about people, it also applies to environmental data. All data has a history (sometimes known as a data biography). The data was collected by certain people to address specific questions, and those questions often embody privileged perspectives. Thus no data is entirely value neutral even as it is collected. Further equity concerns can arise in the process of data analysis and the way data is summarized. Lack of deep understanding of data biographies can lead to significant errors in interpretation of found or borrowed data.

The Data Infrastructure Project aims to make Casco Bay-related data, especially data collected by government entities and members of the Casco Bay Monitoring Network, more readily available. It will inevitably raise equity concerns regarding what data to include, what formats to use when sharing data, what kinds of data summaries to provide, etc.

- CBEP will develop the Data Infrastructure Project with attention to “data biographies” and other equity concerns.
- We will work to develop tools to make information derived from ocean data and monitoring programs more accessible to people of the Casco Bay region.

Monitoring Infrastructure grants, like other CBEP grant programs, will be structured to facilitate applications for funding from underserved populations. We will also work to expand freshwater monitoring in rural and low-income communities.

### Seven-year Equity Targets

- Complete internal DEI / equity assessment of programs, policies, procedures and structure;
- Adopt institutional changes that help invite a broader audience to influence CBEP priorities; and
- Adopt rules and procedures for all CBEP grant programs that facilitate applications from underrepresented populations.

## Tracking Benefits

CBEP will follow the nationally consistent reporting and metrics established by EPA to track benefits to Disadvantaged Communities. We await finalization of relevant guidance.

There are myriad benefits that flow from conservation, restoration, research, and outreach activities that CBEP produces, spanning the many provisioning, supporting, regulating, and cultural services provided by nature. While we will continue to support efforts to develop methodologies to measure such indirect services, available metrics are poorly defined and often difficult to collect.

CBEP will principally track the following factors when defining and measuring the flow of benefits from BIL-funded projects for each fiscal year:

- The number of BIL-funded projects that benefit underserved communities
- The amount of BIL funding/investment dollars directed toward projects that benefit underserved communities
- The number of CBEP grants and contracts that support projects led by members of underserved communities
- The amount of BIL funding/investment dollars directed toward projects led by members of underserved communities
- The number of underserved communities to whom CBEP provides technical assistance
- Measures of the scope of activities that benefit UU communities, such as acres protected, or students served

We will continue to explore strategies to more explicitly define and track benefits of different CBEP activities, inclusive of stakeholder perspectives on what they consider the benefits of these activities.

## Stakeholder Engagement Plan

CBEP has been working with our Management Committee for the last several years to understand and address issues of equity in the Partnership. That work has uncovered ways our history, structure, policies, and procedures have shaped who we collaborate with, excluded voices from our discussions, and determined organizational priorities. We have learned that building a more equitable and inclusive partnership will require new relationships of trust and respect with people and organizations that we have not worked with before. It will take time and staff resources to broaden our networks, understand issues and concerns, and seek areas of potential collaboration.

Building off recently passed state legislation<sup>9</sup> and the work of the Maine Climate Council Equity Subcommittee<sup>10</sup>, we are taking an approach to stakeholder engagement that considers multiple dimensions of social equity. These include:

1. Procedure: the degree of involvement and inclusiveness in rulemaking and decisions.

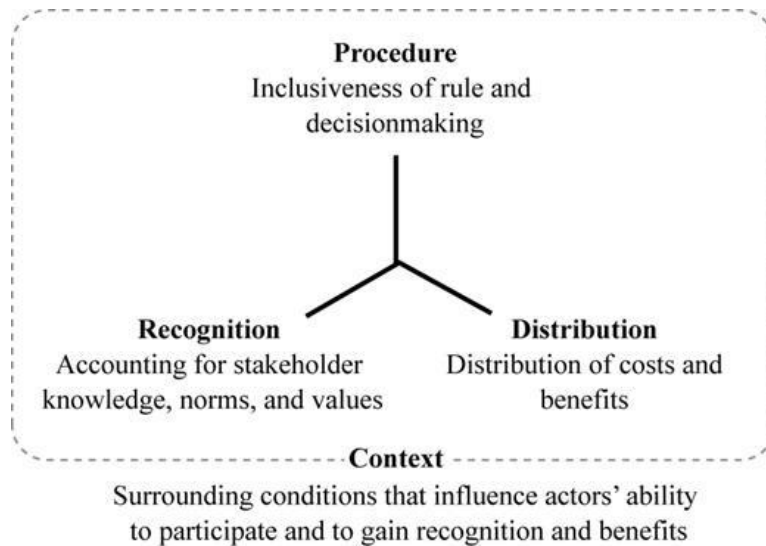
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<sup>9</sup>H.P. 1500 - L.D. 2018: An Act To Implement Recommendations Regarding the Incorporation of Equity Considerations in Regulatory Decision Making

<sup>10</sup>[https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Climate%20Council\\_Equity%20Subcommittee%20Final%20Report\\_March%202023.pdf](https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Climate%20Council_Equity%20Subcommittee%20Final%20Report_March%202023.pdf)



2. **Distribution:** the distribution of costs, benefits, burdens, and rights derived from actions or programs.
3. **Recognition:** the respect for knowledge systems, values, social norms, and the rights of all stakeholders in the design and implementation of actions or programs.
4. **Context:** the surrounding social conditions (e.g., power dynamics, education, language barriers) that influence the ability of an individual or community to gain recognition, participate in decision making, and lobby for fair distribution.<sup>11</sup>



**Figure 7: Four dimensions of social equity<sup>12</sup>**

Our processes and approaches for implementing the Justice40 Equity Strategy in our work are still emerging, and they will almost certainly be iterative as we assess over time what works and what doesn't. This framework for considering the multiple dimensions of social equity will serve as the foundation for these efforts, helping to inform our decision-making processes about options for expanding equity in our work.

CBEP's Community Engagement Strategy outlines community engagement that "informs, engages, or empowers," with a goal of shifting governance and programming toward a more collaborative, community-centered approach. This approach is centered on making it more convenient for people to participate in CBEP activities and governance, and removing barriers to participation. We will continue to expand community engagement by developing new, mutually beneficial connections with new audiences, and employ strategies to move beyond informing and engaging community audiences to empowering and collaborating with them, such as training, capacity-building, and listening sessions.

<sup>11</sup>Pascual, U., Phelps, J., Garmendia, E., Brown, K., Corbera, E., Martin, A., Gomez-Baggethun, E. and Muradian, R., 2014. Social equity matters in payments for ecosystem services. *Bioscience*, 64(11), pp.1027-1036.

<sup>12</sup> Pascual, U., Phelps, J., Garmendia, E., Brown, K., Corbera, E., Martin, A., Gomez-Baggethun, E. and Muradian, R., 2014. Social equity matters in payments for ecosystem services. *Bioscience*, 64(11), pp.1027-1036.

A few core concepts guiding CBEP's community engagement program are (from CBEP Community Engagement Strategy, 2022):

- *Make It Convenient for People to Engage*: Providing convenient opportunities for participation – whether online or offline – is critical to engaging a broad array of audiences. Successful programs are the result of a diverse mix of engagement strategies and opportunities.
- *Reach New Audiences Where They Are*: We're spending more time communicating but still only reaching and hearing from a small segment of the Casco Bay region's population. How do CBEP and our partners level the playing field to engage the broader community, and do so in a way that doesn't require huge marketing budgets or overworked staff?
- *Inform/Engage/Empower/Collaborate*: Consider the goals for reaching each audience; are we intending to inform, engage, or empower and/or collaborate?

The communication and outreach strategies we use will depend upon which goal we are aiming for. Are we looking for action of any kind, or just intending to inform? Traditionally, CBEP has kept its audiences **informed** via the usual channels, including social media channels, our quarterly e-newsletter, and our website. We have **engaged** audiences through more interactive activities such as hosting workshops and training sessions, presentations followed by small group discussions, and occasionally field visits. To shift the engagement power differential in the future, CBEP will work harder to also provide opportunities to **empower** and **collaborate** with audiences. These types of activities will be focused on training and capacity-building, listening sessions, providing support for community science projects, and simply moving our messaging and information delivery to new audiences at their existing venues, rather than inviting them to ours. Finding ways to encourage and build local communities' ability to address environmental challenges with their own projects and programs is a key component of our community engagement program moving forward. It will take time to figure out the best ways to do that.

Guiding Questions:

- Are we reaching UU communities through our traditional communication platforms, languages, and outreach activities?
- Are those the preferred methods of communication within the targeted UU communities?
- How can we deliver outreach and train CBEP staff and Management Committee members to effectively engage with UU communities?
- How can CBEP build relationships with underserved communities that allow for two-way communication and trust?
- How can CBEP make its communications more accessible and understandable to a diverse audience, including underserved communities?

CBEP is currently developing a list of community-based organizations with whom members of our Management Committee have an existing connection, but that lie outside our network. The list includes larger organizations (like the United Way) that serve community-based organizations and smaller community-based organizations that work directly with populations with whom we (CBEP) have not historically connected, especially UU populations. Each of these organizations (many of which are not part of Maine's environmental or conservation communities) is a potential starting point for listening and conversation, and thus broadening CBEP's understanding of issues affecting UU communities.

CBEP will also be carrying out a rebranding campaign that aims in part to reach and connect with UU community audiences, retooling our messaging to be more inclusive, accessible, and engaging.

**Table 4: Partners, stakeholders, engagement activities, and timing information.**

<b>Group / Partner / Community</b>	<b>Geographic Locale</b>	<b>Type of Engagement Anticipated</b>	<b>Rationale for Engagement</b>	<b>Timing/ Regularity of engagement</b>
Community-based organizations (CBOs) that serve urban UU communities	Westbrook; Greater Portland area	Work with PRLT, GPCOG, and other partners; attend community meetings	Learning about community priorities; finding points of intersection	Once/month; reevaluate once we hire additional staff
Inland and upper watershed municipalities	Inland Casco Bay watershed	Work with GPCOG, CCSWCD, LEA, and Sebago Clean Waters to assess local community needs	Assess local community needs to deliver needed capacity, technical assistance, and funding resources	With BIL funding, Fall 2023, ongoing
All UU Communities identified in this Plan	Dispersed regional target communities within the Casco Bay Watershed, as identified in this Plan	Attending community-based and local committee meetings to learn about areas of intersection; Rebranding communications to better reflect and serve new audiences	Learn more about UU populations; Once we have identified new partners and collaborators, rebrand and make communication more accessible	2023, ongoing (attending community meetings); 2024 (rebranding)

## Conclusion

CBEP is committed not only to ensuring that benefits of BIL funding flow to UU communities, but also to transforming our organization to be more equitable and inclusive. Related changes in programs and governance will evolve over the next few years as we establish new relationships, invite new leaders to help determine CBEP priorities, and modify institutional practices to be more welcoming to everyone. Our most recent Annual workplans request funding to support several actions (like conducting a DEIJ review of our organization) to support our commitment to equity and access. Our BIL five-year spending plan and BIL workplans describe programs aimed at providing services to underserved communities. Equity and access concerns will have greater prominence in our updated CCMP, the Casco Bay Plan. The updated CCMP will show how CBEP plans to change some long-standing CBEP activities to provide services to UU communities and become more open to new voices.