



EQUITY PLAN

August 18, 2023 DRAFT

**NARRAGANSETT BAY
ESTUARY PROGRAM**

MASSACHUSETTS • RHODE ISLAND • CONNECTICUT

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A. Introduction

This Equity Plan describes how the Narragansett Bay Estuary Program (NBEP) will sustain and increase investments in underserved communities and the benefits that flow to them using Bipartisan Infrastructure Law (BIL) funding from EPA fiscal year 2024 to 2026 (BIL Year 3 to Year 5). This plan is intended to meet the goals of Executive Orders 14008 ([Justice 40](#)) and 13985 ([Equity Action Plan](#)). Further, it is consistent with the United States Environmental Protection Agency (EPA) *Equity Strategies for the EPA National Estuary Programs and Geographic Programs*. NBEP will strive to adhere to the following three core principles while implementing this plan:

- Assure underserved communities are **meaningfully engaged** in program activities that may impact them,
- **Maximize responsiveness** to the most current local needs through annual planning, and
- **Reliably support** underserved communities (and groups that can serve them) so they are able to increasingly develop, fund, and implement actions that address inequities in their community.

Note that this plan is intended as general guide for executing NBEP's intentions for addressing environmental inequity using BIL funds and gaining approval for a match waiver for Year 3-5 of these funds. Individual governing decisions by NBEP's staff and [Steering Committee](#) consistent with the [Narragansett Bay Estuary Program Bylaws](#), BIL Long-term Plan, forthcoming new Comprehensive Conservation and Management Plan (CCMP) and Organizational Engagement Plans, and [annual workplans](#) will serve to formally enact actions and goals included in this plan.

B. Governance Overview

NBEP is a catalyst for scientific inquiry and collective action to restore and protect the water quality, wildlife, and quality of life in its 2,000 square-mile Study Area of Narragansett Bay, Little Narragansett Bay, the Coastal Salt Ponds, and their watersheds, in Rhode Island, Massachusetts, and Connecticut. Founded in 1987, NBEP is one of 28 place-based [National Estuary Programs](#) (NEP) created by §320 of the Clean Water Act (CWA). Hosted by [Roger Williams University](#) (RWU), with a [staff of four](#), the program operates across boundaries to communicate science, lead collaborative planning, and fund pre-construction work that helps build a pipeline of future projects that sustain the natural environment and communities. NBEP is governed by its bylaw, a diverse 30-member Steering Committee, its [2012 CCMP](#), and annual workplans. The organization strives to be bold and maximize impact by supporting leading-edge, community-driven work to help address the area's toughest problems. See NBEP's [Fact Sheet](#) and [website](#) for more information on our place and work.

Due to the demographics of its Study Area, NBEP has funded projects for decades in underserved communities. However, the program did not intentionally or systematically conduct its work through the lenses of diversity, equity, inclusion, and justice (DEIJ) until 2022 with completion of an [Organizational DEIJ Assessment](#). Coming out of the assessment, the program committed to taking six actions to respond to environmental injustice in our region:

1. Go to events in underserved communities to build relationships.
2. Assure recruitment for staff and interns targets applicants in underserved areas.
3. Fairly compensate community members who bring their insights to our program.
4. Maintain open-source mapping tools to highlight where underserved communities are located.

5. Offer dependable funding to those with agency to develop projects in underserved areas.
6. Review all planned program activities through the lens of equity.

NBEP intends to form a DEIJ Subcommittee in 2024 to guide the program’s work in this space.

C. Definition of Underserved Communities

NBEP has developed its own definition of underserved communities. The program reviewed current literature and detailed methodologies for operating tools (including an existing NBEP [Environmental Justice Tool](#)) and employed an iterative decision-making process among staff to develop a definition appropriate for our Study Area.

1. Definition

In the NBEP Study Area, underserved communities are defined as communities located within a census block group that must:

- i. Meet or exceed the 80th percentile for **one** or more of the following Social Vulnerability criteria based on data taken from the [American Community Survey](#):
 - People of Color
 - Low Income
 - Less than High School Education
 - Limited English Speaking

OR

- ii. Score at least **80 out of 100** in our Environmental Burden composite index, which includes the weighted-average of seven criteria taken from [EJ Screen](#) and [National Land Cover Database](#). Staff evaluated the data’s local relevance to select the final criteria.

Table 1: Narragansett Bay Estuary Region Environmental Burden Composite Index Criteria

Category	Criteria	Weight
Air Pollution	Ozone	0.5
Air Pollution	Particulate Matter 2.5	0.5
Traffic	Traffic Proximity	1
Land Pollution	Hazardous Waste Proximity	1
Water Pollution	Wastewater Discharge	1
Vegetation	Impervious Surfaces	0.5
Vegetation	Lack of Trees	0.5

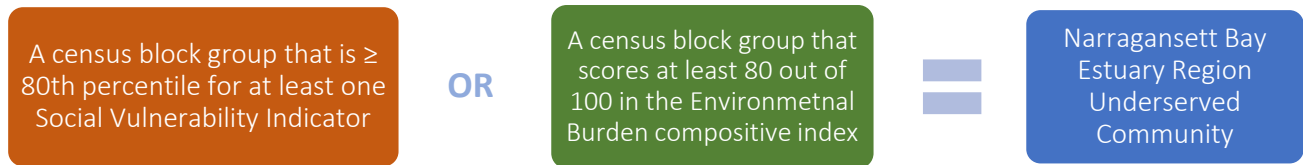
Note for the composite index, indicators that meet or exceed the 80th percentile are assigned a score of 100; those that do not are assigned a score of 0. Null data are dropped and a weighted average is taken of the results; to avoid over-weighting a specific category, the following criteria are assigned half weight: ozone, particulate matter 2.5, impervious surfaces, and lack of trees. This can be represented by the following equation:

$$\frac{.5 \times \text{Ozone} + .5 \times \text{PM 2.5} + \text{Traffic} + \text{Hazardous Waste} + \text{Wastewater} + .5 \times \text{Impervious} + .5 \times \text{Trees}}{5}$$

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A visual description of this definition is provided in Figure 1 below.

Figure 1: Narragansett Bay Estuary Region Underserved Community Definition



2. Inclusion of Race-Based Factors in the Definition

NBEP’s Study Area is located in the states of Rhode Island, Massachusetts, and Connecticut. Each state uses its own definition for underserved communities. In Rhode Island, a census tract that has a “minority population” equal to or greater than 40% of the population qualifies as an [Environmental Justice Focus Area](#). Similarly, in the Commonwealth of Massachusetts a neighborhood where “minorities” make up 40% or more of the population qualifies as an [Environmental Justice Population](#). In Connecticut, “race/people of color” is included in the Socioeconomic Factor composite index of their [Environmental Justice Screening Tool](#). “People of color” is also included in the demographic index used in EPA’s [EJ Index](#) to assure consistency with [Executive Order 12898: Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations](#). Finally, substantial scholarship finds that people of color and ethnic minoritized groups experience greater exposure to environmental hazards than white populations due to the location of pollution sources in historically racially and ethnically segregated communities throughout the United States ([Connecticut Environmental Justice Screening Tool, Draft Report Version 1.5](#)). As place-based program called on to reflect local priorities and to assure consistency with the federal documentation and published literature, NBEP defines underserved communities to include race-based factors.

3. Narragansett Bay Estuary Region Underserved Community Mapping

Areas that meet NBEP’s definition of underserved communities are depicted in the static map provided as Figure 2. They are collectively referred to hereafter as “Narragansett Bay Estuary Region Underserved Communities.” NBEP has also created a new [Narragansett Bay Estuary Region EJMap Tool](#). A screencap of the tool is provided as Figure 3. This open-source interactive tool was used to generate the static NBEP Underserved Communities Map, allows NBEP or the public to explore this map and determine whether an activity is located in an NBEP-defined underserved community, **AND** enables others in our region to customize their own tool, by picking the criteria, percentiles, categories, and weighting that best defines underserved areas in their own community. The complete methodology that underlies the definition, static map, and interactive new tool is found in the [NBEP EJmap technical documentation](#). A “beta” version of the new tool and methodology will be made available in 2023, with refinements expected into calendar year 2024.

4. Scope of Benefits Captured

NBEP has chosen to calculate and report monetary investments in activities where any part physically takes place within the boundaries of Narragansett Bay Estuary Region Underserved Communities. At this time, the program is not including non-monetary benefits or projects that take place entirely outside of these areas (e.g., downstream, within some set proximity). Tracking of benefits is discussed in Section G below.

Figure 2: Narragansett Bay Estuary Region Underserved Communities

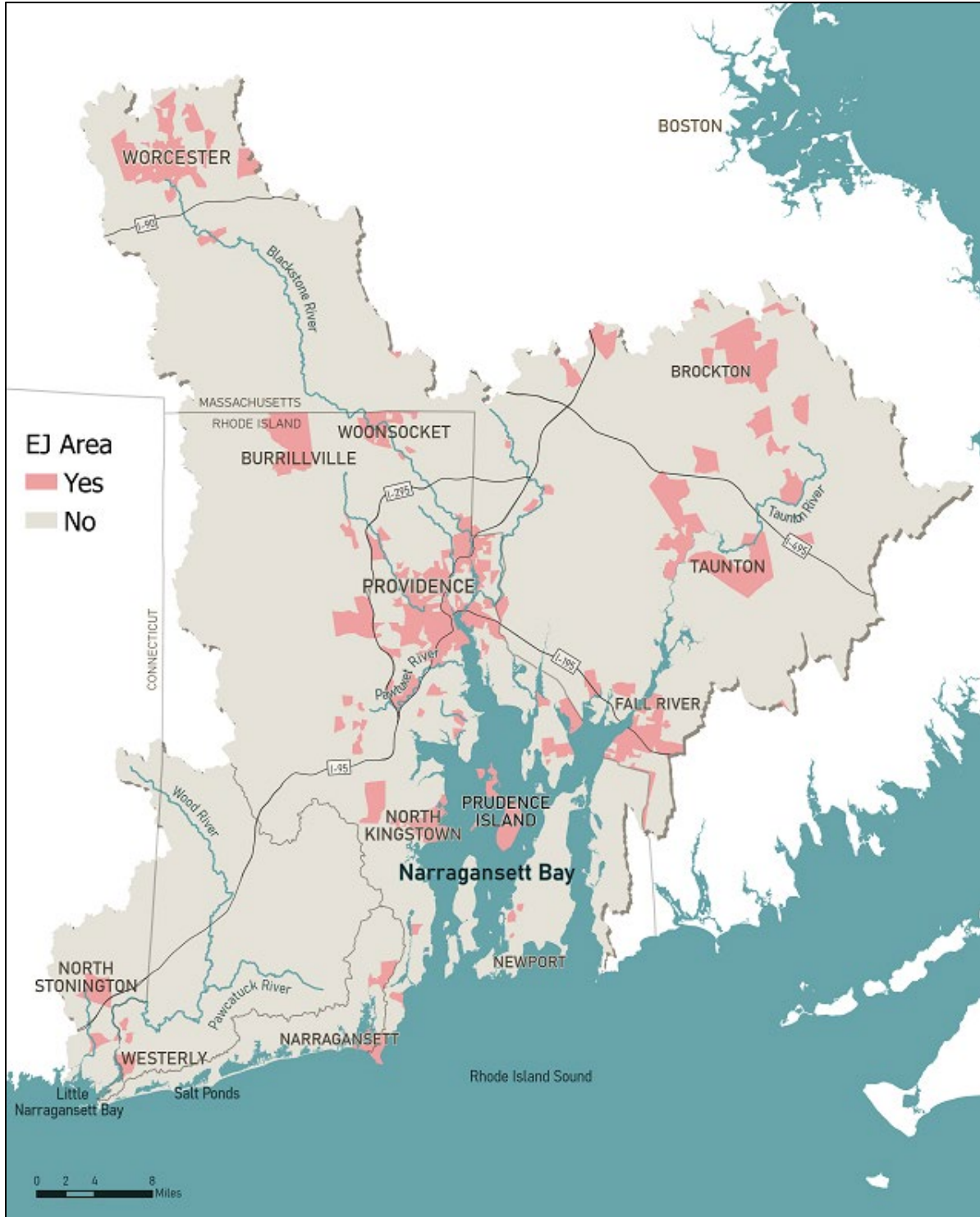
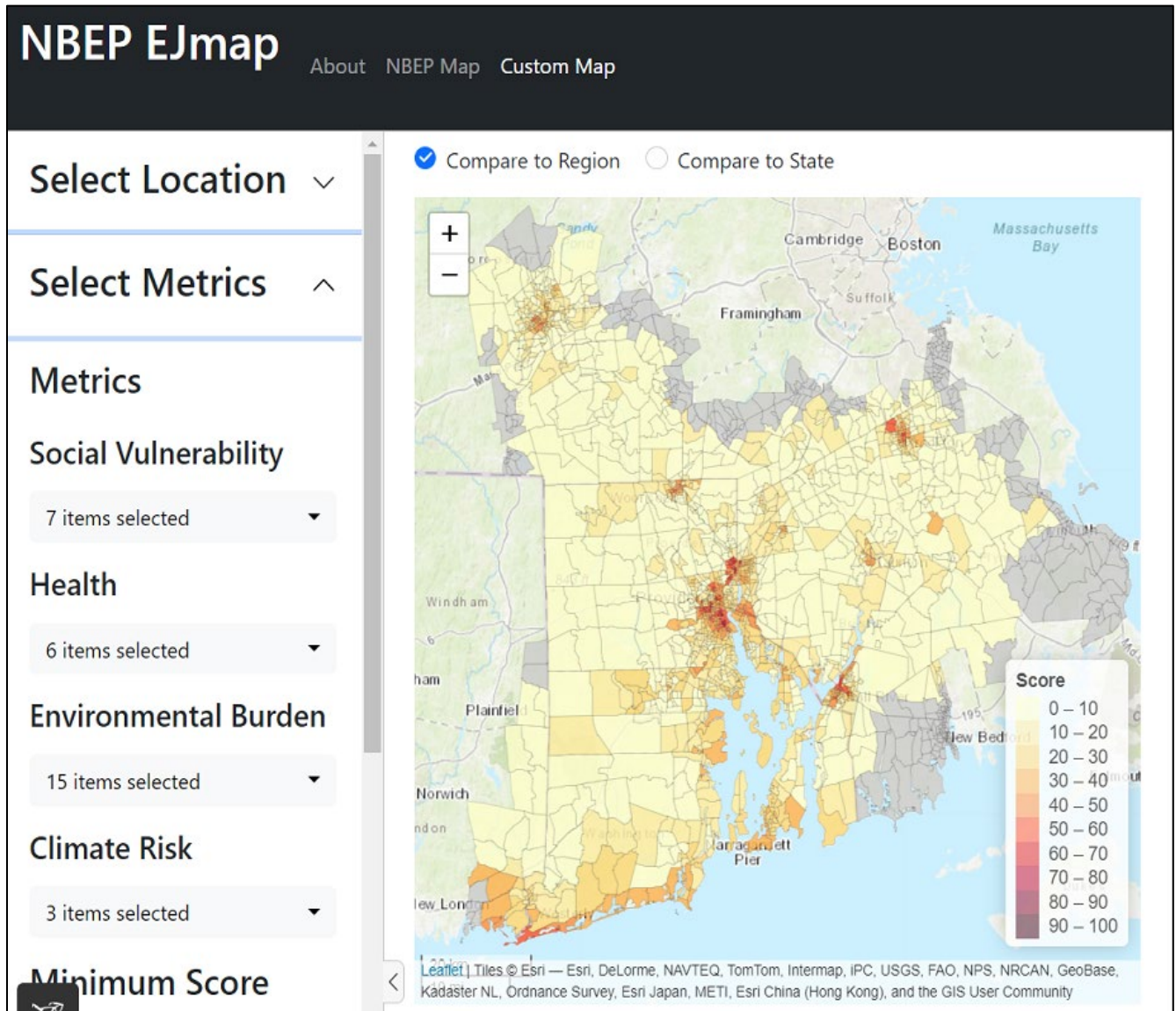


Figure 3: Narragansett Bay Estuary Region EJMap Tool Screenshot



D. Baseline Analysis of Underserved Communities

On March 9, 2023, EPA provided NBEP a baseline analysis based on annual NEPORT reporting that assessed the percent of 2017-2021 pre-BIL funds that benefited underserved communities. This analysis indicated that NBEP had invested **0 percent** of its funds in these communities.

NBEP appreciates the importance of the annual metrics tallied in NEPORT for telling the collective NEP story. However, the numbers included in this report only represent a small part of the NBEP story. These metrics do not capture the green infrastructure projects, nor do they include our support for pre-construction project development steps (“planning”), the latter being the core of program’s current approach to advancing our CCMP. Most of reported habitat and leverage are partners’ non-federal cost-share offered as match for the program’s funding, this is at least in part because NBEP does not conduct habitat construction itself.

NBEP has completed an in-depth analysis of its pre-BIL monetary investments delivered via subawards from 2017-2021. The results of this look-back assessment are provided in Table 2.

Table 2: NBEP Baseline Investment in Underserved Communities Analysis

Year	Total Monetary Investment	Monetary Investment in Underserved Communities	Percent Monetary Investment in Underserved Communities
2017	\$115,601	\$35,000	30%
2018	\$0	\$0	0%
2019	\$341,260	\$47,500	14%
2020	\$24,000	\$16,000	67%
2021	\$759,942	\$278,371	37%
Total	\$1,240,803	\$376,871	30%

Based on this analysis, a baseline investment in underserved communities of **30 percent** will be used by NBEP as the foundation for how benefits are tracked and measured in future years.

E. Numeric Targets for Benefits to Underserved Communities

Per the EPA [National Estuary Program Bipartisan Infrastructure Law Implementation Memo](#), the national numeric target for ensuring 40 percent of the benefits of BIL funds flow to underserved communities. NBEP’s numeric target for monetary investment over the life of BIL funds within Narragansett Bay Estuary Region Underserved Communities is **50 percent** (“numeric target”).

This numeric target is both a realistic and ambitious target based on the sheer amount of underserved areas in the legacy industrial/urbanized watersheds served by NBEP, an organizational commitment to using BIL funds for project development in these areas, and the program and its partners’ strengthening relationships in these communities. A back-of-the envelope estimate as of August 2023 is that 60% of the [FY2022-FY2023 BIL Workplan](#) funds are invested in Narragansett Bay Estuary Region Underserved Communities. Our confidence that this 50% target can be met or exceeded is emboldened by the early performance by organizations funded to develop projects with Year 1 BIL funds in underserved areas (e.g., [Old Colony Planning District](#) in Brockton, MA, the [Southeast Regional Planning and Economic Development District](#) in Taunton, MA, [Groundwork Southcoast](#) in Fall River,

MA, [Blackstone River Watershed Council](#) in Pawtucket/Central Falls, RI, and the [Racial and Environmental Justice Committee](#) (REJC) in Providence, RI), our plan to continue funding many of these entities in Year 2 and beyond, and inclusion of a tribal land acknowledgement and Engagement Plan in our [FY2023 Base Funding Workplan](#) that will seek to build authentic connections with new organizations and people across our Study Area.

A significant barrier to the program meeting this numeric target is that the small, volunteer, and/or nascent community-based organizations, which have unique knowledge and agency to develop projects bottom-up in underserved communities, often do not have the capacity to meet the extensive requirements for accepting federal funds. This is not an issue of competence, initiative, or willingness to comply with the law; rather, it is a lack of experience and impatience for administrative burdens that take them out of the field. This is a challenge for all NEPs, and really anyone trying to get federal money to organizations new to this funding source. Further, our host, RWU, requires the same level of paperwork for subawards using federal awards to small volunteer organizations that it does for fellow universities or large NGOs.

In total, NBEP finds that a 50 percent target, which represents a 66 percent increase over NBEP's 30 percent 2017-2021 baseline, is an appropriate numeric target at this time. Due to recent successes noted above and strong lines of communications with both RWU and EPA, NBEP is confident it can build relationships and find efficiencies that ease the ability to meet this target and continue sending robust BIL funding to underserved communities.

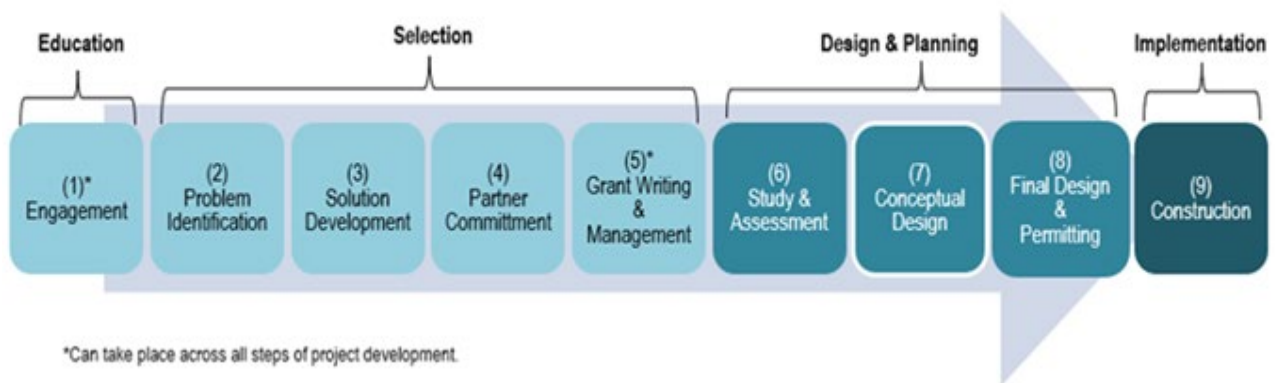
F. Key Activities

The activities that the program will pursue to achieve the numeric target are described in NBEP's [FY2022-FY2023 BIL Workplan](#) and [BIL Long-Term Plan](#). In short, NBEP will support local partners with the expertise and agency to advance projects from idea to construction that reduce pollution, enhance habitat and climate resilience, improve public access to nature, and advance environmental equity. NBEP's Steering Committee has endorsed the topline goal of the program using BIL funds to support human infrastructure that can develop and sustain a pipeline of high-quality projects that are consistent with NBEP's CCMP and local priorities.

The organization's current CCMP from 2012 does not address equity in any specific way; however, NBEP's next CCMP, [Vision 2032](#), will consider all actions through the lenses of climate resilience, sustainable resource use, and equity looking forward. Vision 2032 is expected to be published in summer 2024, likely prior to expenditure of any Year 3 BIL funds to which this plan would apply.

NBEP's Project Development Process included in both plans noted above is provided below as Figure 4. Annual Workplans approved by NBEP's Steering Committee annually in the summer will build on the BIL Long-Term Plan by describing the specific objectives and tasks, consistency with CCMP goals, and how the work will help achieve the numeric target.

Figure 4: Project Development Process



G. Tracking Benefits

Benefits of NBEP’s work will be consistent with its mission to improve “water quality, wildlife, and quality of life” and the general goals noted in the BIL Long-Term Plan to “reduce pollution, enhance habitat and climate resilience, improve public access to nature, and advance environmental equity.” As noted in Section C, for the purposes of tracking achievement of its numeric target, NBEP will only follow and report benefits related to monetary investments in activities that are located within Narragansett Bay Estuary Region Underserved Communities. The program’s Annual Workplans approved by its Steering Committee will describe the specific benefits accrued in these areas. NBEP’s [FY2022-FY2023 BIL Workplan](#) for Years 1 and 2 of BIL funds emphasizes support for ‘project development’ (Figure 4) utilizing subawards to local partners that enable them to hire staff and/or technical consultants that can develop projects. The key metric NBEP is internally using to track progress is the number of ‘steps’ that individual projects advance along the project development process (Figure 4), which moves a project from initial idea and community engagement toward construction or implementation. For a more external audience, NBEP will also track number of projects under development, studies/plans/other pre-construction documents completed, funding leveraged, and eventually, specifics (habitat/treatment acres, etc.) of completed projects. Finally, the program will also track metrics consistent with forthcoming EPA OEJECR requirements.

H. Stakeholder Engagement Plan

NBEP is committed to assuring timely and meaningful engagement in all its work with people across the Study Area that span interests, demographics, and life experiences. Along the spectrum of engagement described in [The Spectrum of Community Engagement to Ownership](#) depicted in Figure 5, NBEP will always seek to achieve the ‘Collaborate’ developmental stage with communities, that is, ensure communities have the capacity for leadership in decisions. Depending on the activity and partner, the ‘Involve’ or ‘Defer To’ developmental stage may be appropriate. NBEP intends to primarily conduct outreach with and through existing organizations that possess trust and agency in frontline communities, including indigenous communities, rather than looking to create new programs from the outside. In cases where there are true gaps in outreach by existing organizations, NBEP will conduct authentic direct outreach to target audiences.

Figure 5: Spectrum of Community Engagement to Ownership



Per NBEP’s [FY2023 Base Funding Workplan](#), the program expects to develop an Organizational Engagement Plan in the coming fiscal year that will describe target audience, purpose, developmental stage, NBEP role, geographic scale, techniques, tools, and timing of outreach work. Engagement with underserved communities to help meet the numeric target in Section E of this document will be a key part of this new plan. Thus, NBEP’s Organizational Engagement Plan, when approved by NBEP’s Steering Committee, will replace Table 3. NBEP’s Engagement Plan is expected to be published in 2024, likely well before any Year 3 BIL funds to which the Equity Plan would apply.

Table 3 is not an exhaustive list of potential partners; rather, it is a starting list of NBEP’s existing partners and contacts that possess trust and agency in frontline communities and additional target audiences. In cases where there are true gaps in outreach by existing organizations, NBEP will conduct direct outreach to target audiences as informed by its 2024 Engagement Plan.

Table 3. Table displaying NBEP key partners, stakeholders, and contacts for authentic outreach. (Listed in alphabetical order after NBEP committees)

Organization Name	Geographic Locale	Type of Engagement	Rationale for Engagement	Timing/of engagement
NBEP Executive and Steering Committees	Regional	Organize meetings, information distribution, consultations, project design	Policy and oversight, CCMP implementation, partnership-building	6 meetings per year plus regular engagement with individual members
NBEP DEIJ Subcommittee	Regional	Organize meetings, consultations, project design	Ensure NBEP Steering Committee engagement in equitable distribution of NBEP services, funding, and products	Bi-annually
Blackstone Watershed Collaborative	Watershed – Coalition of NGOs and municipalities	Attend meetings, information distribution	Connect with municipalities and NGOs that may benefit from NBEP services, funding, and products	Monthly

Blackstone River Watershed Council / Friends of the Blackstone	Watershed	Information distribution, attend events, project design and implementation	Fund local champions to identify and resolve problems in their communities; meaningfully engage with Tribal Nations	As needed
East Coast Shellfish Growers' Association	Regional	Consultations	Understand commercial fishing community needs	As needed
Environment Council of Rhode Island	State	Consultations, project design and implementation	Understand NGO community needs; connect with members that may benefit from NBEP services, funding, and products	As needed
Groundwork Rhode Island	State	Consultations, project design and implementation	Fund local champions in EJ areas to identify and resolve problems in their communities	As needed
Groundwork Southcoast	Regional	Consultations, project design and implementation	Fund local champions in EJ areas to identify and resolve problems in their communities	As needed - at least quarterly
Massachusetts Ecosystem Climate Adaptation Network	State	Attend meetings, consultations	Understand community needs; connect with members that may benefit from NBEP services, funding, and products	As needed
Massachusetts Environmental Justice Council	State	Attend meetings, information distribution	Identify new partners, ensure consistency with NBEP EJ tools and approaches	Quarterly
Massachusetts Lobstermen's Association	State	Consultations	Understand commercial fishing community needs	As needed
Old Colony Planning Council	Regional	Consultations, project design and implementation	Fund local champions to identify and resolve problems in their communities; assist underserved municipalities that lack capacity	As needed - at least quarterly
Racial and Environmental Justice Committee	Local (Providence, RI)	Attend meetings, consultations, project design and implementation	Fund local champions in EJ areas to identify and resolve problems in their communities	As needed - at least quarterly

Resilient Taunton Watershed Network	Watershed – Coalition of NGOs and municipalities	Attend meetings, information distribution	Connect with municipalities and NGOs that may benefit from NBEP services, funding, and products	Monthly
Rhode Island Conservation Districts	State	Information distribution, consultations, project design and implementation	Fund projects; connect with municipalities that may benefit from NBEP services, funding, and products; assist underserved municipalities that lack capacity	As needed – at least quarterly
Rhode Island Division of Statewide Planning	State	Consultations, information distribution, project design	Identify new stakeholders, ensure consistency with NBEP EJ tools and approaches	As needed
Rhode Island Environmental Education Association	State	Attend meetings, consultations	Understand community needs; connect with members that may benefit from NBEP services, funding, and products	As needed
Rhode Island Land Trust Council	State	Consultations	Understand community needs; connect with members that may benefit from NBEP services, funding, and products	As needed
Rhode Island League of Cities and Towns	State / municipality	Consultations, information distribution	Connect with municipalities that may benefit from NBEP services, funding, and products	As needed
Rhode Island Rivers Council	State – coalition of state-designated watershed authorities	Attend meetings, information distribution, consultations, project design and implementation	Partnership-building, information sharing, project identification and development	Monthly
Rhode Island Saltwater Anglers Association	State	Consultations, project design and implementation	Understand recreational fishing community needs; connect with members that may benefit from NBEP services, funding, and products	As needed
Save the Bay	Regional	Consultations, project design and implementation	Fund local champions to identify and resolve problems in their communities; assist underserved municipalities that lack capacity	As needed - at least quarterly

SNEP Network	Regional - southern New England	Attend meetings, consultations, project design	Connect with municipalities that may benefit from NBEP services, funding, and products; assist underserved municipalities that lack capacity	As needed
Southeastern Regional Planning and Economic Development District (SRPEDD)	Regional	Consultations, project design and implementation	Fund local champions to identify and resolve problems in their communities; assist underserved municipalities that lack capacity	As needed - at least quarterly
Tomaquag Indigenous Museum	Regional – southern New England	Attend events, consultations, project design and implementation	Make meaningful connections with Tribal Nations and identify opportunities for NBEP to provide value through funding, services, or products	As needed

I. Next Steps

NBEP expects to submit this draft Equity Plan to EPA for initial consideration in August 2023. The final draft will be brought to the program’s Executive and Steering Committees for formal review and approval in October 2024. This plan may be revised in the future to include new data, consider new circumstances, or otherwise improve its utility meeting and reporting on the program’s environmental equity goals.