STAND UP TO OIL communities fueling change

Learn more at standuptooil.org

Evaluating Fuel Projects - *A Stand Up To Oil Evaluation Tool*

Updated August 2024

Purpose - Evaluation tool to guide how the Stand Up To Oil (SUTO) coalition engages in fossil fuel facility updates, transitions, and proposals as part of our focus on holding the fossil fuel industry accountable.

Principles -

- SUTO is focused on holding the fossil fuel industry accountable, preventing the expansion of fossil fuel infrastructure, and promoting a just transition to clean energy.
- SUTO strives to center environmental justice in all of our work. Our goal is to equip communities with the resources they need to make the best decisions for themselves.
- Not all energy projects claimed to be "clean" are actually clean and good for people and the environment, and each project needs to be evaluated on its own merit, impacts, and benefits.

Process evaluation -

- The permit application information is verifiable - the modifications and related impacts described by the applicant are truthful and we can evaluate at face value.
- Tribal consultation is both incorporated into project development and project review. Tribes have free, prior, and informed consent and are consulted from the beginning. Tribal sovereignty is upheld.
- Community engagement, especially with BIPOC and frontline communities, is valued and incorporated into project review and development from the beginning. There are ample pathways of participation and accommodations that will allow for input from the whole community (e.g. mailing letters, online meetings, in-person meetings, and meeting times outside of the work day).
- Project details are transparent and used for project review in a timely way - the public can easily access information.
- Project developers offer a clear understanding of how the project is financed and insured.
- Project scope is clear (e.g. new project, minor modification, or major modification) and includes necessary permitting processes.

Project details evaluation -

- *Baseline:* Project is not adding capacity such that the facility can ultimately produce/transport/store more fossil fuels. As we transition to a clean energy economy, there must be a decrease in overall fossil fuel production. If emerging fuels are to be used, they need to be replacing fossil fuels, not simply be added on top of fossil fuel production. In some cases, such as blending fossil fuels and emerging fuels, there could even be loopholes that allow for an increase in fossil fuel production.

- *Shipping and transport*: Project-related shipping and transport are clearly identified and described in the project application and threshold determination. Permit conditions mitigating the impacts from shipping and transport are clearly defined and can be verified publicly. The project does not cause increased harm to endangered species or public health from shipping and transport impacts. Examples include increase of vessel traffic, train traffic carrying hazardous materials, and increase in truck traffic.
- *Public health and safety:* Project impacts associated with public health and safety are fully identified, reviewed, and described. The project does not cause undue harm to human health and safety. Examples of adverse health impacts include air pollution, fire safety increases, and noise impacts.
- *Location*: Project location is appropriate for its use and impacts, including land, water, and energy use. Location does not have undue impacts on already overburdened communities. Location is not at risk of geological or other climate hazards (e.g. fault lines or areas that might be compromised by sea level rise or wildfire).
- *Carbon content:* Accurate evaluation of carbon content of fuel, inclusion, and/or reliance on ongoing fossil fuels at the facility, whether or not replacement of current fossil fuels occurs due to project proposal. Proposals do not continue and/or enable further reliance on fossil fuels.
- *Economic context*: Project enables and/or creates new economic opportunities for the local community - including building and construction as well as maintenance and operations. Examples include supporting apprenticeship programs, expanding unionized workforce, and hiring from local community members. Project will not create excessive financial burdens upon community members, such as high increases in utility rates.
- *Need for project:* The project has a definable role in the transition to an economy free of fossil fuels.
- *Ecosystem and wildlife:* The project will not do undue harm to the local ecosystem or create additional pollution. Ideally, it will demonstrably reduce pollution from existing facilities, and/or will exceed standards for new facilities.

Permit evaluation -

- *Updated permits*: For existing facilities, existing project permits are updated and written in a way that incorporates oversight and accountability for any changes at the facility. Examples include lowering air pollution allowances to reflect a shift toward producing more lower carbon products; change in any pipeline safety protocols or reviews if a change is proposed from oil transport to hydrogen transport; and updated wastewater discharge permits to allow less polluting discharge for modifications towards lower polluting refining.
- *Tribal consultation is completed.*
- *Permit conditions:* the project developers and operators are held to the following:
    - *Compliance monitoring:* For all facilities, inclusion of monitoring and periodic review of permits, particularly around key impacts like vessel traffic, air pollution, and low carbon fuel production. Confirmation that the project is operating as permitted.
    - *Capacity and limits established*: Facility capacities and limits are defined as conditions of permitting.
    - *Revocation*: In the case of permits being violated, permit conditions include revocation.

STAND UP TO OIL communities fueling change

Learn more at standuptooil.org

Checklist for Evaluating Project Proposals

Project Need and Transparency

Notes and Citations:

1. Is there a clear need for this project?	**Yes** ☐	**No** ☐	**Unsure** ☐
2. Do you have access to the necessary materials and resources to evaluate this project (permits, reports, studies, analysis, etc.)?	**Yes** ☐	**No** ☐	**Unsure** ☐
3. Are project details transparent and clear?	**Yes** ☐	**No** ☐	**Unsure** ☐

Process Review

1. Are project details verifiable? Do all the materials agree with each other?	**Yes** ☐	**No** ☐	**Unsure** ☐
2. Is there meaningful early and ongoing tribal consultation?	**Yes** ☐	**No** ☐	**Unsure** ☐
3. Is there proper and authentic community outreach and engagement around the project proposal, especially with frontline community members and people of color?	**Yes** ☐	**No** ☐	**Unsure** ☐

Project Impacts Evaluated

1. Is the project replacing or adding capacity?

Replacing ☐ **Adding** ☐ **Unsure** ☐

2. How significant are the transportation impacts?

None **0 1 2 3 4 5 6 7 8 9 10** **Extremely** **Unsure** ☐

3. How significant are the safety impacts?

None **0 1 2 3 4 5 6 7 8 9 10** **Extremely** **Unsure** ☐

4. How significant are the risks of seismic or geological hazards?

None **0 1 2 3 4 5 6 7 8 9 10** **Extremely** **Unsure** ☐

5. How significant are pollution impacts to air quality?

None **0 1 2 3 4 5 6 7 8 9 10** **Extremely** **Unsure** ☐

6. How significant are greenhouse gas emissions?

None **0 1 2 3 4 5 6 7 8 9 10** **Extremely** **Unsure** ☐

7. How significant are pollutant emissions?

None **0 1 2 3 4 5 6 7 8 9 10** **Extremely** **Unsure** ☐

8. How significant are the pollution impacts to water quality?

None **0 1 2 3 4 5 6 7 8 9 10** **Extremely** **Unsure** ☐

9. How significant are the pollution impacts to the land?

None **0 1 2 3 4 5 6 7 8 9 10** **Extremely** **Unsure** ☐

10. How significant are the public health impacts?

None 0 1 2 3 4 5 6 7 8 9 10 Extremely Unsure ☐

11. How significant are the impacts from feedstocks and inputs (e.g. over-appropriating water use or redirecting cropland for fuel instead of food, etc.)

None 0 1 2 3 4 5 6 7 8 9 10 Extremely Unsure ☐

12. Will this increase the environmental injustices already experienced by local overburdened communities?

Yes ☐ No ☐ Unsure ☐

13. Will this increase the environmental injustices already experienced by overburdened communities upstream or downstream from the project?

Yes ☐ No ☐ Unsure ☐

Decision-Making Accountability

1. Overall, will risk and harm be mitigated sufficiently?

Yes ☐ No ☐ Unsure ☐

2. Do permit decisions include monitoring requirements?

Yes ☐ No ☐ Unsure ☐

3. Are capacity limits established?

Yes ☐ No ☐ Unsure ☐

4. Are there any revocation clauses in case of violations?

Yes ☐ No ☐ Unsure ☐

5. Is this project supported by Tribes, BIPOC, and frontline communities?

Yes ☐ No ☐ Unsure ☐

STAND UP TO OIL communities fueling change

Additional Notes and Citations: