

STAKEHOLDER REVIEW DRAFT

“AB 617: Challenges, Successes, Lessons Learned and Recommendations for the Future”

**Jonathan K. London Ph.D.
Peter Nguyen, B.A.
Mia Dawson B.S.
Katrina Manrique**

UC Davis

April 2020

Table of Contents

EXECUTIVE SUMMARY 3

 Introduction / Methods 3

 Summary of Evaluation Findings 3

 Summary of Evaluation Recommendations 5

1. INTRODUCTION 7

2. METHODOLOGY 8

 Research Questions 8

 Data Sources 9

 Data Analysis 10

 Limitations 10

3. EVALUATION COMPONENTS..... 10

A. AB 617 Consultation Group 10

B. Community Air Protection Blueprint 12

C. Community Selection..... 13

D. Community Steering Committees 16

E. Community Air Monitoring Plans (CAMPs) 24

F. Community Emissions Reduction Plans (CERPs)..... 27

G. Community Air Grants 31

H. Environmental Justice..... 33

I. Overall Assessment..... 36

4. RECOMMENDATIONS 41

5. LONGER-TERM EVALUATION QUESTIONS 46

6. CONCLUSION 47

40 **List of Figures**

41 **Figure 1 – AB 617 Blueprint**..... 12

42 **Figure 2 – Community Selection** 15

43 **Figure 3 – CSC Leadership Structure Continuum**..... 19

44 **Figure 4 – CAMP Process** 25

45 **Figure 5 – CAMP Outcomes**..... 26

46 **Figure 6 – CERP Process** 28

47 **Figure 7 – CERP Outcomes**..... 29

48 **Figure 8 – Environmental Justice** 34

49 **Figure 9 – Achievement of Goals**..... 37

50 **Figure 10 – AB 617 Providing Benefits to Community**..... 38

51

52 **Appendices**

53 **Figure i – AB 617 Structure and Process**..... 48

54 **Figure ii – Air Quality Management in California**..... 48

55 **Figure iii – Survey Respondents by Stakeholders in 2018-2019 Survey**..... 49

56 **Figure iv – Survey Respondents by CSCs in 2018-2019 Survey**..... 49

57 **Figure v – Survey Respondents by Stakeholders in 2020 Survey** 50

58 **Figure vi – Survey Respondents by CSCs in 2020 Survey** 50

59

60 **List of Tables**

61 **Table 1 – Summary of Evaluation Findings**..... 3

62 **Table 2 – AB 617 Consultation Group**..... 11

63 **Table 3 – Community Selection**..... 14

64 **Table 4 – CSC Leadership Models**..... 19

65 **Table 5 – CAMP Process**..... 25

66 **Table 6 – CERP**..... 29

67 **Table 7 – Community Air Grants (2018-2019 Survey)** 32

68 **Table 8 – Community Air Grants (2020 Survey)**..... 33

69 **Table 9 – Achievement of Goals** 37

70 **Table 10 – AB 617 Providing Benefits to Community**..... 38

71 **Table 11 – Summary of Evaluation Findings**..... 38

72

73

EXECUTIVE SUMMARY

California’s Assembly Bill 617 (AB 617) is a bold new approach to cleaning the air in disadvantaged communities through unprecedented public participation, local air monitoring, and comprehensive plans for achieving air emissions reductions – all in an effort to reduce health disparities. It has been called “transformative” by members of the legislature, state, regional and local environmental and health leaders for its potential for reworking how air quality management is organized in California. The legislation has been developed into an implementation framework called the Community Air Protection Blueprint by the California Air Resources (CARB) to guide the work of regional air districts and community steering committees.

Over the past two years, all levels of California’s air quality management system have engaged in a process of building collaboration to implement this ambitious policy. Along the way they have developed successful innovations, encountered numerous challenges, and generated a large number of lessons learned that can be used to improve future implementation of the policy. This report documents these successes, challenges and lessons learned with the purpose of helping all stakeholders reflect on their experiences to date and inform future improvements. It does so with the intention of generating constructive suggestions for enhancing the collective work of the diverse stakeholders who are investing so much of their valuable time, knowledge, and passion in implementing the policy for the benefit of the communities most affected by air pollution.

The methodology used to form the analysis and inform the recommendations of this evaluation study placed a high priority on documenting the voices of those directly involved in the implementation process itself. We sought to collect perspectives from all involved stakeholders in a way that valued everyone’s knowledge and experience. Towards this end, we employed a number of primarily qualitative methods, including several on-line surveys, key informant interviews, field observations, and document analysis. The data collection period ran from November 2018 through March 2020.

Research Questions

The report sought to answer four major research questions based on the goals of the statute and the Blueprint.

- 1) What changes did AB 617 create in the management of air quality in California, especially in addressing the needs and challenges of disadvantaged communities?
- 2) How “transformative” were these changes in process and in outcomes?
- 3) What were the factors that facilitated and/or reduced the effectiveness of these changes?
- 4) What are ways that the all parties can better achieve the goals of AB 617 and the underlying goals of addressing air quality needs and challenges of disadvantaged communities?

Summary of Evaluation Findings

AB 617 Element	Major Successes	Major Challenges
<i>Community Air Protection Blueprint</i>	Community Air Protection Blueprint lays out a robust framework for the implementation of the legislation.	The Blueprint does not provide sufficient guidance on community engagement.

<i>AB 617 Consultation Group</i>	The Consultation Group provided crucial support for the development of the Community Air Protection Blueprint.	There has been some lack of clarity about the purpose of the group after the development of the Blueprint. Advocating for funding for AB 617 been suggested as a potential role.
	The Consultation Group’s diverse membership was appreciated by the members.	Clarity on advice to CARB was challenging at times due to the wide range of perspectives.
<i>Community Selection Process</i>	The community selection process has included 10 communities with the worst air quality in the state.	Communities perceived themselves to be in competition with each other.
	There were innovations in the number of community-driven and community/ Air District collaboration.	Some district-led processes did not achieve potential for community collaboration.
<i>Community Steering Committees</i>	Most CSCs achieved a robust composition of residents, community organizations, businesses, and local governments.	There was a significant degree of conflict within the CSC members, especially between residents/ community organizations and business representatives.
	Most CSC improved the level of collaboration throughout the process.	There was a significant degree of conflict between the CSCs and Air Districts in many sites.
	The addition of outside facilitators helped in many CSCs.	Some facilitators approaches did not fit the needs and context of the CSCs and in some cases had to be replaced.
	Spanish translation increased – to some degree participation of mono-lingual Spanish speakers.	Some mono-lingual CSC members continued to feel marginalized during the process and a number dropped off the CSC.
	Community organizations provided crucial capacity-building for residents in many CSC.	Many of the presentations by Air Districts, CARB and outside consultants were not accessible to residents. This improved somewhat over time but often with significant investments by community organizations. Youth membership was limited in all but two CSCs and in general young people’s voices were missing.
		There was some confusion about how much meeting outside of the formal CSC meetings were permissible.
		These additional meetings took a great deal of time and effort from residents and community organizations.

Community Air Monitoring Plans (CAMPs)	There was great interest of residents in the monitoring devices and processes.	Some of the monitoring presentations were not accessible to residents.
		Some of the monitoring areas did not include targets of concern for residents.
		Time constraints limited the value of the CAMPs for informing the CERPSs.
Community Emissions Reduction Plans (CERPs)	The CERPs include a range of community-priorities such as mobile sources, land use, pesticides, community-benefit investments.	This positive result was uncertain until the end of the process and achieved through extensive negotiations between the CSC and Air Districts and often with the support of CARB.
	There has been unprecedented engagement of other agencies (cities, counties, and the Department of Pesticide Regulation).	As noted above.
	There was some integration of public health as a goal and focus of strategies.	There was a call for a greater focus on public health outcome metrics and strategies in the CERPs.
Community Air Grants	The CAGs provided important resources to build capacity in current and potential AB 617 communities.	There were some grants made to larger community organizations that spurred concern in smaller grassroots organizations.
Environmental Justice	There was a strong emphasis on environmental justice and social equity in the legislation, Blueprint and many CSCs.	There was some unevenness in realization of EJ principles, in particular in the ability of Air Districts to open space for CSCs to define their own agendas and action priorities.

115 **Table 1:** Summary of Evaluation Findings

116

117 **Summary of Evaluation Recommendations**

118

119 The study generated a number of recommendations to improve the AB 617 implementation process in
 120 Year 2 and beyond. Because this is a study of community engagement, it emphasizes recommendations
 121 from community organizations and residents, but includes the perspectives of all stakeholders. These
 122 include the following.

123

- 124 1. Sustain the AB 617 Consultation Group with broader charges such as revising the Blueprint
- 125 2. Develop an improved Blueprint focused on community engagement with best practices,
 126 resources, and tools.
- 127 3. Improve the community selection process
 - 128 a. Avoid/ reduce competition between communities
 - 129 b. Use community-based community nomination and vetting processes
- 130 4. Improve the management of CSC processes
 - 131 a. Clarify shared goals (including emphasis on environmental justice)
 - 132 b. Adapt leadership structure that equitably shares authority between community and Air
 133 District representatives
 - 134 c. Develop a framework for use of outside facilitators

REVIEW DRAFT

- 135 d. Pay CSC members stipends (in particular community residents)
- 136 e. Stronger and more proactive role for CARB in mediating, facilitating and ensuring
- 137 accountability of all parties to the Blueprint and overall goals of AB 617
- 138 5. Improve the development of the CAMPs
 - 139 a. Continued community education on monitoring technologies
 - 140 b. Incorporate air quality monitoring by communities
 - 141 c. Better utilization of data to inform CERPs
- 142 6. Improve the development of the CERPs
 - 143 a. Better incorporation of community priorities
 - 144 b. Expansion to air quality “drivers” (i.e., land use)
 - 145 c. Enhance use of health metrics to track health impacts
 - 146 d. Consider use of Civil Rights framework (Title VI) to address racial disparities
- 147 7. Improve the Community Air Grants Program
 - 148 a. Balance the value of enhancing CAMP and CERPs in selected communities and
 - 149 spreading the resources beyond these communities
- 150 8. Support on-going funding for AB 617 at sufficient levels for current and future communities
- 151
- 152
- 153
- 154
- 155
- 156
- 157
- 158
- 159
- 160
- 161
- 162
- 163
- 164
- 165
- 166
- 167
- 168
- 169
- 170
- 171
- 172
- 173
- 174
- 175
- 176
- 177
- 178
- 179
- 180
- 181
- 182
- 183

184 **1. INTRODUCTION**
185

186 California’s Assembly Bill 617 (AB 617), authored by Assemblymember Christina Garcia, is a bold
187 new approach to cleaning the air in disadvantaged communities through unprecedented public
188 participation, local air monitoring, and comprehensive plans for achieving air emissions reductions –
189 all in an effort to reduce health disparities.¹ It has been called “transformative” by members of the
190 legislature, state, regional and local environmental and health leaders for its potential for reworking
191 how air quality management is organized in California. In particular, it has been recognized for its
192 emphasis on the environmental justice motto, “we speak for ourselves,” that is, the recognition that the
193 people most affected by an environmental problem must be at the forefront of decisions addressing the
194 issue. The AB 617 Community Air Protection Blueprint (CARB 2018:6) puts it this way.

195
196 “Community members have intimate familiarity with their neighborhoods and a vision for what
197 they want their communities to become. AB 617 creates a way to incorporate community
198 expertise and direction into the development and implementation of clean air programs in
199 communities.”

200
201 The statute provides a bold vision for reducing air quality pollution in disadvantaged communities and
202 some specific provisions for establishing local air monitoring systems, and community emission
203 reduction programs to improve the air quality in these communities. To carry out this vision, the
204 California Air Resources Board (CARB) developed the AB 617 Community Air Protection Blueprint
205 (Blueprint) to provide guidance to regional air pollution control districts and air quality management
206 districts (Air Districts) on how to implement the statute.² The Blueprint helps guide the formation and
207 management of the Community Steering Committees (CSC), made up of businesses, local
208 governments, community organizations and residents that lead the development of the community air
209 monitoring and emissions reduction plans. The Blueprint also provides the process and structure of the
210 Community Air Monitoring Plans (CAMPs) that establish the location and types of air quality
211 monitoring to be used and the Community Emissions Reduction Plans (CERPs) made up of strategies
212 and actions to clean the air in their focus communities. Based on the needs and capacity of the
213 community, some AB 617 communities were selected to develop CAMPs, others to develop CERPs
214 and some to develop both. CARB also allocated two rounds of funding in Community Air Grants to
215 help build capacity around community air monitoring to organizations throughout the state.

216
217 Over the past two years, all levels of California’s air quality management system, from CARB, to the
218 Air Districts to the CSCs in the ten initially selected disadvantaged communities have engaged in a
219 process of building collaboration to implement this ambitious policy. Along the way they have
220 developed successful innovations, encountered numerous challenges, and generated a large number of
221 lessons learned that can be used to improve future implementation of the policy. These lessons can be
222 applied both to the three newly-selected AB 617 communities (Southwest Stockton, Eastern Coachella
223 Valley and Southeast Los Angeles) as well as other community-based air quality management
224 throughout the state and country as a whole.

225
226 This report documents these successes, challenges and lessons learned with the purpose of helping all
227 stakeholders reflect on their experiences to date and inform future improvements. It does so with the
228 intention of generating constructive suggestions for enhancing the collective work of the diverse
229 stakeholders who are investing so much of their valuable time, knowledge, and passion in
230 implementing the policy for the benefit of the communities most affected by air pollution.
231

232 The structure of AB 617 as articulated in the Blueprint provides both opportunities and challenges for
233 its implementing entities. In particular it calls for all levels of the air quality management system to
234 operate in new ways.³ Moreover, it requires all entities involved to foster new relationships with each
235 other. In some cases, the starting relationships have been characterized by a mixture of conflict and
236 collaboration.

237
238 CARB, for instance, is called on to play a more active role in guiding Air Districts' compliance with
239 the Blueprint compared to its more regulatory role in reviewing and taking final action on the activities
240 of the districts. CARB must also balance leading a statewide implementation of multiple processes in
241 communities with very different demographic, political, economic, and environmental characteristics.
242 That is, CARB is being called on to become more attuned to place-based variations across California.

243
244 The Air Districts are called to work with communities in more intensive and collaborative ways than
245 most have done before. They are also drawn into addressing issues that they have historically been
246 outside of their jurisdiction such as mobile sources, land use, and agricultural pesticides. Furthermore,
247 they are being asked to take on these ambitious tasks with what some describe as inadequate resources.
248 AB 617 has also demanded that organizations and residents on CSCs, more accustomed to advocating
249 outside of the system, to learn how to work internally with the Air Districts.

250
251 Community residents, many of them without scientific training, are now called to engage in often
252 highly technical issues of air quality monitoring and management. Service on a CSC is a significant
253 time commitment and represents a financial hardship for many residents (especially to those whose Air
254 Districts did not provide honoraria). Many residents, especially people of color, came to the CSCs with
255 a lifetime of experiences of racial discrimination, social injustice, and exclusion from public decision-
256 making over issues affecting their health and well-being.

257
258 Finally, all parties have had to take on all of these challenges in a very compressed timeline as they
259 simultaneously had to develop new and improved relationships, construct the structures of the
260 collaboration, and produce a CAMP and/or a CERP.

261
262 While these factors may have pushed the limits of all parties in the AB 617 process, they have also
263 opened new opportunities for addressing community-level environmental issues. These opportunities
264 have the potential to truly transform air quality management in the state and serve as a model for the
265 country, as a whole.

266 267 **2. METHODOLOGY**

268
269 The methodology used to inform the analysis and recommendations of this evaluation study placed a
270 high priority on documenting the voices of those directly involved in the implementation process itself.
271 We sought to collect perspectives from all involved stakeholders in a way that valued everyone's
272 knowledge and experience. Towards this end, we employed a number of primarily qualitative methods,
273 including several on-line surveys, key informant interviews, field observations, and document analysis.
274 The data collection period ran from November 2018 through March 2020.

275 276 **Research Questions**

277
278 The report sought to answer four major research questions based on the goals of the statute and the
279 Blueprint.

REVIEW DRAFT

- 280 1) What changes did AB 617 create in the management of air quality in California, especially in
281 addressing the needs and challenges of disadvantaged communities?
282 2) How “transformative” were these changes in process and in outcomes?
283 3) What were the factors that facilitated and/or reduced the effectiveness of these changes?
284 4) What are ways that all parties can better achieve the goals of AB 617 and the underlying goals
285 of addressing air quality needs and challenges of disadvantaged communities?
286

287 **Data Sources**

288 Surveys

289 We designed and administered three types of surveys. The survey was designed based on input from
290 CARB staff, members from several CSCs as well as experts in survey methods. We administered two
291 general surveys to all stakeholders in the AB 617 process, including CSC members, AB 617
292 Consultation Group members, Air District staff, CARB staff and other interested parties (for example,
293 speakers at CARB board meetings) about the range of issues associated with the policy
294 implementation. The first round collected 102 responses from November 2018 to January of 2019. The
295 second round collected 106 responses from February to March 2020. This accounts for a 21% response
296 rate. This is lower than we would have hoped but still provides a robust data set. This survey was also
297 translated into Spanish and has collected 5 responses. The third survey was specifically for CSC
298 facilitators that examined their roles and responsibilities as well as their perspectives on AB 617
299 overall and received ten responses from February to March 2020. All surveys were managed through
300 the Qualtrics online software platform. In Appendix A, Figures iii and iv illustrate the breakdown of
301 respondents (by stakeholder group and CSC) in the 2018-2019 survey and Figure v and vi illustrate the
302 breakdown of respondents (by stakeholder group and CSC) in the 2020 survey.
303
304

305 Key Informant Interviews

306 We conducted 66 key informant interviews based on questions about their perceptions of what was
307 working well with community engagement, what was not working as well, and what changes they
308 would recommend to improve the policy’s performance. These interviews included CSC members, AB
309 617 Consultation Group members, Air District staff, CARB staff, one CARB board member and
310 Assemblymember Christina Garcia, the author of AB 617. These interviews drew from members of all
311 10 CSCs and Air Districts. Three interviews were conducted in Spanish. Interviews lasted between 30
312 minutes to 90 minutes and were tape recorded with the participants’ consent. Participants were offered
313 confidentiality of their identities and the option to not have their quotes included in the report. We use
314 an [X] to avoid disclosing names or other details that might identify a specific interviewee.
315
316

317 Participant Observation

318 Participant observation field visits were conducted across all 10 CSC meetings between Spring and
319 Fall of 2019. Additionally, participant observations were conducted at other public meetings including
320 CSC Community Summits and Town Hall meetings, Consultation Group meetings, and CARB Board
321 meetings. Observation notes focused on the group dynamics between participants, participation of
322 stakeholder groups, areas of conflict and collaboration, and major topics of discussions.
323
324

325 Videos of CARB board meetings, Assemblymember Garcia’s March 2019 AB 617 legislative hearing,
326 an AB 617 convening at UC Davis, and several AB 617 panels at environmental justice (EJ)
327

328 conferences (the Imperial Environmental Health Leadership Summit and the Central California
329 Environmental Justice Network annual conference) were also documented for analysis.

330

331 Document Analysis

332

333 Key documents, such as CSC meeting minutes from throughout the implementation and the draft
334 CERP comment letters submitted as of March 2020 were collected, thematically coded, and analyzed
335 (see below for coding process).

336

337 **Data Analysis**

338

339 All interviews were transcribed. Interview transcripts, together with the CSC field notes and other
340 observation notes, CERP comment letters and survey responses were all coded in the NVivo 11.0
341 qualitative coding software package. The coding process involved a first read through of a sample of
342 early interview transcripts to develop an initial coding structure. This was then enhanced through a
343 second round of coding to add, change or delete codes. The eventual codes were then established in a
344 codebook of key themes related to the core questions of the study using 19 main themes and 188 sub-
345 themes. These main themes were selected based on the research questions and included changing
346 relationships between stakeholders. These themes included dynamics of CSC meetings, development
347 processes and outcomes of the CAMPs and CERPs, environmental justice and others. We also divided
348 out comments that were supportive and critical of the process. Key quotes were identified from the
349 interviews, surveys, and CERP comment letters that helped illustrate the major successes, challenges,
350 and recommendations for AB 617 implementation. Exemplary quotes were included from all
351 stakeholder groups to highlight the convergence and divergence of perspectives.

352

353 **Limitations**

354

355 One of the challenging aspects of this study is that there is “formative” vs “summative” meaning, that
356 it is tracking and trying to draw conclusions from an on-going process. Indeed, as of this writing, not
357 all of the CERPs have been approved by the CARB board. This has resulted in several challenges.
358 The first round surveys went out before all CSCs had begun and the second round surveys went out
359 before all of the CAMPs and/or CERPs had been completed. Likewise, the interviews and participant
360 observations were primarily conducted during the summer and fall of 2019, in the middle of the
361 process, before the adoption of the CAMPs and CERPs. The assessment of the Community Air Grants
362 was only based on survey data and not an individual project evaluation; likewise data on the AB 617
363 Consultation Group was drawn from the surveys and not a full organizational analysis. The study
364 analyzed the draft CERP comment letters for evidence of community engagement issues as well as
365 several CARB board meeting videos where CERPs were reviewed approved, but not the technical
366 elements of the plans themselves. Finally, because of the method of the survey administration, we are
367 unable to directly compare responses between the two rounds of surveys and instead report them
368 individually. Nonetheless, the report has a robust data set and seeks to present the fullest analysis of the
369 process and outcomes of the AB 617 implementation process possible.

370

371 **3. EVALUATION COMPONENTS**

372

373 **A. AB 617 Consultation Group**

374

375 The AB 617 Consultation Group has played an important role in the development of the AB 617's
376 implementation. Made up of 24 members, representing a diverse range of stakeholders from

377 environmental justice advocates, industry leaders and air district officials the group’s major role has
 378 been advising the development of the Community Air Protection Blueprint.
 379

380 Overall, the self-assessment of the group was positive as shown in Table 2 based on responses from
 381 Consultation Group members in the 2020 survey. For example, 90% of Consultation Group members
 382 are either somewhat satisfied or very satisfied in the composition of the group and 72% are either
 383 satisfied or very satisfied in the reflection of perspectives of the different stakeholders. On the other
 384 hand, 27% of the group members report being somewhat unsatisfied or very unsatisfied with the
 385 quality of collaboration within the group and less than half (45%) of the members are either somewhat
 386 satisfied or very satisfied with the outcomes of the group.
 387

		Very unsatisfied	Somewhat unsatisfied	Neither satisfied nor unsatisfied	Somewhat satisfied	Very satisfied	Total
1	The composition of the membership of the Consultation Group	0%	0%	9%	45%	45%	11
2	The quality of collaboration in the Consultation Group	9%	18%	9%	36%	27%	11
3	The reflection of the perspectives of the different stakeholders	0%	0%	27%	36%	36%	11
4	The outcomes of the Consultation Group to date	0%	9%	45%	27%	18%	11

388
 389 **Table 2:** Level of satisfaction about the AB 617 Consultation Group (2020 Survey; n=11).
 390

391 The group’s diversity has been a great strength as noted by one member, representing an
 392 environmental justice organization. The fact that this member is often a leader in opposition to the
 393 actions of the local air district speaks to the value of this neutral space. “And it was important to us that
 394 this composition include the Air Districts. It would include representatives from industry and, of
 395 course, advocates as well, justice advocates. They created that and the idea was to advise the
 396 implementation, right, or the development of the blueprint. That was the original purpose. And I think
 397 it was a very effective place to have that conversation. You had seven members of the environmental
 398 justice community statewide, all of who have, not bragging, but we have a lot of experience in this
 399 area. So I thought it was great that we had that opportunity to sit there with the big three air districts
 400 and CAPCOA. And again, having industry at the table, the manufacture association at the table and a
 401 couple of other groups, to me, that was critical to have them in that conversation and to be a safe place
 402 to have this conversation.”
 403

404 One member praised the progress that the group has made over its two years of operation.
 405 “The meetings were at first exclusionary and got off to a rough start, which has been remedied
 406 somewhat. The meetings should have more opportunity for focused comment from every participant to
 407 best use the time and thoughts of all of the people present. Presentations are often too long, and should
 408 invite comment during presentation more....That being said, this is a difficult process and CARB staff
 409 have made great efforts and great strides forward and I commend and appreciate them.”
 410

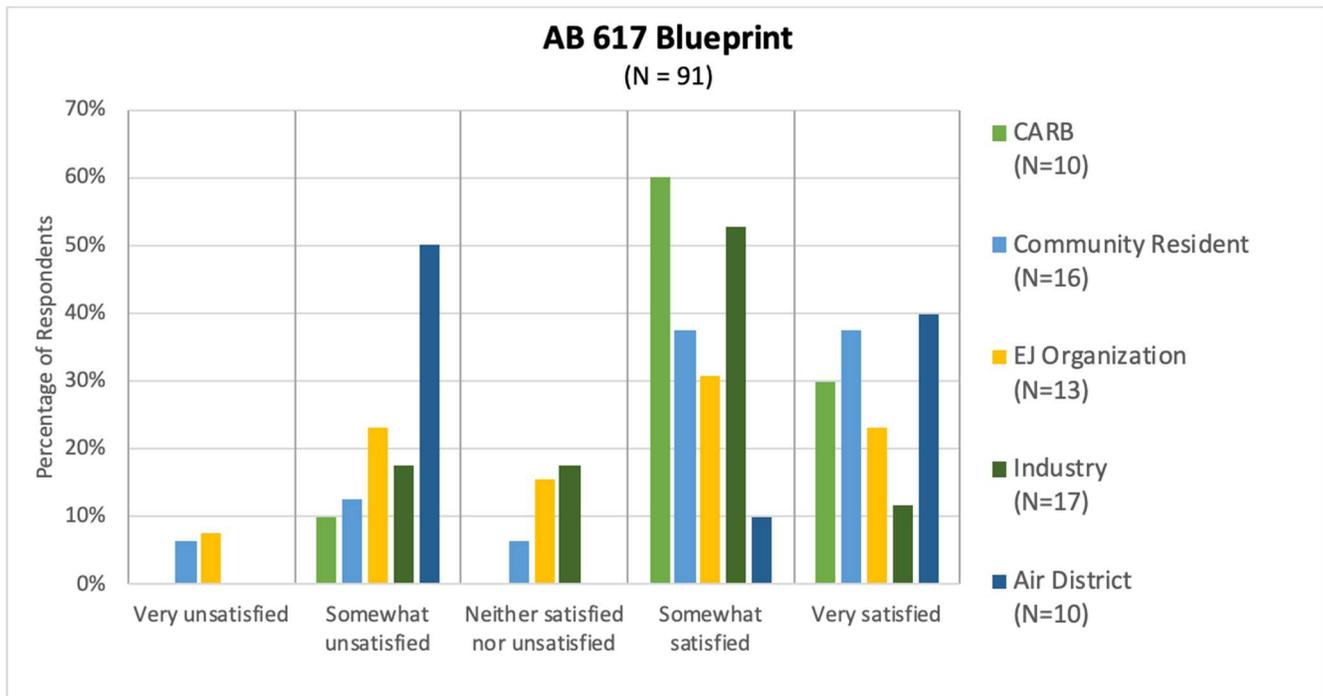
411 A specific recommendation from one group member focuses on its longer-term status.
 412 “CARB needs to recognize the Consultation Group as a formal body with the responsibility of
 413 overseeing the AB 617 implementation and with authority to ensure CARB moves forward on various
 414 goals in a timely fashion and held accountable for failures.”
 415

416 Given the success of the Consultation Group, this latter recommendation seems well supported by the
 417 data.

B. The Community Air Protection Blueprint

418
419
420
421
422
423
424
425
426
427
428
429

The Blueprint lays out the framework for the implementation of AB 617, with an emphasis on guidance to Air Districts and CSCs. Survey results from all categories of stakeholders and interviews indicate a strong support for the Blueprint. Based on responses to the 2020 survey, 66% of respondents indicated they were either somewhat satisfied or very satisfied with the Blueprint in terms of providing sufficient guidance on community engagement while only 23% reported being somewhat unsatisfied or very unsatisfied. This varied significantly between stakeholder groups, however as shown in Figure 1 below. For example, 50% of Air Districts and 32% of EJ organizations were somewhat unsatisfied or very unsatisfied with the Blueprint. This is far more critical than CARB staff for whom only 10% reported being somewhat unsatisfied or very unsatisfied with the Blueprint.



430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448

Figure 1: Level of satisfaction with the AB 617 Blueprint in providing sufficient guidance on community engagement by stakeholder group (2020 Survey; n=91).

Despite overall support, there were a number of comments that expressed concern about the Blueprint, from the nearly one quarter of unsatisfied respondents that can provide some useful feedback for CARB as it considers revisions to the documents.

One CARB staff member recommended that the Blueprint needs to address issues such as land use through a more strategic and comprehensive approach. “The Blueprint should be reviewed with an eye toward revisions based on lessons learned with early implementation of the AB 617 process in the first 10 communities. To me, an important lesson learned is because land use decisions are key to many emissions reduction plans, engagement of air districts/community steering committees with local land use decision makers is key.” This prioritization on land use is also position taken by a large number of community residents and organizations, suggesting a confluence of interests with potential for progress.

One environmental justice organization CSC member echoed the point about land use and provided further insight on the Blueprint’s, seemingly ambiguous, language. “The Blueprint is too vague where

449 it needed to be the most in depth. For example, soft language terms of "to consider" to "guide", did not
450 give the Air Districts enough direction on true robust engagement with community. The language was
451 left up to individual interpretation. Also, there needs to be more clarity and language regarding
452 jurisdictions and land use issues and methods for solutions to get agencies to work together with
453 concrete actions.”

454
455 A resident CSC member also commented on the need for more explicit guidance, “It needs to be
456 updated and deliver more specific guidance especially in the area of governance, what are best
457 practices and what is the role of partnering with agencies. Do we advise or do we assist in the
458 development? What are the key elements to discuss and agree to prior to starting a partnership?” The
459 same resident also asked, if guidance is available, where are the best sources to receive it, “This is an
460 area that my community lacked clarity and was not navigated toward who and or where we could get
461 mentorship, best practices or unbiased guidance (or at least have the bias disclosed).”

462
463 This is somewhat in tension with an Air District staff member who made an observation that from an
464 agency perspective the Blueprint can be *too* definitive. “The Blueprint contains some useful
465 suggestions on community engagement, but it is far too rigid and assumes a ‘one size fits all’ approach.
466 It also has many requirements that are burdensome on air districts with little to no community benefit.
467 It seems that air district efforts would be better applied to other things that actually improve the CERPs
468 or CAMPs and their implementation.” Overall, it should be noted that of the 10 responses from Air
469 District staff, 50% reported being somewhat dissatisfied with the Blueprint’s guidance on community
470 engagement, with 50% reporting being somewhat satisfied or very satisfied.

471
472 The combination of these two conflicting perspectives points to the difficulty of balancing a statewide
473 and place-based approach. Yet this is precisely what is needed to both support the resident and
474 community organization members of the CSCs, while still allowing Air Districts to develop a
475 community engagement plan that fits local conditions with some flexibility.

476 477 **C. Community Selection**

478
479 The process of selecting the first 10 pilot communities for AB 617 participation was a contested one,
480 as dozens of communities vied for selection. This represented a structural problem, as there were
481 bound to be many more disappointed communities than those selected for inclusion. Many comments
482 from the interviews and surveys, as well as at the CARB board meeting in which the communities
483 were selected reflected this tension. Many respondents complained that the process led communities to
484 compete with each other for state support, which produced a level of tension that the EJ movement
485 seeks to avoid as much as possible between its members.

486
487 Several innovations helped address this problem. In the San Joaquin Valley, for example, fifteen EJ
488 and health organizations came together as part of the San Joaquin Valley AB 617 Environmental
489 Justice Steering Committee to develop consensus-based proposals, first to submit AB 617 Community
490 Air Grant applications (through which they secured \$2.2 of the \$10 million granted statewide in the
491 first round) and then to submit proposals to become a pilot community. The process considered a range
492 of variables, including the level of community capacity of the community as well as its degree of
493 disadvantage using CalEnviroScreen and other tools that produced the proposal for the two
494 communities – Shafter and South Central Fresno-- which were eventually selected by CARB. The
495 selection of Shafter was notable in that it ended up substituting for the community of North
496 Bakersfield, which the Air District had originally proposed.

497

498 One member of Shafter’s steering committee described the challenging but successful social process in
 499 these collective decisions. “It was it was very hard. I mean, the thing that was interesting and, I think,
 500 powerful was, you had groups who had principally advocated for their own areas. And that's their sort
 501 of DNA to do that. But yet, they were able to put that to one side. Once they had the data and
 502 information, they were working with everybody else from other communities 200 miles away. And as
 503 we were talking together about those problems and using a tool with data in it and metrics and deciding
 504 on the different variables that were indicators that were the most important.”
 505

506 In Imperial County, the local EJ organization, Comité Civico Del Valle (CCV), also played a pro-
 507 active role in the development of the AB 617 pilot project. In this case, CCV was developing its own
 508 proposal and gaining significant progress and only then did the Air District join its efforts instead of
 509 continuing to submit their own proposal. This set the tone for the partnership, in which there would be
 510 co-chairs for the CSC from the District and CCV. In contrast, in places like Sacramento, the Air
 511 District created their own proposal (for 10 potential sites in the district) and only after one had been
 512 selected did they reach out to the community to solicit members to form the CSC. This was partly a
 513 factor of the limited presence of EJ and related organizations in Sacramento, but also that those that
 514 were present were not connected with the District’s process. This precedent has followed throughout
 515 the process in which the District played a much stronger role in shaping the work of the Committee
 516 than has been the case in other communities. This is not a critique of the Air District, but does speak to
 517 the implications of the different community contexts across the 10 pilot sites. The pattern running
 518 through these examples is the relevance of pre-existing community capacity in structuring the selection
 519 process, with those such as Imperial County, the San Joaquin Valley, Wilmington/Carson/West Long
 520 Beach, Portside EJ Neighborhoods and West Oakland playing a much more proactive role than their
 521 counterparts in places like Sacramento and Richmond.
 522

523 Overall, there is a pattern of moderate to strong support for the selection process and outcomes as
 524 shown in Table 3 and Figure 2 that uses the 2018-2019 survey (because this data collection period
 525 followed most closely the community selection process). Here we see that the percentage of those who
 526 were somewhat or very satisfied ranged from 63%, 57%, 67% for the initial recommended
 527 communities, the selection process and the final selected communities respectively.
 528

Round 1	The process of selecting the initial recommended communities (N=88)	The process for selecting the final set of communities (N=84)	The selected communities (N=84)
Very unsatisfied	6.0%	6.0%	6.0%
Somewhat unsatisfied	5.0%	7.0%	8.0%
Neither satisfied nor unsatisfied	26.0%	26.0%	15.0%
Somewhat satisfied	44.0%	42.0%	43.0%
Very satisfied	19.0%	15.0%	24.0%

Table 3: Level of satisfaction in the community selection process (2018-2019 Survey).

529
530

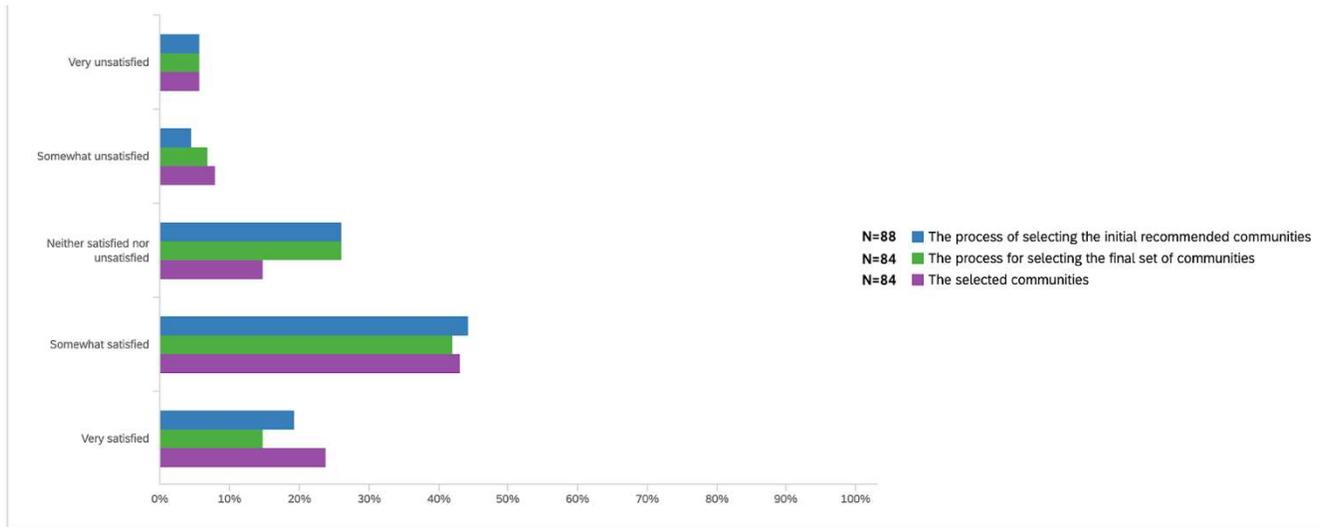


Figure 2: Level of satisfaction regarding the process and selection of communities for air monitoring and/or emissions reductions programs (2018-2019 Survey, n=84- 88).

531
532
533
534

Despite this overall positive reaction, there are some critiques from those who were unsatisfied with the process and outcomes that would be helpful to consider. Many of these comments relate to the issue of organizational capacity and its alignment or misalignment with the needs of the implementation process. Capacity in this case can be understood as a combination of human capital of the knowledge and skills of the participants and the social capital of the strength of relationships.

540

One industry representative observed a problem with stacking the decks towards communities with high capacity. “Priority does not seem to be given to those communities with the highest localized concentrations of air pollution statewide, and much preference is given to those communities that have existing political and resource capacity. While this may have been satisfactory to jump start first year communities, it now seems to be embedded in the selection process, so communities not highly engaged are not likely to be put forward. ...It would be good to select a community with low participation and capacity and high need so that strategies can be tested and developed for these situations — arguable, there are many EJ communities that need help but won’t be able to engage at the level that first-year communities do, and these should not be forgotten or put aside until such time as a hero arises to voice their concerns.” This runs counter to some other observations by CSC and Consultation Group members that highlight how the success of implementation depended on the capacity of community organizations to push their Air Districts to prioritize community input and to hold the districts accountable to the requirements of the policy.

554

One member of the AB 617 Consultation Group commented on their disappointment that the second round community selection process did not seem to be based on learning from the first round. “Lessons learned in the first set of communities could have been more quickly applied to the model and a new potential asset allocation and timeline developed based on that. This would have required a new version of the Blueprint be developed and approved by the Consultation Group, ARB staff or both. It was not done.”

561

Like the Community Air Grants, the decision about community selection presents a dilemma for CARB. If it only selects communities with higher capacity (based on the argument that this is necessary for success of the program), communities with lower capacity but high needs are less likely to get the opportunity to benefit from the program. The Year 1 communities can provide somewhat of

565

566 a natural experiment in this regard, by comparing the experiences of high capacity contexts such as
567 West Oakland and lower capacity contexts such as Sacramento. In the former case, there was
568 significant success-- much of this a product of collaborative work that had long preceded AB 617 – and
569 in the latter, there was less of a history of community partnerships, and therefore a greater degree of
570 struggle. One lesson learned from this might be that if CARB is going to select communities with
571 lower capacity, then it must be prepared to provide the needed guidance and support to ensure success
572 in these communities.

573 **D. Community Steering Committees**

574
575
576 As a community-focused policy, the development of the Community Steering Committees (CSC) is at
577 the heart of the AB 617 implementation process. These CSCs are directed by the Blueprint to include a
578 wide range of community stakeholders, including residents, leaders of EJ and local public health
579 organizations working, as well as representatives of local health, transportation and education agencies,
580 labor, and local businesses. A majority of the members are required to be community residents. The
581 Blueprint specifies that the Air Districts would be the convener of the CSC’s public meetings and that
582 each committee should establish a charter to set out their process and structure. However, specific
583 characteristics such as the size of the CSCs, the elements that ought to be in a charter, what the
584 leadership structure would be, how decisions would be made, whether the group would have a
585 facilitator, and whether the members would be compensated are not addressed. While the lack of
586 guidance allowed for a place-based approach that each community could develop for itself, it also left a
587 vacuum that consumed most of the CSCs in months of often conflictual processes to establish their
588 structure.

589 CSC Member Selection

590
591
592 The first phases of the CSC involved the recruitment of members. Most Air Districts created an on-line
593 nomination process as well as a proactive process to fill the different categories of the committee. In
594 some cases, this was an easy task, with many more applicants than could be accommodated, whereas in
595 others there were fewer applicant and districts had to work harder to find members. In many areas such
596 as the San Joaquin Valley, West Oakland, the two Los Angeles communities, San Diego, and Imperial
597 there were a number of strong environmental justice and health equity organizations who were already
598 mobilized to work on air quality issues and who brought their leaders into the CSC. In some areas,
599 such as Sacramento, there were only a small range of environmental justice organizations to draw from
600 and in others, such as Richmond, several of the major EJ organizations declined to participate in the
601 process, due to their earlier opposition to the policy. This unevenness of strength in the equity-oriented
602 organizations across the regions made for a disparity in the capacity of the CSCs to represent EJ issues
603 and populations.

604
605 A member of one CSC criticized the lack of preparation given by the Air District and CARB during
606 the early formation of their CSC, “My community is starting from scratch. Inadequate preparation and
607 information to have a clearer understanding of the community as to their power, and role as a partner in
608 the development of the CAMP's and CERP's. Timely training and onboarding within the first 3 months
609 of the process were not provided. Clear training on what the role of CARB is for the community
610 members. Best practices to be rolled out initially and updated regularly.”

611
612 One major issue that many CSCs had to address was the ambiguous role of industry-affiliated
613 residents. This was important because, in instances where the rules specified that a majority of resident
614 members was needed to make a decision, it mattered whether an industry-affiliated member counted as

615 a resident or as an industry representative. This was particularly heated in communities like Shafter
616 and Richmond, in which multiple residents also worked for oil and gas companies. A policy of
617 disclosure was finally adopted in each community, but not without significant conflict.

618
619 None of the CSCs allowed industry members to serve in leadership roles, a point that one industry-
620 affiliated CSC member found disturbing. “One of the persons said, ‘I don't want the fox in the
621 henhouse,’ considering themselves the hens, and anybody in industry being the evil, the dark side. So
622 then the committee did get formed with people from industry, and I don't know how the decision was
623 made, but it's no one from industry can be a co-lead.... I'm a resident of this community. I work in this
624 community. I moved here because of my job. It seems strange that you would exclude industry from a
625 co-lead.”

626
627 Another CSC member in this same community expressed a more optimistic view of what they
628 described as a structure that welcomed and benefited from the diversity of the committee.
629 “The Leadership Team consist of a very large group of individuals from several sectors of our defined
630 area. This group includes not only individual residents, but residents from some of the industries
631 identified as sources of pollution. Also included are individuals from local governing bodies, as well as
632 individuals from environmental justice organizations. This is all by design and was agreed upon by a
633 charter, developed with the help on our facilitating consultant and the Air District's advisory team. This
634 creates a challenge to arriving at a consensus on ideas we want to bring forth, but I think it is what
635 makes our group so powerful.”

636
637 On the contrary, an EJ organization not directly involved in the CSC critiqued its leadership team for
638 being too close to industry, “In [X], the outsized presence of [X] and other polluting industries has
639 meant that many so-called community leaders have a historic relationship with those industries.
640 Industry and industry-friendly people have an outsize presence on the steering committee.” This shows
641 that the role of industry remains contentious and controversial.

642
643 Community Voice and Decision-Making Power

644
645 A major concern shared by residents and community organizations regarding the CSCs involved the
646 level of their decision-making in relation to their Air Districts. The question under contention was, to
647 what extent are the CSCs able to make decisions as a committee and to what extent do they serve as an
648 advisory board to the Air District?

649
650 One community organization representative of a CSC explained this concern early on in the process as
651 follows. “We residents and community members speak for ourselves. We don't need to be prescribed
652 solutions. We need to find community-based solutions and community-driven solutions. So that was
653 our motto coming in and at the very, very beginning, the very first meeting, it was shut down
654 essentially. They're saying, "Well, we'll give you the voice that you need. And we'll tell you what you
655 guys need." The residents felt that and they understood that. It was going to be a very tough battle.”

656
657 One indication of a tension between a community-led and a community-advised CSC process was
658 heard in the words of one Air District staff member who sought to highlight the limits of the CSC role.
659 “The Steering Committee, at least some, really think that AB 617 in some way provides the Committee
660 with full authority to basically explore, identify, and then implement essentially whatever they would
661 like to do. I think this has evolved over some time with the Blueprint and we are all rowing in the same
662 direction for the most part. The roles are more clearly understood. The air district is, ultimately... we

663 have to take to our board the CERP, they are the ones who approve the CERP and then CARB
664 ultimately approves the CERP. It's not the CSC. They are more in an advisory role.”

665
666 An EJ representative described the partial progress made in this issue of community voice and power
667 by the end of the process in their region. “The process from the beginning was led by the Air District
668 instead of being shared with the Community Steering Committee (CSC). Towards the last two CSC
669 meeting, the CSC members were able to co-host with the Air District, but I think this was a bit too late.
670 Maybe, if we continue this during the implementation phase, it will be more useful and beneficial to
671 what the community members expected to see in terms of outcomes.”

672 673 Leadership and Facilitation Models

674
675 A major transformation occurred over the course of the implementation process in which CSC's began
676 to use outside facilitators. At the start of the program, only four CSCs used such facilitators, but by the
677 end all but one (San Bernardino) were using them. While most CSCs ended up with positive reactions
678 to their facilitation, in several CSCs it took replacing their first facilitator until they found a suitable
679 one. The lack of guidelines for selecting and managing facilitators played a large role in worsening
680 tensions in these CSCs.

681
682 The CSCs followed a number of different leadership models that varied by how the decision-making
683 authority was distributed between the Air District and the CSC itself. This distribution was the heart of
684 many of the conflicts throughout the AB 617 process. While this varied by location, in general, the
685 tension centered on the CSC seeking more control in the process. This is somewhat set up by an
686 ambiguity in the Blueprint which states that the Air Districts “convene the CSCs,” but whether this
687 means that the District has decision-making power over CSCs or whether the CSCs retain this
688 authority for itself has remained an open and challenging question.

689
690 Table 4 lays out these basic leadership models. “District-led” means that the meeting agendas are
691 created by the District itself and its staff manage the meeting, often in tandem with an outside
692 facilitator. “District-driven” means that while there may one or two CSC members who chair the
693 meetings, it is the District that primarily develops the agenda and drives most of the content of the
694 meetings. “Co-leadership” typically represents a team of Air District staff and a community
695 organization representative or resident that design and direct the meetings together. This is similar to
696 the “co-host model” although this one (used in San Bernardino) is structured as rotating roles for a
697 defined number of meetings.

Community Steering Committee (CSC)	District Role	Community Role	Outside Facilitator?
Portside EJ Neighborhoods	District-led	Membership	Yes
Wilmington/Carson/West Long Beach	District-led	Membership	Yes
Boyle Heights/East LA/West Commerce	District-driven	Community Co-hosts	Yes
South Sacramento - Florin	District-driven	Community Co-chairs	Yes
San Bernardino/Muscoy	District-driven	Community Co-hosts	No
Fresno/Shafter	District driven	Membership	Yes
Richmond	Co-Leadership	Co-Lead Team	Yes
Imperial	Co-Leadership	Community/District Co-Chairs	Yes
West Oakland	Co-Leadership	Community/District Co-Chairs	Yes

710 **Table 4:** CSC Leadership Models

711
 712 The level of community leadership across the ten CSCs can be illustrated in the continuum in Figure 3.
 713 This continuum runs left to right from most district-led to most community-led. This placement is
 714 developed by the authors based on interviews, surveys, and observations of CSC meetings and based
 715 on the distribution of authority over who sets the agenda, who leads the meetings, and how decisions
 716 are made in and outside the meetings. CSCs that are solely directed by Air District staff (e.g., Portside
 717 EJ Neighborhoods, and Wilmington/Carson/West Long Beach) are considered the most district-led,
 718 followed by those with some kinds of community co-chairs with significant Air District influence (e.g.,
 719 South Sacramento-Florin and Boyle Heights/East LA/West Commerce), followed by those with strong
 720 community organizations to influence the process even without co-chairs (e.g., Fresno and Shafter),
 721 and then CSCs with co-leads from the Air District and community holding shared power (e.g., Imperial
 722 and West Oakland).
 723



724 **Figure 3:** CSC Leadership Continuum

725
 726
 727 In some cases, the Air Districts themselves have staff serving as facilitators but for the most part this
 728 was assessed as not being an effective approach and in some cases was deemed detrimental to the
 729 process. In one case, a facilitator who was brought in late to the process commented that the CSC had

REVIEW DRAFT

730 “no neutral facilitation whatsoever, which occurred for [X] months while the group and District
731 spiraled into higher and higher levels of conflict.”

732 One facilitator provided an overview critique of negative practices they witnessed: “Top-down
733 decisions (when the Air District make decisions, even minor decisions such as selecting meeting dates,
734 without collecting input), one way informational meetings that do not include interactive activities
735 (over loading participants with information), expecting participants to make decisions without allowing
736 them 1-2 weeks or a full month to digest information (for example, providing information at a meeting
737 and asking participants to make a decision using that information at that same meeting).”

738 In contrast many facilitators highlighted the positive impact of outside facilitators. “Third party, neutral
739 facilitation has proved crucial in building trust between the community and government agencies after
740 generations of discrimination, distrust, a lack of opportunity and poor health outcomes.”

741 A community organization representative on the Portside EJ Neighborhoods CSC credits real progress
742 being made in the management of the committees, including the use of a facilitator to replace the
743 system in which the Deputy APCO facilitated the meetings without a community co-lead. “San Diego
744 APCD acknowledged that they had difficulty on developing a community process in implementing the
745 goals of AB 617. They worked with the local environmental justice nonprofit to help secure a
746 facilitator that can help with the objectives and dialogue of the meetings. Unfortunately, this took a
747 long time but at the very least community members are getting clarity on the purpose of the meetings
748 and we've seen more interaction among them.”

749 Another observation about the positive improvement in the Portside EJ Neighborhoods comes from
750 one community organization representative. “So it seemed like they [Air District] want to minimize
751 what they're doing, and they don't want to be engaged with community or with activists in any level.
752 So we're pretty skeptical going into AB 617. But they've been pretty-- I think trying in pretty good
753 faith to meet the community's needs on this. And [X] was saying from day one, the first thing out of
754 [X]'s mouth was, "We're a monitoring community. But this really is about getting better air quality. So
755 really it's about emission reductions." So he's been there from day one. We went in thinking we were
756 going to have to have a fight with them about that. Because they're comfortable doing air monitoring.
757 They know how to do that. And we thought, "Okay. That's what they're going to want to do. And we're
758 going to have to really push them to get them to pay any attention to emission reductions." But it really
759 hasn't been like that. And on the process stuff, I think they're open to improvements.”

760 Other innovations in the CSC process included San Bernardino/Muscoy's CSC which designated
761 rotating “co-hosts” whose job it was to make all people feel welcomed and at home in the meetings.
762 This CSC also used techniques such as “progressive stack” which prioritized community members in
763 queuing up speakers as well as opening activities. One of the co-hosts described one such ritual-like
764 method, “So we made a motion to start the agenda of every meeting with a testimony and story from
765 the experts of the community about how this is impacting their health and that we will start the meeting
766 with that tone. And we can remember why we're there.” This CSC also was very effective in
767 welcoming comments from the general public at the meetings throughout the agenda.

768 The San Bernardino/Muscoy CSC is also notable in that it worked diligently to create a culturally-
769 relevant and welcoming space. Some of this was based on the above prioritizing voice and experience
770 of the diverse members of the community. This was in contrast with a number of other CSC which
771 many members described as culturally insensitive, in particular, in reference to the ways in which some

REVIEW DRAFT

772 of the Air Districts treated the residents. There were many comments in the surveys and interviews
773 about the need to improve the cultural competencies of the Air Districts in building collaboration with
774 diverse communities. Many study participants called for additional training in issues such as racial
775 justice as well as proactive hiring practices to ensure that Air District staff better reflect the
776 communities they are intended to serve. The same can be said for CARB as well.

777 Decision-making processes

778 One of the ways that community power was expressed was in the provision that the CSCs have a
779 membership with a majority of residents. However, this majority could have been diluted if the
780 decision-making process used a consensus instead of a majority vote. In some cases, the Air Districts
781 began the CSCs with the consensus model, but community organizations and residents pushed back
782 and in many cases prevailed. One member of the Fresno CSC described the process that led to the
783 voting process there. “So there's been three separate votes during this period. The first vote was to get a
784 vote. Because the district initially proposed a consensus process where, what they called, robust
785 discussion would happen [laughter]. And at the end of that, should there not be a majority opinion, the
786 district would make the decision. And the community said, ‘No. Hell, no!’ [laughter]. And at the next
787 meeting, they opened the meeting, the community opened it by voting on a charter that had a majority
788 vote decision making process.” In other CSCs where voting was used, some members describe their
789 frustration in having their proposals consistently voted down by the committee majority. As noted
790 throughout, getting clarity from the Blueprint on issues such as decision-making processes can help
791 reduce such conflict in developing the CSCs.

792 CARB’s Roles and Responsibilities

793
794 A large number of comments about the CSC meetings were related to concerns about CARB’s role,
795 with many survey and interview respondents looking for a more pro-active and community-focused
796 role for the agency.

797
798 One facilitator commented, “CARB staff needs to provide more direct resources and guidance to the
799 Air Districts and CSC members for the development of the CERPs as well as resources to explain basic
800 air pollution information to community residents. We have CARB staff attend our meetings. they
801 usually sit in the audience and rarely engage in a constructive way. We have had them present at two
802 meetings so far, one on SEPs and on the CAPP Blueprint/CERP process and have not found their
803 engagement helpful. They should be doing more and hire more proactive staff with more experience on
804 community engagement. Their guidance should focus on the development of the CERP and providing
805 resources to empower the participation of SC members to provide more direction to the APCD staff.”
806 By “resources”, this facilitator (and a large number of other study respondents) referred to tools and
807 templates that can be used by CARB, Air Districts, and other stakeholders for effective science
808 communication, community engagement, cross-cultural communication, and conflict resolution.

809
810 A public agency member in one CSC commented on what might be described as a ‘passing the buck’
811 between the Air District and CARB in some of the CSC meetings. “It seemed like they was a huge
812 cohort of AQMD staff in every meeting, but when a question was asked they would all look around at
813 each other to see who could answer the question. And a lot of times the answer would be ‘we don't
814 have any jurisdiction over that, that's CARB's jurisdiction.’ CARB did have staff in the meetings, but
815 they would also sometimes say ‘we don't have jurisdiction over that, that's AQMD's jurisdiction, or
816 that's the County's jurisdiction etc.’ So I think a lot of the participants in the meetings felt that the result

817 of all the time spent in all those meetings wasn't going to amount to much of a tangible result for the
818 community.”

819
820 A resident from the Boyle Heights/East LA/West Commerce notes the passive role that CARB staff
821 plays at the meetings even after requests for them to be more proactive. “CARB has the technical
822 expertise...And that’s why there were several engineers, after a lot of prompting on my part in asking
823 them to bring in representatives that would help our cause, because they weren’t forthcoming. They
824 only had one representative just as an attendant to the meeting for at least the first three meetings. And
825 then, when I was asking specifically for them to come to this meeting, for them to participate in the
826 meeting-- and they still don’t participate in the meeting, they just have more people there.”

827
828 These two quotes bring up a broader issue of the challenge of the complex jurisdictional structure for
829 air quality management in California. In general, CARB has jurisdiction over mobile sources, fuels,
830 greenhouse gas emissions and toxic air contaminants and Air Districts have jurisdiction over industrial
831 and commercial stationary sources, area-wide/ residential sources and indirect sources. Because AB
832 617 addresses elements in both CARB and Air District jurisdictions, both levels of government must
833 collaborate in implementing AB 617. In addition, cities and counties with authority over land use, local
834 traffic routes and urban greening and local transportation agencies with responsibility over
835 transportation planning, regional traffic and roadway infrastructure and regional transit must also play
836 active roles. In many cases, the community emission reduction plans developed by the CSCs require
837 action and unprecedented coordination between these agencies creating a challenge and opportunity for
838 governance innovation in California.

839
840 Community Capacity and Technical Assistance

841
842 Developing effective community engagement cannot rely only on the structure and process of the CSC
843 meetings, but often required extensive meetings outside these formal spaces. In West Oakland for
844 example, the West Oakland Environmental Indicators Project (WOEIP) and the Bay Area Air Quality
845 Management District (BAAQMD) created an on-going planning process with weekly meetings with
846 the design team and a technical team (in which WOEIP also played an active role). One Bay Area
847 Quality Management District staff described their local process as follows, “That has been a very
848 deeply collaborative process to really develop all the agendas, all the materials, all the presentations,
849 everything that moves for and to the steering committee is done jointly. We typically have a meeting
850 which lasts two to three hours every Thursday morning in West Oakland, where we discuss most of the
851 materials and then a lot of our technical discussions that we have with the broader technical team here
852 at the Air District.”

853
854 In the San Joaquin Valley, community-based organizations would meet before and after every CSC
855 meeting with area residents to build their technical capacity, plan strategies for engagement in the
856 meetings, and debrief the experiences to prepare for the following meetings. This involved extensive
857 and unpaid effort on the part of the residents and a significant – but worthwhile – investment of staff
858 time from the community organizations. Similarly, in the Wilmington/Carson/West Long Beach CSC,
859 community organizations and residents would meet outside of the scheduled CSC meetings to touch
860 base and prepare important discussion topics for following meetings, as noted by a resident. “We will
861 oftentimes coordinate on the side to make sure that we’re all on the same page, that we don’t contradict
862 each other, and address and hash out some of the issues.”

863
864 One point of tension in CSCs came up over the application and implications of the Brown Act. This is
865 not specified as a requirement in the Blueprint, not is any other decision-making process, leaving it to

866 the CSC to decide for themselves. Some of the CSCs (such as in Imperial County) used the Brown Act
867 to structure their deliberations, decision-making, and overall rules of order. In others the use of the
868 Brown Act was more controversial. In Sacramento for example, for some on the Aid District and on
869 the CSC itself, the value of the Brown Act was based on the importance of representation of the group
870 being made by the group as whole. For others was interpreted as prohibiting members of the CSC to
871 meet outside the formal meetings. This interpretation made it difficult for the Sacramento CSC to
872 benefit from what a number of other CSCs had put in place to gather informally outside of the CSC
873 meetings to build capacity, develop collaborative strategies, and prep and debrief meetings.

874
875 The technical capacity-building process for CSC members was crucial because the CSC meetings—
876 especially early on—involved extensive presentations by Air District and CARB staff and sometimes
877 outside experts. These presentations were often critiqued for being too complex with technical
878 language that was not accessible to many of the CSC members (especially the residents.) This critique
879 was described in 29 interviews and 13 surveys. They were also presented with very little attention to
880 audience engagement and therefore were generally not effective in achieving their ends of educating
881 the members. Several CSCs, notably in Bay Area and Imperial County made extensive efforts to vet
882 and modify the presentations before the meetings with an eye towards making them accessible for all
883 members of the CSC. Most of the Air Districts began to improve their practices over the course of the
884 process but left much to be desired. The question of whose responsibility it is to provide sufficient
885 technical capacity-building is an important one. In the case of organizations with sufficient internal
886 capacity such as the West Oakland Environmental Indicators Project (WOEIP), the Central California
887 Environmental Justice Network (CCEJN) in the San Joaquin Valley, Coalition for a Safe Environment
888 (CSE) in Wilmington/Long Beach, Environmental Health Coalition (EHC) in San Diego, Center for
889 Community Action and Environmental Justice (CCA EJ) in San Bernardino, or Comité Civico del
890 Valle (CCV) in Imperial County is being provided by the community organizations. However, more
891 assistance is needed in all settings and is in dire need in some.

892 893 Language Justice: Spanish-Speaking Participation & Engagement

894
895 Compounding the issue of accessible language was found in the participation of Spanish-speaking
896 CSC members. While all Air District offered Spanish-language interpreters, it was sometimes difficult
897 for the interpreters to provide equitable access to these members. Some of this was a result of the speed
898 and complexity of the presentations coupled with the limited technical knowledge of some of the
899 Spanish-speakers. In our analysis of the participant observations, there was very limited engagement
900 with Spanish speakers during large-group discussions in the meetings and some members later
901 described how they did not feel comfortable speaking, even with the aid of an interpreter. This was
902 different in the small group discussions, suggesting that this format may be more successful. To their
903 credit, most of the Air Districts provided their documents in Spanish and this did aid access to the
904 process for Spanish-speaking members. One CSC member described the problem of participation of
905 Latinos in the committee, “I think as a Latina, -- because I have definitely experienced this myself--
906 sometimes you just feel embarrassed. Maybe it’s the thought of speaking Spanish in general, or
907 knowing that someone is going to have to translate it into English too.” While she is bilingual, she
908 noted that the one mono-lingual Spanish speaking CSC member quit because she did not feel
909 comfortable participating in the committee.

910 One facilitator in the Portside EJ Neighborhoods CSC commented specifically about attending to the
911 needs of Spanish-speaking CSC members. “As the facilitator, we have noted that speaking in Spanish
912 from the microphone during the meetings and asking Spanish speaking members their opinions/input
913 has increased their participation. When we started, we were told that mono-lingual Spanish speakers on

914 the Steering Committee had never spoken up during the meetings to provide input. So we have made
915 encouraging their engagement a priority.”

916 It should be noted that several AB 617 communities have significant populations who speak languages
917 other than English and Spanish such as Hmong, Tagalog, or Vietnamese but no CSC had monolingual
918 residents from these groups. To their credit, the Fresno CSC did have Hmong translation available at
919 their first meeting and the Year 2 Stockton CSC has had Spanish and Hmong translation at their kick
920 off meetings. This is an issue that the Air Districts ought to consider in their recruitment for CSCs and
921 language access for CSC meetings. Ensuring that Air Districts and CARB have staff with relevant
922 language skills will also help address this issue.

923
924 Youth Engagement

925
926 Another element to community-engagement in the CSCs and the policy implementation as a whole is
927 the involvement of young people. Several CSCs, most notably in West Oakland and Richmond, have
928 had a focus on youth engagement. In Richmond this has included having a youth advocacy
929 organization member on the CSC in charge of coordinating youth engagement who made it a priority
930 to represent youth perspectives in the meetings. In West Oakland there was also a process led by the
931 Air District to engage young people in the CSC meetings. However, even in these communities, often
932 times there was little to no participation of youth in the CSC meeting themselves as they did not
933 perceive that the process was set up appropriately for them, despite the best efforts of their CSC and
934 Air District supporters.

935
936 One young adult CSC member took it upon herself to bring the CSC into social media, a platform
937 frequently used by young people. “So I’ve actually been trying to boost the Instagram page dedicated
938 to the air quality issue in [X] and really breaking down the problem...because if you don’t know
939 what’s going on, you don’t know what to question...But I know that I really want to push that
940 education, kind of incorporate it into the classroom because in this year we’re in where activism and
941 youth advocacy is such a big part of life. It’s time for people like us, people that look like us, to step up
942 and to step up in our own community.”

943
944 Involvement of young people is an area of potential improvement for all CSCs in the future. This can
945 include involvement of youth-oriented community organizations, connecting with area schools, science
946 museums, and scientists who can serve as mentors for youth members of CSCS.

947
948 **E. Community Air Monitoring Plans (CAMPs)**

949
950 The Community Air Monitoring Plans (CAMPs) have been one of the more innovative elements of AB
951 617, both in terms of their local as compared to regional/regulatory scale and because of their extensive
952 community engagement in informing what is monitored, where, and how. Based on observations of
953 several CSCs, we noticed that CSC members were very excited to view and demo the monitoring
954 devices and to discuss the monitoring process with Air District staff. This appeared to be an excellent
955 example of science communication and translation.

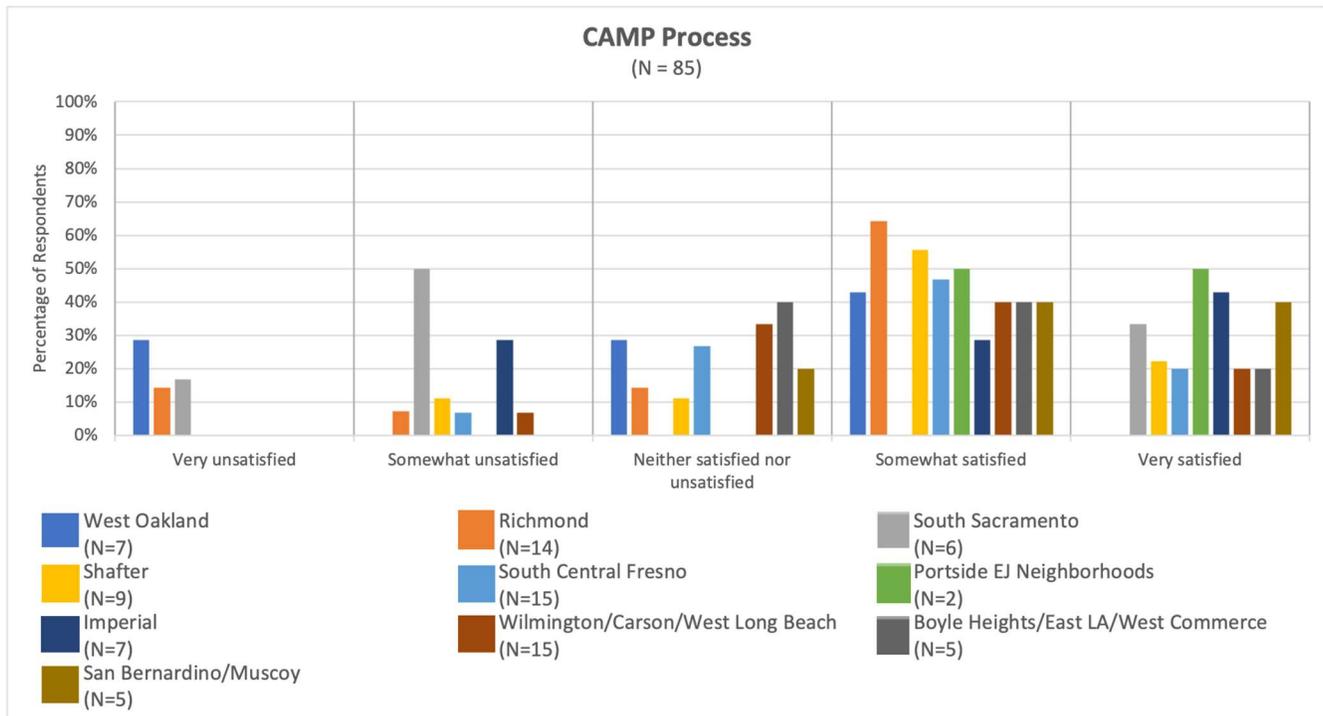
956
957 Overall, there was a high degree of satisfaction among stakeholders about the CAMPs. Respondents to
958 the survey reported 63% being somewhat or very satisfied and only 17% being somewhat or very
959 unsatisfied with the CAMP development process. As seen in Table 5 breaking this down by
960 stakeholder group, several distinctions emerge. CARB staff and EJ organization representatives had a
961 fairly negative view of the CAMP process, both with only 50% reporting being somewhat or very

962 unsatisfied. In contrast, 80% of residents and 70% of Air District respondents reported being somewhat
 963 or very satisfied.
 964

	Community Resident (N=10)	EJ Organization (N=10)	Industry (N=16)	Air District (N=10)	CARB (N=4)
Very unsatisfied	0.0%	0.0%	0.0%	10.0%	25.0%
Somewhat unsatisfied	0.0%	50.0%	6.3%	20.0%	25.0%
Neither satisfied nor unsatisfied	20.0%	30.0%	37.5%	0.0%	0.0%
Somewhat satisfied	40.0%	10.0%	50.0%	40.0%	50.0%
Very satisfied	40.0%	10.0%	6.3%	30.0%	0.0%

965 **Table 5:** Level of satisfaction for the development process for the CAMP in your community by
 966 stakeholder group (2020 survey; n=50).
 967
 968

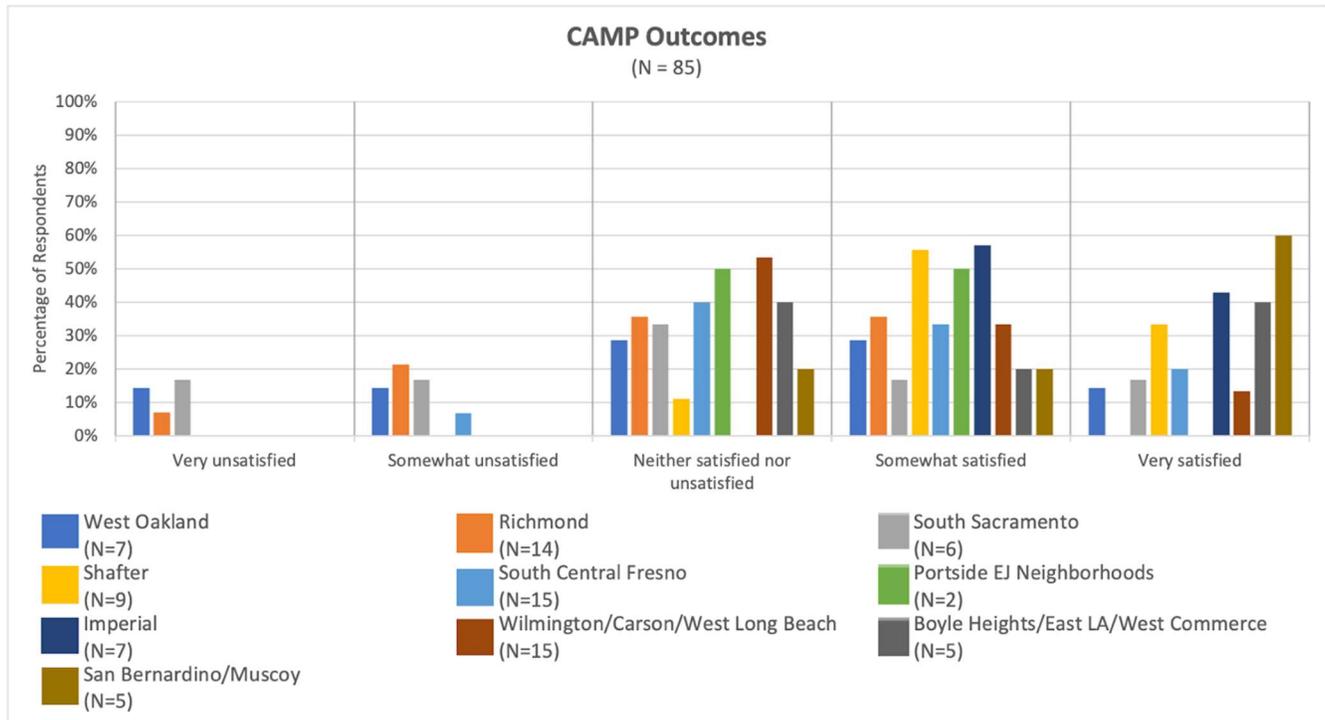
969 Dividing the data by community there are also some clear distinctions in. As seen in Figure 4, in
 970 general, there was a strong level of satisfaction with the CAMP development process. At the high end,
 971 100% of respondents in the Portside EJ Neighborhoods reported that they were somewhat or very
 972 satisfied with the CAMP process. (Note this result should be treated with caution because it is based on
 973 only two responses). At the low end only 33% of respondents in South Sacramento were somewhat or
 974 very satisfied.
 975



976 **Figure 4:** Level of satisfaction with the development process of the CAMP for your community by
 977 CSCs (2020 Survey; n=85).
 978
 979

980 The assessment of the CAMP outcomes was also largely positive but with some variation, especially
 981 by community. At the high end, 100% of respondents from Imperial expressed that they were
 982 somewhat or very satisfied by the outcomes of the CAMP. Shafter followed close behind with 90% of

983 the respondents reporting being somewhat or very satisfied. Conversely, only 34% of respondents from
 984 South Sacramento and 36% from Richmond were somewhat or very satisfied.
 985



986
 987 **Figure 5:** Level of satisfaction with the outcomes from the final CAMP for your community by CSCs
 988 (2020 Survey; n=85).
 989

990 Based on survey and interview data, the negative perception about CAMP outcomes is to a large
 991 degree because the CAMP data were not well used by the CERPs due to timing challenges. One CARB
 992 staff member commented on this issue as well as the problems in the effectiveness of community
 993 engagement in the CAMP. “The development process of the CAMP left much to be desired.
 994 Committee members often times appeared confused about the process or where they were in the
 995 process. As new members joined, they did not undergo an onboarding training and were left to learn by
 996 themselves. There appeared to be a lot of confusion regarding the roles of the District and CARB, and
 997 often committee members did not even know that CARB staff were in attendance and could support
 998 them.”
 999

1000 One resident from the Wilmington/Carson/West Long Beach CSC commented along the same lines. “I
 1001 think what a lot of the community organizations that have been involved in this process were hoping
 1002 for is to be directly involved in the monitoring plan, either by selecting the vendors or doing the
 1003 monitoring itself.” However, much of this community engagement in monitoring has not come to
 1004 fruition yet.
 1005

1006 There was controversy in several CSCs over where the monitoring should occur, with residents and
 1007 community organizations often recommending a wider monitoring area and the Air Districts pushing
 1008 back to maintain what they described as a more manageable scope. This was upsetting to a number of
 1009 CSC members who felt like their local expertise in identifying important neighborhood sources were
 1010 being disregarded.
 1011

1012 One CSC member described this as follows, “I could tell you I was a little disappointed with our air
1013 monitoring rollout. Well, one is we couldn't get enough monitors. So there's a backlog because, I
1014 guess, everybody's ordered monitors, so we were only able to receive four. So we put out four in the
1015 community. The Air Quality Management District had come up with a different plan, and we kind of
1016 rolled with their plan rather than our plan. And so that's where the disappointment was.... Well, there's
1017 sort of a little bit of a struggle with that through the whole process and in my opinion. And part of it
1018 started with the community map itself...I know I wanted to include the train tracks along [X]
1019 Boulevard...that's only a half a mile down from the boundary. I just happen to know that area is an
1020 industrial area all the way through the train tracks. And so including that would've been, in my opinion,
1021 an easy thing to do; and so we chose not to go beyond X Boulevard.”

1022
1023 A number of comments pointed to challenges in terms of the timing of the CAMPs, including their
1024 development occurring too quickly before the development of the CERPs that little to no monitoring
1025 data was able to be used to inform the plan. One EJ organization member on a CSC commented,
1026 “Development of the CAMP was heated in that there was a deadline set by CARB which required
1027 educating and asking for input from the CSC in an expedited fashion. The CSC did not feel fully
1028 confident by the final approval as there were questions still lingering regarding some aspects of the
1029 plan. While dissatisfied by the process this respondent commented that “Final CAMP is satisfactory in
1030 that it will fill data gaps in the community selected, tracks progress for the CERPS, and builds capacity
1031 within the air district to continue the work beginning with the program.” It should be noted that
1032 contrary to this quote, the deadline for monitoring deployment was set by in the statute, not by CARB.
1033

1034 Additionally, there was some tension around the question of the uses of non-regulatory monitors in the
1035 CAMPs. In some CSCs low-cost and often mobile monitors were viewed as a useful complement to
1036 the fixed and more expensive Air District monitors. These are also often deployed by community
1037 organizations (such as those in West Oakland, Richmond, the San Joaquin Valley,
1038 Wilmington/Carson/West Long Beach, and Imperial County) that may provide important data for the
1039 CAMPs. However, there were some who criticized the reliance of these monitors. This was heard an
1040 email message by an organization represented on a CSC which called for “advanced air monitoring for
1041 poor neighborhoods (it’s the new streetlight) no toy monitors please. Honor AB617 GHG [greenhouse
1042 gas] reduction.” Some have critiqued the role of private companies with the perception that they are
1043 seeking to cash in on the AB 617 process in ways that are not beneficial to the communities. The
1044 questions of what kinds of monitors to use, by whom and in what combinations has not been resolved
1045 and are causing confusion in the development and implementation of the CAMPs.
1046

1047 **F. Community Emissions Reduction Plans (CERPs)**

1048

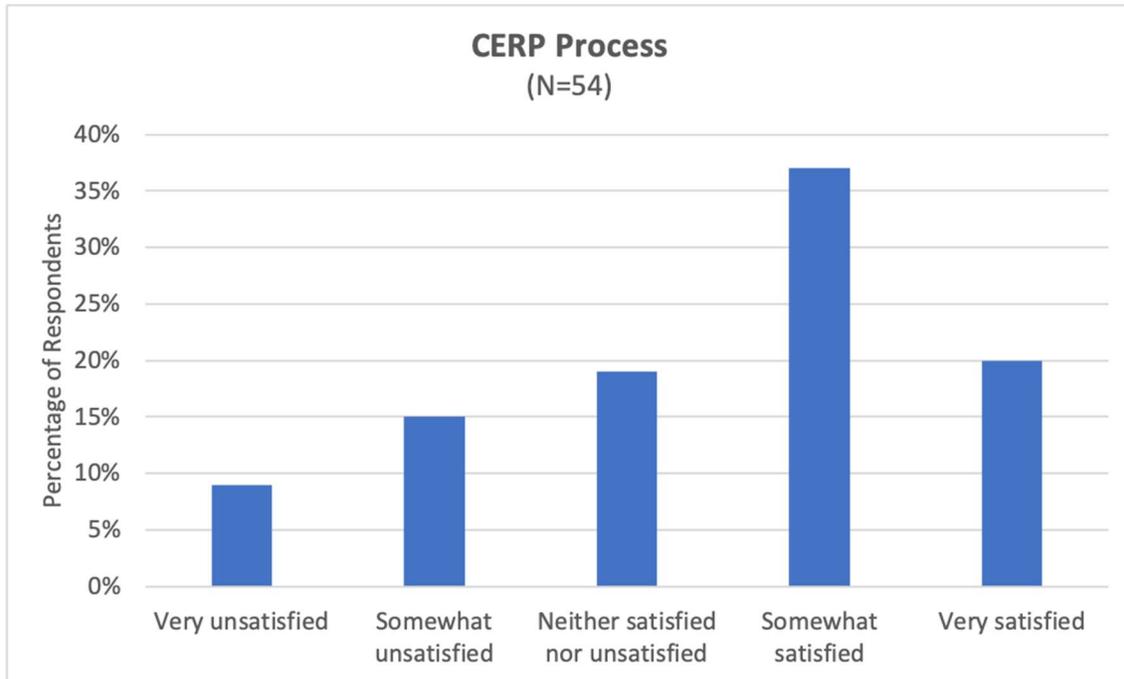
1049 The element of the AB 617 process that has attracted the greatest attention and generated the greatest
1050 controversy is the development of the Community Emissions Reduction Plans (CERPs) because they
1051 are the means by which the policy will meet its intended goal of improving air quality in disadvantaged
1052 communities. As of the latest survey run (March 20, 2020) there is a moderately positive reaction to
1053 both the process and the outcomes of the CERPs across the 10 communities.
1054

1055 It is important to note that the data for this section has a timing challenge in that some of the CERPs
1056 are still in the approval process as of this writing and even the most recent survey that closed in March
1057 2020 came before some of the recently approved CERPs. Nonetheless, it is valuable to track the
1058 progress along the way to better understand the patterns and implications of the community
1059 engagement process in the plan’s development. Data in this section is drawn only from the CSCs that

REVIEW DRAFT

1060 have CERPs. These data are not broken out by stakeholder groups or CSCs since the responses (n=54)
1061 don't allow for this disaggregation.

1062
1063 There is a moderate assessment of the CERP process with only 57% of respondents reporting that that
1064 they were either somewhat satisfied or very satisfied. Still there were 24% reporting that they were
1065 somewhat or very unsatisfied, indicating some degree of concerns and 19% who were neither satisfied
1066 nor unsatisfied. As illustrated by the quotes below, this negative review is based largely in critiques
1067 about how well the Air Districts reflected the perspectives and proposals of the CSCs.
1068



1069
1070 **Figure 6:** Level of Satisfaction with CERP process (2020 Survey; n=54).
1071

1072 This moderate support view is reflected in the assessment of the outcomes of the CERP with only 53%
1073 reporting being somewhat or very satisfied and 16% reporting being somewhat unsatisfied or very
1074 unsatisfied. This leaves a fairly high level (30%) of those who were neither satisfied nor unsatisfied,
1075 indicating a less than ringing endorsement of the CERPs.
1076

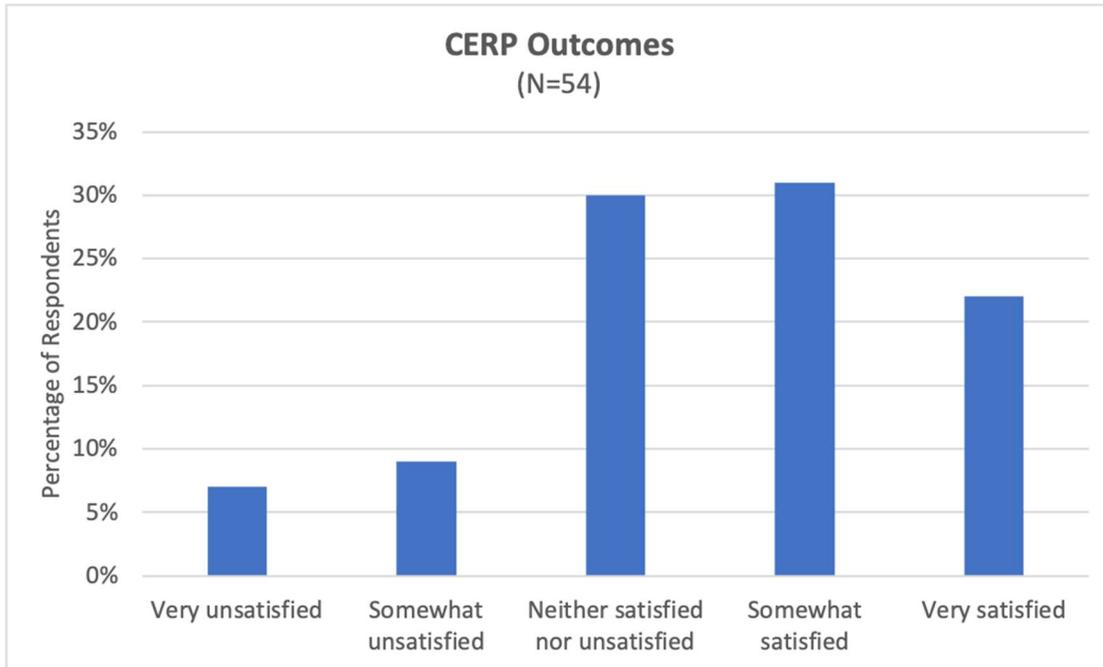


Figure 7: Level of Satisfaction with CERP outcomes (2020 Survey; n=54).

1077
1078
1079
1080
1081
1082
1083
1084
1085

There is also a moderate overall level of satisfaction for across the different elements of the plans with between 52% to 60% of respondent reporting being satisfied or very satisfied with the different aspects of the CERPs. Still it is important to acknowledge that between 18% to 24% of respondents reported that they were somewhat or very unsatisfied with the CERP components and between 22% and 24% who were neither satisfied or unsatisfied.

		Very Unsatisfied	Unsatisfied	Neither Unsatisfied Nor Satisfied	Satisfied	Very Satisfied	Total
1	Community Identified Actions	4%	14%	22%	29%	31%	51
2	Extent to which it includes an appropriate mix of incentives relative to rules, regulations, and enforcement	6%	18%	24%	25%	27%	51
3	Extent to which it goes above and beyond Air District commitments	4%	16%	22%	39%	20%	51
4	Extent to which it is sufficient to make significant efforts in improving air quality	6%	16%	24%	33%	22%	51

Table 6: Level of satisfaction regarding the CERP for your community (2020 Survey; n=51).

1086
1087
1088
1089
1090
1091
1092
1093
1094
1095
1096
1097

Positive comments about the CERPs focused both on their participatory process of development and on the activities set forth in the plan.

West Oakland’s plan was generally recognized by many in that community and in other sites as an exemplar of success. The fact that the plan is titled ‘Owning Our Air: The West Oakland Community Action Plan’ speaks to its strong emphasis on community empowerment. According to one Bay Area Air Quality Management, “West Oakland is really a model. It was truly community-driven, the technical work is groundbreaking and unmatched in California. As we move into implementation, the community's ownership of the plan is doing wonders in bringing key players to the table like the Port

REVIEW DRAFT

1098 of Oakland, City of Oakland, Alameda County Transportation Commission and Caltrans. This is key,
1099 since land use and transportation are driving exposure there.”

1100

1101 The CERPs in the San Joaquin Valley, after coming in for significant criticism in their draft forms
1102 received relatively high praise in their final form. Many respondents credited the active engagement of
1103 CARB in encouraging the Air District to adopt more of the community-led proposals. At their board
1104 meeting to consider approval of the Fresno CERP, for example, there was very constructive dialogue
1105 between the CARB board, the Air District and the CSC. This led to the Air District agreeing to
1106 establish an MOU between themselves and other local jurisdictions to address key issues such as land
1107 use, diesel truck routes, measures to ensure the protection of school sites. These were some of the
1108 major requests that CSC members wanted, but was not in the initial CERP. This shows CARB’s ability
1109 to support the Air District to be more responsive to community needs. This pro-active role of CARB is
1110 one of the major transformations involved in the AB 617 process.⁴

1111

1112 One community organization member involved in the Shafter CSC commented positively on the
1113 outcomes of the CERP but also some concern about the extensive process to arrive there. “We are very
1114 pleased that pesticide TACs [Toxics Air Contaminant programs] have been incorporated into the
1115 Shafter AB 617 CERP. We’re also pleased that CARB, the Air District and DPR [Department of
1116 Pesticide Regulation] recognized multi-jurisdictional authority over pesticide The wins described
1117 above are great improvements, but the Shafter Steering Committee had to expend an
1118 EXTRAORDINARY [all caps in original] and unrealistic amount of effort to make sure pesticide
1119 TACs were included in the process and that the actions above were taken. Hopefully it will mean that
1120 future communities won’t have such a big lift with respect to pesticide TACs.” This represents a major
1121 shift in the development of the CERP, as the Air District originally resisted inclusion of pesticides in
1122 their document because of their position that pesticides were outside of their purview. It was only
1123 through the advocacy of the residents and EJ organizations on the CSC and the willingness of the
1124 Department of Pesticide Regulation to provide monitoring and take other regulatory action, and
1125 support by CARB that this provision was included in the final CERP.

1126

1127 Along with these positive comments, there were a number that point to the shortcomings of the plan.
1128 (Again, some of these quotes come from the comment letters on the draft CERPs, so they should be
1129 considered not as a final judgement, but to provide insights into the process.)

1130

1131 A CERP comment letter developed by a coalition of organizations in the San Joaquin Valley noted
1132 the lack of reflection of community input in the Air District’s draft plan for Fresno. “Members of the
1133 Community Steering Committee created and submitted a list of 40 strategies for incorporation into the
1134 Draft CERP to address these concerns. The proposed strategies focus and accelerate actions to provide
1135 direct emission reductions within the community to maximize reductions in exposure to applicable
1136 toxic air contaminants, area wide sources and direct PM2.5... The Air District incorporated only 1 of
1137 the 40 recommended strategies drafted by community residents into the draft CERP.”

1138

1139 A resident from Boyle Heights/East LA/West Commerce also commented on the lack of including
1140 important community priorities within the CERP along with the tight timelines. “It’s been rushed. It
1141 really has been rushed. There hasn’t been really a lot of-- well, there has been a lot of discussion but it
1142 seems like there is drawing on-- of course, they have to appease many people. But the community
1143 came together as a group, early on in the plan, and identified priorities. But I don’t feel that the top two
1144 priorities have really been addressed, which is the bulk of the-- which has been the bulk of our issues
1145 for generations.” The issues in this case were truck traffic and freeways. Overall, the issue of including
1146 mobile sources challenge as such emissions are in the jurisdiction of CARB, not the Air Districts.

1147 However, the Blueprint is clear that mobile sources must be included in the CERPs. In all cases,
1148 mobile sources were well represented in the final CERPs.
1149

1150 A community organization on the San Bernardino/Muscoy CSC critiqued the mix of emission
1151 reduction measures and the lack of measurable targets or metrics. “Currently, the CERP
1152 overwhelmingly focuses on education, outreach and enforcement - strategies that are necessary and
1153 important parts of the plan. However, they must be matched with subsequent emission reduction goals
1154 and health outcome targets. A community health assessment must be required to measure the existing
1155 health standards baseline in order to have quantifiable goals and targets.”
1156

1157 A number of comments focused on the limited way that the CERPs addressed health outcomes,
1158 including this one from a community organization in Boyle Heights/East LA/West Commerce. “The
1159 various members of the CSC have been very clear in their request to see specific emission reduction
1160 targets that include a nexus with community health outcomes. Yet, the draft CERP continues to lack
1161 specific emissions reduction targets, let alone targets based on health outcomes.”
1162

1163 One community resident in Wilmington/Carson/West Long Beach recognized the challenges of linking
1164 emissions reductions to health outcomes, but urged the Air District to help improve community health
1165 outcomes even if there are challenges in measuring or tracking such progress. “There is a big
1166 community push on having a health nexus to emissions reduction plan. Basically, something in there
1167 that shows how the CERP will improve community health. Now I get where AQMD is coming from,
1168 and their staff is coming from. It's like we don't-- to do a one to one ratio of okay, we've reduced
1169 pollution by this much. We expect this much reduction in asthma cases. I know that it's very hard to do
1170 that. I think that particular issue has been more difficult to get traction off from staff.”
1171

1172 The issue of the place of public health in the AB 617 statute and Blueprint is a complex one. Both the
1173 statute and the Blueprint call for the development of strategies to reduce criteria pollutants and toxic air
1174 contaminants that will have positive health effects. As the above quote acknowledges, while there is
1175 strong evidence that emissions reductions improve health conditions, it is methodologically difficult to
1176 correlate emissions reductions to specific health impacts. Furthermore, in a resource-limited context,
1177 allocating funding for health tracking projects can reduce available funds for emissions reduction
1178 activities. Nonetheless, building and implementing a public health framework for AB 617 can help the
1179 Air Districts and CARB respond to community interests in addressing health disparities in
1180 disadvantaged communities.
1181

1182 The range of illustrative comments here suggests that the CERP process and outcomes have achieved
1183 some notable success, but with room for improvement. It also demonstrates that there was substantial
1184 improvement in the latter stages of the CERP process, speaking well of the CSC members’ success in
1185 advocating for their envisioned plans, the willingness of the Air Districts to address at least some of the
1186 CSCs’ demands, and the crucial role of CARB acting as a backstop to ensure that the community voice
1187 was integrated into the final plans.
1188

1189 **G. Community Air Grants**

1190
1191 The AB 617 Community Air Grants have allocated over \$15 million in two rounds of funding to 57
1192 recipients. In the first round of funding in 2018, 10 of 28 air grants were awarded to organizations
1193 associated with the selected CSCs. In the second round of funding in 2019, 15 of 29 air grants were
1194 awarded to organizations associated with the selected CSCs. According to CARB’s grant guidelines
1195 the purpose of the grants is “to provide community-based organizations in California an additional

1196 opportunity to participate in the implementation of AB 617 and the means to acquire some logistical
 1197 and technical assistance to support those participation efforts. The Community Air Grants Program
 1198 also aims to foster strong collaborative relationships between communities, air districts, CARB, and
 1199 other stakeholders.”⁵ Based on the surveys and interviews from the period of the first and second round
 1200 of grant funding, there a moderate level of support for the Community Air Grants but this varied
 1201 widely among stakeholders and over the two years of the program.⁶
 1202

1203 In the 2017/2018 round of grants (shown in Table 7 below), there was a mixed response, with Air
 1204 Districts having the lowest ratings of satisfaction on both the grant making process (45% expressed
 1205 that they were somewhat or very unsatisfied with the grant making process and 50% were somewhat or
 1206 very unsatisfied about the selected grantees). In contrast, 0% of residents and 0% of CARB staff
 1207 reported being somewhat or very unsatisfied about either the process or the selected grantees (There
 1208 were only 2 CARB respondents so this finding should be taken with a note of caution).
 1209

		Community Resident (N=10)	EJ Organization (N=10)	Industry (N=10)	Air District (N=11)	CARB (N=3)
The grant making process	Very unsatisfied	0.0%	0.0%	10.0%	9.1%	0.0%
	Somewhat unsatisfied	0.0%	10.0%	10.0%	36.4%	0.0%
	Neither satisfied nor unsatisfied	50.0%	50.0%	50.0%	36.4%	50.0%
	Somewhat satisfied	30.0%	30.0%	30.0%	18.2%	30.0%
	Very satisfied	20.0%	10.0%	0.0%	0.0%	20.0%
The selected grantees	Very unsatisfied	0.0%	10.0%	10.0%	9.1%	0.0%
	Somewhat unsatisfied	0.0%	0.0%	30.0%	18.2%	0.0%
	Neither satisfied nor unsatisfied	50.0%	10.0%	30.0%	54.5%	33.3%
	Somewhat satisfied	30.0%	60.0%	30.0%	9.1%	66.7%
	Very satisfied	20.0%	20.0%	0.0%	9.1%	0.0%

1210 **Table 7:** Level of satisfaction with the Community Air Grants program by stakeholder groups (2018-
 1211 2019 Survey; n=44).
 1212
 1213

1214 There was some variation in the second round of the community air grants (shown in Table 8). At the
 1215 low end of support, again 50% of Air Districts were somewhat unsatisfied or very unsatisfied with the
 1216 grant making process and 10% were very unsatisfied with the selected grantees. This low rating
 1217 contrasts with CARB for which 0% were somewhat unsatisfied or very unsatisfied by the grant making
 1218 process and 0% were somewhat unsatisfied or very unsatisfied by the selected grantees. Environmental
 1219 Justice organizations also had a relatively high rating with only 9% being very unsatisfied and 63%
 1220 being somewhat or very satisfied with the grant making process and with the selected grantees. The
 1221 fact that 8 of the 11 respondents were Community Air Grant recipients may account for some of this
 1222 positive response.
 1223

		Community Resident (N=10)	EJ Organization (N=11)	Industry (N=12)	Air District (N=10)	CARB (N=9)
The grant making process	Very unsatisfied	18.2%	9.1%	0.0%	10.0%	0.0%
	Somewhat unsatisfied	0.0%	0.0%	0.0%	40.0%	0.0%
	Neither satisfied nor unsatisfied	45.5%	27.3%	61.5%	20.0%	44.4%
	Somewhat satisfied	18.2%	54.5%	38.5%	10.0%	55.6%
	Very satisfied	18.2%	9.1%	0.0%	20.0%	0.0%
The selected grantees	Very unsatisfied	10.0%	9.1%	0.0%	10.0%	0.0%
	Somewhat unsatisfied	0.0%	9.1%	8.3%	0.0%	0.0%
	Neither satisfied nor unsatisfied	30.0%	18.2%	58.3%	60.0%	44.4%
	Somewhat satisfied	40.0%	54.5%	33.3%	20.0%	55.6%
	Very satisfied	20.0%	9.1%	0.0%	10.0%	0.0%

Table 8: Level of satisfaction regarding the Community Air Grants by stakeholder groups (2020 Survey; n=52).

There was some variation in opinion about the use of the grants with most of the comments recommending that the grants be directly tied to the AB 617 implementation communities, and in particular, to improve the CERP process.

One Air District staff member recommended a targeted approach. “Air Grants should also be a mechanism to support participation in implementing the CERPs; this should be a high priority category within the RFP, as this is the kind of work that would enhance community participation in making the CERPs successful.”

However, there were some comments that pushed for a more expansive approach. For example, one industry representative observed that a broader approach would be needed. “Currently, air grants are limited to the designated AB 617 community. In many cases, the air emissions affecting these communities are generated by facilities outside the AB 617 community and those facilities should be eligible for the air grants program.” It should be noted that this is not correct, as the air grants are not restricted to AB 617 communities and there awarded outside these communities.

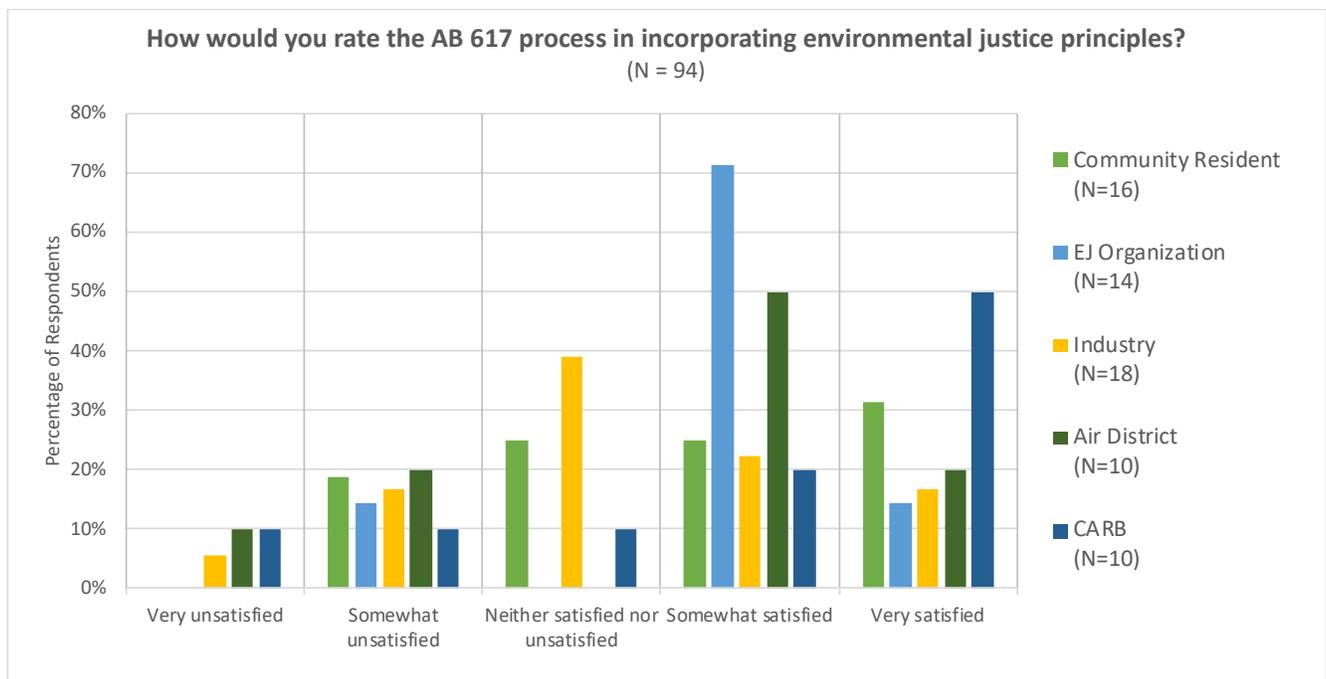
Like the community selection process, there is some tension about how widely or focused the Community Air Grants should be distributed, a decision that CARB will need to make in the next round of grants. A separate evaluation that reviewed the each of the air grants individually would be needed to assess the effectiveness of the implementation of these grants: a step that would be beneficial to CARB as it develops its future plans for the grants.

H. Environmental Justice

Environmental justice (EJ) as a specific term is not mentioned in either the AB 617 statute and has a basic definition in an Appendix of the Blueprint.⁷ However, it is arguably a value that informs the policy as a whole. Therefore, the lack of more extensive treatment of EJ presents a challenge in assessing how well the implementation meets a standard of addressing environmental justice. According to EJ activists and scholars, EJ is often defined as having three components. First, there is a process component, in which communities confronting environmental pollution should be at the center about decisions that affect their lives. Secondly, there is an outcomes component which ensures that no community is subjected to disproportionate impacts. Lastly, there is a respect for diverse forms of

1260 knowledge including local knowledge about people’s own experiences and bodies.⁸ The AB 617
 1261 process, as captured in the responses below, has touched on all of these aspects of environmental
 1262 justice with generally positive results.

1263
 1264 As seen in Figure 8, it is notable that in the 2020 survey 85% of the EJ organization respondents
 1265 reported that they were somewhat satisfied or very satisfied with the incorporation of EJ into AB 617.
 1266 This was the highest level of satisfaction compared to other stakeholder groups. The stakeholder group
 1267 with the lowest level reporting being somewhat or very satisfied was industry (39%). One industry
 1268 representative commented on their survey, “Do not agree with a lot of their principles, it is known that
 1269 they are anti oil/ farming/dairy.” Several industry representative members commented in their
 1270 interviews that they were concerned that restrictions placed on their and other firms would hurt the
 1271 economies of the communities. This was contested by many residents and community organizations
 1272 who sought a win/win solution of a green transition to sustainable industries such as solar,
 1273 electrification, and other sectors.
 1274



1275
 1276 **Figure 8:** “How would you rate the AB 617 process in incorporating environmental justice
 1277 principles?” by stakeholder groups (2020 Survey; n=94).
 1278

1279 There were a number of critical comments about the integration of environmental justice from the
 1280 surveys and interviews across of the stakeholders that would be valuable to consider to improve the
 1281 future implementation of AB 617.
 1282

1283 One EJ advocate on a CSC expressed mixed reviews in their 2018 survey for the implementation of EJ
 1284 by the Air District, “As far as bureaucrats go, it is difficult to discern their concern for environmental
 1285 justice issues. They pay lip service but continue to perpetuate the same systemic issues, despite the
 1286 incorporation of environmental justice issues into the AB 617 process. Despite this, I chose "somewhat
 1287 satisfactory" because the inclusion of EJ principles, in of itself, is a big step in the right direction.”
 1288

1289 A number of respondents sought to expand the understanding of environmental justice, including one
 1290 advocate who placed the concept in a larger historical perspective. “And the other principle is

1291 understanding structural and historical obstacles that these people-- that have led for them to become
1292 environment justice communities and that comes with a form of understanding equity and
1293 understanding like, okay, we're going to have to invest more in the communities in this area and in this
1294 region both in their capacity and in education and understanding where they're coming from.”

1295
1296 One resident in a rural community described her and other residents’ efforts to represent their unique
1297 lived experiences of EJ compared to others on their CSC. Recognizing and honoring the experiential
1298 knowledge and histories of people facing environmental justice is a critical part of achieving
1299 environmental justice. “And we're going to keep working because people...they have never really lived
1300 in the community like us out here. They haven't lived where we have lived, and be sheltered in town. I
1301 mean, they don't have the direct dust coming all over us, clouding us with all those contaminants and
1302 stuff. So to me, it's like they were coming from a place where-- I mean, they have paved streets, they
1303 have curb and gutter, they have light, they have this, they have that. I mean, they're shielded and we're
1304 right in the middle of it.”

1305
1306 One Air District staff provided some context for the challenges of that their agency experiences on
1307 attempting to implement an EJ approach in their survey, “There is not enough guidance from the State
1308 as to what is considered environmental justice principles and how that relates to current law for
1309 decision making process. Many community members and agency staff have different interpretations of
1310 what that may mean to them or their agencies. There needs to be clear expectations so that agency staff
1311 can fulfill the expectations of community, legislation, and CARB.”

1312
1313 Another Air District staff member commented in an interview on the challenge of balancing the
1314 interests of groups involved in the AB 617 process and noting a new commitment to EJ. “If we're too
1315 soft there, then we draw the ire of the environmental justice groups for good reason, for not doing our
1316 job. If we go too far, we draw the ire of the public and the elected Board of Supervisors, hurting the
1317 economy. So in that spirit, truly they take that kind of spirit and apply it to now working shoulder to
1318 shoulder with the environmental justice community.”

1319
1320 An industry representative expressed interest in getting greater clarity for Air Districts on how to
1321 implement EJ. “The AB617 law can have stronger language on what it means for the Air Pollution
1322 Control District to meet the principles of environmental justice. The importance of meeting these
1323 principles will help the port, industry and other business understand the need to achieving
1324 environmental justice and how these resources can help us achieve those goals.”

1325
1326 One population that is not frequently included in the AB 617 discussion are tribal communities.⁹ One
1327 tribal government representative stated in their survey that, “The program could develop understanding
1328 of Tribal Nation specifics. There are 109 federally recognized tribal nations within California, tribal
1329 lands are not well represented in the data sets that drives focused air pollution attention. Developing a
1330 mechanism for understanding how tribal communities (often disadvantaged, low income, and
1331 vulnerable) are impacted by stationary and mobile sources (toxic hotspots, legacy diesel energy use,
1332 tailpipe emissions, other) would improve the program for tribes and by extension, the state.”

1333
1334 Finally, there is recognition from some CARB staff about the uneven quality of the integration of EJ in
1335 the program. As one staff member put it, “Onboarding of CSC members should include training on
1336 environmental justice principles. Staff at CARB and Districts should also receive training on those
1337 principles. Given that these trainings did not occur, the inclusion of EJ principles varied widely by
1338 CSC. There was no ‘backstop’ at CARB when it became clear that some CSCs were going ahead
1339 without meaningful EJ engagement/leadership structures.”

1340
1341
1342
1343
1344
1345
1346
1347
1348
1349
1350
1351
1352
1353
1354
1355
1356
1357
1358
1359
1360
1361
1362
1363
1364
1365
1366
1367
1368
1369
1370
1371
1372
1373
1374
1375
1376
1377
1378
1379
1380
1381
1382

One observation from the surveys and interviews is that respondents rarely explicitly brought up the intersection of racism and environmental justice. This may be because it is assumed to be part of the concept of EJ. However, without this laid out in specific terms, there is a lack of attention placed on identifying and remedying racial disparities. Some CSC members, in an effort to address this lacking issue, referenced Title VI of the Civil Rights Act which requires the elimination of disparate racial impacts of policies. They recommended that AB 617 be framed through a civil rights lens. This would require that CARB and the Air Districts commit to imbedding these standards into the Blueprint, CSC partnering agreements, and metrics for the CERPs. According stakeholder surveys and interviews this could be accomplished by making compliance with Title VI a legal requirement for CARB, the Air Districts and all products of the AB 617 implementation. As described by a member of the West Oakland Community Steering Committee, “The AB 617 program needs to incorporate concepts and tools from the past several decades of implementation of the federal Clean Air Act and Civil Rights Act of 1964. There is also an unnecessary vagueness around ‘partnering’ and ‘collaboration’, both of which, if left undefined and supported by detailed guidance, will continue to AB 617 program's suffering from unrealistic and unmet expectations as experienced by EJ communities.”

In sum, there is a level of moderate satisfaction with the way that AB 617 has integrated EJ into its process and outcomes but with clear room for improvement. A clear pattern is that respondents are seeking greater clarity from CARB about the definition of EJ and metrics to ensure that it is being met.

I. Overall AB 617 Assessment

AB 617 is a work in progress, given that it has just finished its production of the first round of CERPs in its 10 pilot communities and is launching on its second round of 3 communities. It is, therefore, too early to provide a definitive and comprehensive statement of its success. However, there were a large number of responses in the surveys and interviews that speak to a conclusion that AB 617 has been a qualified success in meeting its overall goals.

In the 2020 survey, the majority of respondents (59%) reported being somewhat satisfied or very satisfied with the achievement of AB 617 in meeting their goals with 16% reporting being somewhat or very unsatisfied. The remainder of 25% reported that the progress has been neither satisfied nor unsatisfied. On the summative survey question, “Please rate your level of agreement or disagreement with the following statement: Participating in the AB 617 process has provided benefits to my community” 73% reported agreeing or strongly agreeing and only 9% reported disagreeing or strongly disagreeing.

Breaking this down by stakeholder group shows some significant variation. For example, while only 45% of industry representatives reported being somewhat or very satisfied with the achievement of their goals 72% of CARB staff and 60% of EJ organization representatives reported this high level of satisfaction. All of the other stakeholder groups reported more than a 50% level being somewhat or very satisfied.

	Community Resident (N=17)	EJ Organization (N=15)	Industry (N=22)	Air District (N=9)	CARB (N=11)
Very unsatisfied	11.8%	0.0%	4.5%	11.1%	0.0%
Somewhat unsatisfied	0.0%	6.7%	27.3%	11.1%	0.0%
Neither satisfied nor unsatisfied	29.4%	33.3%	22.7%	11.1%	27.3%
Somewhat satisfied	29.4%	53.3%	36.4%	33.3%	45.5%
Very satisfied	29.4%	6.7%	9.1%	33.3%	27.3%

Table 9: Level of satisfaction of meeting your goals to date by stakeholder groups. (Survey 2020; n=74).

1383
1384
1385
1386

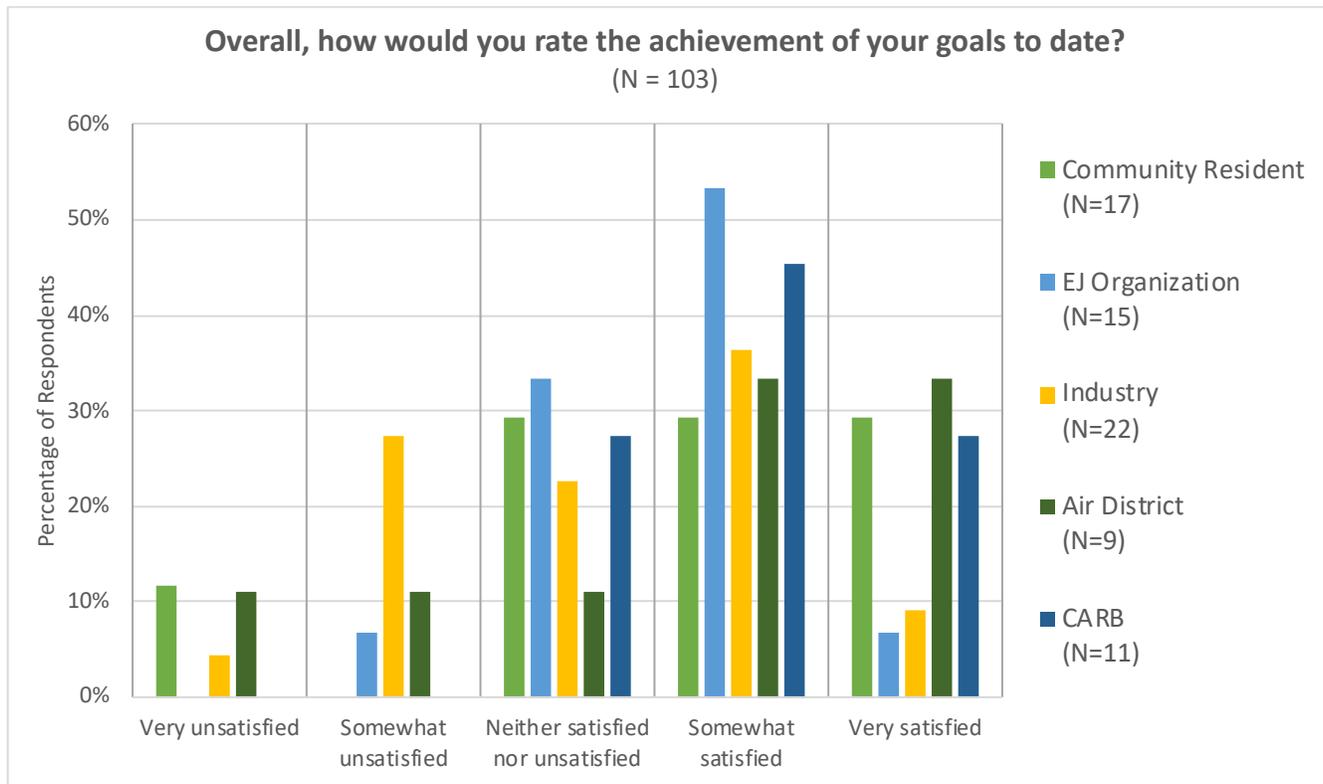


Figure 9: Level of satisfaction in meeting your goals to date by stakeholder groups (Survey 2020; n=103).

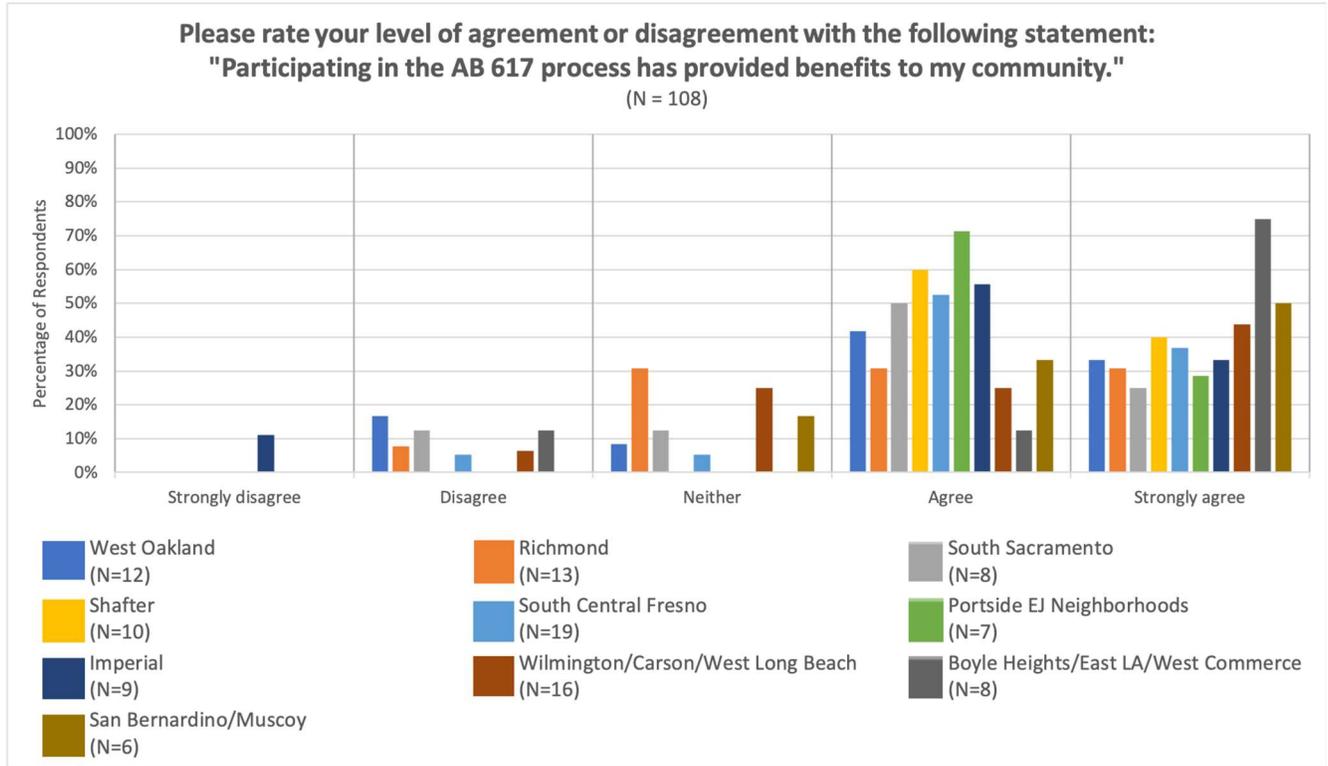
1387
1388
1389
1390
1391
1392
1393
1394
1395
1396
1397
1398

On the question of level of agreement or disagreement that participating in the AB 617 process has provided benefits to their community, there is also a generally positive response with some variation by community.¹⁰ More than 60% of respondents in all 10 communities reported either agreeing or strongly agreeing that the process has provided benefits to their community. The most positive communities being Shafter and Portside (100% agreeing or strongly agreeing) and the lowest two being Wilmington/Carson/Long Beach (69%) and Richmond (62%) agreeing or strongly agreeing. This is seen in Table 10 and Figure 10.

	West Oakland (N=12)	Richmond (N=13)	South Sacramento (N=8)	Shafter (N=10)	South Central Fresno (N=19)	Portside EJ Neighborhoods (N=7)	Imperial (N=9)	Wilmington/Carson/West Long Beach (N=16)	Boyle Heights/East LA/West Commerce (N=8)	San Bernardino/Muscoy (N=6)
Strongly disagree	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	11.1%	0.0%	0.0%	0.0%
Disagree	16.7%	7.7%	12.5%	0.0%	5.3%	0.0%	0.0%	6.3%	12.5%	0.0%
Neither	8.3%	30.8%	12.5%	0.0%	5.3%	0.0%	0.0%	25.0%	0.0%	16.7%
Agree	41.7%	30.8%	50.0%	60.0%	52.6%	71.4%	55.6%	25.0%	12.5%	33.3%
Strongly agree	33.3%	30.8%	25.0%	40.0%	36.8%	28.6%	33.3%	43.8%	75.0%	50.0%

1399
1400
1401
1402

Table 10: Level of agreement that participating in the AB 617 process has provided benefits to my community by CSCs (Survey 2020; n=108).



1403
1404
1405
1406
1407
1408
1409
1410

Figure 10: Level of agreement or disagreement with the following statement: “Participating in the AB 617 process has provided benefits to my community” by CSCs (2020 Survey; n=108).

Overall, community engagement in AB 617 implementation has achieved an impressive range of successes and experienced some significant challenges. In some cases, the challenge represents a success that is only partially realized. These are summarized in Table 11 below.

AB 617 Element	Major Successes	Major Challenges
<i>Community Air Protection Blueprint</i>	The Blueprint lays out a robust framework for the implementation of the legislation.	The Blueprint does not provide sufficient guidance on community engagement.

<i>AB 617 Consultation Group</i>	The Consultation Group provided crucial support for the development of the Community Air Protection Blueprint.	There has been some lack of clarity about the purpose of the group after the development of the Blueprint. Advocating for funding for AB 617 been suggested as a potential role.
	The Consultation Group’s diverse membership was appreciated by the members.	Clarity on advice to CARB was challenging at times due to the wide range of perspectives.
<i>Community Selection Process</i>	The community selection process has included 10 communities with the worst air quality in the state.	Communities perceived themselves to be in competition with each other.
	There were innovations in the number of community-driven and community/ Air District collaboration.	Some district-led processes did not achieve potential for community collaboration.
<i>Community Steering Committees</i>	Most CSCs achieved a robust composition of residents, community organizations, businesses, and local governments.	There was a significant degree of conflict within the CSC members, especially between residents/ community organizations and business representatives.
	Most CSC improved the level of collaboration throughout the process.	There was a significant degree of conflict between the CSCs and Air Districts in many sites.
	The addition of outside facilitators helped in many CSCs.	Some facilitators approaches did not fit the needs and context of the CSCs and in some cases had to be replaced.
	Spanish translation increased – to some degree participation of mono-lingual Spanish speakers.	Some mono-lingual CSC members continued to feel marginalized during the process and a number dropped off the CSC.
	Community organizations provided crucial capacity-building for residents in many CSC.	Many of the presentations by Air Districts, CARB and outside consultants were not accessible to residents. This improved somewhat over time but often with significant investments by community organizations. Youth membership was limited in all but two CSCs and in general young people’s voices were missing.
		There was some confusion about how much meeting outside of the formal CSC meetings were permissible.
		These additional meetings took a great deal of time and effort from residents and community organizations.

Community Air Monitoring Plans (CAMPs)	There was great interest of residents in the monitoring devices and processes.	Some of the monitoring presentations were not accessible to residents.
		Some of the monitoring areas did not include targets of concern for residents.
		Time constraints limited the value of the CAMPs for informing the CERPSs.
Community Emissions Reduction Plans (CERPs)	The CERPs include a range of community-priorities such as mobile sources, land use, pesticides, community-benefit investments.	This positive result was uncertain until the end of the process and achieved through extensive negotiations between the CSC and Air Districts and often with the support of CARB.
	There has been unprecedented engagement of other agencies (cities, counties, and the Department of Pesticide Regulation).	As noted above.
	There was some integration of public health as a goal and focus of strategies.	There was a call for a greater focus on public health outcome metrics and strategies in the CERPs.
Community Air Grants	The CAGs provided important resources to build capacity in current and potential AB 617 communities.	There were some grants made to larger community organizations that spurred concern in smaller grassroots organizations.
Environmental Justice	There was a strong emphasis on environmental justice and social equity in the legislation, Blueprint and many CSCs.	There was some unevenness in realization of EJ principles, in particular in the ability of Air Districts to open space for CSCs to define their own agendas and action priorities.

1411 **Table 11:** Summary of Evaluation Findings – Major Successes and Major Challenges

1412
1413 Many comments from the survey and interviews report hard-won – although not complete—progress.

1414
1415 A comment from a CARB staff member observed a positive trend in the agency’s engagement in AB
1416 617. “CARB has benefited greatly through this process, even though it was painful at times. I believe
1417 that the agency is better equipped to serve the public by having to work through AB 617
1418 implementation.”

1419
1420 One Bay Area Air District staff member reported on the transformative effect of AB 617, “We’ve
1421 learned so much from this program. Working closely with the community has been very rewarding and
1422 has changed how we think about everything we do. BAAQMD is dedicated to racial equity and this
1423 lets us put our skills and resources directly toward addressing environmental injustice in our region.”

1424
1425 A resident in Richmond expressed appreciation for the process even though the outcomes is not yet
1426 clear. “It is too soon to know how much the community may benefit from the AB-617 process. At the
1427 very least, I feel it is bringing many parts of the community together in seeing they have more power /
1428 ability to direct than many previously thought.”

1429

1430 Finally, an EJ organization representative who was not on a CSC but closely observed the process as a
1431 Community Air Grant recipient provided a broad overview of the mixed positive and negative record
1432 of the policy implementation. “The process has finally formed a table for advancing community
1433 emissions reductions and burdens placed on disadvantaged communities. Some of the success has been
1434 that there are now active community air monitoring programs in communities identifying local
1435 pollution data. Other success has been that communities are becoming more engaged and present in the
1436 development of strategies and becoming more aware of the issues surrounding them. Some
1437 shortcomings of the program are: that there are interpretations made by some air districts where the
1438 administration of the program is still not understood and badly misinterpreted to not take community
1439 into account; also, there were no overall metrics included in AB 617 and some early CERPs have not
1440 been able to develop the metrics in more detail for goal setting. The accountability factor is still not
1441 clear and communities are feeling like there will be no enforcement of CERP goals.”

1442 **4. RECOMMENDATIONS**

1443
1444 The following recommendations are derived from the analysis of the findings above. Because the study
1445 participants expressed a wide – and sometimes contradictory -- range of perspectives, we do not
1446 merely repeat all suggestions they provided. Instead we synthesize these recommendations based on
1447 the preponderance of evidence and based on our own professional judgement as policy analysts of
1448 what kinds of interventions will be most helpful to address the major challenges uncovered in our
1449 study and to enhance the implementation of AB 617 going forward. We worked to incorporate as
1450 many perspectives as possible from the broad set of stakeholders. However, as this is a study of
1451 community engagement, we did foreground the suggestions we received from community residents
1452 and organizations to build these recommendations. These recommendations follow the flow of the AB
1453 617 process, starting with the development of the AB 617 Consultation Group and ending with the
1454 prospects for program sustainability.

1455 1. Sustain the AB 617 Consultation Group with broader charges

1456
1457 There is generally a positive assessment of the Consultation Group. This is based primarily on the
1458 collaborative climate it has developed bringing together entities that are often at odds with each other
1459 in a positive and productive manner. The group receives high praise for its success in helping guide
1460 CARB in the development of the Blueprint. This success can be built upon by making the group a
1461 standing committee charged throughout the AB 617 process. Second, the group can be a forum to
1462 develop the improved Blueprint that incorporates enhanced community engagement guidelines and
1463 also to develop a Civil Rights/ racial justice element to AB 617.

1464 2. Develop an improved Blueprint focused on community engagement.

1465
1466 There was generally high praise for the Blueprint as representing a forward-looking document to match
1467 the broad and bold goals of the enabling legislation. It was also praised as a positive example of
1468 collaborative action on the part of the AB 617 Consultation Group in a relatively short amount of time.
1469 However, its significant shortcomings in providing sufficient guidance in the area of community
1470 engagement was also a common observation by study participants. In the next version of the
1471 Blueprint, a more explicit set of expectations for Air Districts to collaborate with their CSCs and the
1472 broader public can be helpful both to provide improved guidance in what is often a new way of
1473 operating for many districts and as a basis for communities to hold the districts accountable to meet
1474 these standards. This is important to allow for a place-based approach that allows the Air Districts and
1475 the CSCs to develop structures and processes that match the local conditions. However, without a
1476 foundation of minimum requirements from the Blueprint, this can result in confusion for the
1477

1478 implementing partners, conflicts over how to interpret the basic Blueprint guidelines, and a set of
1479 individual systems that cannot live up to the statewide goals of CARB or the legislature.

1480
1481 Towards this end, a revised Blueprint can lay out the allocations of decision-making power of the
1482 CSCs relative to the Air Districts, provide a framework for the role of facilitators, offer case studies of
1483 successful community engagement approaches, suggestions for training resources on key issues such
1484 as cultural competence, anti-racism, civic science and environmental justice, and provisions for
1485 conflict resolution between stakeholders. This can also be a place for consideration of the application
1486 of Title VI of the Civil Rights Act and other legal frameworks to guide an environmental justice-
1487 oriented approach to AB 617. This will require a process to determine how much of this can be
1488 addressed through a revision to the Blueprint and how much will require action by the legislature. In
1489 any case, the revision of the Blueprint should be accompanied by training for all parties (CARB, Air
1490 Districts, CSCs) in how to apply its principles, including on environmental and racial justice. This
1491 revision or augmentation can be directed by the AB 617 Consultation Group, perhaps with the
1492 assistance of other experts on community engagement.

1493 3. Improve the Community Selection Process

1494 The criticisms of the community selection process highlighted a number of challenges that any new
1495 process must address. First, the process must reduce the sense of competition between communities as
1496 many advocates felt that they were vying to present themselves as the worst of the worst to obtain
1497 designation as an AB 617 community. This will become much more pressing as the pool of funds
1498 continue to shrink for new AB 617 communities. Some of this can be alleviated by providing other
1499 types of funding, possibly including a prioritization for Community Air Grants to those communities
1500 not selected for full inclusion. This can also be addressed by spreading the innovations developed in
1501 the first round of communities to others throughout the state, such as the creation of lower-resource
1502 versions of CAMPs and CERPs.

1503
1504
1505 There was a great variation in the methodologies used in the different Air District proposals with some
1506 being quite rigorous and data-based and others having a less robust approach. One response to this
1507 would be to develop a consistent assessment methodology that can be used across the state to create a
1508 predictable and easy to understand basis for making the case and assessing proposals. In addition to
1509 considering environmental exposures and social vulnerability factors (using CalEnviroScreen and
1510 adaptations currently under development by a team led by UC Berkeley) that focus more specifically
1511 on air-related issues, including pesticides, the methodology should also consider community capacity
1512 to engage in a meaningful way in the process as a key selection criteria.

1513
1514 One significant innovation to the selection process was represented to the greatest degree in the San
1515 Joaquin Valley was a community-driven proposal development process, through which community
1516 organizations applied a rigorous data-based methodology combined with a collective prioritization of
1517 communities to propose to the Air District. Once CARB has enhanced its selection criteria, the
1518 community-driven process can apply this in their deliberations. This process would require a
1519 substantial amount of capacity for community groups, but this could be built with the support of the
1520 San Joaquin Valley AB 617 Environmental Justice Steering Committee.

1521 4. Improve Management of CSC Processes

1522 The greatest degree of conflict in the AB 617 process occurred in the CSCs. This was mostly in the
1523 relationships between the Air Districts and CSC members over the degree of decision-making authority
1524 that the community residents and organizations sought and for which the Air Districts were uneven in
1525 their delivery. Unfortunately, the structure of some of the CSCs did not resolve, and sometimes
1526

1527 exacerbated this tension. At the same time, there were a number of approaches that could be
1528 considered models for future implementation.

1529

1530 It is important to keep in mind a number of points in developing best practices for CSC management.
1531 In particular, a number of the most successful CSCs in terms of collaboration, such as in West
1532 Oakland, were the product of decades of development thus, no current CSC should be expected to
1533 exhibit this level of high function in the 1-2 year timeline of the CSCs. Conversely, a number of the
1534 most conflictual settings, such as in Wilmington/Carson/West Long Beach and the San Joaquin Valley
1535 were the product of decades of tension between Air Districts and community organizations, and it is
1536 unrealistic to expect these to be resolved in the AB 617 pilot timeline. However, there are a number of
1537 design principles that can be adapted for future implementation.

1538

1539 First, develop a set of collaborative or partnering agreements, not merely a CSC charter. These would
1540 spell out roles, responsibilities, decision-making and conflict resolution processes. They would lay out
1541 explicit values of the group (for example, racial, environmental and social justice and inclusion). It
1542 would also lay out a clear leadership structure. Based on the experiences of the first round of
1543 communities, a co-lead as in West Oakland, co-chair as in Imperial or a co-host as in San Bernardino,
1544 consisting of a community representative and a district representative, appears to work best. These
1545 decisions must be made by the CSC itself – not CARB or the Air Districts - and can be codified in the
1546 CSC charter. Including a phase of collective goal setting (over and above the guidelines in the
1547 Blueprint) that lay out specific elements that the CSC wants to achieve and through what processes
1548 will be helpful.

1549

1550 Second, CSCs should make additional efforts to include typically marginalized populations, including
1551 non-English speakers, youth and tribal governments and communities. While a number of CSCs have
1552 made youth and non-English speakers a priority (and CARB has conducted tribal outreach) there is a
1553 long way to go to ensure that the CSCs truly reflect the breadth of the community. Strong
1554 considerations of engaging mono-lingual speakers of other languages besides Spanish that are
1555 prevalent in CSC locations will also be critically important as this was lacking in most if not all CSCs.
1556 Designating staff from CARB, the Air Districts, and community organizations (the latter with
1557 additional compensation) to play this outreach and engagement function will be helpful.

1558

1559 Third, improving the science communication capacities of the Air Districts and other presenters at CSC
1560 meetings will help make the meetings more accessible and the participation more meaningful for all
1561 members. Vetting presentations with community organizations before each meeting for assistance in
1562 making the language appropriate could be helpful. The development of independent Technical
1563 Advisory Groups consisting of scientific experts who could help interpret Air District and CARB
1564 materials for CSC members, develop scientifically-sound proposals with the CSC has been seen as a
1565 promising practice. This is under development in Richmond and under discussion in Sacramento and
1566 bears careful consideration as AB 617 implementation moves ahead.

1567

1568 Fourth, make the use of an external facilitator standard for all CSCs. In some cases, such as
1569 Sacramento, where there was not an external facilitator until late in the process, there was significant
1570 tension between the Air District and the CSC. At the same time, there was some variation in
1571 effectiveness of the facilitators across the CSCs, so ensuring that they have the cultural competence,
1572 conflict resolution and experience with public policy will be beneficial. There should be, at the
1573 minimum, input, and ideally shared decision-making by the Air District and the CSC in the selection
1574 process. One CSC facilitator laid out their set of recommendations for promising practices.

1575 “Supporting a team of community leaders in co-designing and co-leading the process has also
 1576 proved crucial for similar reasons; incorporating transparency at every stage of the process
 1577 (explaining decisions upfront, providing as many opportunities as possible for participants to ask
 1578 questions and provide input, conducting live polling and displaying the results and counts in real
 1579 time, acknowledging mistakes and learning curves for all parties including those made by
 1580 government agencies and the community co-lead team, etc.), paid stipends (members of the
 1581 community are busy and they appreciate the acknowledgement that their time and work is
 1582 valuable.)”
 1583

1584 Third, the conflicts between Air Districts and CSCs in most areas of the state suggests a number of
 1585 needed improvements. This should include making sure that the Air Districts do not play facilitator
 1586 roles or try to control the process. Instead they should embrace the new mode of relationships with
 1587 community residents and organizations that is not based on defending against local engagement, but
 1588 viewing it as a valuable component to ensuring that they meet their mission. To support this they must
 1589 improve their staff capacities in cultural competence in working with diverse communities and build
 1590 environmental justice into their organizational values. Finally, they can increase their coordination
 1591 with other agencies and governments (e.g., cities and counties, transportation agencies, pesticide
 1592 regulation agencies and others) to address broader drivers of air quality disparities.
 1593

1594 Fifth and finally, as noted in the CSC findings above, there was great concern about the “back of the
 1595 room” role for CARB at the CSC meetings. While the CARB staff may have – quite appropriately --
 1596 been trying not to overstep their bounds with the Air Districts, this approach was often perceived as
 1597 insufficient by CSC members. Instead, numerous respondents called for a more active role in
 1598 communicating the requirements of the Blueprint for community engagement, explaining the
 1599 expectations of the agency in terms of the key elements of the policy (i.e., CAMPs, CERPs) and
 1600 backing up the community representatives when needed. While CARB staff did provide backup in
 1601 urgent situations this was often too ad-hoc and reactive and could have been less needed if a more
 1602 upfront process and active role was followed in the first place. This critique was expressed by some
 1603 CARB staff themselves, speaking to their frustration at the restrictions on their roles, suggesting that
 1604 measures need to be taken by CARB leadership to better support their staff. Part of this support can
 1605 come in the form of improved training in community engagement and cultural competency and could
 1606 also benefit from a hiring practice for new staff with these capacities if this is going to be an on-going
 1607 and more significant role for CARB. As noted above, having access to a Blueprint that provides
 1608 explicit guidance to Air Districts for community engagement and that can also inform CARB’s
 1609 interactions with the CSC and Air Districts would greatly improve CARB’s effectiveness.
 1610

1611 5. Improve Development of the CAMPs

1612 The development of the CAMPs had some important successes, principally in the ways in which they
 1613 provided community members with education and awareness in monitoring technology. This was
 1614 greatly appreciated by many respondents. In addition, the tensions between community members and
 1615 Air Districts over the monitoring boundaries was largely resolved in most of the communities.
 1616

1617 However, most CAMPs did not succeed one of the major goals of the AB 617 legislation, which was to
 1618 provide data to inform the CERPs. This was primarily a function of the timeline laid out in the statute
 1619 by the legislature with a very limited period between submission of the CAMP and development of the
 1620 CERP. This is a difficult challenge to address, but clearly, increasing the monitoring time to allow for
 1621 application to the CERP will be needed. Another potential, yet partial solution, is the increased use of
 1622 community-generated air quality monitoring as is available in several locations
 1623 (Wilmington/Carson/West Long Beach, Imperial County, West Oakland, San Joaquin Valley and

1624 Richmond.) Air Districts and community organizations with expertise in community air monitoring
1625 can collaborate to apply some of this monitoring data into the CAMPs themselves. Using the
1626 community air grants to further support this kind of civic science as well as partnerships with technical
1627 support from universities and consultant can provide additional benefits.

1628

1629 6. Improved Development of CERPs

1630 The production of the CERPs that could effectively improve air quality on disadvantaged populations
1631 was the clear central goal of AB 617. While there was general satisfaction in CERPs by the end of the
1632 process in most areas of the state, this was the result of significant struggle between the CSCs and the
1633 Air Districts and in a number of cases strong intervention by the CARB board itself in the final
1634 approval process. There are a number of improvements to the CERP process that could assist in both
1635 reducing the conflict and effectiveness of its outcomes.

1636

1637 First, the CERP process should start earlier by identifying community priorities for investments that
1638 make a direct difference in the health and well-being of the residents of the focus communities instead
1639 of having the Air District's come up with their list and having the community respond. These can
1640 include items like including funding for electric vehicles and solar panel subsidies; urban greening
1641 (tree planting, green walls), and complete streets in many of the urban CERPs; port and other industrial
1642 facility equipment electrification; diesel truck rerouting among others.

1643

1644 The criteria of direct exposure and health impact benefits for area residents, as a priority over general
1645 area-wide strategies can help demonstrate that this is truly a *community* air protection program. This is
1646 not to say that the area-wide strategies are not also valuable, but that community-scale actions and
1647 impacts must be highly prioritized. Likewise, CARB ought to require Air Districts to follow the
1648 Blueprint guidelines to emphasize new actions over and above their current actions (which was uneven
1649 in its application in some of the CERPs, at least in their draft forms.) Similarly, CARB ought to
1650 encourage Air Districts to emphasize permitting and enforcement actions to hold industry accountable
1651 and not only to provide industry incentives. Legislation that prohibits permitting of polluting facilities
1652 that would violate a CERP could address this issue.

1653

1654 Second, the CERPs should address “up-stream” drivers of air quality, principally land use that locate
1655 hazardous facilities in and near disadvantaged communities. This will require active engagement with
1656 city and county government which have land use power. Integrating AB 617 with the implementation
1657 of SB 1000 (requiring the integration of EJ elements into city and county General Plans) can assist in
1658 this process. This will require that Air Districts and CARB become more engaged with land use
1659 planning: an arena that they have not addressed in a significant way, tending to defer to the cities and
1660 counties for whom this is a primary jurisdiction. Therefore, developing more active and robust
1661 partnerships with cities and counties on land use issues will be important.

1662

1663 Third, the CERPs should include specific health improvement metrics as a basis for assessing the
1664 success of their actions. The leadership in the Wilmington/Carson/West Long Beach CSC has been
1665 quite articulate in promoting this public health orientation to AB 617. As noted above, CARB places a
1666 high priority in protecting public health as part of their mission and the reduction of health-harming
1667 emissions can be considered a public health improvement strategy. However, some CSC members are
1668 calling for specific health metrics (such as reductions in asthma ER visits and hospitalizations) to be
1669 included in the CERPs. Tracking these impacts are complex – and often expensive – so will need to be
1670 considered carefully. This will benefit from more active partnerships with state and local public health
1671 agencies as well as health researchers at universities who may already be pursuing relevant studies.

1672

1673 Fourth and finally, CARB and the Air Districts should strongly consider recent proposals by some
1674 CSC members (primarily from West Oakland) to use Title VI of the Civil Rights Act as well as
1675 provisions in the Clean Air Act that require agencies to eliminate racial disparities in exposure to air
1676 pollution. This would create a much higher standard for CARB and the Air Districts than the current
1677 Blueprint provides that only calls to address these disparities without an explicit standard or legal
1678 requirement to meet it. It would also make important steps to upholding the values of EJ that have a
1679 strong racial justice component. One way for this to happen would be to charge a committee to develop
1680 a strategy for this kind of policy integration. This could be the AB 617 Consultation Group (or a
1681 subcommittee of the Group) and perhaps adding ad-hoc members with appropriate legal expertise.
1682 California policies prohibiting the use of race in the distribution of funds will need to be addressed in
1683 these strategies.

1684
1685 **7. Improve the Community Air Grants Program**

1686 There were mixed recommendations from the study participants in whether the Community Air Grants
1687 should be focused on the AB 617 communities to enhance the development of the CAMPs and CERPs
1688 or whether they should be spread beyond these communities. Both have strong justifications. On the
1689 one hand, focusing them on the AB 617 communities will help ensure that these communities have the
1690 capacity to create the highest quality planning documents – an argument for effectiveness. On the other
1691 hand, spreading the funds outside of these core communities would produce a more equitable outcome
1692 across the state. One way to address this dilemma would be to split the difference and provide one
1693 portion of funds for the designated AB 617 communities with the specific goal of improving the
1694 CAMPs and CERPs and the other portion to build capacity in other communities to help them get into
1695 a pipeline to be able to adopt effective CAMPs and CERPs in the future. This would require the grants
1696 to not be provided for other uses (e.g., general community education on air quality). To ensure that the
1697 grants are being used most effectively, there should be a program evaluation of the first rounds of the
1698 program.

1699
1700 **8. Secure long-term funding to support AB 617 Implementation**

1701 For AB 617 to fulfill its goal of being a transformative intervention in air quality management, it needs
1702 steady funding to match the degree of demands placed on all parties, including CARB and the Air
1703 Districts. Unfortunately to date, the funding from the legislature and governor for these efforts has
1704 been unpredictable and inconsistent. It is therefore recommended that an assessment be done on the
1705 funding model being used to implement AB 617 to determine what level of funds are necessary for the
1706 Air Districts to perform their needed functions and for CARB’s legislative affairs office, perhaps in
1707 collaboration with the AB 617 Consultation Group to work with the legislature and Governor’s Office
1708 to secure sufficient funds for a sustainable implementation of the policy.

1709
1710
1711 **5. LONGER-TERM EVALUATION QUESTIONS**

1712
1713 AB 617 is a bold new approach that is attempting to transform air quality governance in California.
1714 This is based on a number of hypotheses that need to be empirically assessed over time. These include
1715 the hypothesis that a community-engaged approach will create improved air quality plans and that, if
1716 implemented will in fact improve air in these communities. This, in turn, raises a number of questions
1717 that should be assessed to measure the actual transformations achieved. These include the following.

- 1718
1719
 1. How are CAMPs and CERPs being integrated into Air District plans and planning processes?
 2. How are CAMP and CERP implementation being integrated into other entities (e.g., cities, counties, tribal governments)?

- 1722 3. How has the 617 process changed the relationships between community organizations with Air
1723 Districts?
1724 4. How has the 617 process changed the relationships between CARB and Air Districts?
1725 5. How have the CERPs improved air quality in disadvantaged communities?
1726 6. How well are lessons learned from Year 1 being integrated into Year 2 communities and
1727 beyond?
1728 7. How well has community voice and power been sustained through the process?
1729

1730 These questions can form the basis of subsequent evaluations of the AB 617 process, whether by
1731 another outside evaluator and/or by critical reflection by the stakeholders themselves.
1732

1733 6. CONCLUSION

1734
1735 AB 617 has been hailed as a transformative policy for air quality management in California. These
1736 transformations include a localization of air quality management from a regional regulatory scale to a
1737 community scale, both in terms of the local focus of its air quality monitoring and management and in
1738 its engagement of affected communities as partners, not only as beneficiaries of government actions. It
1739 also represents an important step in California’s efforts to integrate environmental justice more deeply
1740 into the state agencies’ culture, structure and function. Based on the analysis of all of the data sources
1741 considered in this study, we find it appropriate to consider the AB 617 experiment a qualified success
1742 as a pilot program. Despite a range of conflicts, all 10 of the pilot communities were able to produce
1743 CAMPs and/or CERPs that represent real progress beyond the baseline of current practices. Likewise,
1744 while many of the processes did involve great tension between all stakeholders (within the CSCs;
1745 between the CSCs and the Air Districts; and between all of these entities and CARB) throughout the
1746 process, there was progress made in all 10 communities towards a more collaborative set of
1747 relationships. All parties have much to be proud of and it is hoped that this report will help them
1748 pursue their goals in ever more effective ways.
1749

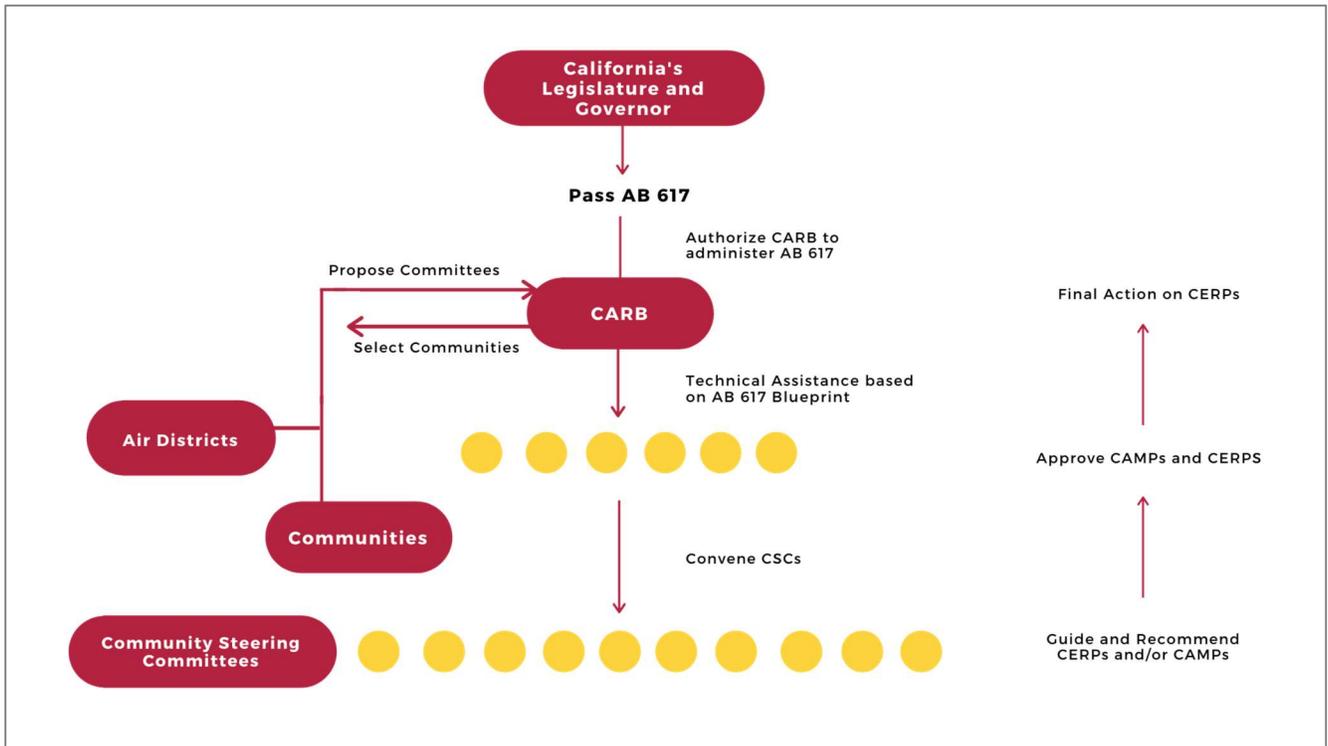
1750
1751 Please direct questions about this draft report to Project Director, Dr. Jonathan London:
1752 ijklondon@ucdavis.edu
1753

1754 **Acknowledgments:** The authors express their gratitude to the many individuals involved in
1755 implementing AB 617, including CARB and Air District staff and Community Steering Committee
1756 members who shared their stories and perspectives with us. Several anonymous reviewers from CARB
1757 have helped improve the report. All errors are the responsibility of the authors.
1758

1759 **Disclaimers:** The opinions expressed in this article are solely those of the authors and do not represent
1760 the official position or policy of the State of California, the California Environmental Protection
1761 Agency, or the California Air Resources Board. The mention of trade names, products, and
1762 organizations does not constitute endorsement or recommendation for use.
1763
1764
1765

1766
1767

Appendices

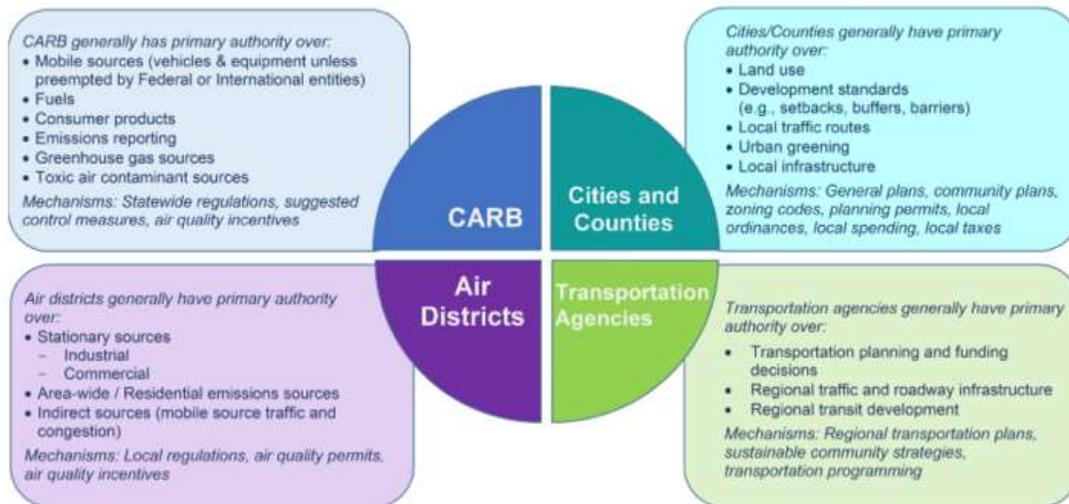


1768
1769
1770

Figure i: AB 617 Structure and Process

Source: Author

Who Has the Authority to Implement Actions?



1771
1772
1773
1774

Source: CARB

Figure ii: Air Quality Management in California

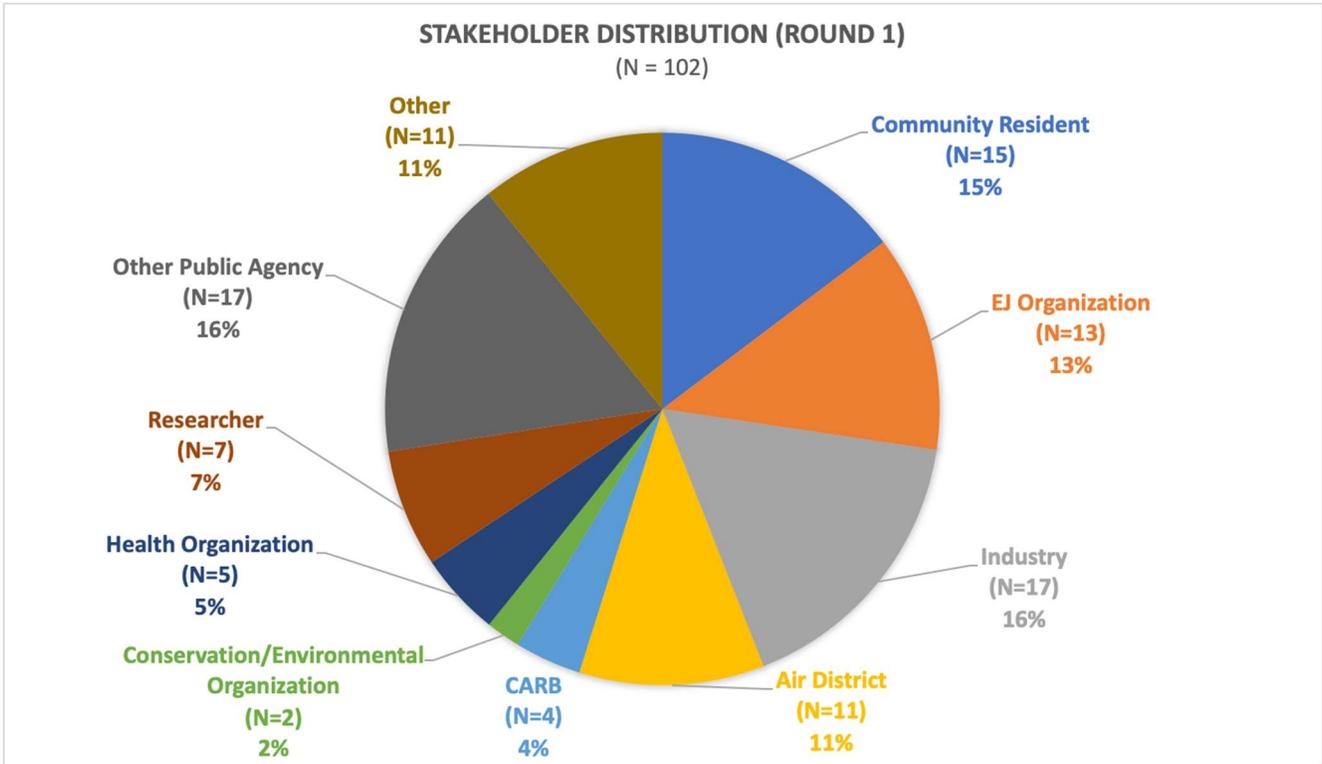


Figure iii: Survey Respondents by stakeholder groups in 2018-2019 survey (n=102).

1775
1776
1777

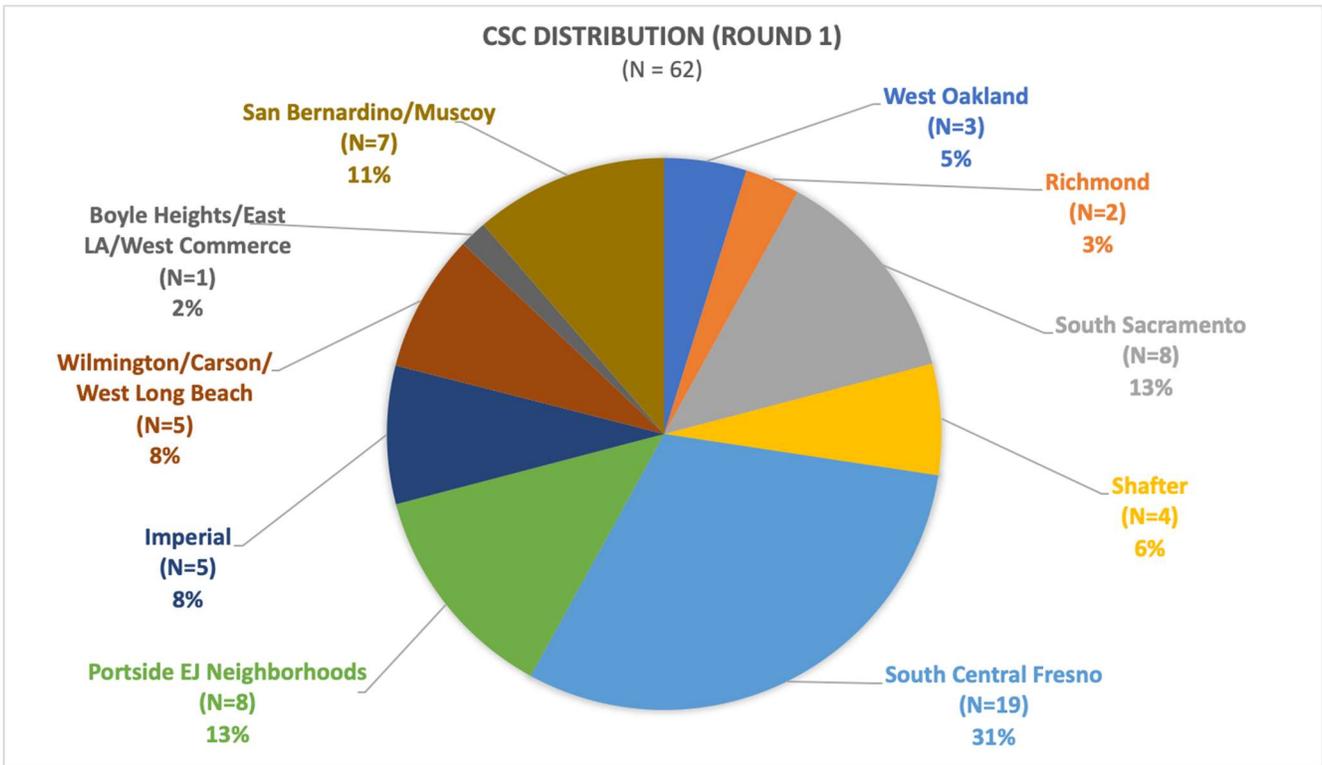
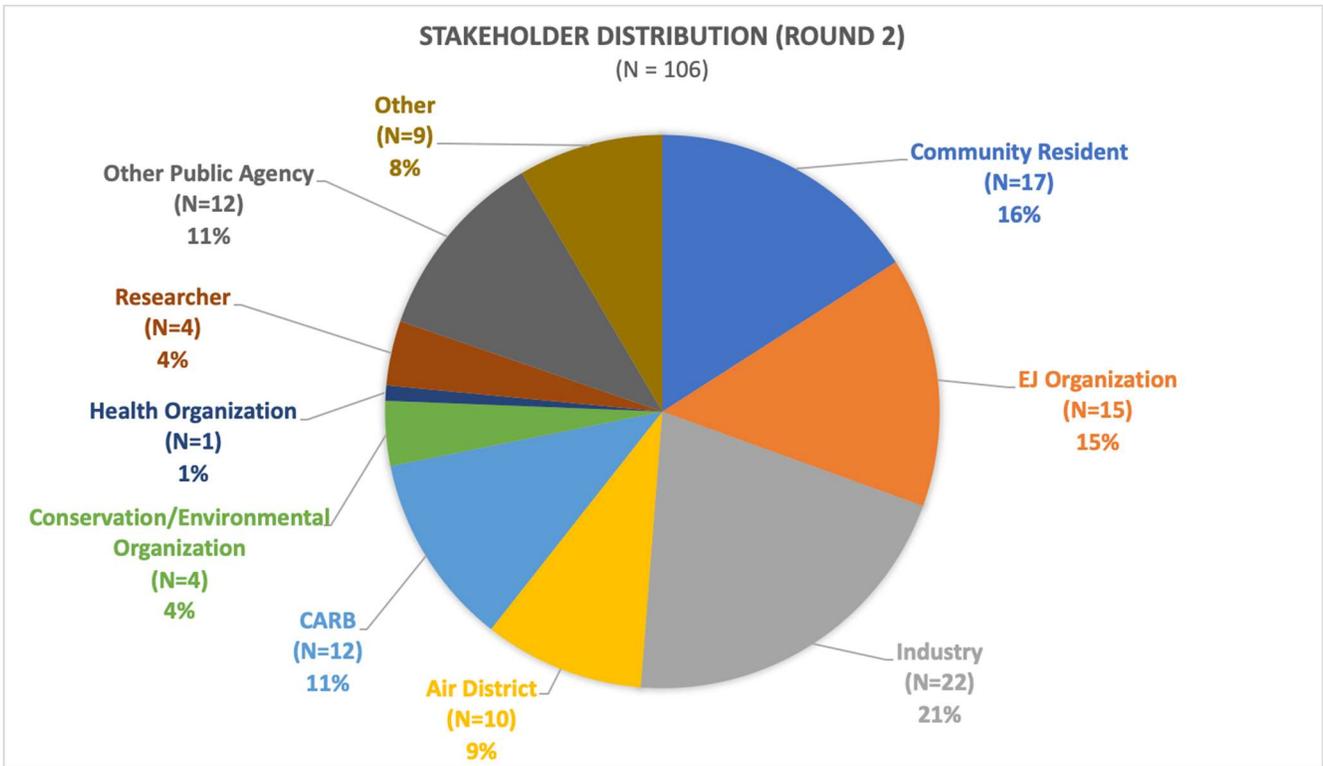


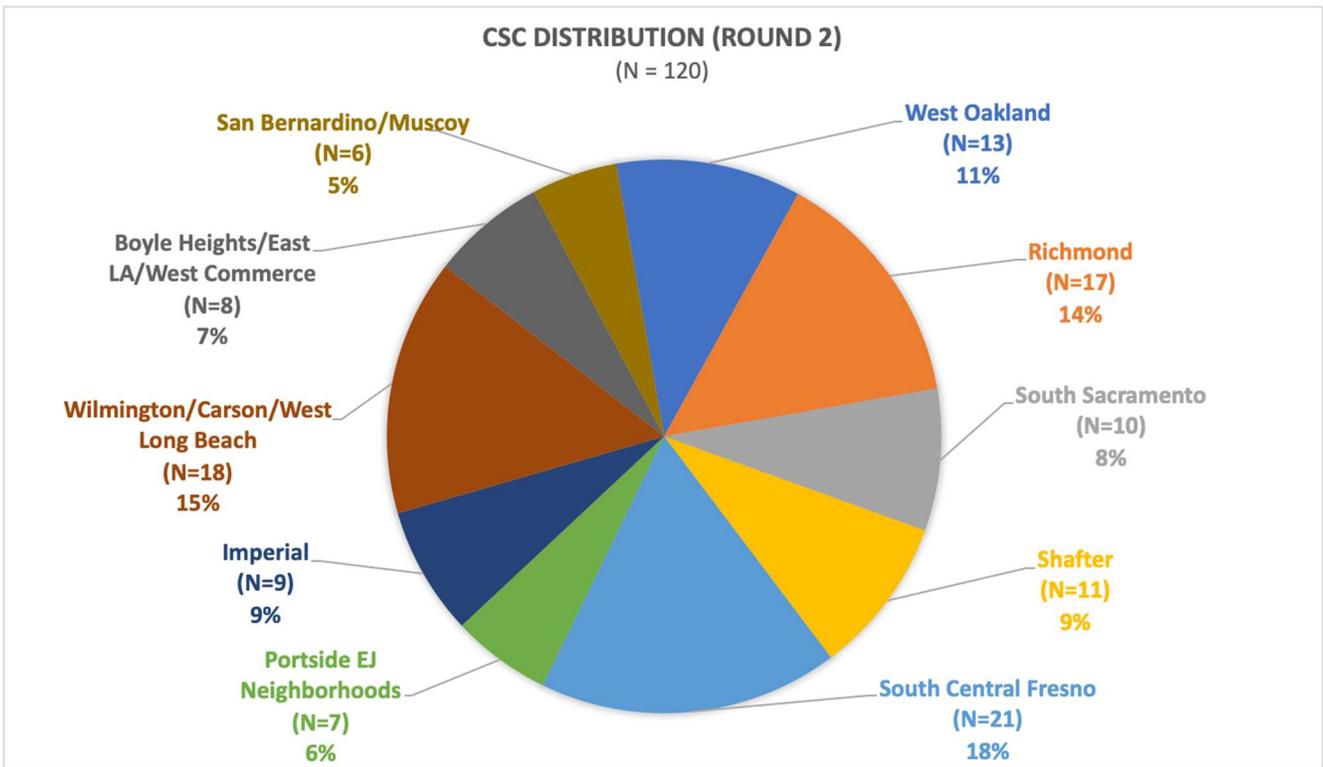
Figure iv: Survey Respondents by CSCs in 2018-2019 survey (n=62).

1778
1779
1780



1781
1782
1783

Figure v: Survey Respondents by stakeholder groups in 2020 survey (n=106).



1784
1785
1786
1787
1788

Figure vi: Survey Respondents by CSCs in 2020 survey (n=120).

Endnotes

¹ Information about AB 617 (Garcia 2017), can be found here:

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB617. Last accessed April 3, 2020.

² Information on CARB's AB 617 Community Air Protection Blueprint can be found here:

<https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/community-air-protection-blueprint>. Last accessed April 3, 2020.

³ The structure of implementation of AB 617 as well as information about the different jurisdictions for air quality management in California can be found in Appendix A.

⁴ Information about the CARB board resolutions for Fresno and Shafter (and others) can be found here:

<https://ww2.arb.ca.gov/board-resolutions-2020>. Last accessed April 3, 2020.

⁵ Information about CARB's Community Air Grant guidelines can be found here:

<https://ww2.arb.ca.gov/resources/documents/community-air-grants-2017-2018-guidelines>. Last accessed April 4, 2020.

⁶ The respondent sample between the 2018/2019 and the 2020 surveys are significantly different so these results should be taken independently, not as a measure of change in the same population.

⁷ The Blueprint's Appendix I defines EJ as "The fair treatment of people of all races and incomes with respect to development, implementation and enforcement of environmental laws, regulations, and policies" following California Government Code Section 65040.12 and California Public Resources Code Section 72000).

⁸ For definitions of environmental justice see: David Schlosberg, *Defining environmental justice: theories, movements, and nature*. Oxford University Press, 2009.

⁹ It should be noted that CARB has conducted a number of tribal outreach activities with tribes across the state.

¹⁰ Some respondents to the question of how strongly they agreed or disagreed with "Participating in the AB 617 process has provided benefits to my community" indicated association with multiple communities making the total responses higher than the number of respondents. These were primarily Air District and CARB staff.