

COMMUNITY ENGAGEMENT IN AB 617

**AN EVALUATION OF CHALLENGES, SUCCESSES,
LESSONS LEARNED AND RECOMMENDATIONS FOR
THE FUTURE**

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**UC DAVIS
JUNE 2020**

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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. However, like all significant transformations, the implementation of AB 617 has been marked by both collaboration and conflict, and there are a range of perspectives about its degree of success as well as the progress needed to achieve its goals.

The goals of the statute have been incorporated into an implementation framework called the Community Air Protection Blueprint by the California Air Resources (CARB) to guide the work of regional air districts (Air Districts) and Community Steering Committees (CSCs). 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 and challenges 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 disproportionately 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 April 2020.

Research Questions

The report sought to answer four major research questions based on the goals of the AB 617 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 Components	Major Successes	Major Challenges
<p>Community Air Protection Blueprint</p> <p>Document developed by CARB to guide Air Districts to implement AB 617</p>	<p>The Blueprint lays out a robust framework for the implementation of the legislation.</p>	<p>The Blueprint does not provide sufficient guidance on community engagement.</p> <p>The Blueprint does not include clear enough requirements for the achievement of measurable, mandatory enforceable emissions reductions beyond Air Districts' existing activities.</p>
<p>AB 617 Consultation Group</p> <p>Multi-stakeholder advisory body to CARB for AB 617 statewide implementation</p>	<p>The Consultation Group provided crucial support for the development of the Community Air Protection Blueprint.</p>	<p>There is a lack of clarity about the purpose of the group after the development of the Blueprint. Advocating for funding for AB 617 has been suggested as a potential role.</p>
	<p>The Consultation Group's diverse membership was appreciated by the members.</p>	<p>Clarity on advice to CARB was challenging at times due to the wide range of perspectives.</p>
<p>Community Selection Process</p> <p>CARB's process to select the AB 617 implementation committees</p>	<p>The community selection process has included 10 communities with the worst air quality in the state</p>	<p>Communities were set into competition with each other for limited selection spots</p>
	<p>There were innovations in the number of community-driven and community/ Air District collaboration.</p>	<p>Some district-led processes did not achieve potential for community collaboration.</p>
<p>Community Steering Committees (CSCs)</p> <p>Local stakeholders that guide the implementation of AB 617 in selected communities.</p> <p>Consists of residents, community organizations, local businesses, and public officials.</p>	<p>Most CSCs achieved a robust composition of residents, community organizations, businesses, and local governments.</p>	<p>There was a significant degree of conflict within the CSC members, especially between residents/ community organizations and business representatives.</p>
		<p>There were concerns about conflicts of interests in the CSC membership of industry representatives and resident employees.</p>
	<p>Most CSCs improved the level of collaboration throughout the process.</p>	<p>There was a significant degree of unresolved conflict between the CSCs and Air Districts in many sites.</p>
	<p>The addition of outside facilitators helped in many CSCs.</p>	<p>Some facilitators' approaches did not fit the needs and context of the CSCs and in some cases had to be replaced.</p>
	<p>Spanish translation increased—to some degree— participation of mono-lingual Spanish speakers.</p>	<p>Many mono-lingual non-English speaking CSC members were marginalized during the process and a number dropped off from their CSCs.</p>

	Community organizations provided crucial capacity-building for residents in many CSCs.	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 to what extent meeting outside of the formal CSC meetings were permissible.
		These additional meetings took a great deal of time, energy, and effort from residents and community organizations.
Community Air Monitoring Plans (CAMPs)	Residents were very engaged in learning about the monitoring devices and processes.	Some of the monitoring presentations were not accessible to residents.
Plans for air quality monitoring in AB 617 implementation communities	There was innovation in incorporating district-led monitoring with community-based air monitoring in some communities.	Some of the monitoring areas did not include areas and contaminants of concern from residents.
		Time constraints limited the value of the CAMPs for informing the CERPs.
Community Emissions Reduction Plans (CERPs)	The CERPs include a range of community-priorities such as mobile sources, land use, pesticides, community-benefit investments.	These positive results were uncertain until the end of the process and achieved through community pressure, extensive negotiations between the CSCs and Air Districts, often with the support of CARB.
Specific actions to improve air quality in AB 617 implementation communities		Most CERPs lack mechanisms to enforce specific mandatory emissions reductions in addition to existing Air District actions.
	There has been unprecedented engagement of other agencies (cities, counties, and the Department of Pesticide Regulation).	This engagement came late in the process and could have been improved by proactive efforts by Air Districts.
	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 within the CERPs.
Community Air Grants (CAGs)	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.
CARB funding to community organizations to support AB 617 implementation and community capacity building		
Environmental Justice	There was a strong emphasis on environmental justice and social equity in the legislation, Blueprint and many CSCs.	There was unevenness in the realization of EJ principles, particularly in the ability of Air Districts to share power with CSCs to define

Values and actions to address disproportionate environmental impacts on people of color and other disadvantaged groups.	their own agendas and action priorities to address environmental injustices.
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Table 1: Summary of Evaluation Findings: Successes and Challenges

Summary of Evaluation Recommendations

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

1. Sustain the AB 617 Consultation Group with broader charges such as revising the Blueprint and advocating for increased funding.
2. Develop an improved Blueprint focused on community engagement with best practices, resources, and tools as well as clarification about requirements for Air Districts to achieve measurable, enforceable emissions reductions.
3. Improve the community selection process
 - a. Avoid or reduce competition between communities
 - b. Use community-based community nomination and vetting processes
 - c. Develop regional, state-wide, and industry sector-based actions to spread the benefits of AB 617 beyond its selected communities.
4. Improve the management of CSC processes
 - a. Clarify shared goals (including emphasis on environmental justice)
 - b. Adapt leadership structure that equitably shares power and authority between community and Air District representatives
 - c. Develop a culturally-responsive framework for use by outside facilitators
 - d. Pay CSC members stipends (in particular community residents)
 - e. Develop improved and consistent Conflict of Interest policies
 - f. Ensure a stronger and more proactive role for CARB in mediating, facilitating and ensuring accountability of all parties to the Blueprint and overall goals of AB 617
5. Improve the development of the CAMPs
 - a. Continued community education on monitoring technologies
 - b. Incorporate air quality monitoring by communities
 - c. Better utilization of data to inform CERPs
 - d. Address problem of insufficient time to develop CAMPs
6. Improve the development of the CERPs
 - a. Better incorporation of community action priorities
 - b. Development of measurable, enforceable and significant emission reductions beyond those otherwise required.
 - c. Expansion actions to include air quality “drivers” (i.e., land use)
 - d. Enhance use of health metrics to track health impacts and improvements
 - e. Consider use of Civil Rights framework (Title VI) to address racial disparities
 - f. Address problem of insufficient time to develop CERPs
7. Improve the Community Air Grants Program
 - a. Balance the value of enhancing CAMP and CERPs in selected communities and spreading the resources beyond these communities

8. Support sufficient and sustainable funding for AB 617 at sufficient levels for current and future communities

1. INTRODUCTION

California’s Assembly Bill 617 (AB 617), authored by Assemblymember Christina Garcia, 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.¹ 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. However, like all significant transformations, the implementation of AB 617 has been marked by both collaboration and conflict, and there are a range of perspectives about its degree of success as well as the progress needed to achieve its goals.

The statute provides a bold vision for reducing air quality pollution in disadvantaged communities and some specific provisions for establishing local air monitoring systems, and community emission reduction programs to improve the air quality in these communities. In particular, it has been recognized for its emphasis on the environmental justice motto, “we speak for ourselves,” that is, the recognition that the people most affected by an environmental problem must be at the forefront of decisions addressing the issue. The AB 617 Community Air Protection Blueprint (CARB 2018:6) puts it this way.

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

To carry out the statute, the California Air Resources Board (CARB) developed the AB 617 Community Air Protection Blueprint (Blueprint) to provide guidance to regional air pollution control districts and air quality management districts (Air Districts) on how to implement the statute.² The Blueprint helps guide the formation and management of the Community Steering Committees (CSCs), made up of businesses, local governments, community organizations and residents that lead the development of the community air monitoring and emissions reduction plans. The Blueprint also provides the process and structure of the Community Air Monitoring Plans (CAMPs) that establish the location and types of air quality monitoring processes to be used and the Community Emissions Reduction Plans (CERPs) made up of strategies and actions to clean the air in their focus communities. Based on the needs and capacity of the community, some AB 617 communities were selected to develop CAMPs, others to develop CERPs and in most to develop both. CARB also allocated two rounds of funding in Community Air Grants to help build capacity around community air monitoring to community organizations throughout the state.

Over the past two years, all levels of California’s air quality management system, from CARB, to the Air Districts to the CSCs in the ten initially selected disadvantaged communities have engaged in a process of building collaboration to implement this ambitious policy. Along the way they have

¹Information 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.

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. These lessons can be applied both to the three newly selected AB 617 communities (Southwest Stockton, Eastern Coachella Valley and Southeast Los Angeles) as well as other community-based air quality management throughout the state and country as a whole.

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

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

The Air Districts are called to work with communities in more intensive and collaborative ways than most have done before. They are also drawn into addressing issues that have historically been outside of their jurisdiction such as mobile sources, land use, and agricultural pesticides. Furthermore, they are being asked to take on these ambitious tasks with what some Air District leaders describe as inadequate resources.

Community residents, many of them without scientific training, are now called to engage in often highly technical issues of air quality monitoring and management. Service on a CSC is a significant time commitment and represents a financial hardship for many residents (especially to those whose Air Districts did not provide honoraria). Many residents, especially people of color, came to the CSCs with a lifetime of experiences of racial discrimination, social injustice, and exclusion from public decision-making over issues affecting their health and well-being. AB 617 has demanded that organizations and residents on CSCs, more accustomed to advocating outside of the system, to learn how to work internally with the Air Districts. Additionally, residents and organizations have long experiences working in opposition to industries that contribute to air pollution emissions in their communities and now must find ways to collaborate with them on the CSCs, often with a high degree of conflict. Finally, all parties have had to take on all of these challenges in a very compressed timeline as they simultaneously had to develop new and improved relationships, construct the structures of the collaboration, and produce a CAMP and/or a CERP.

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

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 the Appendix.

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.

2. METHODOLOGY

The methodology used to inform the analysis and 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 all parties can better achieve the goals of AB 617 and the underlying goals of addressing air quality needs and challenges of disadvantaged communities?

Data Sources

Surveys

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

Key Informant Interviews

We conducted 70 key informant interviews based on questions about their perceptions of what was working well with community engagement, what was not working as well, and what changes they would recommend improving the policy's performance. These interviews drew from members of all 10 CSCs and associated Air Districts with 5-6 members per CSC. The general composition of the community interviews included 1-2 residents, 1 business representative, 1 local government leader, 1-2 community organizations, and 1 Air District representative. Three interviews with CSC resident members were conducted in Spanish. These interviews also included CARB 617 Consultation Group members, Air District staff, CARB staff, one CARB board member and Assemblymember Christina Garcia, the author of AB 617. Interviews lasted between 30 minutes to 90 minutes and were digitally recorded with the participants' consent. Participants were offered confidentiality of their identities and the option to not have their quotes included in the report. We use an [X] to avoid disclosing names or other details that might identify a specific interviewee.

Participant Observation

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

Videos of CARB board meetings, CERP Approval Meetings, Assemblymember Garcia's March 2019 AB 617 legislative hearing, an AB 617 convening at UC Davis, and several AB 617 panels at environmental justice (EJ) conferences (the Imperial Environmental Health Leadership Summit and the Central California Environmental Justice Network annual conference) were also documented for analysis.

Document Analysis

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

Data Analysis

All interviews were transcribed. Interview transcripts, together with the CSC field notes and other observation notes, CERP comment letters and survey responses were all coded in the NVivo 11.0 qualitative coding software package. The coding process involved a first read through of a sample of early interview transcripts to develop an initial coding structure. This was then enhanced through a second round of coding to add, change or delete codes. The eventual codes were then established in a codebook of key themes related to the core questions of the study using 19 main themes and 188 sub-themes. These main themes were selected based on the research questions. These themes included dynamics of CSC meetings, development processes and outcomes of the CAMPs and CERPs, environmental justice and others. We also divided out comments that were supportive and critical of the process. Key quotes were identified from the interviews, surveys, and CERP comment letters that helped illustrate the major successes, challenges, and

recommendations for AB 617 implementation. Exemplary quotes were included from all stakeholder groups to highlight the convergence and divergence of perspectives.

Limitations

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

Finally, because this is an evaluation of the AB 617 community engagement process, it does not provide an independent assessment of the technical elements of the CERPs or how well community input was incorporated into the plans. Instead, it reports on the stakeholders’ perceptions of how well the CERPs accomplished this goal based on surveys, interviews, and written documentation. An additional outcome-based evaluation would be necessary to assess the question of how well the community engagement process influenced the final plans. Furthermore, a long-term tracking process to assess the implementation of the CERPs relative to community goals will be needed to judge the success of AB 617. While the AB 617 process is important, the authors of this study highly recommend an outcome-based evaluation, as the measurable improvements to the air quality and thus the health of the residents in the most affected communities is the ultimate goal.

3. EVALUATION COMPONENTS

A. AB 617 Consultation Group

The AB 617 Consultation Group has played an important role in the development of the AB 617’s implementation. Made up of 24 members, representing a diverse range of stakeholders from environmental justice advocates, industry leaders and Air District officials, the group’s major role has been advising the development of the Community Air Protection Blueprint.

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

		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 different stakeholders	0%	0%	27%	36%	36%	11
4	The outcomes of the Consultation Group to date	0%	9%	45%	27%	18%	11

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

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

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

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

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

B. The Community Air Protection Blueprint

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.

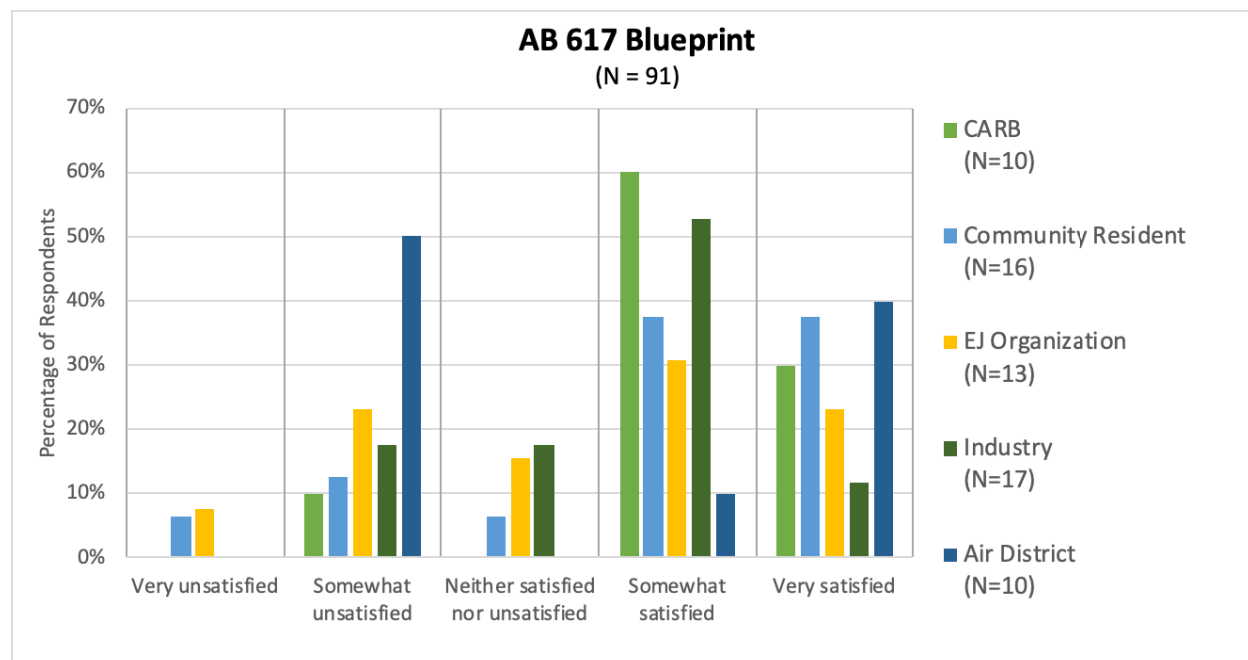


Figure 1: Level of satisfaction with the AB 617 Blueprint in providing sufficient guidance on community engagement by stakeholder group (2020 Survey; n=91).

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

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

This is somewhat in tension with an Air District staff member who made an observation that from an agency perspective the Blueprint can be *too* definitive. "The Blueprint contains some useful suggestions on community engagement, but it is far too rigid and assumes a 'one size fits all' approach. It also has many requirements that are burdensome on air districts with little to no community benefit. It seems that air district efforts would be better applied to other things that actually improve the CERPs or CAMPs and their implementation." Overall, from the 2020 survey it should be noted that of the 10 responses from Air District staff, 50% reported being somewhat dissatisfied with the Blueprint's guidance on community engagement, with 50% reporting being somewhat satisfied or very satisfied.

The combination of these two conflicting perspectives points to the difficulty of balancing a statewide and AB 617's place-based approach. Yet this balance is precisely what is needed to both support the resident and community organization members of the CSCs, while still allowing Air Districts to develop a community engagement plan that fits local conditions with some flexibility.

C. Community Selection

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

Several innovations helped address this problem. In the San Joaquin Valley, for example, fifteen EJ and health organizations came together as part of the San Joaquin Valley AB 617 Environmental Justice Steering Committee to develop consensus-based proposals, first to submit AB 617 Community Air Grant applications (through which they secured \$2.2 of the \$10 million granted statewide in the first round) and then to submit proposals to become a pilot community. The process considered a range of variables, including the level of community capacity of the

community as well as its degree of disadvantage using CalEnviroScreen and other tools that produced the proposal for the two communities – Shafter and South Central Fresno-- which were eventually selected by CARB. The selection of Shafter was notable in that it ended up substituting for the community of North Bakersfield, which the Air District had originally proposed.

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

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

Overall, there is a pattern of moderate to strong support for the selection process and outcomes as shown in Table 3 and Figure 2 that uses the 2018-2019 survey (because this data collection period followed most closely the community selection process). Here we see that the percentage of those who were somewhat or very satisfied was about two-thirds for the initial recommended communities, the selection process and the final selected communities respectively.

	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%	6%	6%

Somewhat Unsatisfied	5%	7%	8%
Neither Satisfied nor Unsatisfied	26%	26%	15%
Somewhat Satisfied	44%	42%	43%
Very Satisfied	19%	15%	24%

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

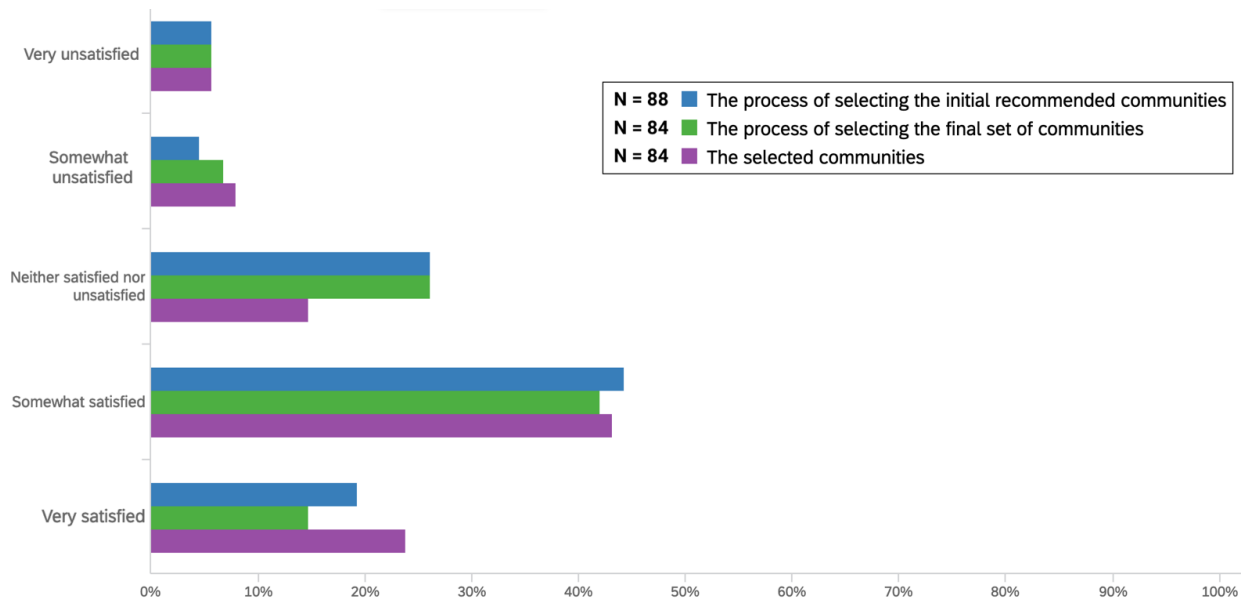


Figure 2: Level of satisfaction regarding the process and selection of communities for air monitoring and/or emissions reductions programs (2018-2019 Survey, n=84-88).

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.

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 AB 617 policy.

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.”

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 a natural experiment in this regard, by comparing the experiences of high capacity contexts such as West Oakland and lower capacity contexts such as Sacramento. In the former case, there was significant success-- much of this a product of collaborative work that had long preceded AB 617 – and in the latter, there was less of a history of agency-community partnerships, and therefore a greater degree of struggle. One lesson learned from this might be that if CARB is going to select communities with lower capacity, then it must be prepared to provide the needed guidance and support to ensure success in these communities. Selection of a limited number of communities also places them in competition with each other, a concern expressed by multiple respondents to interviews and surveys.

D. Community Steering Committees

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

CSC Member Selection

The first phases of the CSC involved the recruitment of members. Most Air Districts created an on-line nomination process as well as a proactive process to fill the different categories of the committee. In some cases, this was an easy task, with many more applicants than could be accommodated, whereas in others there were fewer applicant and districts had to work harder to find members. In many areas such as the San Joaquin Valley, West Oakland, two of the Los Angeles communities, San Diego, and Imperial there were a number of strong environmental justice and health equity organizations who were already mobilized to work on air quality issues and who brought their leaders into the CSC. In some areas, such as Sacramento, there were only a small range of environmental justice organizations to draw from and in others, such as

Richmond/San Pablo, one of the major EJ organizations working in the region, Communities for a Better Environment, declined to participate in the process. This was based primarily on their opposition to the original legislation and then to the selection of Richmond/San Pablo as a monitoring-only community as well as the lack of action on emissions reductions from oil refinery and related petro-chemical facilities. An unevenness of strength in the equity-oriented organizations across the regions made for a disparity in the capacity of the CSCs to effectively represent EJ issues and populations.

There was great variation in the make-up of CSC membership across the 10 communities. In all cases there was an expectation that there would be a majority of residents and community organizations. However, while in most CSCs this was the case, some had slightly (and some much) lower levels than this. This range in membership can set up disparities in the prominence of resident and community organization voice. Some notable examples of this variation, as seen in Table 4, included those within districts such as Shafter’s CSC which has 66% residents compared to Fresno’s 32%. On the other hand, both of these sites had an overall strong community voice. As an even more extreme example, West Oakland, which has arguably the strongest community voice, had only 17% of resident members, compared to the case of South Sacramento where even the 70% of residents on the CSC have not resulted in significant community power. In this case, the community power in West Oakland was largely due to the leadership role of the West Oakland Environmental Indicators Project. Nonetheless, this wide variety of membership proportions is issue for CARB and the Air Districts to carefully consider in the recruitment and representation of CSC members in the future.

Community Steering Committee	Resident	Community Organization	Business/Labor Organization	Government/ University/ Hospital
West Oakland	17%	26%	9%	48%
Richmond/San Pablo	31%	34%	17%	17%
South Sacramento – Florin	70%	20%	10%	0%
Shafter	66%	14%	7%	14%
South Central Fresno	32%	21%	32%	15%
Wilmington/Carson/West Long Beach	28%	24%	24%	24%
Boyle Heights/East LA/West Commerce	23%	23%	8%	46%
San Bernardino/Muscoy	21%	25%	8%	46%
Portside EJ Neighborhoods	48%	15%	15%	22%
Imperial Valley	47%	13%	13%	27%

Table 4: CSC Membership by Stakeholder Category

Source: CSC Membership Rosters

One major issue that many CSCs had to address was the ambiguous role of industry-affiliated residents. This was important because, in instances where the rules specified that a majority of resident members was needed to decide, it mattered whether an industry-affiliated member counted as a resident or as an industry representative. This was particularly contentious in communities like Shafter and Richmond/San Pablo, in which some residents also worked for industries (oil, agriculture, manufacturing) that generate significant air emissions. A policy of disclosure was finally adopted in each community, but not without significant tension. Several residents and community organizations wanted a policy to simply disclose conflicts based on industry affiliation, while others recommended the recusal of industry-affiliated members from decision-making that would affect their firms or sectors and others sought a policy that would bar members with industry affiliations from the CSCs as a whole. These debates were not resolved (with the exception of not using the industry exclusion rule) and remains a key question for future implementation.

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

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

In contrast, an EJ organization not involved in a CSC critiqued its leadership team for being too close to industry, “In [X], the outsized presence of [X] and other polluting industries has meant that many so-called community leaders have a historic relationship with those industries.” While the CSC members in this community contest this description and point out that by not engaging in the process this organization was not able to make an accurate assessment of the committee, it does show that the role of industry remains contentious and needs additional attention from the Air Districts and CARB in the future.

Community Voice and Decision-Making Power

A major concern shared by residents and community organizations regarding the CSCs involved the level of their decision-making in relation to their Air Districts. To what extent are the CSCs able to make decisions as a committee and to what extent do they merely serve as an advisory group, with no real power and agency, to the Air District? While AB 617 is not the cause and cannot be expected to solve the issue of power disparities in the participating communities, there is still the possibility that they can reproduce historic systems of racial and ethnic discrimination

within the policy's structure and implementation process. Within their core values, AB 617 and environmental justice share a common desire to transform power and social inequities. By approaching AB 617 through an environmental justice framework, it would consider the structural factors that This transformation of power and social inequities are core values of environmental justice and of AB 617 itself. An environmental justice approach to AB 617 would therefore take into consideration the structural factors that shape the inequitable distribution of environmental harms and amenities. It would also recognize the historical exclusion of people of color and low-income people from decision-making roles.

Another issue which affects the influence of residents and community member in the CSC is the members' level of capacity and training. A member of one CSC criticized the lack of preparation given by the Air District and CARB during the early formation of their CSC, "My community is starting from scratch. Inadequate preparation and information to have a clearer understanding of the community as to their power, and role as a partner in the development of the CAMPs and CERPs. Timely training and onboarding within the first 3 months of the process were not provided. Clear training on what the role of CARB is for the community members. Best practices to be rolled out initially and updated regularly." This issue also came up at the UC Davis AB 617 Convening in February 2020 as well with several members of the Sacramento CSC expressing dismay at the lack of on-boarding support for CSC members, many of them without prior knowledge of air quality science and management.

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

Another point of tension was the idea of a community-led versus a community-advised CSC process. This concern was shared by shared through the perspective of an Air District staff member who sought to highlight the limits of the CSC role, "The Steering Committee, at least some, really think that AB 617 in some way provides the Committee with full authority to basically explore, identify, and then implement essentially whatever they would like to do. I think this has evolved over some time with the Blueprint and we are all rowing in the same direction for the most part. The roles are more clearly understood. The air district is, ultimately... we have to take to our board the CERP, they are the ones who approve the CERP and then CARB ultimately approves the CERP. It's not the CSC. They are more in an advisory role."

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

role of community voice will be an important issue to track in the longer-term implementation phases of AB 617.

Leadership and Facilitation Models

A major transformation, which occurred over the course of the implementation process, was that CSC’s began to use outside facilitators. Only four CSCs used outside facilitators at the beginning of the program, however, by the end all but one CSC (San Bernardino) were using outside facilitators. While outside facilitation was received positively by most CSCs, several other CSCs needed to replace their first facilitator until they found a suitable one. The lack of guidelines for selecting and managing facilitators played a large role in worsening tensions within CSCs.

The CSCs followed a number of different leadership models that varied by how the decision-making authority was distributed between the Air District and the CSC itself. The distribution of decision-making authority was at the heart of many conflicts throughout the AB 617 process. While this tension varied by location, the tension was generally centered on the CSCs seeking more control in the process. The Blueprint states that the Air Districts “convene the CSCs,” however these is no further language which specifies whether the District has decision-making power over CSCs or whether the CSCs retain this authority for itself. This has remained an open and challenging question.

Table 5 lays out the variation in leadership models. The Air District roles have several variations. “District-led” means that the meeting agendas are created by the District itself and its staff manage the meeting, often in tandem with an outside facilitator. “District-driven” means that, while there may one or two CSC members who chair the meetings, it is the District that primarily develops the agenda and drives most of the content of the meetings. “Co-leadership” typically represents a team of Air District staff and a community organization representative or resident that design and direct the meetings together. The community role also have several variations. “Membership” means that CSC members do not have a designated leadership role. “Community co-hosts” facilitate the meetings but do not have decision-making authority over the agenda or CSC decisions. The Richmond/ San Pablo CSC has a group of CSC members that function as a “community co-lead team” to work with Air District staff to develop the agendas and develop proposals for CSC decisions. “Community co-chairs” work with an Air District Co-Chair to develop agendas, develop decision proposals, and chair the meeting.

Community Steering Committee (CSC)	Air District	Community Role	Outside Facilitator
Portside EJ Neighborhoods	District-Led	Membership	Yes
Wilmington/Carson/West Long Beach	District-Led	Membership	Yes
Boyle Height/East LA/West Commerce	District-Driven	Community Co-hosts	Yes
South Sacramento – Florin	District-Driven	Co-Chairs	Yes
San Bernardino/Muscoy	District-Driven	Community Co-hosts	No
Fresno	District-Driven	Membership	Yes
Shafter	District-Driven	Membership	Yes

Richmond/San Pablo	Co-Leadership	Community Co-Lead Team	Yes
Imperial Valley	Co-Leadership	Community Co-Chairs	Yes
West Oakland	Co-Leadership	Community Co-Chairs	Yes

Table 5: CSC Leadership Models (Updated as of March 2020)

The level of community leadership across the ten CSCs can be illustrated in the continuum in Figure 3.

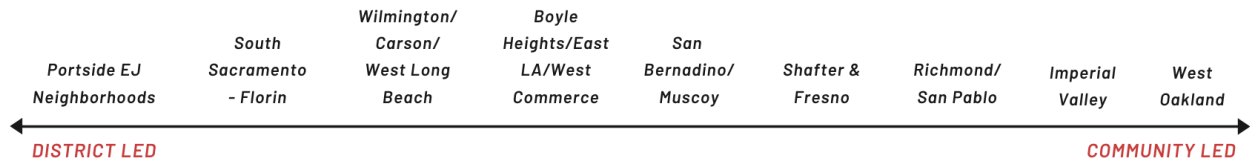


Figure 3: CSC Power Continuum

This continuum runs left to right from most district-led to most community-led. This placement is developed by the authors based on interviews, surveys, and observations of CSC meetings. It is also based on the distribution of authority over who sets the agenda, who leads the meetings, and how decisions are made inside and outside the meetings. CSCs that are solely directed by Air District staff (e.g., Portside EJ Neighborhoods, and Wilmington/Carson/West Long Beach) are considered the most district-led, followed by those with some kinds of community co-chairs with significant Air District influence (e.g., South Sacramento-Florin and Boyle Heights/East LA/West Commerce), followed by those with strong community organizations to influence the process even without co-chairs (e.g., Fresno and Shafter), and then CSCs with co-leads from the Air District and community holding shared power (e.g., Imperial and West Oakland).

This “power continuum” is similar to the “CSC leadership models” but with the difference that it measures not just the form structure, but the ability of the CSC to exert power over the overall direction of the process, including the development of the CAMPs and CERPs. For example, although the Fresno and Shafter CSCs were “Air District-driven” the presence of very strong community organizations resulted in a potent community voice. In the case of other CSC, a district-led process in the meetings still led to a CERP that had significant community priorities such as the Wilmington/Carson/Long Beach. On the other hand, there were some CSC that had a community-chairs structure, such as South Sacramento, that still ended up a product that reflected the Air District more so than community priorities. This was largely due to the lack of strong community organizations on the CSC, and perhaps also the small size of the CSC (approximately ten over the course of the process).

It is important to note that the goal is not necessarily to select that model that is most community led, but instead to adopt and adapt one that is best *aligned* with the needs and capacities of the CSC stakeholders. For example, not all communities have the capacity nor interest in managing the time-intensive co-leadership model as West Oakland’s CSC. In addition, this site had the benefit of maintaining a decades-long community-agency collaboration between the primary environmental justice organization, the West Oakland Environmental Indicators Project and the Air District. This collaboration led to the development of a set of formal collaboration agreements (developed in 2005) that served as a foundation for West Oakland’s AB 617 work. This same model is difficult, if not impossible, to replicate within AB 617’s proposed timeline. With that said, even without a long-history of collaboration, the Imperial CSC came the closest to replicating

the same kind of power sharing as West Oakland. This is due to Imperial's strong community organization leadership and an amenable Air District.

Communities with limited interaction between residents, community organizations, and Air Districts such as Sacramento experienced the negative impacts of trying to build trusting relationships while navigating through a rushed CAMP process without a strong community leadership base. Meanwhile, some communities with conflictual relationships between local organizations and Air Districts, such as in the Imperial Valley were able to create a co-leadership model while others—such as in the San Joaquin Valley- had difficulty overcoming long-enduring tensions and were not able to develop such a model. And yet, through strong advocacy and the support of CARB, the San Joaquin Valley CSC as well as others such as the Wilmington/Carson/West Long Beach CSC with limited formal leadership were able to achieve significant victories in strong air protections in their final CERPs.

In some cases, certain Air Districts had staff serving as facilitators, but, this was generally considered not to be an effective approach and in some cases was deemed detrimental to the process. In one instance, a facilitator who was brought in late to the process commented that the CSC had “no neutral facilitation whatsoever, which occurred for [X] months while the group and District spiraled into higher and higher levels of conflict.”

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

In contrast, many facilitators recognized the positive impact of outside facilitators. “Third party, neutral facilitation has proved crucial in building trust between the community and government agencies after generations of discrimination, distrust, a lack of opportunity and poor health outcomes.” A community organization representative on the Portside EJ Neighborhoods CSC credits real progress being made in the management of the committees, including the use of a facilitator to replace the system in which the Deputy APCO facilitated the meetings without a community co-lead. “San Diego APCD acknowledged that they had difficulty developing a community process in implementing the goals of AB 617. They worked with the local environmental justice nonprofit to help secure a facilitator that can help with the objectives and dialogue of the meetings. Unfortunately, this took a long time but at the very least community members are getting clarity on the purpose of the meetings and we've seen more interaction among them.”

Another observation about the positive improvement in the Portside EJ Neighborhoods comes from one community organization representative. “So, it seemed like they [Air District] want to minimize what they're doing, and they don't want to be engaged with community or with activists in any level. So, we're pretty skeptical going into AB 617. But they've been pretty-- I think trying in pretty good faith to meet the community's needs on this. And [X] was saying from day one, the

first thing out of [X]’s mouth was, ‘We’re a monitoring community. But this really is about getting better air quality. So really it’s about emission reductions.’ So, he’s been there from day one. We went in thinking we were going to have to have a fight with them about that. Because they’re comfortable doing air monitoring. They know how to do that. And we thought, ‘Okay. That’s what they’re going to want to do. And we’re going to have to really push them to get them to pay any attention to emission reductions.’ But it really hasn’t been like that. And on the process stuff, I think they’re open to improvements.”

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

The San Bernardino/Muscoy CSC is also notable for working diligently to create a culturally relevant and welcoming space. Some of this was based on the work mentioned above which prioritized the voice and experience of its community’s diverse members. In contrast, members from a number of other CSCs described some interactions with the Air Districts as culturally insensitive. Survey and interview comments of surveys call for an improvement in the Air District’s cultural competencies in order to build collaboration across diverse communities. In particular, many study participants called for additional training in issues such as racial justice combined with proactive hiring practices in order to ensure that Air District staff better represent the communities they are intended to serve. The same recommendation on improved training was made for CARB as well.

Decision-making Processes

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

CARB's Roles and Responsibilities

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

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

A public agency member in one CSC observed how the Air District and CARB would divert responsibility between each other in some CSC meetings. "It seemed like there was a huge cohort of AQMD staff in every meeting, but when a question was asked they would all look around at each other to see who could answer the question. And a lot of times the answer would be 'we don't have any jurisdiction over that, that's CARB's jurisdiction.' CARB did have staff in the meetings, but they would also sometimes say 'we don't have jurisdiction over that, that's AQMD's jurisdiction, or that's the County's jurisdiction etc.' So, I think a lot of the participants in the meetings felt that the result of all the time spent in all those meetings wasn't going to amount to much of a tangible result for the community."

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

These two quotes are part of a much broader challenge regarding California's air quality management and its complex jurisdictional structure. In general, CARB has jurisdiction over mobile sources, fuels, greenhouse gas emissions and toxic air contaminants while Air Districts have jurisdiction over industrial and commercial stationary sources, area-wide/residential sources and indirect sources (See the Appendix Figure ii). Because AB 617 addresses elements in both CARB and Air District jurisdictions, both levels of government must collaborate in implementing AB 617. In addition, cities and counties with authority over land use, local traffic routes and urban greening and local transportation agencies with responsibility over transportation planning,

regional traffic and roadway infrastructure and regional transit must also play active roles. In many cases, the CERPs developed by the CSCs require action and unprecedented coordination across various agencies, thus creating a challenge and opportunity for governance innovation in California.

Community Capacity and Technical Assistance

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

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

One point of tension was the application and implications of the Brown Act’s requirements for open public meetings. This is not specified as a requirement in the Blueprint, nor is any other decision-making process, leaving it to the CSCs to decide for themselves. Some of the CSCs (such as in Imperial County) used the Brown Act to structure their deliberations, decision-making, and overall rules of order. For other CSCs, the use of the Brown Act was more controversial. In South Sacramento for example, for some on the Air District and on the CSC itself, the value of the Brown Act was based on the importance of representation of the group being made by the group as whole. For others, it was interpreted to mean that members of the CSC were prohibited from meet outside the formal meetings. This interpretation made it difficult for the Sacramento CSC to benefit from what a number of other CSCs had put in place to gather informally outside of the CSC meetings in order to build capacity, develop collaborative strategies, and prep and debrief meetings. When several members sought to create these outside meetings, they were shut down by the Air District, developing significant conflict in the CSC.

The technical capacity-building process for CSC members was crucial because the CSC meetings—especially early on—involved extensive presentations by the Air District, CARB staff, and sometimes outside experts. These presentations were often critiqued for being too complex

with technical language that was not accessible to many of the CSC members (especially the residents.) This critique was described in over half (29 out of 56) of the CSC interviews. The presentations were designed with very little attention to audience engagement and were, therefore, generally not effective in achieving their purpose of educating the members. Several CSCs, notably in Bay Area and Imperial County made extensive efforts to vet and modify the presentations before the meetings with an eye towards making them accessible for all members of the CSC. Most of the Air Districts began to improve their practices over the course of the process but left much to be desired.

The question of whose responsibility it is to provide sufficient technical capacity-building is an important one. In the case of organizations with sufficient internal capacity such as the West Oakland Environmental Indicators Project (WOEIP), the Central California Environmental Justice Network (CCEJN) in the San Joaquin Valley, Coalition for a Safe Environment (CSE) in Wilmington/Long Beach, Environmental Health Coalition (EHC) in San Diego, Center for Community Action and Environmental Justice (CCA EJ) in San Bernardino, or Comité Civico del Valle (CCV) in Imperial County is being provided by the community organizations. However, more assistance is needed in all settings and is in dire need in some.

Language Justice: Spanish-Speaking Participation & Engagement

One issue affecting equitable participation in the CSCs was found in the participation of members whose primary language is not English. Problems of language justice is much larger than AB 617, and reflects long historical legacies of racial and ethnic discrimination in the broader society. Nonetheless, it is still an important issue for Air Districts to address. While all Air Districts offered Spanish-language interpreters, it was sometimes difficult for the interpreters to provide equitable access to these members. This difficult arose from a combination of factors including the speed and complexity of the presentations coupled with the limited technical knowledge of some of the Spanish-speakers. There was very limited engagement with Spanish speakers during large-group discussions in the meetings based upon our analysis of the participant observations. Some members later described how they did not feel comfortable speaking, even with the aid of an interpreter. This was different in the small group discussions, suggesting that this format may be more successful. To their credit, most of the Air Districts provided their documents in Spanish and this did aid access to the process for Spanish-speaking members. On the other hand, there were some instances in which the Spanish translations of key documents were not provided by Air Districts in a timely manner.

One CSC member described the problem of Latino participation in the committee, “I think as a Latina, -- because I have definitely experienced this myself-- sometimes you just feel embarrassed. Maybe it’s the thought of speaking Spanish in general, or knowing that someone is going to have to translate it into English too.” While she is bilingual, she noted that the one mono-lingual Spanish speaking CSC member quit because she did not feel comfortable participating in the committee.

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

Spanish speakers on the Steering Committee had never spoken up during the meetings to provide input. So, we have made encouraging their engagement a priority.”

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

Youth Engagement

One important element to community-engagement in the CSCs is the involvement of young people. One of the Spanish-language survey respondents from the Portside EJ Neighborhoods commented on the problems with limited youth participation. “I have seen that some of the younger people have made suggestions, but the administrators simply disregard them. It has gotten to a point where younger people stopped coming to the meetings and witnessing that makes me sad, I would like to see them come back. They had great perspectives to offer.”

Several CSCs, most notably in West Oakland and Richmond/San Pablo, have focused on youth engagement. In Richmond/San Pablo this has included having a youth advocacy organization member on the CSC in charge of coordinating youth engagement who made it a priority to represent youth perspectives in the meetings. In West Oakland there was also a process led by the Air District to engage young people in the CSC meetings. Even in these communities, however, there were often times little to no youth participation in the CSC meeting themselves because they did not perceive that the process was set up appropriately for them, despite the best efforts of their CSC and Air District supporters.

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

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

E. Community Air Monitoring Plans (CAMPs)

The Community Air Monitoring Plans (CAMPs) have been one of the more innovative elements of AB 617, both in terms of their local as compared to regional/regulatory scale and because of their extensive community engagement in informing what is monitored, where, and how. Based on observations of several CSCs, we noticed that CSC members were very excited to view and

demo the monitoring devices and to discuss the monitoring process with Air District staff. This appeared to be an excellent example of science communication and translation.

Overall, there was a high degree of satisfaction among stakeholders about the CAMPs. Respondents to the survey reported 63% being somewhat or very satisfied and only 17% being somewhat or very unsatisfied with the CAMP development process. As seen in Table 6 breaking this down by stakeholder group, several distinctions emerge. CARB staff and EJ organization representatives had a fairly negative view of the CAMP process, both with only 50% reporting being somewhat or very unsatisfied. In contrast, 80% of residents and 70% of Air District respondents reported being somewhat or very satisfied.

	Community Resident (N=10)	EJ Organization (N=10)	Industry (N=16)	Air District (N=10)	CARB (N=4)
Very Unsatisfied	0%	0%	0%	10%	25%
Somewhat Unsatisfied	0%	50%	6%	20%	25%
Neither Satisfied nor Unsatisfied	20%	30%	38%	0%	0%
Somewhat Satisfied	40%	10%	50%	40%	50%
Very Satisfied	40%	10%	6%	30%	0%

Table 6: Level of satisfaction for the development process for the CAMP in your community by stakeholder group (2020 survey; n=50).

There are some clear distinctions in perception between communities. As seen in Figure 4, in general, there was a strong level of satisfaction with the CAMP development process. At the high end, 100% of respondents in the Portside EJ Neighborhoods reported that they were somewhat or very satisfied with the CAMP process. (Note this result should be treated with caution because it is based on only two responses). At the low end, only 33% of respondents in South Sacramento were somewhat or very satisfied.

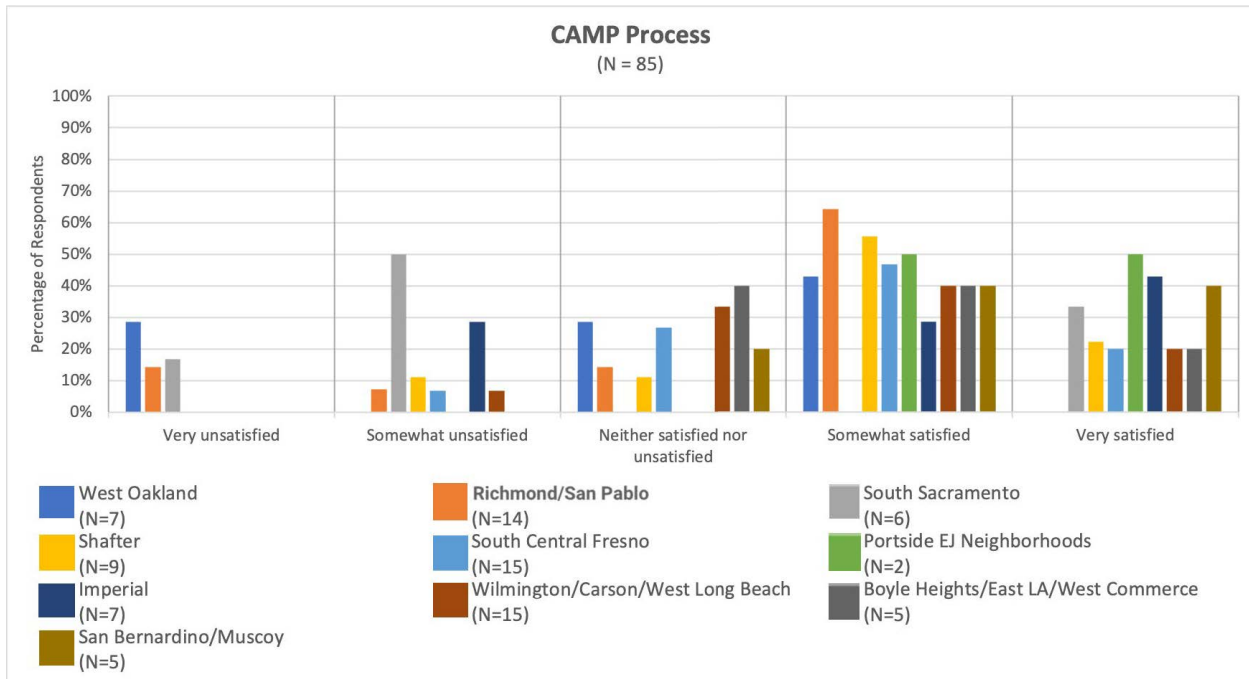


Figure 4: Level of satisfaction with the development process of the CAMP for your community by CSCs (2020 Survey; n=85).

The assessment of the CAMP outcomes was also largely positive but with some variation by community. At the high end, 100% of respondents from Imperial expressed that they were somewhat or very satisfied by the outcomes of the CAMP. Shafter followed close behind with 90% of the respondents reporting being somewhat or very satisfied. Conversely, only 34% of respondents from South Sacramento and 36% from Richmond/San Pablo were somewhat or very satisfied. In both of these latter cases, since the CAMPs are still in process, these should be taken as only preliminary results.

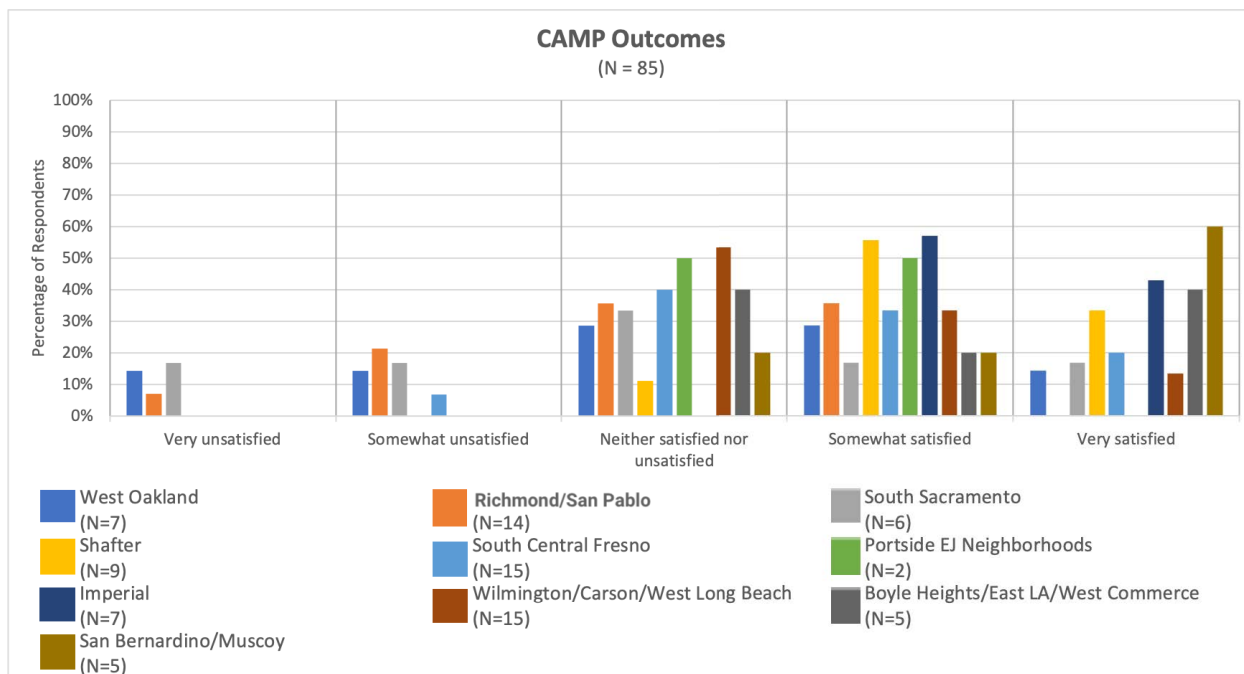


Figure 5: Level of satisfaction with the outcomes from the final CAMP for your community by CSCs (2020 Survey; n=85).

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

One resident from the Wilmington/Carson/West Long Beach CSC commented along the same lines. “I think what a lot of the community organizations that have been involved in this process were hoping for is to be directly involved in the monitoring plan, either by selecting the vendors or doing the monitoring itself.” Much of this community engagement in monitoring has not come to fruition yet. However, in one significant accomplishment, the final CAMP in this community has integrated the use of low-cost sensors as well as public education to use them along with Air District support for data quality assurance. Likewise, Imperial, West Oakland, Shafter, Fresno, and Richmond/San Pablo have all made use of community-based air monitoring.

In several CSCs, there was controversy over where the monitoring should occur. Residents and community organizations often recommended implementing a wider monitoring area while the Air Districts pushed back to maintain what they felt was a more manageable scope. This was upsetting to a number of CSC members who felt like their local expertise in identifying important neighborhood sources was being disregarded.

One CSC member described this as follows, “I could tell you I was a little disappointed with our air monitoring rollout. Well, one is we couldn't get enough monitors. So, there's a backlog because,

I guess, everybody's ordered monitors, so we were only able to receive four. So, we put out four in the community. The Air Quality Management District had come up with a different plan, and we kind of rolled with their plan rather than our plan. And so that's where the disappointment was.... Well, there's sort of a little bit of a struggle with that through the whole process and in my opinion. And part of it started with the community map itself...I know I wanted to include the train tracks along [X] Boulevard...that's only a half a mile down from the boundary. I just happen to know that area is an industrial area all the way through the train tracks. And so, including that would've been, in my opinion, an easy thing to do; and so, we chose not to go beyond [X] Boulevard.”

A number of comments expressed challenges between the timing of the CAMPs and the timing of the CERPs. Since there was little time between the CAMPs’ development and the CERPs’ development, there was often little monitoring data that could be used to inform the CERP. One EJ organization member on a CSC commented, “Development of the CAMP was heated in that there was a deadline set by CARB which required educating and asking for input from the CSC in an expedited fashion. The CSC did not feel fully confident by the final approval as there were questions still lingering regarding some aspects of the plan. It should be noted that, contrary to this quote, the deadline for monitoring deployment was set in the statute and not by CARB. While dissatisfied by the process this respondent commented that the “final CAMP is satisfactory in that it will fill data gaps in the community selected, tracks progress for the CERPS, and builds capacity within the air district to continue the work beginning with the program.”

Additionally, there were disagreements regarding the usage of non-regulatory monitors in the CAMPs. In some CSCs low-cost and often mobile monitors were viewed as a useful complement to the fixed and more expensive Air District monitors. These are also often deployed by community organizations (such as those in West Oakland, Richmond/San Pablo, the San Joaquin Valley, Wilmington/ Carson/ West Long Beach, and Imperial County) that may provide important data for the CAMPs. However, there were some who criticized the reliance of these non-regulatory monitors. This was expressed in an email message delivered by an organization represented on a CSC which called for “advanced air monitoring for poor neighborhoods (it’s the new streetlight) no toy monitors please. Honor AB617 GHG [greenhouse gas] reduction.” Some have also critiqued the role of private companies with the perception that they are seeking to cash in on the AB 617 process in ways that are not beneficial to the communities involved. Questions of what kinds of monitors to use, by whom, and in what combination remain unresolved and continue to cause confusion in the development and implementation of the CAMPs.

F. Community Emissions Reduction Plans (CERPs)

The element of the AB 617 process that has attracted the greatest attention and generated the greatest controversy is the development of the Community Emissions Reduction Plans (CERPs) because they are the means by which the policy can meet its intended goal of improving air quality in disadvantaged communities. While there are some very positive and promising achievements with the CERPs, there have also been many critiques – especially from residents and EJ-oriented community organizations – regarding how well the CERPs will achieve meaningful air emissions reductions and subsequent health improvements.

It is important to recognize that the data for this section of the report has a timing challenge in that some of the CERPs are still in the approval process as of this writing and even the most recent survey that closed in March 2020 came before some of the recently approved CERPs. Nonetheless, it is still valuable to track the progress along the way to better understand the patterns and implications of the community engagement process in the plan’s development. Data in this section is drawn only from the CSCs that have CERPs. These data are not broken out by stakeholder groups or CSCs since the responses (n=54) don’t allow for this disaggregation.

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

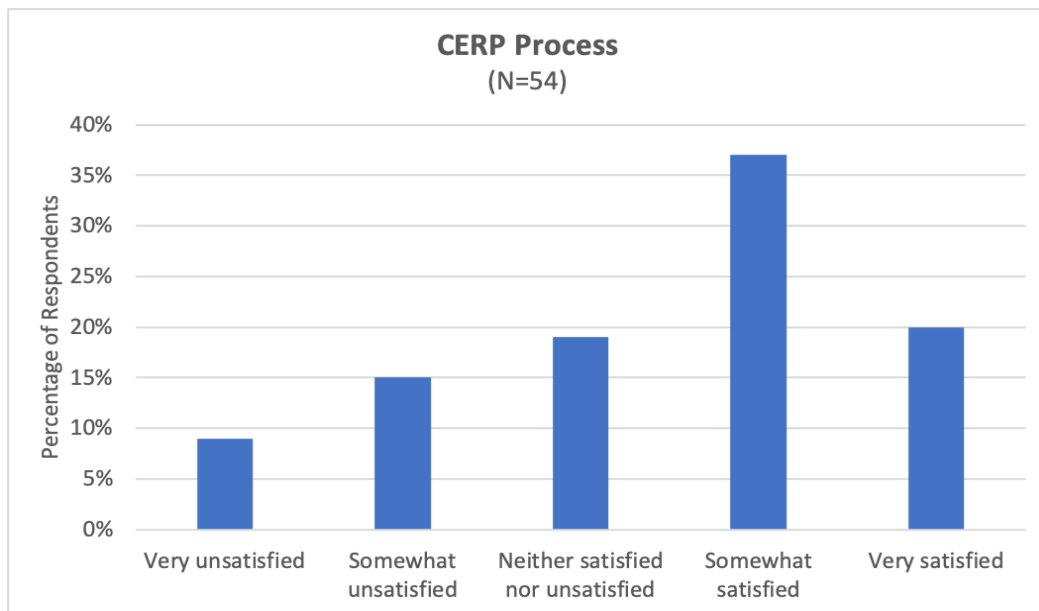


Figure 6: Level of Satisfaction with CERP process (2020 Survey; n=54).

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

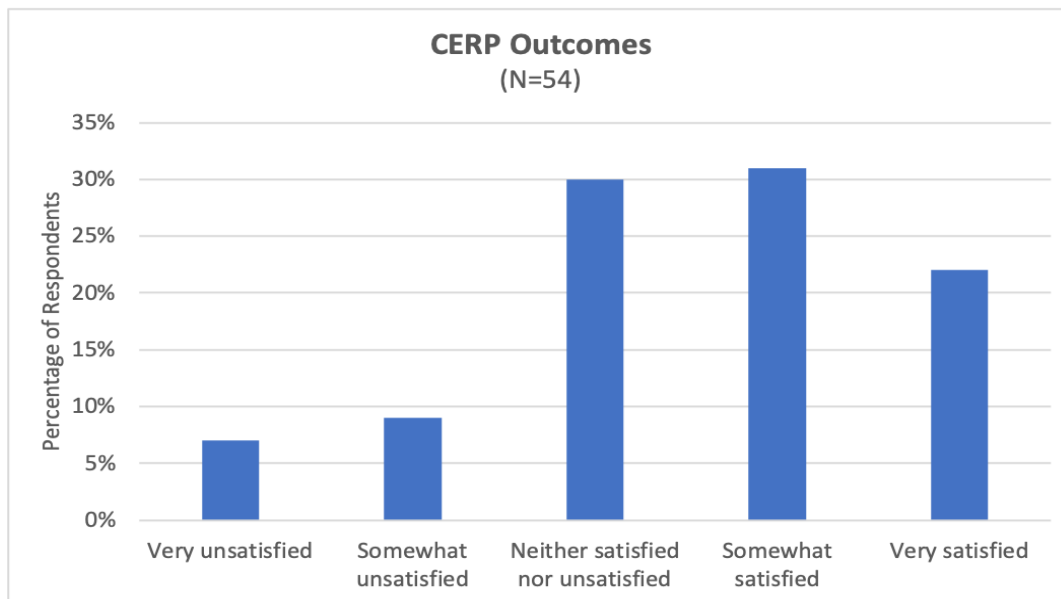


Figure 7: Level of Satisfaction with CERP outcomes (2020 Survey; n=54).

There is also a moderate overall level of satisfaction 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 nor 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 7: Level of satisfaction regarding the CERP for your community (2020 Survey; n=51).

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 as an exemplar of success by many in that community and in other sites. 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 District staff member, “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 of Oakland, City of Oakland, Alameda County Transportation Commission and Caltrans. This is key, since land use and transportation are driving exposure there.”

The CERPs in the San Joaquin Valley, after coming in with significant criticism in their draft forms, received relatively strong praise in their final form. A CERP comment letter submitted by a coalition of organizations in the San Joaquin Valley noted the lack of reflection of community input within the Air District’s draft plan for South Central Fresno. “Members of the Community Steering Committee created and submitted a list of 40 strategies for incorporation into the Draft CERP to address these concerns. The proposed strategies focus and accelerate actions to provide direct emission reductions within the community to maximize reductions in exposure to applicable toxic air contaminants, area wide sources and direct PM2.5... The Air District incorporated only 1 of the 40 recommended strategies drafted by community residents into the draft CERP.”

While some of these concerns were addressed in the final CERP, there were still criticisms that remained. In a letter to CARB, members of the California Environmental Justice Alliance (which includes several of the prominent EJ organizations in the San Joaquin Valley) expressed their concern that the South Central Fresno CERP does not “include clear quantifiable emissions reduction targets for several emission sources including heavy duty mobile sources, older/high polluting cars, residential burning, agricultural open burning, industrial sources, land use and urban sources, exposure reduction measures, and health protective targets.”

Many respondents credited the active engagement of CARB in encouraging the Air District to adopt more of the community-led proposals. At their board meeting to consider approval of the Fresno CERP, for example, there was very constructive dialogue between the CARB board, the Air District and the CSC. This led to the Air District agreeing to establish a Memorandum of Understanding (MOU) between themselves and other local jurisdictions to address key issues such as land use, diesel truck routes, measures to ensure the protection of school sites. These were some of the major requests that CSC members wanted, but was not in the initial CERP. This shows CARB’s ability to support the Air District to be more responsive to community needs. This proactive role of CARB is one of the major transformations involved in the AB 617 process.⁴

One community organization member involved in the Shafter CSC commented positively on the outcomes of the CERP but also voiced concern on the extensive process to arrive at the final outcome. “We are very pleased that pesticide TACs [Toxics Air Contaminant programs] have been incorporated into the Shafter AB 617 CERP. We're also pleased that CARB, the Air District and DPR [Department of Pesticide Regulation] recognized multi-jurisdictional authority over pesticide. The wins described above are great improvements, but the Shafter Steering Committee had to expend an EXTRAORDINARY [all caps in original] and unrealistic amount of effort to make sure pesticide TACs were included in the process and that the actions above were taken. Hopefully it will mean that future communities won't have such a big lift with respect to pesticide TACs.” This represents a major shift in the development of the CERP, as the Air District originally resisted the

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.

inclusion of pesticides in their document because of their position that pesticides were outside of their purview. It was only through the advocacy of the residents and EJ organizations on the CSC and the willingness of the Department of Pesticide Regulation (DPR) to provide monitoring and take other regulatory action, and support by CARB that this provision was included in the final CERP.

Residents and advocates on the Wilmington / Carson / West Long Beach CSC were gratified by several key provisions in the final CERP. Initially, a majority of residents and community organizations on the CSC rejected the first draft of the CERP, prepared by the Air District, because they felt it contained insufficient reduction targets for emissions reductions from mobile sources. They were also unsatisfied with the minimal attention placed on stationary sources. In the end, they took great satisfaction in their advocacy and the hard work of the Air District that led to a provision for a 50% reduction in refinery nitrous oxides (NOx), sulfur oxides (SOx) and volatile organic compounds (VOCs) emissions in the next 10 years. The final CERP also added specific regulations with reduction targets for refinery boilers and heaters, flares, storage tanks, and other VOC leaks. Additionally, they appreciated that despite earlier resistance of the Air District, the final CERP was the only one in the state to include a public health assessment as well as actions on operating and abandoning oil well sites. Along with these positive comments, there were a number that point to the plan's shortcomings. (Because some of these quotes come from the comment letters on the draft CERPs, they should be considered not as a final judgement, but to provide insights into the process.)

A resident CSC member from Boyle Heights/East LA/West Commerce commented in an interview that, due to the CERP's tight timeline, the plan was unable to fully incorporate important community priorities within the CERP. "It's been rushed. It really has been rushed. There hasn't been really a lot of-- well, there has been a lot of discussion but it seems like there is drawing on-- of course, they have to appease many people. But the community came together as a group, early on in the plan, and identified priorities. But I don't feel that the top two priorities have really been addressed, which is the bulk of the-- which has been the bulk of our issues for generations." The issues in this case were truck traffic and freeways. Overall, the issue of including mobile sources challenge as such emissions are in the jurisdiction of CARB, not the Air Districts. However, the Blueprint is clear that mobile sources must be included in the CERPs.

A community organization on the San Bernardino/Muscoy CSC critiqued the mix of emission reduction measures and the lack of measurable targets or metrics. "Currently, the CERP overwhelmingly focuses on education, outreach and enforcement - strategies that are necessary and important parts of the plan. However, they must be matched with subsequent emission reduction goals and health outcome targets. A community health assessment must be required to measure the existing health standards baseline in order to have quantifiable goals and targets." A letter to CARB from CEJA on the final CERP expands upon this criticism, "The San Bernardino, Muscoy CERP does not include direct actions or emission reduction requirements for major sources in the community including the concrete batch, asphalt batch, and rock/aggregate plants."

A number of comments focused on how the CERPs were limited in addressing health outcomes, including this statement from a community organization interviewee in Boyle Heights/East LA/West Commerce. "The various members of the CSC have been very clear in their request to

see specific emission reduction targets that include a nexus with community health outcomes. Yet, the draft CERP continues to lack specific emissions reduction targets, let alone targets based on health outcomes.”

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

The place of public health in the AB 617 statute and Blueprint is complex. Both the statute and the Blueprint call for the development of strategies to reduce criteria pollutants and toxic air contaminants that will have positive health effects. While there is strong evidence that emissions reductions improve health conditions, it is difficult to correlate emissions reductions to specific health impacts. Furthermore, in a resource-limited context, allocating funding for health tracking projects can reduce available funds for emissions reduction activities. Nonetheless, building and implementing a public health framework for AB 617 can help the Air Districts and CARB respond to community interests in addressing health disparities in disadvantaged communities.

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

G. Community Air Grants

The AB 617 Community Air Grants have allocated over \$15 million in two rounds of funding to 57 recipients. In the first round of funding in 2018, 10 of 28 air grants were awarded to organizations associated with the selected CSCs. In the second round of funding in 2019, 15 of 29 air grants were awarded to organizations associated with the selected CSCs. According to CARB’s grant guidelines the purpose of the grants is “to provide community-based organizations in California an additional opportunity to participate in the implementation of AB 617 and the means to acquire some logistical and technical assistance to support those participation efforts. The Community Air Grants Program also aims to foster strong collaborative relationships between communities, air districts, CARB, and other stakeholders.”⁵ Based on the surveys and interviews from the period of the first and second round of grant funding, there a moderate level of support

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.

for the Community Air Grants but this varied widely among stakeholders and over the two years of the program.⁶

In the 2017/2018 round of grants (shown in Table 8 below), there were mixed stakeholder responses, with Air Districts having the lowest ratings of satisfaction on both the grant making process (45% expressed that they were somewhat or very unsatisfied with the grant making process and 50% were somewhat or very unsatisfied about the selected grantees). In contrast, 0% of residents and 0% of CARB staff reported being somewhat or very unsatisfied about either the process or the selected grantees (There were only 3 CARB respondents so this finding should be taken with a note of caution).

	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%	10%	9%	0%
	Somewhat Unsatisfied	0%	10%	10%	36%	0%
	Neither Satisfied nor Unsatisfied	50%	50%	50%	36%	50%
	Somewhat Satisfied	30%	30%	30%	18%	30%
	Very Satisfied	20%	10%	0%	0%	20%
	The Selected Grantees	Very Unsatisfied	0%	10%	10%	9%
Somewhat Unsatisfied		0%	0%	30%	18%	0%
Neither Satisfied nor Unsatisfied		50%	10%	30%	55%	33%
Somewhat Satisfied		30%	60%	30%	9%	67%
Very Satisfied		20%	20%	0%	9%	0%

Table 8: Level of satisfaction with the Community Air Grants program by stakeholder groups (2018-2019 Survey; n=44).

There was some variation in the second round of the community air grants (shown in Table 9). At the low end of support, again 50% of Air Districts were somewhat unsatisfied or very unsatisfied with the grant making process and 10% were very unsatisfied with the selected grantees. This low rating contrasts with CARB for which 0% were somewhat unsatisfied or very unsatisfied by the grant making process and 0% were somewhat unsatisfied or very unsatisfied by the selected grantees. Environmental Justice organizations also had a relatively high rating with only 9% being very unsatisfied and 64% being somewhat or very satisfied with the grant making process and with the selected grantees. The fact that 8 of the 11 respondents were Community Air Grant recipients may account for some of this positive response.

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.

	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%	9%	0%	10%	0%
	Somewhat Unsatisfied	0%	0%	0%	40%	0%
	Neither Satisfied nor Unsatisfied	46%	27%	62%	20%	44%
	Somewhat Satisfied	18%	55%	39%	10%	56%
	Very Satisfied	18%	9%	0%	20%	0%
The Selected Grantees	Very Unsatisfied	10%	9%	0%	10%	0%
	Somewhat Unsatisfied	0%	9%	8%	0%	0%
	Neither Satisfied nor Unsatisfied	30%	18%	58%	60%	44%
	Somewhat Satisfied	40%	55%	33%	20%	56%
	Very Satisfied	20%	9%	0%	10%	0%

Table 9: 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 many 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 Request for Proposal (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. One industry representative, for example, 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 are grantees 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 the AB 617 statute and has only a basic definition in an Appendix of the Blueprint.⁷ This is unfortunate as EJ 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 knowledge including local knowledge about people's own experiences and bodies.⁸ The AB 617 process, as captured in the responses below, has touched on all of these aspects of environmental justice with generally positive results.

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

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, 2009. *Defining environmental justice: theories, movements, and nature*. Oxford University Press..

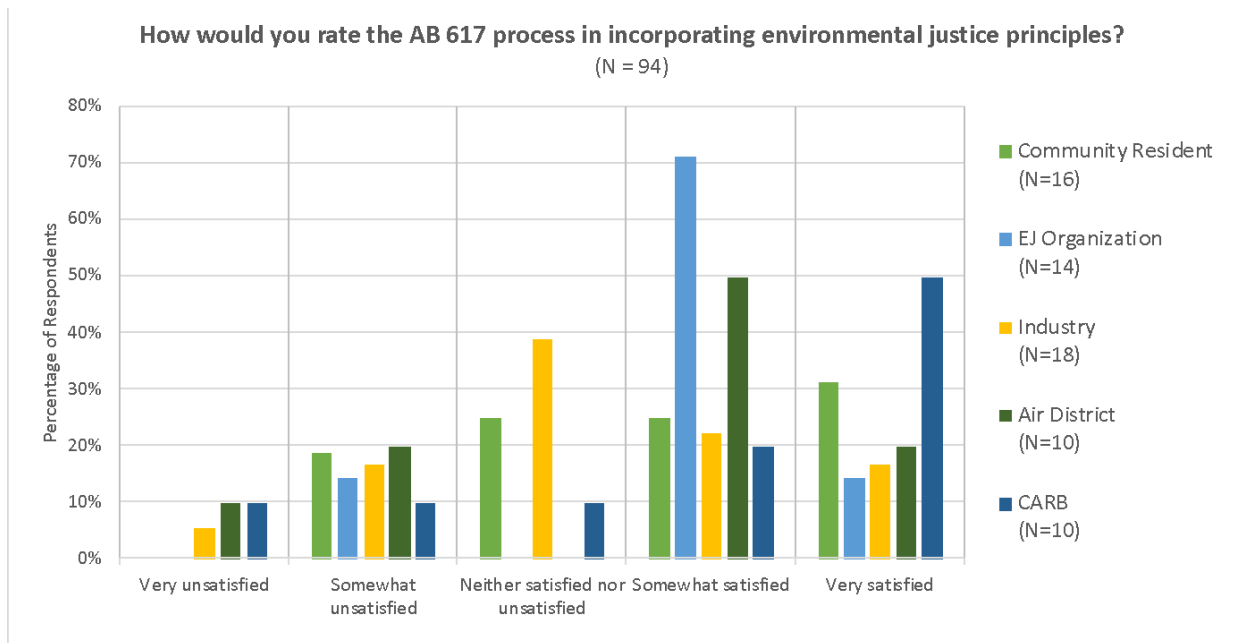


Figure 8: “How would you rate the AB 617 process in incorporating environmental justice principles?” by stakeholder groups (2020 Survey; n=94).

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

One EJ advocate on a CSC expressed mixed reviews in their 2018-2019 survey response for the implementation of EJ by the Air District, “As far as bureaucrats go, it is difficult to discern their concern for environmental justice issues. They pay lip service but continue to perpetuate the same systemic issues, despite the incorporation of environmental justice issues into the AB 617 process. Despite this, I chose "somewhat satisfactory" because the inclusion of EJ principles, in of itself, is a big step in the right direction.”

A number of respondents sought to expand the understanding of environmental justice, including one advocate who placed the concept in a larger historical perspective. “And the other principle is understanding structural and historical obstacles that these people-- that have led for them to become environment justice communities and that comes with a form of understanding equity and understanding like, okay, we're going to have to invest more in the communities in this area and in this region both in their capacity and in education and understanding where they're coming from.”

One resident in a rural community described her and other residents’ efforts to represent their unique lived experiences of EJ compared to others on their CSC. A critical part to achieving environmental justice involves recognizing and honoring the experiential knowledge and histories of people facing environmental justice. “And we're going to keep working because people...they have never really lived in the community like us out here. They haven't lived where we have lived, and be sheltered in town. I mean, they don't have the direct dust coming all over us, clouding us with all those contaminants and stuff. So, to me, it's like they were coming from a place where-- I

mean, they have paved streets, they have curb and gutter, they have light, they have this, they have that. I mean, they're shielded and we're right in the middle of it.”

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

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

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

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

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

One observation from the surveys and interviews is that respondents rarely explicitly brought up the intersection of race, racism and environmental justice. This may be because race is assumed to be part of the concept of EJ as many of the CSC residents and community organizations operate

⁹ It should be noted that CARB has conducted a number of tribal outreach activities with both federally recognized and not recognized tribes across the state. CalEPA's tribal protocol lists 80 tribes that are currently not federally recognized.

from an explicit racial justice framework. However, without this laid out in specific terms in the AB 617 policy and Blueprint, there is a lack of attention placed on identifying the causes and remedying the impacts of racial disparities. More broadly, the lack of specific language and guidance in the Blueprint on EJ there was a difficulty in communication between CSCs and Air Districts over how to address issues of race and racism in the CSC process and outcomes in the CAMPs and CERPs.

In an effort to address this issue, some AB 617 stakeholders (particularly from the West Oakland CSC) reference Title VI of the Civil Rights Act and associated California State law at California Code 11135, which requires due diligence in avoiding disparate racial impacts of policies. They recommend that AB 617 be framed through a civil rights lens. This would require that CARB and the Air Districts commit to embedding these standards into the Blueprint, CSC partnering agreements, and metrics for assessing the success and impact of the CERPs.

According to stakeholder surveys and interviews, this could be accomplished by emphasizing that compliance with Title VI is a legal requirement applicable to CARB, the Air Districts and any stakeholders who are recipients of federal or state funds. As described by a member of the West Oakland CSC, “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 summary, 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 definitions and associated standards of environmental and racial justice as well as clear metrics to ensure that they are 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. And yet, nearly 12% of residents (followed closely by Air Districts) reported being very unsatisfied in the achievement of their goals, the highest of all stakeholder groups.

	Community Resident (N=17)	EJ Organization (N=15)	Industry (N=22)	Air District (N=9)	CARB (N=11)
Very Unsatisfied	12%	0%	5%	11%	0%
Somewhat Unsatisfied	0%	7%	27%	11%	0%
Neither Satisfied nor Unsatisfied	29%	33%	23%	11%	27%
Somewhat Satisfied	29%	53%	36%	33%	46%
Very Satisfied	29%	7%	9%	33%	27%

Table 10: Level of satisfaction of meeting your goals to date by stakeholder groups. (Survey 2020; n=74).

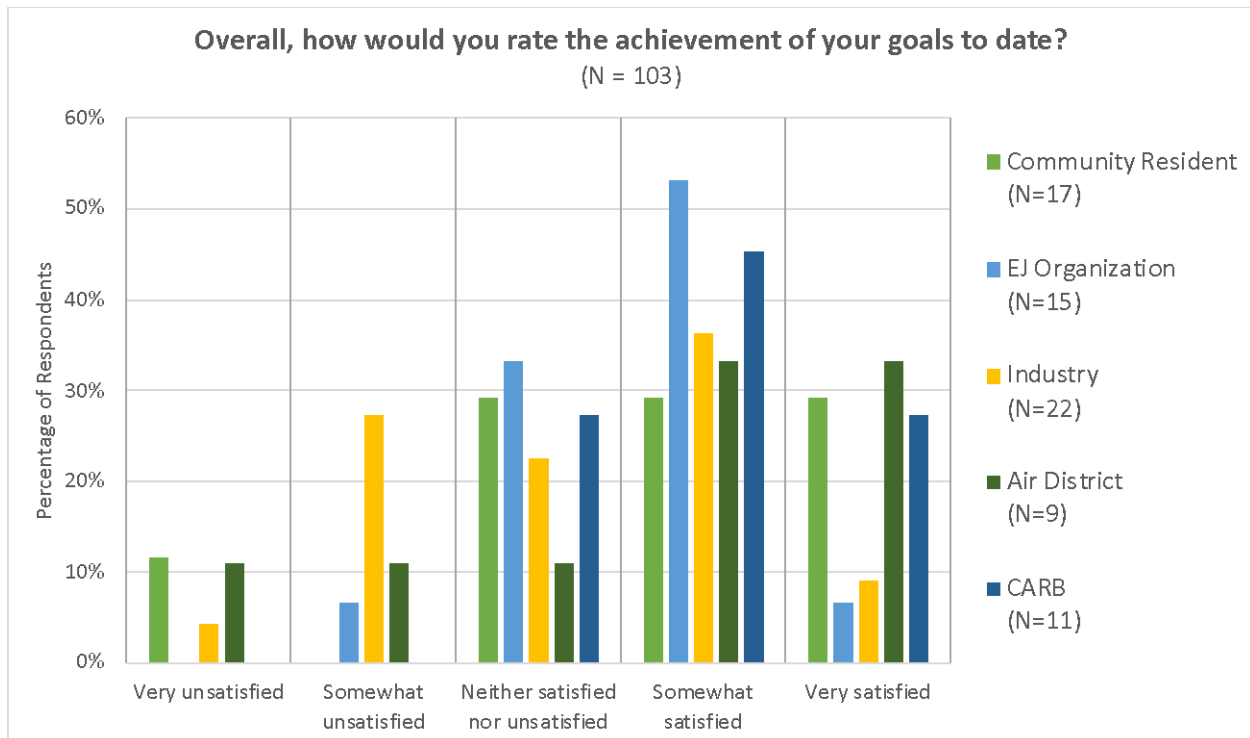


Figure 9: Level of satisfaction in meeting your goals to date by stakeholder groups (Survey 2020; n=103).

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 EJ Neighborhoods (100% agreeing or strongly agreeing) and the lowest two being Wilmington/Carson/West Long Beach (69%) and Richmond/San Pablo (62%) agreeing or strongly agreeing. This is seen in Table 11.

	West Oakland (N=12)	Richmond / San Pablo (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%	11%	0%	0%	0%
Disagree	17%	8%	13%	0%	5%	0%	0%	6%	13%	0%
Neither	8%	31%	13%	0%	5%	0%	0%	25%	0%	17%
Agree	42%	31%	50%	60%	53%	71%	56%	25%	13%	33%
Strongly Agree	33%	31%	25%	40%	37%	29%	33%	44%	75%	50%

Table 11: Level of agreement that participating in the AB 617 process has provided benefits to my community by CSCs (Survey 2020; n=108).

Overall, community engagement in AB 617 implementation has achieved an impressive range of successes while experiencing some significant challenges. In some cases, the challenge represents a success that is only partially realized. Many comments from the survey and interviews report hard-won – although not complete—progress.

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

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

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

Finally, an EJ organization representative who was not on a CSC but closely observed the process as a Community Air Grant recipient provided a broad overview of the mixed positive and negative

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.

record of the policy implementation. “The process has finally formed a table for advancing community emissions reductions and burdens placed on disadvantaged communities. Some of the success has been that there are now active community air monitoring programs in communities identifying local pollution data. Other success has been that communities are becoming more engaged and present in the development of strategies and becoming more aware of the issues surrounding them. Some shortcomings of the program are: that there are interpretations made by some air districts where the administration of the program is still not understood and badly misinterpreted to not take community into account; also, there were no overall metrics included in AB 617 and some early CERPs have not been able to develop the metrics in more detail for goal setting. The accountability factor is still not clear and communities are feeling like there will be no enforcement of CERP goals.”

In short, AB 617 has initiated—but not yet achieved—a significant transformation in the governance of air quality in California, with a special focus on the health and well-being of the state’s most vulnerable communities through the empowered roles of their residents in partnerships with Air Districts and CARB. Significant challenges remain to be addressed before the goals of AB 617 can be achieved. These successes and challenges are summarized in Table 12 below.

AB 617 Components	Major Successes	Major Challenges
<p><i>Community Air Protection Blueprint</i></p> <p>Document developed by CARB to guide Air Districts to implement AB 617</p>	<p>The Blueprint lays out a robust framework for the implementation of the legislation.</p>	<p>The Blueprint does not provide sufficient guidance on community engagement.</p> <p>The Blueprint does not include clear enough requirements for the achievement of measurable, mandatory enforceable emissions reductions beyond Air Districts’ existing activities.</p>
<p><i>AB 617 Consultation Group</i></p> <p>Multi-stakeholder advisory body to CARB for AB 617 statewide implementation</p>	<p>The Consultation Group provided crucial support for the development of the Community Air Protection Blueprint.</p>	<p>There is a lack of clarity about the purpose of the group after the development of the Blueprint. Advocating for funding for AB 617 has been suggested as a potential role.</p>
	<p>The Consultation Group’s diverse membership was appreciated by the members.</p>	<p>Clarity on advice to CARB was challenging at times due to the wide range of perspectives.</p>
<p><i>Community Selection Process</i></p> <p>CARB’s process to select the AB 617 implementation committees</p>	<p>The community selection process has included 10 communities with the worst air quality in the state</p>	<p>Communities were set into competition with each other for limited selection spots</p>
	<p>There were innovations in the number of community-driven and community/ Air District collaboration.</p>	<p>Some district-led processes did not achieve potential for community collaboration.</p>
<p><i>Community Steering Committees (CSCs)</i></p> <p>Local stakeholders that guide the implementation of AB 617 in selected communities.</p>	<p>Most CSCs achieved a robust composition of residents, community organizations, businesses, and local governments.</p>	<p>There was a significant degree of conflict within the CSC members, especially between residents/ community organizations and business representatives.</p>

<p>Consists of residents, community organizations, local businesses, and public officials.</p>		There were concerns about conflicts of interests in the CSC membership of industry representatives and resident employees.
	Most CSCs improved the level of collaboration throughout the process.	There was a significant degree of unresolved 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.	Many mono-lingual non-English speaking CSC members were marginalized during the process and a number dropped off from their CSCs.
	Community organizations provided crucial capacity-building for residents in many CSCs.	<p>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.</p> <p>Youth membership was limited in all but two CSCs and in general young people's voices were missing.</p>
		There was some confusion to what extent meeting outside of the formal CSC meetings were permissible.
		These additional meetings took a great deal of time, energy, and effort from residents and community organizations.
<p>Community Air Monitoring Plans (CAMPs)</p> <p>Plans for air quality monitoring in AB 617 implementation communities</p>	Residents were very engaged in learning about the monitoring devices and processes.	Some of the monitoring presentations were not accessible to residents.
	There was innovation in incorporating district-led monitoring with community-based air monitoring in some communities.	Some of the monitoring areas did not include areas and contaminants of concern from residents.
		Time constraints limited the value of the CAMPs for informing the CERPs.
<p>Community Emissions Reduction Plans (CERPs)</p> <p>Specific actions to improve air quality in AB 617 implementation communities</p>	The CERPs include a range of community-priorities such as mobile sources, land use, pesticides, community-benefit investments.	These positive results were uncertain until the end of the process and achieved through community pressure, extensive negotiations between the CSCs and Air Districts, often with the support of CARB.
		Most CERPs lack mechanisms to enforce specific mandatory emissions reductions in addition to existing Air District actions.

	There has been unprecedented engagement of other agencies (cities, counties, and the Department of Pesticide Regulation).	This engagement came late in the process and could have been improved by proactive efforts by Air Districts.
	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 within the CERPs.
Community Air Grants (CAGs) CARB funding to community organizations to support AB 617 implementation and community capacity building	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 Values and actions to address disproportionate environmental impacts on people of color and other disadvantaged groups.	There was a strong emphasis on environmental justice and social equity in the legislation, Blueprint and many CSCs.	There was unevenness in the realization of EJ principles, particularly in the ability of Air Districts to share power with CSCs to define their own agendas and action priorities to address environmental injustices.

Table 12: Summary of Evaluation Findings: Successes and Challenges

4. RECOMMENDATIONS

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

1. Sustain the AB 617 Consultation Group with broader charges

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

2. Develop an improved Blueprint focused on community engagement.

There was generally high praise for the Blueprint as representing a forward-looking document to match the broad and bold goals of the enabling legislation. It was also praised as a positive example

of collaborative action on the part of the AB 617 Consultation Group in a relatively short amount of time. However, its significant shortcomings in providing sufficient guidance in the area of community engagement was also a common observation by study participants. In the next version of the Blueprint, a more explicit set of expectations for Air Districts to collaborate with their CSCs and the broader public can be helpful both to provide improved guidance in what is often a new way of operating for many districts and as a basis for communities to hold the districts accountable to meet these standards. This is important to allow for a place-based approach that allows the Air Districts and the CSCs to develop structures and processes that match the local conditions. However, without a foundation of minimum requirements from the Blueprint, this can result in confusion for the implementing partners, conflicts over how to interpret the basic Blueprint guidelines, and a set of individual systems that cannot live up to the statewide goals of CARB or the legislature.

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

3. Improve the Community Selection Process

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

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

consider community capacity to engage in a meaningful way in the process as a key selection criteria.

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

More broadly, the competition between communities can be lessened by CARB and the Air Districts committing to extending the benefits of AB 617 implementation beyond the confines of the individual selected AB 617 communities. This can be done through the adoption of a regional approach. In this structure, areas near selected AB 617 communities would have a role in commenting on CAMPs and CERPs to ensure that their interests and concerns are seriously considered and that air emissions reductions benefit their residents. For example, while South-Central LA was not selected for the second round of communities, it could be engaged with the new Southeast LA community efforts. Secondly, AB 617 can adopt a state-wide and industry sector-based approach to developing policies such as Indirect Source Rules for highly-polluting industries that will benefit all communities in California, with a focus on those disproportionately-burdened by such sources. A variation on this approach is to ensure that Air Districts across the state coordinate with each other to incorporate promising practices within CSC processes and regulatory strategies. This can an important role for the California Association of Pollution Control Officers. Third, and most broadly, many of the components of AB 617, such as CSCs, inclusion of upstream drivers of air pollution such as land use, public health metrics and assessments, and a shift towards new emissions reduction strategies can be integrated in Air District actions throughout the state. Of course, obtaining additional funding from the legislature will be necessary to support many of these activities.

4. Improve Management of CSC Processes

The greatest degree of conflict in the AB 617 process occurred in the CSCs. This was mostly in the relationships between the Air Districts and CSC members over the degree of decision-making authority that the community residents and organizations sought and for which the Air Districts were uneven in their delivery. Unfortunately, the structure of some of the CSCs did not resolve, and sometimes exacerbated this tension. At the same time, there were a number of approaches that could be considered models for future implementation.

As noted above, a number of the most successful CSCs in terms of collaboration, such as in West Oakland, were the product of decades of development and collaboration thus, no current CSC should be expected to exhibit this level of high function in the 1-2 year timeline of the CSCs. Conversely, a number of the most conflictual settings, such as in Wilmington/Carson/West Long Beach and the San Joaquin Valley communities were the product of decades-long tensions between Air Districts and community organizations, and it is unrealistic to expect these to be resolved in the AB 617 pilot timeline. However, there are a number of design principles that can be adapted for future implementation.

First, the leadership and decision-making models need to be established in a participatory and democratic way. While, as described above, there are a wide range of models that the first round of CSCs have adopted, it is important that all CSCs prioritize the building of community power. In most if not all cases, this will involve a change of the status quo from the ways that Air Districts currently engage with their local communities and require a ceding of some level of control from the agency towards the community. Whether this is done through a formal co-chair structure or some other means, the positioning of the community voices in the center of decision-making is critical. Furthermore, the decision on leadership structure must be made by the CSC itself, not the Air Districts.

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

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

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

Fifth, make the use of an external facilitator standard for all CSCs. In some cases, such as Sacramento, where there was not an external facilitator until late in the process, there was significant tension between the Air District and the CSC. At the same time, there was some variation in effectiveness of the facilitators across the CSCs, so ensuring that they have the cultural

competence, conflict resolution and experience with public policy will be beneficial. There should be, at the minimum, input, and ideally shared decision-making by the Air District and the CSC in the selection process. One CSC facilitator laid out their set of recommendations for promising practices.

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

However, even with an external facilitator, the Air Districts must ultimately be accountable to ensure that key elements of the process including the timely distribution of meeting materials (in all relevant local languages), ensuring that there is sufficient time in meetings for the participatory activities (e.g., CSC member ranking of CERP actions) to be done in a meaningful way, and a proactive commitment to integrate this input into the plans.

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

Seventh, develop an explicit and consistent policy on conflicts of interest within CSC membership. There were a number of CSC proposed conflict of interest policies that can be considered. At the most limited extent were proposals to simply disclose potential conflicts. A more substantial policy would be to make industry representatives and resident employees recuse themselves from decisions affecting their industries and at the most restrictive, CSC membership would not be allowed for these parties. In the face of such divergent positions by CSC members, the selection of an appropriate model is beyond the scope of this evaluation and instead we strongly recommend that CARB consider this and come out with a standard policy for all CSCs to follow. However, there are a number of models that can be drawn upon, including the California Public Utilities Commission and the California Energy Commission mandate their Disadvantaged Community Advisory Group that requires a statement of economic interest (Form 700) for all members.

Eighth and finally, as noted in the CSC findings above, there was great concern about the “back of the room” role for CARB at the CSC meetings. While the CARB staff may have – quite appropriately -- been trying not to overstep their bounds with the Air Districts, this approach was

often perceived as insufficient by CSC members. Instead, numerous respondents called for a more active role in communicating the requirements of the Blueprint for community engagement, explaining the expectations of the agency in terms of the key elements of the policy (i.e., CAMPs, CERPs) and backing up the community representatives when needed. While CARB staff did provide backup in urgent situations this was often too ad-hoc and reactive and could have been less needed if a more upfront process and active role was followed in the first place. This critique was expressed by some CARB staff themselves, speaking to their frustration at the restrictions on their roles, suggesting that measures need to be taken by CARB leadership to better support their staff. Part of this support can come in the form of improved training in community engagement and cultural competency and could also benefit from a hiring practice for new staff with these capacities if this is going to be an on-going and more significant role for CARB. As noted above, having access to a Blueprint that provides explicit guidance to Air Districts for community engagement and that can also inform CARB's interactions with the CSC and Air Districts would greatly improve CARB's effectiveness.

5. Improve Development of the CAMPs

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

However, most CAMPs did not succeed one of the major goals of the AB 617 legislation, which was to provide data to inform the CERPs. This was primarily a function of the timeline laid out in the statute by the legislature with a very limited period between submission of the CAMP and development of the CERP. This is a difficult challenge to address, but clearly, increasing the monitoring time to allow for application to the CERP will be needed.

Another potential, yet partial solution, is the increased use of community-generated air quality monitoring as is available in several locations (Wilmington/Carson/West Long Beach, Imperial County, West Oakland, San Joaquin Valley and Richmond/San Pablo). Air Districts and community organizations with expertise in community air monitoring can collaborate to apply some of this monitoring data into the CAMPs themselves. Capacity-building and technical assistance from Tracking California for a number of CSCs has been valuable and should be extended and expanded. Using the community air grants to further support this kind of civic science as well as partnerships with technical support from universities and consultant can provide additional benefits.

6. Improved Development of CERPs

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

First, one of the most significant critiques from residents and community organizations of the CERPs is that they lack “teeth.” This means that they rely too heavily on monitoring, enforcement, and incentives, which while valuable, may not by themselves ensure substantial air emissions reductions. Instead, the CERPs should include aggressive emission reductions quantities and deadlines, with specific new regulations to meet these targets over and above existing Air District actions. Furthermore, these emissions goals must be mandatory and enforceable, and CARB should set a high bar for the initial approval of the CERPs and certification on an annual basis based on these mandatory standards. Without this backstop based on outcomes, community engagement alone will not ensure that the goals of the AB 617 legislation and Blueprint will be met.

Second, the CERP process should start earlier by identifying community priorities for investments that make a direct difference in the health and well-being of the residents of the focus communities instead of having the Air Districts’ come up with their list and having the community respond. These can include items like including funding for electric vehicles and solar panel subsidies; urban greening (tree planting, green walls); complete streets in many of the urban CERPs; port and other industrial facility equipment electrification; and diesel truck rerouting among others. At the same time, it is important that developing the emissions reduction strategies are not the sole responsibility of CSC members who may not have the necessary technical expertise and capacities. In these cases, having the residents and community organizations identify overall goals and then the Air Districts (with CARB staff support as appropriate) develop the technical bases for achieving these goals would be more effective. This was the case in South Coast AQMD’s work to develop the 50% reduction in refinery strategy in the Wilmington/Carson/West Long Beach CSC. The Air Districts should also document how they are addressing community recommendations as well as disclose how they are integrating them into the CERPs.

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

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

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

Fifth and finally, CARB and the Air Districts should strongly consider recent proposals by some CSC members (primarily from West Oakland) to use Title VI of the Civil Rights Act as well as provisions in the Clean Air Act that enable and require agencies to put forward all best efforts towards eliminating racial disparities in impacts due to exposure to air pollution. This would create a much higher standard for CARB and the Air Districts than the current Blueprint provides that only calls to address these disparities without an explicit standard or legal requirement to meet it. It would also make important steps to upholding the values of EJ, including the strong racial justice component that underlie the origins of the environmental justice movement. One way for this to proceed would be to charge a committee to develop a strategy for this kind of policy integration. This could be the AB 617 Consultation Group (or a subcommittee of the Group) and perhaps including ad-hoc members with appropriate policy and legal expertise. California policies prohibiting the use of race in the distribution of funds will also need to be addressed in these strategies.

7. Improve the Community Air Grants Program

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

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

For AB 617 to fulfill its goal of being a transformative intervention in air quality management, it needs steady funding to match the degree of demands placed on all parties, including CARB and the Air Districts. Unfortunately to date, the funding from the legislature and governor for these

efforts has been unpredictable and inconsistent. It is therefore recommended that an assessment be done on the funding model being used to implement AB 617 to determine what level of funds are necessary for the Air Districts to perform their needed functions and for CARB's legislative affairs office, perhaps in collaboration with the AB 617 Consultation Group to work with the legislature and Governor's Office to secure sufficient funds for a sustainable implementation of the policy.

5. LONGER-TERM EVALUATION QUESTIONS

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

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

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

6. CONCLUSION

AB 617 has been hailed as a transformative policy for air quality management in California. These transformations include a localization of air quality management from a regional regulatory scale to a community scale. This has been manifested both in terms of the local focus of its air quality monitoring and management and in its engagement of affected communities as partners, not only as beneficiaries of government actions. It also represents an important step in California's efforts to integrate environmental justice more deeply into the state agencies' culture, structure and function.

Despite a range of conflicts, all 10 of the pilot communities were able to produce CAMPs and/or CERPs that represent progress beyond the baseline of current practices. Likewise, while many of the processes did involve great tension between all stakeholders (within the CSCs; between the CSCs and the Air Districts; and between all of these entities and CARB) throughout the process, there was progress made in all 10 communities towards a more collaborative set of relationships.

Based on the analysis of all of the data sources considered in this study, we find it appropriate to consider the AB 617 experiment a qualified success as a pilot program. Remaining challenges

include ensuring that there is improved sharing of power between Air Districts, residents and community organizations (on and beyond the CSCs), that the CERPs produce significant, measurable, and enforceable improvements to air quality, and the lessons learned from these pilots be incorporated into future implementation of the policy throughout the state. While it is too early to assess this long-term success of the policy implementation, there are signs of hope that by placing environmental justice values of eliminating racial disparities in air pollution and health disparities and respecting and building community voice and power that AB 617 is on its way to realizing meaningful impacts for achieving environmental justice.

Acknowledgments: The authors express their gratitude to the many individuals involved in implementing AB 617, including CARB and Air District staff and Community Steering Committee members who shared their stories and perspectives with us. Several anonymous reviewers from CARB as well as multiple stakeholder reviewers from the CSCs have helped improve the report. All errors are the responsibility of the authors. Report commissioned by the California Air Resources Board contract _____.

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

Suggested Citation: London, Jonathan; Peter Nguyen, Mia Dawson, and Katrina Manrique (2020). *Community Engagement in AB 617: An Evaluation of Challenges, Successes, Lessons Learned and Recommendations for the Future*. University of California, Davis.

Jonathan London was Project Director and primary author of the report. Peter Nguyen and Mia Dawson served as Research Associates and conducted many of the interview and participant observations. Katrina Manrique developed the graphics and editing for the report.

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APPENDICES

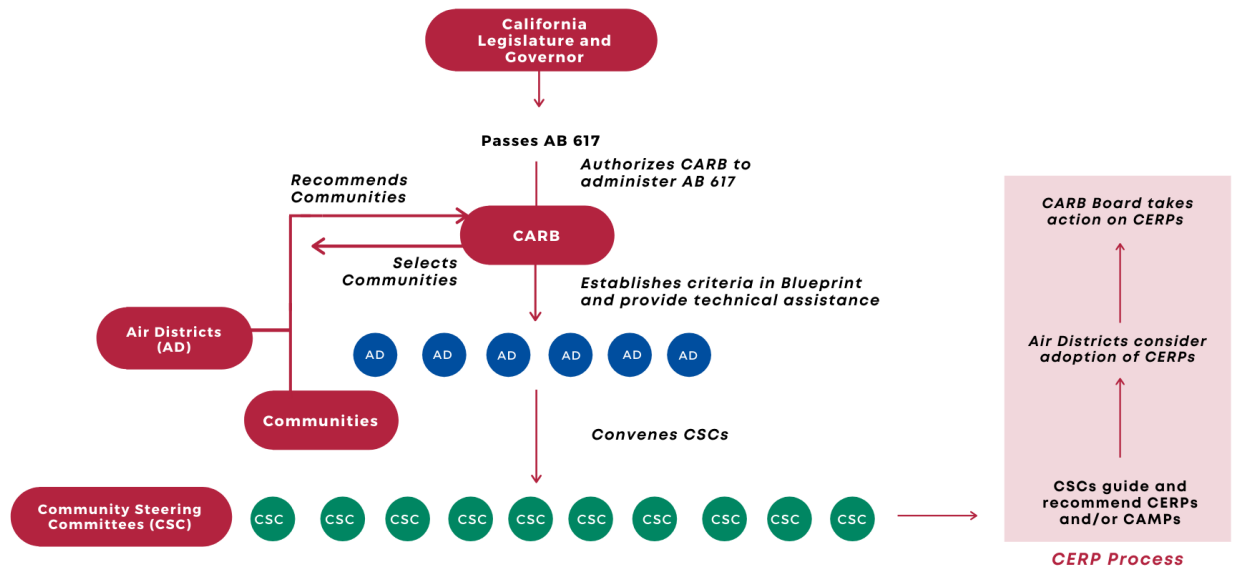


Figure i: AB 617 Structure and Process

Source: Authors (Graphic: Katrina Manrique)

Who Has the Authority to Implement Actions?

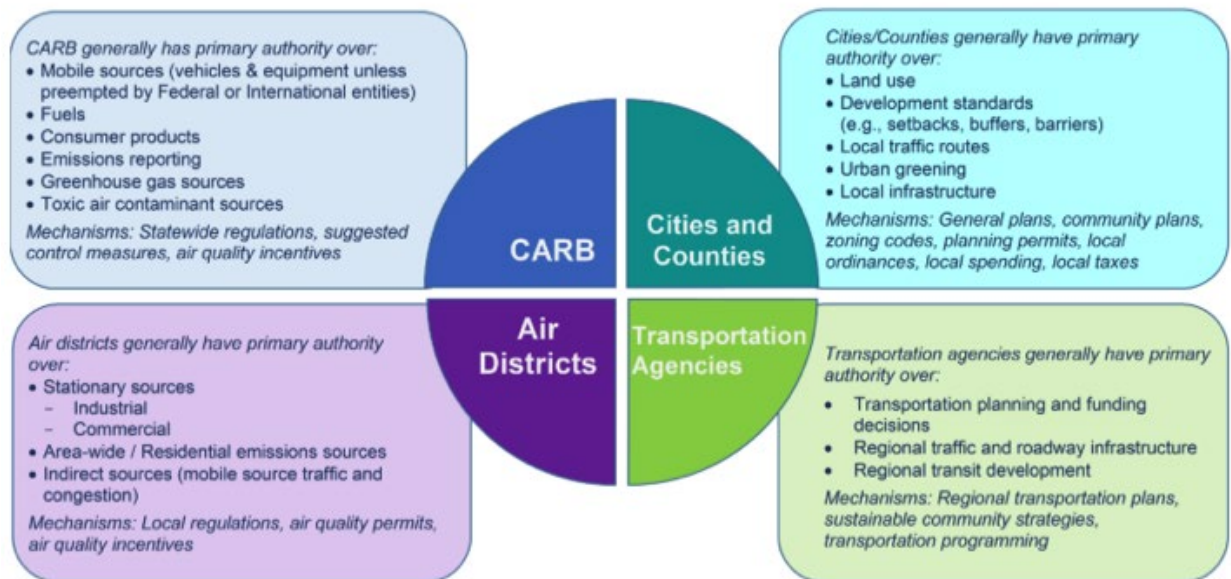


Figure ii: Air Quality Management in California

Source: CARB

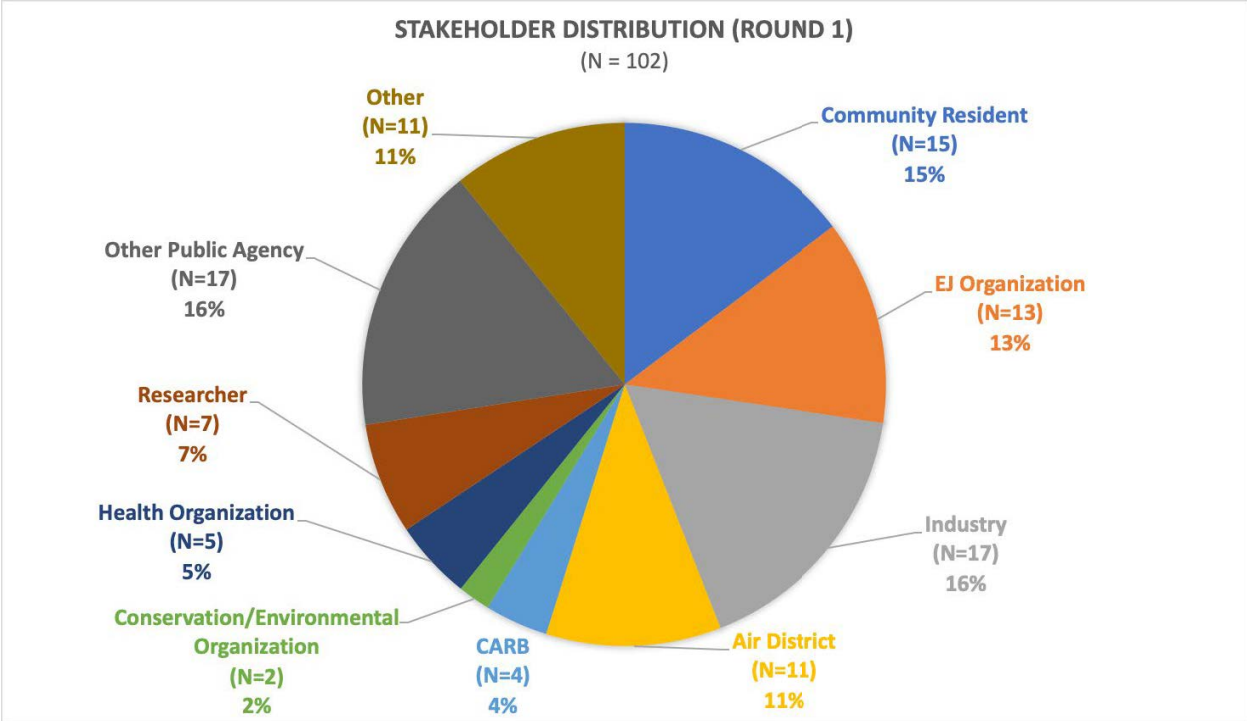


Figure iii: Survey Respondents by stakeholder groups in 2018-2019 survey (n=102).

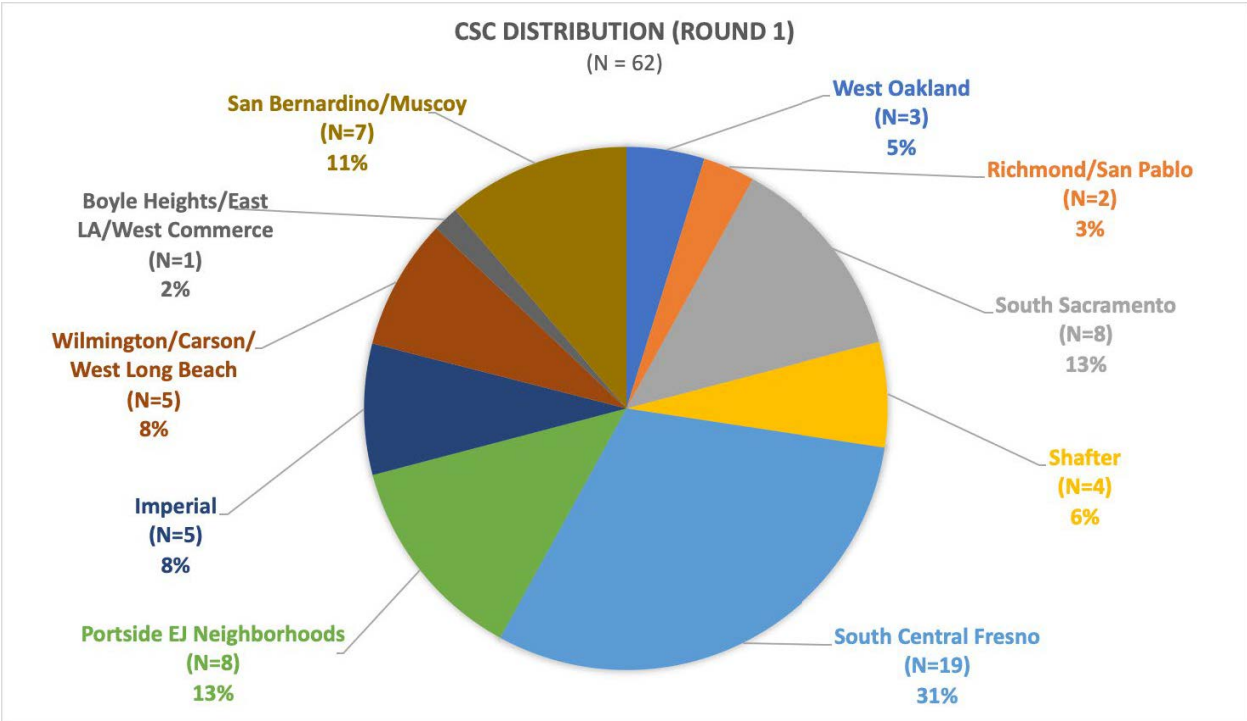


Figure iv: Survey Respondents by CSCs in 2018-2019 survey (n=62).

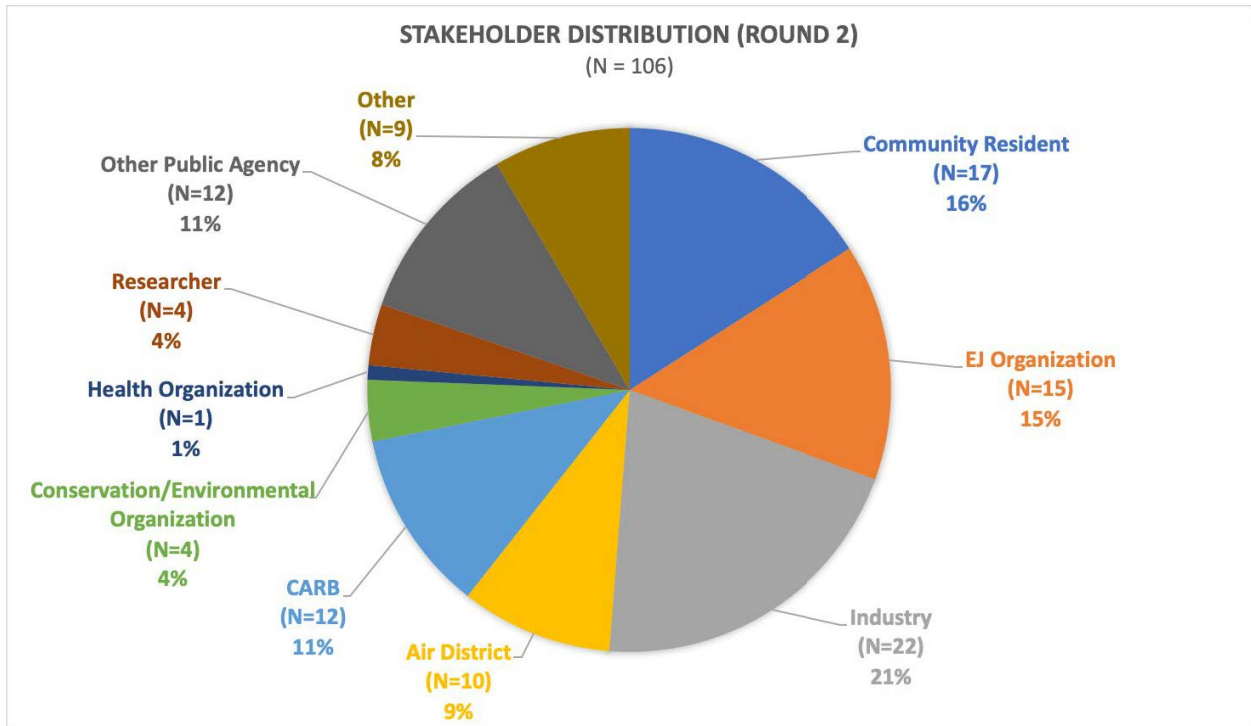


Figure v: Survey Respondents by stakeholder groups in 2020 survey (n=106).

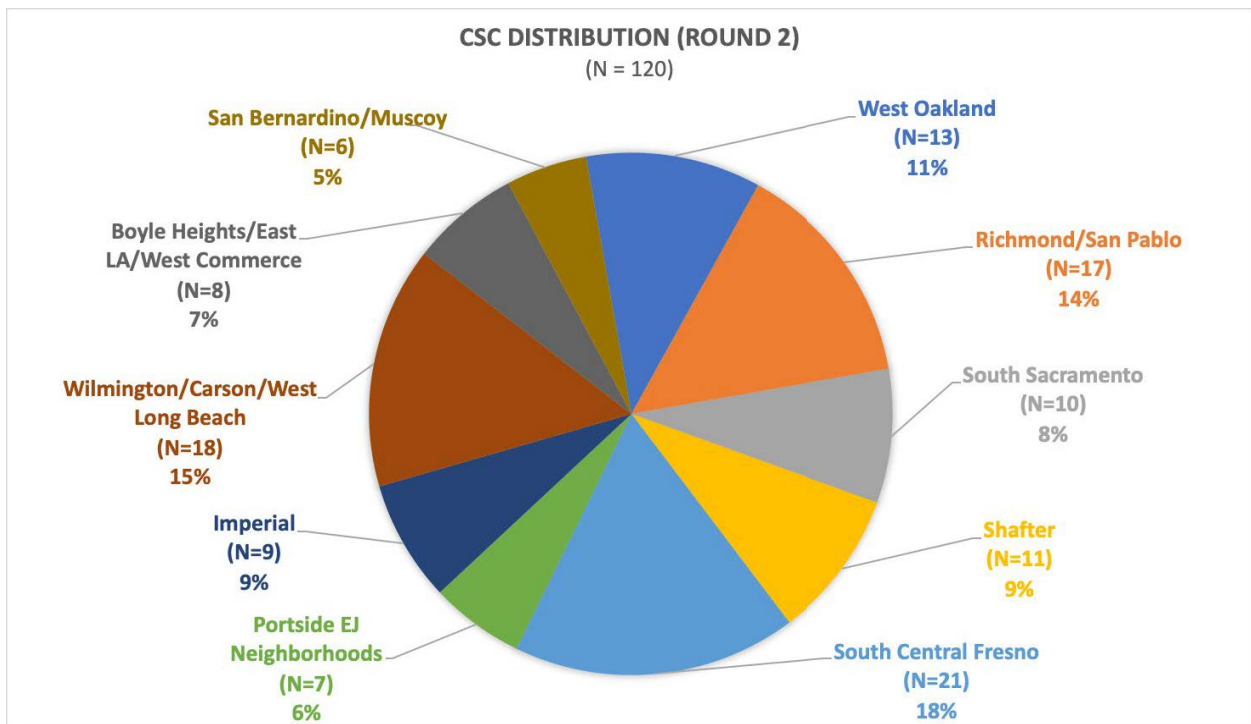


Figure vi: Survey Respondents by CSCs in 2020 survey (n=120)