

CARB Response to *Supplemental Report of 2019-20 Budget Act*

Item 3900-001-3228 – Assembly Bill 617 Implementation

A major factor behind the passage of AB 617 and establishment of the Community Air Protection Program (Program) is that public agencies have been unable to improve air quality to the same level across the State, leaving many disadvantaged communities overburdened with unhealthful air. In overburdened communities, interactions with local, regional, and State agencies have often been negative. These experiences have led many residents in these communities to distrust those government institutions they believe have ignored their concerns and failed to protect their health.

For more than a century, State and local government agencies consciously and disproportionately concentrated industrial sites and, consequently, most stationary sources of emissions in economically-disadvantaged and politically-marginalized communities, especially communities of color. Patterns of redevelopment and the construction of new transportation corridors further worsened the impacts of environmental injustices and structural racism throughout California's history by significantly increasing emissions from mobile sources in disadvantaged communities.

Until the 1970s, local governments in California exercised virtually unlimited authority to make local land use decisions—zoning and permitting—without significant environmental reviews. The passage of the federal Clean Air Act and the California Environmental Quality Act (CEQA) in 1970 and a raft of related federal and state legislation imposed additional requirements on State and local governments when approving permits and land-use plans. However, even with the increased regulation of industrial polluters, State and local decision-making processes have too often continued to ignore the concerns and input of poorer and non-white residents, and these community members frequently were the very people who would be most directly affected by proposed projects.

This has left many disadvantaged communities overburdened with unhealthful air while more affluent communities have disproportionately benefitted from the progress the State has made in improving air quality since the 1970s. Radically disparate environmental and public health outcomes have eroded community trust and continue to make it difficult to restore faith that State and local

governments will implement policies to protect these communities from emissions and the harmful effects of pollution.

AB 617 is intended to reduce emissions in overburdened communities by directing districts to focus more reductions within specific communities and incorporating communities and other stakeholders into that district process. Because of the long-standing trust and communication barriers between community residents and air districts and other government agencies and because of CARB's role in adopting the statewide strategy to implement AB 617, community members and organizations turn to CARB staff for help in representing their priorities, building trust, and moving conversations forward with air districts and other State and local agencies. To help build this trust, CARB staff make concerted, focused, and continuous efforts to understand the unique perspectives of each AB 617 stakeholder, and to be transparent, honest, responsive, and consistent in interactions with all parties. Although difficult to quantify, this function is critical to the successful implementation of AB 617, and demands thoughtful and resource-intensive action to cultivate, maintain, and improve community trust.

This collaborative, trust-based approach permeates all aspects of AB 617 implementation, including the activities performed by CARB staff that are associated with each of the four responses to the questions detailed below.

1. Detailed information about the activities performed by CARB staff and the workload associated with these activities, including both past workload and estimated future workload.

Ongoing revisions of the statewide strategy adopted by CARB, known as the Community Air Protection Program Blueprint (Blueprint), to achieve the reductions in community pollution burdens mandated by Chapter 136, Statutes of 2017 (AB 617).

The Blueprint establishes the minimum requirements any plans developed under AB 617 must follow, including the following:

- Criteria and requirements for identifying and selecting impacted communities that will develop community emissions reduction programs (CERP) and/or community air monitoring plans.
- Statewide emission reduction actions to reduce emissions of criteria air pollutants and toxic air contaminants and statewide strategies, tools, and other resources to support Program.
- Requirements for CERPs and community air monitoring plan development.

- Guidelines for CARB and air district consultation with stakeholders, especially community members during development of CERPs and community air monitoring plans.
- Criteria for CARB's review and approval of CERPs.

Through individual stakeholder consultations, meetings with community-based organizations, air districts, industry representatives, and other State agencies as well as through statutorily-required public workshops across the state, CARB staff spent nearly a calendar year drafting, publicly vetting, and revising an initial Blueprint. In September 2018, the CARB Board approved the first Community Air Protection Blueprint to govern the implementation of AB 617.

The Blueprint is now two years old, the Community Air Protection Program (Program) has now been through a full cycle of community selection and CERP development, and the initial CERP communities are completing their first year of implementation. CARB is required by statute to update the Blueprint every five years with public consultation. The Program is a first of its kind in the nation, and it was not possible to anticipate every issue that could be addressed in the first version of the Blueprint. The experiences of CARB staff, air district staff, stakeholders, and community members have yielded new and better knowledge about what will be needed for successful Program implementation. As a result, CARB staff have identified important areas for Blueprint updates, and key stakeholders, including community steering committee members and air districts, are demanding an immediate and fundamental rewrite of the Blueprint that draws upon the implementation experiences to date. For example, community stakeholders are requesting a substantial list of changes, including Statewide guidance on community steering committee charter requirements and conflict resolution, among many others (Appendix, pg. 2).

Based on stakeholder feedback, an expanded public process to revise the Blueprint is now underway. The Program's Consultation Group, chaired by a CARB Board member and supported by CARB staff, has discussed and prioritized changes to the Blueprint. The Consultation Group has also formed a Sub Committee and a smaller "writer's group" to work with CARB staff in publicly-held meetings to discuss proposed/potential revisions to the Blueprint. The drafted Blueprint revisions will then go through a statewide public process to solicit public comment, including public meetings and workshops. CARB staff will incorporate changes before seeking CARB Board approval. CARB staff anticipate the need for regular Blueprint updates to address implementation needs, as well as to incorporate best practices and efficiencies to move more communities through the Program and, fulfill the intended goals of the Program.

Community assessment and selection into the Program (mandated by AB 617)
AB 617 requires the Board each year to consider selecting additional communities into the Program, taking into account a required statewide assessment of high cumulative air pollution exposure burden conducted by CARB staff. The community identification, assessment, and selection process is illustrated in Figure 1.

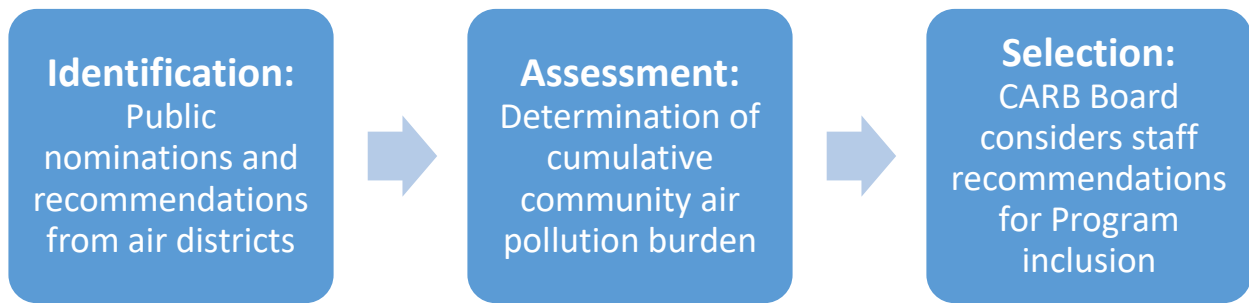


Figure 1: Summary of community selection process

Staff conduct a significant amount of community engagement on the **identification** of candidate communities through: in-person and virtual workshops; carrying out an annual, Blueprint-required community nomination process involving public workshops and receiving formal community nominations; and maintaining a list of candidate communities, per Board direction during the first two years of the Program. The public has nominated over 120 unique communities, and new communities are nominated every year. Through air district and community nominations CARB has a broad list of over 300 candidate communities identified for inclusion in the Program, with the majority designated as disadvantaged communities.

Staff utilize air quality, emissions inventory, and other publicly available data to evaluate and prioritize AB 617 communities for inclusion into the Program. As required by AB 617, a [statewide assessment](#) characterizes the cumulative exposure impacts within each community and includes factors such as the density and magnitude of air pollution emission sources impacting the community, and the proximity of sensitive receptors (schools, daycare facilities, hospitals) to these mobile and stationary sources. Staff update the comprehensive evaluation of statewide communities annually as new statewide air quality, emissions inventory, and health data become available. This statewide assessment focuses on statewide-available datasets and tools to allow for some level of comparison among communities.

In addition to the standardized statewide assessment, CARB staff annually conduct **community-specific assessments** for communities that have been considered in the past and remain strong candidate communities. Unlike the statewide assessment, these community assessments focus more specifically on the unique datasets and rich community resources that help build a detailed, individualized community story. This phase of assessment is not focused on community comparison; instead, it is designed to ensure that CARB creates the most complete picture of each community's socioeconomic composition, historical challenges, needs, and resources.

To inform Board **selection**, CARB staff produce an annual staff report of recommendations for community selection (Appendix, pg. 8). This report takes into account information from the identification and assessment steps. The report also contains community profiles to aid in the Board's selection process. Each profile includes a staff recommendation, community description, community-specific technical assessments, and community engagement analysis. Staff's community recommendations are presented in a public workshop where public testimony is taken, a draft community selection staff report is released for public comment, and a final report and staff presentation is provided to the Board.

The workload associated with community assessment and selection will remain consistent and ongoing. AB 617 requires CARB to consider new communities for selection annually and does not include a sunset date. Since the Program's inception, community members and advocates themselves are increasingly looking to self-nominate their communities for inclusion in the Program. Because of this, there is a growing need for CARB staff to provide statewide assessment data in more common, accessible language so that it is easy to understand and use. This will empower community representatives with data to effectively characterize air quality and emission burdens in their communities as part of community self-nominations. The increased use and accessibility of data for community assessment purposes and increase in self-nominations will increase workload for CARB staff in several areas. The first is within the area of outreach, education, and training on how to access and use newly available data. Second, having more nominations and a growing list of strongly supported communities will increase demand for CARB staff to produce community-specific assessments, which require more work and specificity than standard statewide assessment data. Last, requests for one-on-one technical support or custom data processing will increase. For example, where publicly available statewide assessment data are not refined enough or is missing specific

information desired by a community representative that is interested in making a self-nomination.

These more complete assessments include, for example, analyses of existing community-scale air quality, meteorology, emission sources, vehicle activity, and satellite imagery data to draw preliminary linkages between community air pollutant concentrations and contributing pollutant sources. AB 617 staff also coordinate with other CARB divisions to prioritize and develop preliminary emissions inventories, pilot studies, and simulations of air quality using computer models. This work is integral to providing a sound technical basis for CARB's annual consideration of selecting new communities into the Program.

Technology Clearinghouse development and emissions control technology evaluation (mandated by AB 617)

The Technology Clearinghouse will empower AB 617 communities and the public by providing transparent and user-friendly information about the cleanest air pollution control technologies available—for control of criteria air pollutants and toxic air contaminants—including zero emission options. Communities have continuously requested this data to allow them to collaborate successfully with air districts during CERP development, and to assess existing and available measures to reduce emissions in their communities. Historically, this data has either not been publically-available or has been difficult to access across the websites for the 35 air districts and CARB. Additionally, differences in policy and terminology at the district level have further complicated comparisons for those without extensive technical knowledge. The Technology Clearinghouse will solve these problems by bringing together disparate data and providing well-documented, easy-to-understand tools that allow for accurate searches and comparisons of control technologies and emission limits.

To date, CARB has developed multiple prototype tools to demonstrate proof of concept and obtain feedback on the design and functionality of the Technology Clearinghouse for a final Technology Clearinghouse development contractor. CARB has worked closely with communities, local air districts, and US EPA in the design and development of these tools. These include: routinely hosting virtual workshops with community residents and environmental justice advocates across the State. These prototypes not only expedite benefits by providing data to the public now, but will also inform final Technology Clearinghouse requirements and will accelerate design and development by the contractor, once in place. Until a contract is completed, CARB staff will continue to engage with stakeholders using the prototypes to meet the short-term needs of both air districts and community members.

Keeping data up-to-date in the prototypes and, eventually, in the final Technology Clearinghouse, providing training and resource materials for how to use the systems for strategy development, and conducting technology evaluations are long-term, continuous needs for the Program that require staff on a permanent basis. The Technology Clearinghouse data is not static, and requires continuous work to stay up-to-date. Control technologies, rules, and legal requirements can change rapidly, and providing the most current information allows adoption of the best control technologies or requirements to achieve the largest emission reductions. The final Technology Clearinghouse development contractor will develop tools to streamline management of the Technology Clearinghouse.

While the final system is under development, CARB staff will work diligently to maintain and support interim prototype tools. This work includes: ongoing data entry and review, hosting public facing tools, responding to user feedback, developing user guides, and providing training to stakeholders. CARB will also continue to release new prototypes including enhancing the next generation of emission control technology data.

The existing prototypes are each standalone products; however, once the final Technology Clearinghouse is available, the functionality and data within these tools will be seamlessly integrated and enhanced. Staff will use the system and the up-to-date data in the system to support the development of community emission reduction strategies. Users will be able to search and extract emissions limits and associated control technologies from district data for stationary pollution sources in the State, then use this information to identify next generation control technologies that may reduce emissions beyond what is legally required. This will spotlight cleaner alternative technologies as potential emission reduction strategies as part of the community emission reduction program process. The long-term goal will be for the final Technology Clearinghouse to present the best rules, measures, and control technology options to deploy advanced and zero emission technologies within communities.

Development of Community Emissions Reduction Programs (CERP) and Community Monitoring Systems (mandated by AB 617)

The core of the AB 617 Program is understanding local air quality through community monitoring and/or development and implementation of a localized community emission reduction program. CARB staff engage in this process to implement the Blueprint and to develop recommendations for the Board for the review and approval of district-adopted CERPs.

Each of the thirteen currently-selected communities is unique. The differences between the distinct communities are significant and extend far beyond the sources and levels of pollution. Each community steering committee has its own unique group dynamics, preferred methods for conducting meetings, frequency of meeting, desire for professional facilitation, decision-making process, etc. Existing trust or mistrust between stakeholders and the air districts also differs across regions and communities. As a result, the type of work and level of involvement by CARB varies widely with each committee, but in all cases, this work requires CARB staff to develop strong relationships with community members and to maintain these relationships to build trust. To do this, staff must—at minimum—engage in continuous correspondence and frequently participate in face-to-face conversations, both in person and remotely.

CARB staff attend all community steering committee (CSC) and subcommittee meetings and are actively involved with local air districts and community members throughout the process of developing CERPs and community air monitoring plans. CARB staff participation in the CSC process includes:

- Providing in-person and virtual training on the Blueprint to air districts and steering committees and continually improving, expanding, and updating information available through the AB 617 Community Air Protection Program Resource Center. Resource Center materials cover the basics of community air quality, strategy development, technical assistance, and AB 617 implementation (such as online tutorials in both English and Spanish). Since steering committee members often have little or no experience working with government agencies and typically lack expertise on air quality laws and regulations, this policy and technical outreach plays an essential role in providing steering committee members the necessary background knowledge about planning and the regulatory process.
- Contributing during community steering committee and subcommittee meeting discussions as experts on subjects under CARB's authority (Blueprint requirements, enforcement, sources of pollution, emissions inventory, statewide measures, etc.).
- Providing informal guidance in the form of email correspondence, phone calls, virtual meetings, and summary documents to steering committee members, air districts, and other stakeholders on technical, policy, and regulatory issues within CARB's subject matter expertise and authority (e.g., environmental justice, monitoring, enforcement, incentives, toxics, emissions inventory, mobile sources, freight, etc.).

- Coordinating meetings between air district staff, community members, and other stakeholders with expert staff within CARB, and other state agencies, to fulfill any inquiries that CARB staff are unable to fully address during meetings. It is critical for CARB staff to develop positive and authentic relationships with all participants to ensure successful and efficient communication.
- Engaging with other State and local agencies to foster and encourage development of community-identified priorities for strategies that do not fall within CARB's authority, such as pesticides, school air filtration, vegetative barriers, and truck rerouting.

In addition, CARB staff create robust community-level datasets and tools—examples include: stationary source rules look-up tool, strategy implementation trackers, and land use and transportation resources that provide best practices for sustainable planning and development. All of these tools are critical for CERP development, implementation, and tracking. Staff quantify the emissions reduction potential of statewide strategies, helping the community steering committee with strategy prioritization and ensuring that real emissions reductions are achieved with CERP implementation. CARB staff revise and refine datasets and tools as CERP strategies evolve. Staff also develop, update, and periodically expand a suite of metrics to track implementation of statewide strategies, emissions reductions of CARB strategies, improvements in air quality based on community monitoring data, disbursement of incentive and implementation funds, and enforcement actions within each community. Common metrics used across communities cannot be completely standardized and need to be tailored to specific locations; more unique metrics that reflect the interests of the community steering committees and specific strategies included in each CERP are developed and tracked over time.

Finally, CARB staff review CERPs and recommend action to the Board for those programs, review annual progress reports and inform the Board, conduct additional analyses to track implementation progress, and seek opportunities to improve Program guidance.

Past Workload

Please see table 1 in Appendix, page 105.

Future Workload

Please see table 2 in Appendix, page 105.

2. *A description of how the CARB workload is different from the AB 617 activities performed by local air districts and why CARB staff are needed for successful implementation.*

Distinction between CARB and Air District Workload

CARB's work is distinct from and complementary to the work of the local air districts, based on State or local statutory authority, including the mandates of AB 617. At a general level, state statute designates CARB with the primary responsibility for coordinating efforts to attain and maintain ambient air quality standards and controlling mobile sources of emissions, while air districts have primary responsibility for controlling stationary sources of emissions. Under AB 617, CARB staff carry out policy and provide technical support to guide the overall Statewide implementation of AB 617, and the Board adopts the Blueprint and reviews and approves district-approved CERPs. Air districts work directly with members and stakeholders of each community to develop, adopt, and implement community air monitoring plans and CERPs that are uniquely designed to address community concerns. Both CARB and air districts are needed to meet AB 617 goals and accomplish real emissions reductions in the State's most over-burdened communities. AB 617 cannot succeed without bottom-up input from residents and community-level development facilitated by the air districts and CARB. CARB must also provide Statewide support to ensure equity for all communities in the Program.

There are other workload elements that distinguish CARB workload from air district workload. AB 617 requires CARB to develop and revise, at least every five years, the Statewide strategy that establishes the overall framework for the Program (i.e. Blueprint), consider adding new communities annually, develop and implement State-level strategies to limit pollution from mobile sources to reduce community emissions, review and approve CERPs, provide ongoing oversight to ensure the objectives of CERPs are met, and develop and maintain a Technology Clearinghouse of emission reduction technologies that air districts must consider.

Additionally, because each community has different stakeholders and different levels of trust between the community and government, developing a CERP in a new community is not a standardized process. Each new community requires starting at the ground level every time, and a lack of trust can present unique implementation challenges in each community. CARB staff have been asked to participate or coordinate as a mediator or objective party in certain circumstances or to assist community stakeholders in discussions with districts or other State agencies. The process of building and maintaining trust in the Program requires continuous, focused, and deliberate effort.

Air districts are responsible for working with selected communities to develop, adopt, and implement CERPs, develop and deploy community air monitoring systems, adopt and implement emission reduction rules, implementing

expedited Best Available Retrofit Control Technologies on certain stationary sources, and implementing AB 617 incentive programs. (Figure 3).

CARB	Air Districts
<ul style="list-style-type: none">• Develop and implement new Statewide strategies• Establish Program requirements (Blueprint)• Program oversight• Identify and select communities• Develop, maintain & improve resources to make data more accessible and transparent.• Administer Community Air Grants and CAP incentive funding• Provide technical support and review of air district programs.	<ul style="list-style-type: none">• Partner with communities on CERPs and community air monitoring plan development• Implement strategies to reduce emissions from stationary sources• Deploy community air monitoring systems• Implement incentive programs• Report stationary emissions• Expedite best available retrofit control technology (BARCT) review

Figure 3: Roles of CARB and the air districts.

3. Based on input from community steering committees, a description of the degree to which CARB staff attendance at community steering committee meetings is helpful for developing emission reduction plans and opportunities to improve CARB's role in the emission reduction plan process.

Community Steering Committee Input on CARB Participation

University of California, Davis researchers have produced a report that documents AB 617 community steering committee members' expectations for CARB statewide (Appendix, pg. 106). In the report, community members and environmental justice organizations clearly expressed expectations that CARB should continue to be directly involved in all aspects of the Program. CARB has also captured these expectations in a variety of other formats, including letters received from environmental justice organizations, comments made by the AB 617 Consultation Group, the Scientific Review Panel, and comments received during various CARB public outreach events. Community steering committee

members have said clearly that CARB staff must be even more active in the development of the CERPs.

Community steering committee members want CARB to continue to clarify and advise on the requirements of the Blueprint for community engagement and CARB's expectations in terms of the key elements of the Program and CERP review. In addition to these roles, a majority of community steering committee members are asking CARB to go further in supporting community representatives, when appropriate, and resolving disputes between community members and air districts. CARB is already engaged in every facet of Program implementation, and yet, there remains a consensus among the selected communities that CARB should take on a more active role in ensuring that the objectives and intent of AB 617 are realized.

CARB staff participate in community steering committee meetings by sharing information on subjects under CARB's authority (requirements of the Blueprint, enforcement, sources of pollution, emissions inventory, statewide measures, Technology Clearinghouse development, etc.), engaging in break-out group discussions related to development of emissions reduction programs and air monitoring plans, and answering CARB- and Program-related questions. Guidance to each steering committee touches upon every technical, policy and regulatory specialty area within CARB (e.g., environmental justice, monitoring, enforcement, incentives, toxics, emissions inventory, mobile sources, freight, etc.). These activities allow steering committee members to make informed decisions while prioritizing strategies for emissions reductions and air monitoring.

Staff have also advanced committee progress by actively engaging other State agencies to discuss community-identified priorities for strategies that do not fall within CARB authorities, such as the use of pesticides, land use decisions, and truck routing. For example, CARB staff will often provide comments to local agencies during the CEQA process for projects that will have emissions impacts on AB 617 communities. Finally, community members and organizations regularly turn to CARB staff for help in representing their priorities and moving conversations forward with air districts and other State and local agencies to develop effective strategies to achieve emissions reductions.

Community steering committee meeting attendance also allows CARB staff to perform critical and comprehensive reviews of the CERPs for the Board to consider during evaluation. Without observing and participating in CERP development as it unfolds, CARB staff would struggle to understand or portray the quality of the process accurately, and could not adequately determine

whether or not the community engagement reaches a level that meets the expectations of AB 617 and the Blueprint.

4. *A description of the metrics CARB uses to assess AB 617 program outcomes, CARB's evaluation of the degree to which the state has achieved these outcomes, and how the activities performed by CARB staff help to achieve these outcomes*

The Legislature created the Program with no sunset in statute. Nor does statute provide clear direction for how to assess overall Program outcomes. Instead, AB 617 specifies for individual CERPs that “(t)he programs shall result in emissions reductions in the community, based on monitoring or other data.” Therefore, to remain consistent with this statutory requirement, the Blueprint provides direction for the establishment of CERP-specific metrics.

Description of CARB Assessment Metrics

When developing the Blueprint, CARB established a process for creating and tracking the progress of each strategy included in a CERP. The process begins with the community setting broad need-based goals. These goals could focus on specific sources of emissions, like electrifying a truck fleet, reducing the impact of residential wood smoke, or cleaning up refineries. A goal could also be to strengthen an air quality rule and increase compliance with a regulation. The final broad category, proximity-based goals, focuses on reducing the impact of air pollution at places where people live, work, and play, like indoor air filtration or roadside vegetative barriers. Once a goal is defined, a quantifiable emissions reduction or mitigation target is estimated, and metrics are put in place to track the implementation status of each strategy (Figure 4).

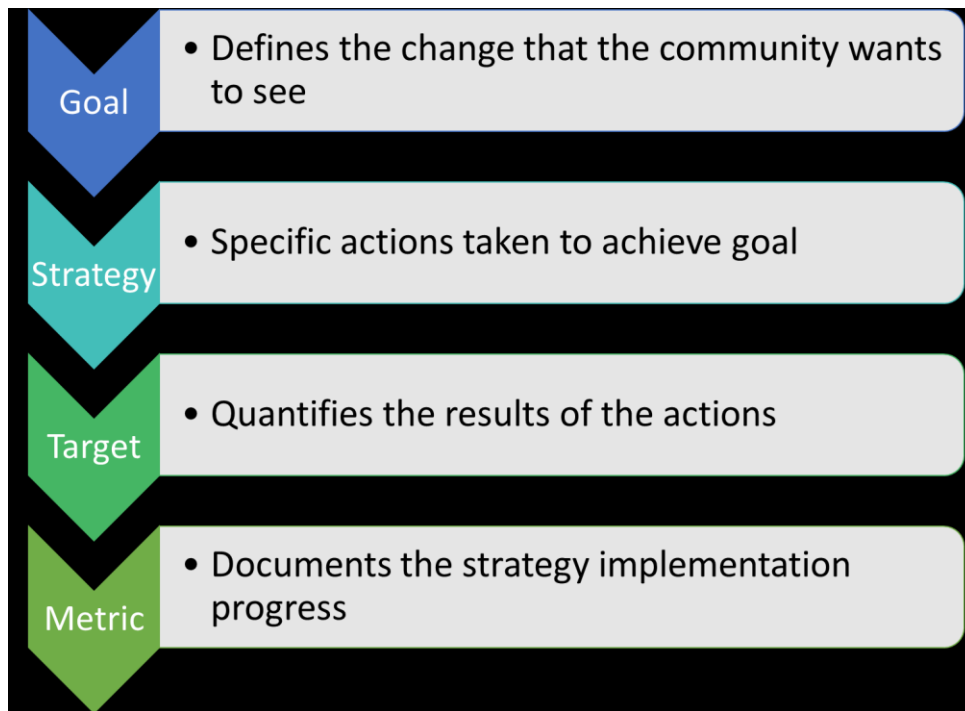


Figure 4: CERP strategy development and tracking process

Air districts with approved community emission reduction programs are required to report back to CARB annually on progress (October) and, based on these reports, CARB staff compile and assess overall program outcomes annually (December).

Each community emissions reduction program is different, and each strategy will have different metrics. For every community emissions reduction program, CARB staff create a metric-tracking data collection template, capturing enforcement, incentive, regulatory, and community outreach progress made each year. The template contains the minimum reporting requirements outlined in the Blueprint. Specific examples of metrics include:

- Emission reductions achieved and progress towards meeting the individual emissions reduction targets for each pollutant.
- Compliance rates and the current status of deployments of new technologies to meet implementation targets for sources of criteria and other toxic pollutants.
- Status of rules and regulations adopted or other strategies implemented.
- Outreach metrics, such as the dates, times, locations, and number of participants at workshops, including links to the presentation materials

and minutes/notes for all workshops and AB 617-related public meetings conducted by air districts.

- Number of interactions with local governments to address air pollution exposure.
- Number and results of enforcement inspections performed in the community.

The template is revised as the Program matures so that it can serve the needs of the communities in the Program as well as future communities selected into the Program. Air districts and CARB use the progress metric information in the template to generate annual reports and to provide progress reports/updates to stakeholders, including the Board.

Evaluation of Achieving Outcomes

CARB is presently collaborating with the air districts and their staff to finalize the first draft annual reports that were released on October 1, 2020. The Blueprint requires actions to achieve the specific, quantifiable emissions reductions within the five-year implementation timeframe. To demonstrate continued progress beyond the five-year implementation timeframe, CARB and air districts will also estimate and describe the ongoing community benefits these strategies will provide for an additional five years. This outlines an 11-year commitment to each CERP community, starting at CARB Board selection (figure 4).



Figure 4. CERP timeline.

After CERP adoption, community steering committee members continue to meet and guide implementation. Many communities have formed subcommittees to focus on specific CERP strategies (vegetative barriers, heavy duty truck rerouting, port and freight, walk/bike/transit, etc.). A CERP is a living document, evolving as community priorities shift, strategy effectiveness is evaluated, and goals are met.

CARB continues to work closely with air districts and first year community members to assess and modify emissions reduction strategies. Many community steering committees are already reallocating funding and developing

community-specific incentive projects based on community priorities, and look to CARB for information, analysis, and guidance.

How CARB Staff Help Achieve Outcomes

After a community emissions reduction program is adopted by an air district but before CARB approves a community emissions reduction program for implementation as required by statute, it is evaluated for completeness by CARB staff. The evaluation includes determining whether the CERP has appropriately defined metrics to assess progress. Appendix C of the Blueprint includes a checklist that is a high-level summary of the completeness criteria for community emissions reduction program elements. This checklist is designed to both guide the air districts in developing the community emissions reduction programs and promote transparency in CARB's consideration and staff recommendations to the CARB Governing Board for action on submitted CERPs.

Once a community emissions reduction program is approved by the Board, CARB staff continue to collaborate with the air districts, steering committees, and sub-committees throughout the implementation process. This work includes conducting outreach to stakeholders. Staff also track implementation of statewide strategies (e.g., adoption of regulations or status of regulation development); emissions reductions of CARB strategies; improvements in air quality based on community monitoring data, and enforcement actions within each community (e.g., number of violations reported). Additionally, staff track the disbursement of incentive funds, like dollars spent or the number of zero emission vehicles funded. As this new program evolves, new metrics will be identified as well as new methodologies for quantifying emission reductions.

In addition to the CERP evaluation process described above, CARB staff support the community-driven process by providing community members and air districts with policy and technical expertise throughout CERP and air monitoring plan development and implementation. CARB staff devote time and resources to interact directly and personally with community members to exchange ideas, knowledge, and experience, creating an empowering environment that will lead to AB 617 improving air quality for historically marginalized communities. For example, CARB staff has met with various community stakeholders from across the State to discuss concerns such as pesticide use, stationary source rules, vegetative barriers, community health, school air filtration options, heavy duty truck enforcement, and port activities.

Lastly, but equally critical, CARB staff coordinate with community members, air districts, and other public agencies to implement strategies that require the involvement, specialized technical expertise, and authority of multiple

regulatory agencies. For example, in the Shafter community, the air district and community members, with the support of CARB and collaboration with the California Department of Pesticide Regulation, have pushed forward prioritization of the development of a pesticide application notification system. Similarly, the City of Fresno is now an active participant in a truck rerouting study aimed at reducing community exposure to heavy-duty truck emissions in the AB 617 community located in South Central Fresno. CARB also coordinates with the Office of Environmental Health Hazard Assessment to develop more granular community-scale health metrics to aid in community needs assessments and better track health outcomes. CARB also works with air districts and community members to bring other public agencies, such as port authorities and agricultural commissioners, into the process to address strategies that fall outside both CARB's and the air districts' jurisdiction.

For AB 617 and the Program to achieve the level of healthful air that residents of disadvantaged, over-burdened communities deserve, and have been historically denied, it is imperative that CARB continue, and expand, its role in coordinating with multiple State, regional, and local public agencies, as well as non-governmental environmental justice organizations. This all hands on deck approach, facilitated by CARB, is the time and resource-intensive process required to realize the goals of AB 617.