



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

November 9, 2021

Deldi Reyes
Director, Office of Community Air Protection
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on the People’s Blueprint

Dear Ms. Reyes,

Thank you for the opportunity to comment on the People’s Blueprint. The People’s Blueprint provides an important, community-led framework to ensure that equity and environmental justice drive the Assembly Bill (AB) 617 work. The Bay Area Air Quality Management District (Air District) would like to offer reflections on what aspects of our AB 617 work already align with the People’s Blueprint and where the People’s Blueprint identifies growth opportunities in our work. We also seek additional detail, clarity, and guidance and offer recommendations on a few areas of the People’s Blueprint.

Achieving equity and environmental justice is a critical long-term goal. One of the essential tenets of environmental justice is that communities speak for themselves. Accordingly, the seventh Principle of Environmental Justice states, “Environmental Justice demands the right to participate as equal partners at every level of decision-making, including needs assessment, planning, implementation, enforcement and evaluation.”¹ As the agency that oversees air quality regulations in the nine Bay Area counties, we take this responsibility seriously and commit to forging ahead in partnership with our environmental justice community leaders. We therefore honor the role of the People’s Blueprint and deeply value guidance from our local community members as foundational to achieving justice. In that spirit, we commit to incorporating that guidance whenever possible.

The Bay Area Air Quality Management District has made strides, particularly in the last few years, to implement AB 617 in partnership with community. As you may know, our governing board adopted the West Oakland Community Action Plan in 2019, and the Richmond-North Richmond-San Pablo Community Steering Committee process launched earlier this year.

¹ Principles of Environmental Justice drafted and adopted by the delegates to the First National People of Color Environmental Leadership Summit held on October 24-27, 1991 in Washington, D.C. Available at: <https://www.ejnet.org/ej/principles.html>

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The Air District, co-leads and the community steering committees (CSCs) are beginning to implement many strategies that align with the People's Blueprint's recommended best practices for community collaborations, such as:

- Setting up co-leadership structures, like the ones that exist in West Oakland and Richmond-North Richmond-San Pablo;
- Creating partnership agreements and charters between the Air District and community advocates in West Oakland and in Richmond-North Richmond-San Pablo;
- Developing CSCs that represent the diversity of the community;
- Setting up equity-forward engagement processes, which have resulted in funding to community-based organizations for capacity building and stipends for CSC members;
- Contracting with neutral facilitators; using non-technical language in presentations; providing simultaneous interpretation and translation of materials; providing child watch and food for in-person meetings; and providing resources and support to community-based organizations in over-burdened communities that have not yet received formal AB 617 designation,
- Providing internal trainings for Air District staff to build capacity for collaborative partnerships, conflict resolution, and build awareness of implicit bias, structural racism, and the history and underpinnings of environmental justice;
- Applying community-scale analyses and supporting data-to-action approaches;
- Engaging community in air monitoring design and decision-making (the Richmond-North Richmond-San Pablo air toxics monitoring project conducted by the Air District and designed through the Community Air Monitoring Plan is one example) and following a checklist for developing community air monitoring; and
- Placing environmental justice and equity at the forefront of our hiring and contracting practices.

We will continue to apply these best practices. Yet, we also recognize that we could be doing more to support of community leadership and to realize the People's Blueprint's vision. We therefore commit to additional focus on the following helpful recommendations:

- Improving community selection process so that communities are not "competing against each other" for AB 617 designation (One way to mitigate those dynamics is through our ongoing work to create a "starter kit" for communities aspiring to formal AB 617 designation. Another way to reduce the perception of competition may be by providing technical support and partnership for community-based organizations and residents of impacted communities);
- Continuing to provide staff training alongside community members to develop a shared understanding of the issues and tools available for operationalizing learnings;

- Respectfully sharing leadership with community members so that we are providing the time and space to identify and accomplish shared tasks, such as jointly developed agendas and reading materials, while still meeting deadlines;
- Streamlining internal management and coordination for the purpose of dedicating more staff time to community-directed priorities;
- Making budgets more transparent and increasing community decision-making on budgeting. Funding for AB 617 communities is intended to benefit impacted communities. Therefore, communities should have a meaningful voice in deciding how we spend those funds. The Air District is eager to work with community leadership to establish more community ownership in budgeting. One possible venue for establishing participatory budgeting protocols may exist in the Air District's imminent Community Advisory Council, which will focus its expertise on various equity-related, policy issues;
- Dedicating even more time and effort on community-led, community-friendly, and action-oriented monitoring, modeling, and related technical analyses;
- Expanding resources and support to help communities build foundational knowledge about air quality (in response to the questions and needs identified by community members and recommendations in Exhibit 1 of the People's Blueprint—Core Training Topics for AB 617 participants);
- Honoring community-based technical and non-technical expertise and lived experiences, while being transparent about both the power and limitations of our technical methods and data;
- Continuing to apply an equity and environmental justice lens broadly in all Air District policies and practices moving forward.

Because the People's Blueprint is being shared widely as a guide for community-led AB 617 implementation, we would benefit from some additional clarity and guidance. We thus seek more detail on the People's Blueprint's recommendations on technical products, like modeling and processes, and governance. To those ends, we have the following questions for the authors of the People's Blueprint:

- What have we collectively learned about successful, targeted applications of modeling and/or monitoring that support expedited action to reduce air pollution emissions and exposures in impacted communities?
- Can such applications be extended to other CERP-nominated communities? Can they be extended to communities that have been identified as impacted but not yet formally designated?
- Are there more specific recommendations on CARB's fourteen community monitoring elements? That additional detail would help air districts implement these elements more effectively in the future.
- Might there be additional guidance or training on governance processes under the Brown Act, building off lessons learned in previous communities choosing to operate under the Brown Act?

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- Because the People’s Blueprint proposes that (p. 14) “[t]he final community steering committee (CSC) membership should reflect the diverse makeup of the community it represents,” would the authors of the People’s Blueprint provide more clarity on what “diverse makeup” means and how to measure/demonstrate what it is?

Finally, we would like to offer recommendations for alternative approaches to certain aspects of the People’s Blueprint that may be better tailored to meet the needs identified by our Bay Area EJ communities, such as:

- For community members selecting particular people or entities to conduct monitoring, modeling, or analysis, it would be helpful to identify those individuals or entities well in advance of the anticipated timeline for creating the work product so that the Air District can mobilize the right combination of funding and/or staffing to support the requested work. It is helpful to integrate the processes of identifying and collecting data with the process of analyzing data. It thus would be helpful to have the people who are selected to analyze the data also be involved in identifying and collecting the data. (That connection isn’t clear in the current version of the document.)
- We also recommend including a process to help community members thoroughly vet potential technical consultants or organizations and identify situations where consultants, companies, or air districts are misrepresenting their capabilities and costs.
- The document states (p. 14), “Require a leadership structure that puts community at the forefront of decision-making through a co-chair/co-lead structure with a local community-based organization.” While we wholeheartedly agree that community must lead decision-making, we urge flexibility in CSC leadership, and recommend that CSC leadership not necessarily be expected to come from a community-based organization. In our Richmond/North Richmond/San Pablo Steering Committee we have two CSC co-chairs who are highly effective and enjoy the strong support from the CSC. They are residents of the impacted community but do not represent a community-based organization.

Thank you again for providing the opportunity to comment on this community framework towards equity and environmental justice. Please let me know if you would like to discuss the contents of this letter.

Sincerely,



Jack P. Broadbent
Executive Officer/APCO