



South Coast Air Quality Management District

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Friday, August 23, 2024

VIA Electronic Mail

Deldi Reyes

Director, Office of Community Air Protection
California Air Resources Board (CARB) 1001 I Street
Sacramento, CA 95814

Re: South Coast AQMD Comments on Community Air Grant Draft Request for Applications (RFA)

Dear Ms. Reyes (she/her/hers),

The South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to provide comments on the Community Air Grants Draft Request for Applications (RFA). We recognize and applaud CARB's efforts to administer AB 617 in such a way that empowers communities and their leadership. We believe this process can provide consistently nominated AB 617 communities and community-based organizations with the necessary resources to build the social capital needed to identify and improve air quality.

This RFA process is an instrument for applications and is educational in nature for communities. This process can provide Community Air Grant applicants with an organizational infrastructure, expectations and metrics needed to ensure success. If utilized properly, the data gathered in this RFA will provide a critical baseline of information; thus, reiterating the impact of community work on 21st century environmental injustice, specifically air pollution.

This comment letter provides specific feedback in the three following areas:

1. Racial Equity and Environmental Justice
2. Project Development Processes
3. Success Indicators and Benchmarks

Racial Equity and Environmental Justice

As indicated in Blueprint 2.0, Community Air Grants are “a new pathway to bring resources to consistently nominated communities in alignment with CARB's commitment to environmental justice (EJ) and racial equity.” We appreciate the inclusion of Racial Equity and Environmental Justice, specifically the identification of historical and contemporary forms of oppression that

continue to impact the quality of life of the residents of poor air quality communities. We believe that the information provided in the Blueprint 2.0 provides appropriate context, however more purposeful efforts should be made to address ongoing Diversity, Equity and Inclusion (DEI) and EJ issues and concerns. As there can be a community hesitancy to work with governmental agencies based on history of systemic oppression, inter-group trust cannot be assumed. We are encouraged by the expectation of recipients to include DEI/EJ in their projects; it is imperative to identify restorative DEI and EJ practices with communities disproportionately impacted by air pollution.

As the RFA document indicates EJ and racial equity are foundational to this process, we believe it is necessary to add specific DEI, criterion to the process that identifies ways in which applicants will address DEI/EJ in the implementation of their community air grants. The application of and adherence to environmental justice principles need to be identified at the onset of the RFA process. Potential DEI/EJ initiatives could include language justice, community and partnership agreements within between organizations and air districts, and DEI/EJ training discussions.

We appreciate elements of the RFA that diversify the voices involved in the process; we believe that partnership, collaboration, and engagement with the Diversity, Equity, and Inclusion and Environmental Justice practitioners of air districts statewide is a critical next step in translating the guiding principles into operational standards. This would be instrumental in bridging inter-agency and inter-organizational divides between grant recipients, CARB and air district staff.

Project Development Processes

The RFA provides tools and techniques for an educational RFA. Recognizing there is a lack of resources available to address the number of communities in need, and not all applicants will receive funding. The RFA is comprehensive, completion of this RFA will increase non-grant recipients' success of future RFAs.

We recognize the voices of community members who have shared their distrust of historical RFA processes of governmental agencies; ones that were mired in exclusion, hidden agendas and gatekeeping tactics. We believe this RFA provides knowledge that has been historically inaccessible to these communities. Regardless of the outcome, the competencies gained in this RFA process can be instrumental in addressing obstacles impacting the capacity of community air grant applicants to fight air pollution. We feel this process can build trust and lay the groundwork for a safer, more respectful, collaborative endeavors moving forward.

User-Friendly Application

The application is informative and user-friendly. Providing appendices of acronyms and definitions, appropriate California Government Codes, legal notes, references and resources will assist in increasing communities' acumen of governmental regulations. The inclusion of checklists, sample grant drafts, budget and evaluation templates will assist applicants to navigate project management expectations, increasing their overall organizational development preparedness.

The virtual meetings of the pre-application process will benefit all applicants: specifically, presentations on how to prepare grant proposals and workshops on the Draft RFA and pre-application assistance. These information sessions will prepare applicants for success.

Terminology

Use of deficit terminology in the evaluation criteria should be eliminated. Many of these organizations have experienced resistance expertise from challenging inequality in their communities. Usage of words such as pass/fail is pejorative and can undermine the intent of this process; we suggest replacing with verbiage such as pass/no pass or ‘Does applicant meet the evaluation criteria? yes/no’.

Project Development Timeline

The timeline in the RFA is ambitious. All involved parties should be included throughout the selection process and time will be needed to develop a proficient understanding of all aspects of the proposed grant projects. To ensure reporting and timelines are in alignment, Air Districts should be involved at the onset of projects that involve Air District staff and resources (i.e. Local Community Emission Reduction Plans). To ensure transparency, the requirements needed from the Air Districts for the successful completion of any community air grants (such as data collection, reporting and analysis) before final selection should be identified upfront.

We would recommend pre-grant agreement discussions with consulting partners and stakeholders (Community Air Grant recipients, Air Districts and CARB) to take place before the grant term and projects begin in June 2025. For initiatives to be successful, grant recipients will need to be adept at working with CARB and if applicable Air District partners. Communication should be open and transparent and all parties should understand and agree on the final metrics.

Community Engagement Initiatives

We are encouraged by early successes of recent CARB initiatives to enhance community engagement within the AB 617 program and would encourage similar expectations of Community Air Grant recipients. This could include regular monthly meetings with cohorts of grant recipients, ongoing DEI/ EJ training efforts, peer mentoring, and community video projects. In doing so, collaboration would be foundational between Community Air Grant recipients and with CARB and Air District partners.

Expectations of working relationships with Community Air Grant recipients, Air Districts and CARB should be established. This could include participation in a grant recipients’ orientation/onboarding and the establishment of communities of practice between current and incoming grant recipients. In addition, we believe it integral to schedule annual opportunities for recipients to engage with staff to address administrative and operational concerns, discuss topics such as governance, co-collaboration, community outreach, consensus building, and conflict resolution. As these projects and the metrics to determine their success are still being developed, these leadership opportunities can provide space for grant recipients to become more comfortable in uncertain contexts.

Conflicts of Interest

TProjects that might coincide with pre-existing scopes of work with Air Districts to address potential conflicts of interest should be identified. There is a need to further identify ways to address

gaps, contradicting and overlapping contractual expectations. This should be identified as a directive in the RFA process as it will not necessarily be addressed in an Air District letter of commitment.

Success Indicators and Benchmarks

South Coast AQMD recognizes the difficult task of incorporating Blueprint 2.0, and applying lessons learned, best practices to navigate this RFA process. As these are relatively new processes, South Coast AQMD is eager to continue working with CARB on establishing the parameters and metrics for success and identifying how the Air Districts can work effectively with recipients of Community Air Grants.

South Coast AQMD would like to emphasize the importance of the development of success indicators and benchmarks at the onset of grant development to promote evidenced-based best practices. It is important to establish an infrastructure that will support success; the development of templates with timelines such as pre-checklists, data collection and analysis, self-assessments, sign-in sheets and community surveys at the onset of the project will likely ensure adherence to those expectations.

Conclusion

In conclusion, the South Coast AQMD reaffirms its commitment to working collaboratively with CARB and Community Air Grant recipients towards improving air quality in our region. South Coast AQMD advocates for RFA process as it will explore new approaches for community-led action in improving air quality at the local level. We appreciate the opportunity to provide comments and thank you for considering our agency's comments. We look forward to continued collaboration in the pursuit of cleaner air for all. If you have any questions or would like to discuss further, do not hesitate to reach out to me at ahheard-johnson@aqmd.gov or 909-964-2573.

Sincerely,



Dr. Anissa Cessa Heard-Johnson

Deputy Executive Officer
Diversity, Equity, and Inclusion
with Community Air Programs