

Community Expert and Public Comment Recommendations to Strengthen Relationships with Communities within the CARB Community Engagement Model

Date: January 3, 2025

Introduction

Background: This document summarizes recommendations from contracted community experts and the public on the California Air Resources Board (CARB) [Community Engagement Model](#) (Model). These recommendations were not incorporated into the Model because they may require additional resources. They are provided to promote transparency and strengthen relationships with communities to improve program design, implementation, and decision-making.

The document is part of a package of public documents that includes:

1. The revised Community Engagement Model.
2. A comment table listing individual public comments received on the Model and CARB's response to each comment.
3. A summary of major public comments and the agency's responses to those comments.

Model Background:

The Model is a living internal guidance document containing information to guide CARB staff on appropriate community engagement practices. It aims to help CARB staff gain the knowledge, tools, and confidence needed to consistently design and implement effective community engagement strategies. Moving forward, this Model will help CARB improve its ability to build and maintain relationships with communities throughout the State, especially communities impacted by inequalities, including racial inequalities. The Model is designed to support CARB's mission to serve the public in California. CARB has a civil rights obligation to all to ensure equal access and no barriers to the benefits of its air quality efforts based on protected categories like race, age, or sex. Consistent with CARB Resolution 20-33, CARB seeks to build relationships with communities most impacted by air pollution who have experienced limited access to government staff and decision-makers.

Model Development:

Staff ensured the Model was developed in partnership with diverse community voices. The Model was developed through engagement with [19 contracted Community Experts](#), 9 virtual and in-person [Public Dialogue Sessions](#) with nearly 300 attendees, and individual conversations with Community-Based Organizations (CBO) and the public. The Community Experts provided written and verbal feedback over email and during [four virtual meetings](#). Staff held Public Dialogue Sessions from January 2023 through April 2024 in Yuba City, Salinas, Oakland, Riverside, and virtually. During these sessions, the public provided general feedback on how CARB can strengthen its community engagement efforts. CBOs and the public also provided individual comments on the Model and CARB's community engagement

efforts, more generally, through voicemail, email, individual meetings, and an online public docket. In total, the Model development process generated about 2,800 comments.

Throughout the Model development process, communities requested detailed information about how their input impacts CARB's work. As a result, staff committed to being transparent about Model revisions by recording and responding to each comment received, even though CARB is not legally required to respond to public comments for this internal guidance document. All public comments and CARB responses are in a comment table on the [CARB website](#). This summary document synthesizes the recommendations from contracted community experts and the public that were not included in the Model due to the potential resources needed to address them.

CARB staff took a "yes" approach in responding to Model comments, honoring the community members' expertise and time spent improving the Model and CARB's community engagement efforts. Staff worked to incorporate as much feedback as possible into the Model.

What is in This Document: This proposal captures public recommendations not incorporated into the Model because they may require additional resources. These recommendations include community decision-making power, agencywide transparency, removing barriers to public participation, Tribal engagement, and addressing past and current harm to communities. Aspects of these recommendations require additional staff or resources. This document does not provide comments or responses from CARB.

[Recommendations to strengthen relationships with communities](#)

[Adjust Decision-making](#)

[Access to Decision-makers](#)

Community Comment: Communities would like the same access to CARB resources and decision-makers as lobbyists and industry. They requested that, when possible, CARB executive staff, Board Members, or other CARB decision-makers join community meetings. This included suggestions for a sub-quorum of the Board to meet with community members or host bi-annual regional meetings with Board Members from local areas or with similar interests.

[Ensure Adequate Influence](#)

Community Comment: All public-facing CARB actions need adequate time for community engagement, which should be able to influence outcomes. Communities reiterated requests for CARB to move into a power-sharing model with communities and expand when and how CARB can move from "involving" to "collaborating" on the [spectrum of public participation](#). There may be legal limitations on this, but CARB should identify pilot actions to test different collaboration approaches.

[Co-develop Multi-directional Dialogues with Demonstrable Action](#)

Community Comment: Host regular community listening sessions with CARB and Air Districts to determine how best to meet community needs. The agenda should be co-developed with communities, focusing on multi-directional conversations and dialogue. Meetings should result in transparent and demonstrable actions.

Improve Engagement

Ensure Adequate Time

Community Comment: All public-facing CARB actions need adequate time for community engagement. Engaging early and often should be a standard CARB practice, and engagement should not wait until after a program is designed or a decision is made. The amount of time required will vary, but timelines beyond a 30- or 45-day comment period are required.

Airtime Equity

Community Comment: Identify opportunities to move away from the “2-minute comment period” at the end of meetings. Possible solutions are to host listening sessions with multi-directional dialogues instead of comment periods, move the comment period to the middle or beginning of meetings, and increase the amount of time for comments.

Improve Knowledge Access

Community Comment: Improve and streamline CARB accessibility for communities. Communities note the challenges in accessing information at CARB, understanding who to ask for assistance, getting timely and accurate responses, and having a centralized place for information.

Similarly, communities have shared that the website and events calendars are hard to find and navigate and often do not have enough information. Have a centralized page with upcoming events, meeting agendas, materials, and background information. This could be called “Community Hub” or something similar. The Hub should be accompanied by a “help desk” or improved helplines and associated resources. Communities would like a centralized location where the public can be connected to the right people, provided with timely and accurate follow-up, and staff who can set up multi-directional conversations as appropriate.

Improve Collaboration and Coordination

Community Comment: Developing a regional directory of organizations or community groups and streamlining CARB requests and meetings can reduce engagement fatigue for both CARB and communities. Additional suggestions for addressing this concern include creating community or regional information factsheets that provide historical context, demographic data, political landscape overview, and history of CARB efforts for each region or area. These should be created by CARB with support and input from communities. OCAP has started these for [AB617 communities](#).

Increase Qualified Staff

Community Comment: CARB should develop racial equity, community engagement, and language justice questions and incorporate those into hiring questions. CARB should also develop internships and paid student positions targeting priority communities to increase employment opportunities, workforce development, and staff recruitment of people with lived experience in priority communities.

Improve Engagement Through Evaluation and Action

Community Comment: Create a standard set of post-engagement questions about event and process perceptions. Evaluate changes over time and demonstrate improvements. Commit to larger external evaluation if improvements are not demonstrated. Potential metrics include, but are not limited to:

- If communities felt the event or process was accessible.
- If communities felt the information was accessible.
- If communities felt their ideas or concerns were heard.
- If communities felt their ideas or concerns were addressed.
- If their trust in CARB increased, decreased, or stayed the same.

Increase Transparency

Develop Transparency Rules

Community Comment: CARB should standardize practices to increase transparency. Desired options include modifying the Initial Statement of Reasons/Final Statement of Reasons (ISOR/FSOR) environmental justice section to include more accountability and transparency, posting pre- and post-meeting materials online, documenting all comments and how input was addressed, and articulating how community engagement impacted CARB actions. Other suggestions include developing an oversight committee that responds to transparency requests and publishing the allocated budget for every CARB action.

Remove Barriers

Address Monetary Participation Barriers

Community Comment: All public-facing CARB actions should have budgets to support community participation. General categories that require additional investment include service contracts, stipends, childcare, eldercare, food, and transportation. Additionally, provide standing budgets to compensate Tribes and Community-Based Organizations (CBOs) to partner on engagement activities like outreach, co-designing events, and co-hosting events.

Address Non-monetary Participation Barriers

Community Comment: Support is needed to ensure equitable and accessible engagement. These requests primarily focused on language access, Americans with Disability Act (ADA) remediation, appropriate communications, and equity-centered facilitation. Communities want consistent and accurate translation, interpretation, and

ADA best practices for all external materials and meetings. Communities also requested improved messaging, plain language communications, and background information. Suggestions also included outreach and engagement teams to assist with developing appropriate messaging, content, and outreach strategies. Lastly, communities requested external facilitators focused and trained on community engagement and racial equity.

Create a Tribal Engagement Model

Create a Tribal Engagement Model

Community Comment: CARB needs to seek advice on Tribal Engagement and provide advice and training to staff. Tribes and Tribal members did not apply to develop the Model. Therefore, it is inappropriate to integrate detailed Tribal engagement advice into the Model without extensive Tribal input. CARB should consider an adequately resourced and staffed approach to creating a Tribal Engagement Model. This should leverage existing work by the Tribal Liaison and the California Climate Investment group. Note, Tribes have legal rights to consultation with CARB under state law, a process CARB implements under its [Tribal Consultation Policy](#). This proposed engagement would be distinct from the consultation process.

Address Harms and Document Equity Efforts

Acknowledge and Address Harms

Community Comment: Acknowledge community perceptions of CARB harms. These harms can range from ongoing health impacts from air quality disparities caused by government policies and regulations to more acute events like mismanaging community events.

Publish CARB's Equity History and Efforts

Community Comment: CARB should provide a timeline of its history related to promoting equity within the agency to illustrate the work that has been done and what continues to be needed.