

CARB's Equity Lens

November 2026 Draft

CARB's Equity Lens

A Tool to Help Staff Advance Equity in All CARB Actions

Table of Contents

Background 1

CARB's Equity Lens Questions 2

Process to Apply CARB's Equity Lens 3

CARB's Equity Lens and Engagement 4

CARB's Equity Lens 5

Question 1: Scope 5

Question 2: Data 6

Question 3: Equity Analysis 7

Question 4: Goals and Strategies 8

Question 5: Implementation 9

Question 6: Metrics and Accountability 10

Implementation of CARB's Equity Lens 11

DRAFT

Background

The California Air Resources Board (CARB) is committed to a future where all Californians breathe healthy and clean air, benefit from climate change actions, and where no aspect of a person's identity or life circumstances predict air pollution burdens. Data consistently shows that identity-based disparities are real and significant,[1] underscoring that this commitment is essential to our agency's mission.

Within CARB and in work that impacts communities, using equity tools like *CARB's Equity Lens* and the *Community Engagement Model* help staff play a vital role in supporting cleaner air by ensuring that approaches are responsive, inclusive, appropriately tailored to the distinct and varied needs of communities, and help to create a more equitable future for all Californians. Additional information on why this work is necessary in pursuit of CARB's mission can be found on *CARB's equity webpage*.

Compliance with Law

CARB designs and implements its programs, initiatives, and activities in compliance with all applicable state and federal law and CARB policies prohibiting discrimination, including but not limited to Proposition 209. This includes not discriminating or granting preferences to any individual or group based on race, sex, color, ethnicity, national origin, religion, disability, sexual orientation, and other characteristics protected by law. (See, e.g., Cal Cost., Art. I, § 31; Civil Code § 51; Gov. Code § 11135; and Gov. Code §§ 12900 et seq.) CARB staff should reach out to *legaloffice@arb.ca.gov* if they have any questions or concerns about legal compliance.

What is CARB's Equity Lens?

CARB's Equity Lens is a data-driven analysis tool made of six questions to help staff analyze how to better advance equity through CARB actions. A CARB action relates to the development or implementation of policies, regulations, or programs to improve air quality and fight climate change, as well as internal initiatives such as efforts to strengthen workplace culture. The tool helps identify equity considerations by prompting staff to gather and analyze relevant data, engage with internal and external partners, and to consider how their work may help to address or avoid potential disparities. As mentioned above, data consistently shows that California's most pollution-burdened neighborhoods are largely home to people of color and low-income households.[2] This means race and income are

---

[1] Tessum, C., et al., PM2.5 polluters disproportionately and systemically affect POC in the US, Science Advances, Vol. 7, Issue 18 (Apr. 28, 2021), available at: *https://www.science.org/doi/10.1126/sciadv.abf4491*.

[2] Office of Environmental Health Hazard Assessment, *Analysis of Race/Ethnicity and CalEnviroScreen 4.0 Scores* (Oct. 2021); American Public Health Association, *Disparities in Distribution of Particulate Matter Emission Sources by Race and Poverty Status* (Mar. 7, 2018).

factors to consider when evaluating disparities and designing solutions to improve access to clean air.

Development of the Equity Lens began in 2021, when CARB staff recognized the need for a structured, data-driven approach to identify existing and potential disparities and considering equity during decision making. See *CARB's Equity Lens webpage* for more information on the development of the Equity Lens and how input from external and internal partners, including five community experts, helped to shape the current version of the tool.

CARB's Equity Lens Questions

Figure 1: CARB's Equity Lens Questions overviews the questions that make up the Equity Lens. The next section outlines a four-step, engagement-centered process to use the tool.

Figure 1: CARB's Equity Lens Questions

For each proposed CARB action, answer the following questions:	
Scope	What is the **scope** and what is **prompting** the action?
Data	What **data** are needed to **assess equity impacts,** and **how will that data be collected?**
Equity Analysis	What **equity factors**—including past, present, and potential disparate impacts—should be considered?
Goals and Strategies	What are the **equity goals** and what **strategies** will help achieve them?
Implementation	What is the plan for **implementing equity goals?**
Metrics and Accountability	What is the plan to **track, evaluate, and publicly share** the equity impacts over time?

Engagement with internal and/or external partners should inform answers to Equity Lens questions. If applicable, plan and implement a community engagement plan using the ***Community Engagement Model.***

DRAFT

Process to Apply CARB's Equity Lens

The Equity Lens is an iterative tool. As you move through the following steps, you will return to early insights, using new data and engagement to better identify potential disparate impacts and to develop a more complete and effective approach to achieving equity goals. While application of the Equity Lens will vary by program and context, its questions are designed to be flexible and applicable across all CARB work.

Step 1: Draft Initial Answers to the Equity Lens Questions



Work with your team to draft initial thoughts on the Equity Lens questions. Make sure to identify where additional data and engagement with internal and external partners can help to better understand disparate impacts and design more equitable strategies.

Step 2: Gather Needed Data and Conduct Internal and External Engagement



Gather necessary data and engage with the internal and external partners identified in Step 1. Use the Community Engagement Model when developing and implementing a community engagement plan and gathering community-informed perspectives.

Step 3: Revise Initial Answers to the Equity Lens Questions



Return to the Equity Lens questions and revise answers as needed based on additional data and information gathered in Step 2. Document how data and community perspectives helped you revise answers. You may need to conduct more engagement and follow up with engagement partners more than once to strengthen analyses and ensure the proposed CARB action effectively advances its equity goals. Revising answers will take longer than the thought exercise in Step 1.

Step 4: Share Equity Lens Experiences and Takeaways



After completing your application of the Equity Lens, please share your experience using the tool with the Office of Engagement and Equity, including lessons learned and any challenges encountered. The Office of Engagement and Equity will use this information to support future applications of the tool.

The process to apply the Equity Lens could take a few days to several months, depending on the needs of the specific project.

Tip: Internal resources to support staff in answering the Equity Lens questions are available. Reach out out to the Office of Engagement and Equity at equity@arb.ca.gov for more information.

DRAFT

CARB's Equity Lens and Engagement

Engagement is a deliberate, inclusive, and respectful collaboration with interested parties to identify existing or potential disparate impacts and design appropriate and effective solutions. This requires active listening and a multi-directional flow of information between groups. Externally, interested parties can include, but are not limited to: communities and community-based organizations, tribal governments, industry and businesses, other government agencies, and researchers. Internally, interested parties may include other program staff, CARB leadership, and offices providing support for the Equity Lens like the Office of Engagement and Equity and the Legal Office.

Engagement with interested parties is a core part of advancing equity as both a process and an outcome. Equity as a process ensures those impacted by structural inequities are meaningfully involved in the creation and implementation of CARB actions that impact their lives. An outcome that advances equity means benefits and burdens aren't concentrated unfairly and that health outcomes improve for all groups. If we improve the process to engage and partner with interested parties, our outcomes should reflect consideration of interests and priorities from those most impacted and become more equitable. Engagement is at its most effective when it is early, sustained, and meaningful.

Because engagement plays a critical role in identifying and addressing disparate impacts, each section of the Equity Lens includes examples of how meaningful engagement with internal and external partners can contribute to answering that specific question. The Equity Lens is also designed to work together with CARB's *Community Engagement Model* to advance equity in our programmatic work. The Community Engagement Model is a comprehensive guidance document that provides staff with strategies and resources to meaningfully involve communities in work that impacts the public. Staff using both tools should start with the Equity Lens and then integrate use of the Community Engagement Model during the *Process to Apply CARB's Equity Lens*.

DRAFT

CARB's Equity Lens

Question 1: Scope

What is the scope and what is prompting the action?

Instructions: *Create a project scope outline for the action. The scope outline should include:*

- *A description of the problem, opportunity, or requirement that is prompting the proposed CARB action.*
- *Deliverables and goals (including any equity goals, if known).*
- *Collaborators (including internal teams, community-based partners, or other agencies).*
- *Resources and constraints (including timelines and deadlines).*

Why Define What is Prompting the Action and the Scope

Describing the scope of the action is the starting point for successful project planning. It makes sure everyone is on the same page. It also helps identify possibilities for incorporating equity considerations in the proposed action and where there may be limitations in developing and implementing it, which is essential when applying the Equity Lens. This information also helps you communicate to external partners what they can influence, builds trust, and supports more productive dialogue.

Engagement with internal and external partners helps to ensure the proposed CARB action addresses the right problem(s). Internally, work first with your immediate team to develop a clear sense of project expectations, constraints, and what is possible. It can then be helpful to reach out to other teams and leadership across the agency to understand related efforts and ensure your work is aligned and not duplicated. As you use the Equity Lens, make sure to work with the Office of Engagement and Equity who support implementation of CARB's equity tools. Externally, community members can offer lived experience to surface underlying issues and potential impacts to shape the action.

Tip: *Project details will continue to evolve as a proposed CARB action develops. You are encouraged to return to earlier answers and update responses as you use the Equity Lens and gain new information.*

DRAFT

Question 2: Data

What data are needed to assess equity impacts, and how will that data be collected?

Instructions: *List data that are needed to assess equity impacts related to the proposed CARB action. This includes:*

- *What data are already available and what data are missing.*
- *The plan to access or collect additional needed data. Note what additional information, including community-informed insights, may be needed. If additional data would be helpful but is not feasible to collect, explain why.*

Ideally, include quantitative and qualitative data and can be broken down by demographic factors, including but not limited to income, geography, housing status, or education to see impacts across groups. Data analysis will be examined in Question 3.

Why Data Requires Critical Thinking and Broad Engagement

When examined critically through an equity lens, using data can replace assumptions with evidence and help identify any existing and potential disparate impacts. For example, while overall emissions may be improving statewide, data broken down by demographics that are known to correlate with air pollution impacts, like race or socioeconomic factors, shows certain communities still face higher exposure to air pollution.[3] Examples of relevant quantitative and qualitative data for identifying potential disparate impacts include:

- Tools like *CalEnviroScreen* from government agencies or institutions that compile multiple health indicators.
- Air quality monitoring data, for example *AQView*.
- Results from CARB programs, for example the *Community Air Protection Program*.
- Community-driven data, like reports by community-based organizations summarizing environmental justice concerns.
- Academic studies on key pollution exposure disparities.

Engagement can strengthen data identification and collection processes. For instance, internal partners could surface existing data sources and flag known gaps or limitations. External partners, including community-based organizations and academic institutions, can help point to data or even generate important data that might not otherwise be available.

[3] Libby Koolik, et al., *$PM_{2.5}$ exposure disparities persist despite strict vehicle emissions controls in CA, Science Advances*, Vol. 10, Issue 37 (Sept. 11, 2024), DOI: 10.1126/sciadv.adn8544.

Question 3: Equity Analysis

What equity factors—including past, present, and potential disparate impacts—should be considered?

Instructions: *Analyze data collected in Question 2 to understand how equity intersects with the proposed CARB action. Describe the methodologies used, including how data is applied and interpreted. When reporting findings, aim to note:*

- *Who and what might be impacted by the proposed CARB action.*
- *Past and present disparities that could interact with the proposed CARB action.*
- *Potential disparate impacts, that could occur from the proposed CARB action, including benefits and burdens and possible differences across communities.*

Why Analysis Matters and How Collaboration Can Help

Analyzing data helps uncover patterns that show how past and present inequities shape environmental and health outcomes, helping to design actions that reduce harm instead of unintentionally reinforcing disparities. For example, considering the history of redlining—a discriminatory federal policy originating in the 1930s that denied housing investments to neighborhoods based on racial composition—can help to understand present-day disparities in exposure to air pollution based on location, race, and ethnicity.[4] Data analysis could also reveal how overlapping identities or life circumstances shape disparities and potential disparate impacts, a concept known as intersectionality. For instance, exposure to wildfire $PM_{2.5}$ is highest for rural communities on federally recognized tribal land.[5] Individuals living or working in a rural location or in certain socioeconomic conditions often experience compounded environmental burdens.

Engagement during the equity analysis helps to ensure potential harms and opportunities are surfaced. External and internal partners can provide feedback on how to approach the equity analysis, including key questions to ask, what to look for, and expertise needed to conduct certain analyses. In addition, external engagement can bring critical context to understand findings. For example, community members may help staff understand why an identified disparity exists and the history behind it.

---

[4] Haley Lane, et al., *Historical Redlining is Associated with Present-Day Air Pollution Disparities in U.S. Cities, Environmental Science and Technology Letters*, Env. Sci. Technol., 9 (4): 345-350 (2022), https://doi.org/10.1021/acs.estlett.1c01012.

[5] Joan A. Casey, et al., *Measuring long-term exposure to wildfire PM2.5 in California: Time-varying inequities in environmental burden, Proceedings of the National Academy of Sciences USA*, 121(8) e2306729121 (Feb. 13, 2024), https://doi.org/10.1073/pnas.2306729121.

Question 4: Goals and Strategies

What are the equity goals and what strategies will help achieve them?

Instructions: *Identify specific goals that aim to reduce existing or potential disparities. Include both short-term and long-term goals. For each goal, consider different strategies. This could include adjusting the proposed action, adding complementary actions, or a fundamentally different strategy. Explain how each strategy helps reduce existing disparities and/or prevent unintended impacts. Ensure that all alternative strategies are consistent with legislative direction and existing laws, including Cal Cost., Art. I, § 31; Civil Code § 51; Gov. Code § 11135; and Gov. Code §§ 12900 et seq.*

How to Develop Equity Goals and Strategies and How Engaging with Interested Parties Can Help

To develop equity goals, consider changes in process (how the work occurs), outcomes (what results are achieved), and learning (what information is gathered) that could help to reduce or avoid disparate impacts through the proposed CARB action.

Examples of equity goals by program type include:

- *Regulation development*: Identify and consider elevated exposure burdens in historically impacted communities when developing and reporting on measures to reduce air pollution.
- *Incentives programs and contracting*: Structure outreach and application processes to reduce barriers to applicants from underrepresented communities.
- *Monitoring*: Include community lived experiences when gathering data and information about air quality and impacts.

Alternative strategy assessment is a systematic process of identifying, comparing, and evaluating multiple possible approaches for achieving a specific outcome. You can use this approach to explore different strategies to achieving equity goals, which will help ensure you develop the strongest strategy to advance CARB's mission and equity commitments.

Work with internal and external engagement partners to develop and refine the proposed CARB action's equity goals and alternative strategies for consideration. Internal engagement partners like the Office of Engagement and Equity and the Office of Internal Equity can help identify equity goals and strategies. The Legal Office can help confirm that strategies comply with state and federal laws. External engagement partners, including communities, other government agencies, and academic institutions, can provide insights that help identify and prioritize equity goals and strategies for the proposed CARB action.

DRAFT

Question 5: Implementation

What is the plan for implementing equity goals for the proposed CARB action?

Instructions: *Describe the plan to implement the proposed CARB action's equity goals. Make sure to identify the specific steps that will be taken to carry out the equity goals, in what order, and when. Note how you are PREPARED for success:*

- ***P****lanned: The plan has feasible, clear, and actionable steps.*
- ***R****esourced: There is adequate funding and staff resources (including time).*
- ***E****nforced: Includes sponsors from CARB leadership to support implementation.*
- ***P****articipatory: Incorporates community input, if applicable.*
- ***A****daptable: Includes specific points in the timeline to check in on progress and allows for mid-course corrections if equity goals are not realized.*
- ***R****eported: Considers how to share progress with internal partners and the public.*
- ***E****valuated: Reviewed by key partners, including CARB leadership and external partners like communities or other agencies, if applicable.*
- ***D****ata-driven: Informed by quantitative and qualitative data.*

Why We Should Think About Implementation and Who Shapes It

Proactively assessing whether the proposed CARB action's equity goals are feasible, funded, and adequately resourced ensures it can successfully translate the goals into measurable outcomes. If potential issues are identified, it allows time to reassess and pivot before implementation.

Engagement can add a range of perspectives to identify potential issues that might have otherwise been overlooked. Engagement with communities and community-based organizations might reveal barriers to accessing resources in certain areas. Engaging with internal partners, such as the Legal Office or teams that have worked on similar CARB actions, can help identify and avoid past roadblocks or share past successes.

When planning out implementation, it is important to understand any limitations and set expectations for any engagement (this can occur in Step 1 of applying the Equity Lens, when working with your internal team). Consider what is needed for your engagement partners to participate in a meaningful way at the different stages in the process. Aim to account for varying situational contexts, capacities, and access to resources by referring to the Community Engagement Model. *Step 1.3: Identify Needed Engagement Resources*, *Step 1.4: Identify Broad Audiences*, and *Step 2.1: Identify Specific Location(s), Communities, and Their Needs* of the *Community Engagement Model* have guidance on providing resources to help community members participate more fully in the engagement process.

DRAFT

Question 6: Metrics and Accountability

What is the plan to track, evaluate, and publicly share the equity impacts over time?

Instructions: *Describe the plan for tracking, evaluating, and reporting on the equity impacts of the proposed CARB action, including the equity metrics that will be developed and monitored. Consider how success will be measured across different communities. Note what accountability mechanisms will be used to support the action's equity goals.*

The Importance of Equity Metrics That Resonate with Impacted Parties

Equity metrics are a set of quantifiable indicators designed to assess disparities in access, outcomes, or opportunities across different population groups, particularly those that have been historically marginalized or disadvantaged. Examples of equity metrics include:

- Participation levels from communities in highly impacted areas during engagement activities.
- Pollution reductions achieved in communities with the highest baseline of pollution.
- Number of community-driven recommendations implemented in final regulation or program design.
- CARB program data, including who applied and who benefited.

Analyzing equity metrics provides clear, data-driven evidence to measure progress toward equity goals and to highlight areas where additional or adjusted approaches may be needed. Sharing the results of the action, especially with affected parties, helps to build trust and demonstrate that CARB's work to advance equity is backed by measurable results.

If the proposed CARB action impacts communities, staff should consider how success will be measured across different communities. When possible, involve affected parties in the development of equity metrics and evaluation criteria.

DRAFT

Implementation of CARB's Equity Lens

Centering equity is critical to CARB's work because experiences of air pollution are not and have not historically been shared equally across California. CARB's Equity Lens is a tool to help staff systematically consider how their work may help address or avoid potential disparities and identify practical ways to better serve communities most impacted by air pollution and climate change. The Equity Lens has been designed as both an analytical tool and a process to be continually refined based on its use, learnings from staff, and community insights. This approach is rooted in the philosophy of cultural humility, which emphasizes the lifelong commitment to self-evaluation, self-critique, and developing partnerships with community partners—especially leaders and community members directly impacted by CARB's work.[6]

CARB's Office of Engagement and Equity provides staff with tailored guidance, technical assistance, and supplemental resources for the effective application of the Equity Lens in the various programs throughout the agency. CARB staff will continue to advance these goals and values through the agency's work to drive meaningful and lasting change. Read more about CARB's commitment to advancing equity on our *equity webpage*.

DRAFT

[6] Yeager, K.A., & Bauer-Wu, S., *Cultural humility: essential foundation for clinical researchers*, Appl Nurs Res. (Aug. 12, 2013), 26(4):10.1016/j.apnr.2013.06.008. doi:10.1016/j.apnr.2013.06.008.