California Community Air Protection

Assembly Bill 617 People's Blueprint

September 2021

Disclaimer

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1. Introduction

The California Community Air Protection Program (Program) was first established as part of Assembly Bill (AB) 617[1], signed into law in July 2017, to continue California's environmental leadership in establishing innovative new policies to improve air quality. The bill requires new community-focused and community-driven action to reduce air pollution and improve public health in communities that experience disproportionate burdens from exposure to air pollutants. The primary purpose was to reduce emissions and adverse effects of air pollution in disadvantaged communities, low income, and communities of color by working with community representatives in these communities to plan and implement strategies that would work given specific issues that needed to be addressed.

Many California programs designed to reduce emissions lack community-driven inclusive processes. With its focus on communities, AB 617 is a significant step toward transforming California's air quality programs to address air pollution with strategies that prioritize solutions that place community wellbeing at the center. AB 617 mandates community driven and community-focused actions to reduce air pollution in disproportionately burdened communities through statewide strategies and community-specific emissions reduction programs.

A Partnering Framework

The focus of AB 617 is community. Community representatives from impacted communities have a lead role, working in equal partnership with State and local air pollution control agencies.[2] The Program relies on a multi-stakeholder partnering framework with the aim to produce community driven and focused emission reduction strategies and actions. In partnership with California Air Resources Board (CARB), air districts, and community representatives, each identified AB 617 community develops solutions to mitigate, reduce and/or preferably eliminate, air pollution. Community representatives, local business representatives and government agencies arrive at the partnership with their own interests, assets, capabilities, and needs. The biggest strength of the Program is intentionality in bringing together various perspectives and interests to allow for community representatives to consider and design innovative solutions. Theoretically, this approach is straightforward, but in practice, quite challenging. There is a myriad of differences community (e.g., residents vs. industry) and government (e.g., air districts and statewide entities) priorities. Each AB 617 community needs to develop processes that are inclusive and equitable and, most importantly, place community health and well-being as a priority. Since the initiation of AB 617 and the release of the first AB 617 Community Air Protection Program Blueprint, there have been many lessons learned. Establishing effective partnerships provides a critical first step. Success requires diligence and a commitment to respectfully working through differences, acknowledging missteps, and building inclusive community driven processes

This "People's Blueprint" reflects the lessons learned from the first four years of AB 617 Community Air Protection Program implementation. It addresses topics that community representatives have identified needing improvement to establish effective partnerships and achieve results defined in AB 617. The evidence is clear that conflicts may occur between stakeholders - such as disagreements about strategies

[1] Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2. See Appendix H for complete bill language.

[2] We view the community as people who live and/or work in an affected community, particularly around the source fence line.

selected in the community emission reduction program, establishing the budget, agenda setting, and so forth. Conflict may also arise in cross-agency decision-making, for example, when engaging outside agencies with authority to address the exposure impacts. The People's Blueprint clarifies the roles and responsibilities of the CARB, air districts, community representatives, and community steering committees (CSCs) in the Community Air Protection Program. The People's Blueprint is solutions focuses and identifies actions to better support a collaborative problem-solving approach. The intention is to reduce conflicts and propose transparent processes that allow community and government to work side by side to fulfill AB 617 requirements and beyond.

The People's Perspective

As the Community Air Protection Program pivots from its first few years of implementation to one foreseen in the People's Blueprint, the following perspectives have been put forward.

Note: These points have been made in various meetings (e.g., Consultation Group, People's Blueprint Writing Group) and added here for context.

Air Districts

- The Program has created challenges for the air districts.
- The Program was created by statute, reflecting high level policy discussion and political compromise. It was not designed to dovetail with existing programs easily or in some cases, at all. The program was design to identify gaps in existing programs with the intent of propose new solutions to mitigate climate inequities.] Significant time and attention are needed to establish a response to these mandates in ways that air districts can manage.
- As noted elsewhere, neither the statute nor the 2018 Blueprint has clearly identified the responsibilities of CARB, air districts, community representatives, and community steering committees in detail. A great deal was left to the air districts, AB 617 communities, and community steering committees to interpret. This has required a great deal of time from all and as might be expected, conflicting views and practices have emerged that have been taxing. This conflict has resulted in significant delays and potentially missed opportunities to achieve early results from this landmark program.
- The expectations of CARB, air districts, community representatives, and community steering committees vary. Community representatives may view the Program as being primarily about ensuring achieving equity and justice within an often arcane and inflexible regulatory framework. Both CARB and air districts have significant statutory requirements to meet and are accountable and must be responsive to their respective board.
- While it is probably fair to say that the air districts and CARB may have done better implementing some aspects of this program, it is also fair to say that the challenges were significant and little time for preparation was available.
- AB 617 was designed with the purpose of developing innovative solutions in target communities challenged by climate inequities. However, not enough guidance was provided under AB 617 to help air districts implement new and innovation solutions. The air districts have been subjected to criticism at times about the products of the outdated habitual processes and results they have produced. Air districts and CARB have worked very hard to produce required products and complete mandated steps, often in an environment completely foreign to their standard pattern and practices. Many individuals both in the agencies and the community were called upon to perform in areas outside their training and or expertise and it is a testament to that commitment that some success can be attributed to the Program.
- The air districts boards and CARB are both concerned about obtaining resources to carry out the mandates of the Program and about maintaining their own authority and that this not be eroded in any way, as are the various local government agencies who suddenly find themselves included in an unfamiliar process without needed preparation.

- There is a perception from community representatives working on program implementation that districts are using the Program to fund their regional initiatives through leveraging of dedicated Program funding and not community driven solutions.

Community Representatives

- The 2018 Blueprint was written by CARB in consultation with the AB 617 Statewide Consultation Group which included eleven representatives from community based environmental justice organizations. However, several critical issues necessary for successful Program implementation were not included. Consequently, the 2018 Blueprint represented an early understanding from CARB and perhaps the air districts, but not of the expertise or insights of community representatives. This was a significant deficit to the content of the 2018 Blueprint and did not reflect an understanding of the value and significance of the participation of the community. The 2018 Blueprint did not acknowledge questions of equity and justice that are the heart of environmental justice and so must be incorporated.
- The 2018 Blueprint included a lot of discussion about CARB's role and actions that CARB would take but as there was no reference point or process that could be modeled on, did not reflect an understanding of how to define, prepare for, or manage the processes needed to implement the law. This has led to a great deal of conflict and consternation that may not have been necessary with a broader scoping process involving all the parties. Much of what is presented in the People's Blueprint deals with these issues and applies those lessons hard earned by those AB 617 communities first chosen.
- The processes involved with the first round of community emissions reduction programs (CERPs) included conflicts that remained largely unresolved and that were detrimental for the community representatives. Provisions to identify and resolve conflicts fairly and rapidly are needed.
- Much greater attention is needed to prepare future AB 617 communities and create necessary readiness and capacity among CARB, air districts, community representatives, and community steering committees.
- Questions of jurisdiction over specific target emissions are neither within the power nor the responsibility of community representatives to resolve and should be resolved by the State, air districts, or other relevant agencies. For example, any number of agencies or governmental bodies (e.g., county, city, regional authorities) can and should be contributing authority to compound authority. Any entity contributing to the community emissions reductions programs should be able to do what they can.

CARB

- In reflection, significant positive work since the Program was legislated back in 2017 has been implemented. It is important to reinforce it. Some of the work that has moved the Program along since 2017 is the inclusion of community air monitoring and community emissions reductions plans. CARB's distribution of funding is mandated and budgeted by the legislature and governor each year, to uplift early actions to address localized air pollution by funding for cleaner technologies in underserved communities while simultaneously supporting community participation with the AB 617 process and the agency has carried out that responsibility fairly and transparently.
- Looking forward, it is important to acknowledge that revisiting the Program and 2018 Blueprint in timely light of the lessons learned. Some of these lessons reflected the timely need for explicit content surrounding equity and justice. Furthermore, other lessons mirrored feedback regarding more defined parameters surrounding collaboration with various entities and clearly outlined steps needed to meet the objectives of CARB.
- Regarding the 2017-2018 timeline and the 2020 Board Actions, it is imperative that civil rights requirements and considerations be brought squarely into the Program especially considering current events further raising racial inequities.

About the People's Blueprint

AB 617 was legislated in July of 2017 in part to resolve the objections by environmental justice communities

and advocates to California's market-based approach to climate change. While environmental justice advocates raised concerns at the time regarding enforceability and accountability, overall, there was an agreement to head down the AB 617 path to see if there could be real progress towards community-scale environmental justice.

We are now four years further along, and the state of justice, environmental and otherwise, has evolved and changed in very significant ways. The murder of George Floyd on May 25, 2020 crystallized long standing discontent about racial justice in America, and since that time, public discourse and actions have also evolved significantly to the extent that programs and policies seen as forward leaning in 2017 must be reconsidered and adjusted to meet the times. Following a period of uprisings around the country in response to actions, including police violence against BIPOC, there has been a national discussion acknowledging historic injustice and inequality, the need for structural change, and the importance of anti-racist actions. Many sources and types of inequities need to be addressed. Structural racism[3] needs to be acknowledged, addressed, and eliminated.[4]

Equity issues can arise within agencies and governmental entities at all levels. CARB employees recently recognized issues for African American employees within the agency.[5] The CARB Governing Board adopted a resolution on racial equity in October 2020.[6] Renewed and expanded discussions of equity and justice are needed for internal and external contexts.

Given this context, several immediate actions can be taken to promote equity and inclusion. The Equity Manifesto developed by Policy Link defines equity.[7] Here, equity is defined as the "just and fair inclusion into a society in which all can participate, prosper, and reach their full potential. Unlocking the promise of the nation by unleashing the promise in us all." Equity always exists in a historical context.

Systemic and institutional racism, white supremacy, and restorative justice, sometimes framed as reparations, are now squarely on the table and must be considered in the policies and practices of public agencies.

It is in this spirit, time, and context that the "People's Blueprint" has been drafted, in the hope and expectation that it will be received as an attempt at a timely and constructive critique of and improvement upon the 2018 Blueprint. We acknowledge that the 2018 Blueprint was put together under time constraints imposed by the 2017 legislation and represented the good faith efforts of CARB staff in providing useful guidance to district agencies, communities, and the public at large. It is time, however, to now bring the voices of the communities and people most impacted by the program into the

The People's Blueprint brings a lens of equity and justice.

[3] Structural racism is defined as the macrolevel systems, social forces, institutions, ideologies, and processes that interact with one another to generate and reinforce inequities among racial and ethnic groups.
[4] Powell JA. Structural Racism: Building upon the Insights of John Calmore. North Carolina Law Review. 2008;86:791–816.
[5] https://ww2.arb.ca.gov/sites/default/files/2020-11/Letter-Action%20Plan%20for%20Racial%20Change%20at%20CARB.pdf
[6] CARB's racial equity resolution (Oct 2020) acknowledges that impacts from air pollutants and greenhouse gases disproportionally affect communities of color and that CARB's mission includes reducing the harmful effects of these emissions where socioeconomic and racial disparities are most pronounced. CARB recognizes the role of institutional and structural racism in continuing to threaten its ability to equitably fulfill its charge so that all BIPOC - both inside the organization, and those outside the organization for whom CARB serves and works with as constituents and stakeholders - are treated without prejudice, bias, and derision. Further, CARB welcomes and supports global, national, statewide, and local demands for racial justice and an end to institutional and structural racism in all its various forms, and acknowledges it must actively participate in changing processes, protocols, and policies within its control to ensure racial equity and social justice remain a key objective in reducing air pollutants and greenhouse gas emissions.
[7] PolicyLink. The Equity Manifesto. https://www.policylink.org/about-us/equity-manifesto

discussion and the implementation of the program.

Accordingly, the People's Blueprint reflects and lessons of the first years of the Community Air protection program. It builds on the experiences of communities, air districts, CARB, and stakeholders. The overall purpose of this document is to define steps needed to achieve the goals of Community Air Protection. The intent is to lay the groundwork for successful collaboration.

The People's Blueprint provides a working definition of what it means to have a community-centered approach, including the following:

- The partnerships are, ideally, centered on individual communities and are led by community representatives. Representatives of communities impacted by environmental hazards play an integral role in the design and execution of the planning process. More explicit identification of steps and role are intended to enhance this.

- The Peoples Blueprint encourages collaborative processes to maximize all participants contributions and to reduce and resolve conflicts. It also identified a mechanism to resolve conflicts as they occur; additional discussion of governance and roles is added.

- Increasing readiness for all parties to participate productively in the process is important. What helps communities get ready? What do they need to know about? Similarly, what can help to get district staff ready? The chapter on readiness discusses training, shared understanding, and competencies to help prepare partners to work together. We believe this will make it easier for everyone.

- Greater clarity about processes within the planning has emerged. A new chapter explicitly defines processes at different stages and lays out the steps.

2. Achieving Equity and Justice

The Community Air Protection Program was established to redress disproportionate burdens of air pollution in disadvantaged communities and communities of color that lead to environmental injustice.[8] A greater share of pollution (among other adverse factors) gets allocated toward communities of color and lower income. This disparity has persisted and not been rectified by existing strategies. This chapter references historical milestones for environmental justice that have prompted action to address the environmental injustices, grounding the Community Air Protection Program in the principles of environmental justice (EJ). The U.S. Environmental Protection Agency defines environmental justice as:

> "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. . . Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies[.] Meaningful involvement means that: (1) people have an opportunity to participate in decisions about activities that may affect their environment and/or health; (2) the public's contribution can influence the regulatory agency's decision; (3) their concerns will be considered in the decision making process; and (4) the decision makers seek out and facilitate the involvement of those potentially affected[.]"[9]

Environmental justice principles originated in 1981 when the term "environmental racism" was coined.[10] Race is an important demographic predictor of exposure to environmental contaminants. Further, Title VI of the Civil Rights Act of 1964 requires:

> "each Federal agency shall ensure that all programs or activities receiving Federal financial assistance that affect human health or the environment do not directly, or through contractual or other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin."[3]

Other key legislation and mandates include the National Environmental Policy Act (NEPA), the Clean Air Act, and President Clinton's Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations[11] and the accompanying Presidential Memorandum in 1994 that helped establish environmental justice principles. It is worth noting that a primary driving principle of the Executive Order was Title VI of the 1964 Civil Rights Act.

In the 1980s, the environmental justice movement effectively redefined the meaning of "environment", as the predominantly white environmental movement had framed it, to now encompass a broad range of issues from housing and transportation to worker safety and toxic pollution. The redefined meaning of environment was made clear to all when in 1991, the First National People of Color Environmental Leadership Summit

[8]Lawrence Lingbloom. AB 617 Assembly Floor Analysis. https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201720180AB617#.

[9] U.S. EPA, Environmental Justice: Basic Information, http://www.epa.gov/environmentaljustice/basics/index.html (last visited June 8, 2012).

[10] Alan Ramo, Environmental Justice as an Essential Tool in Environmental Review Statutes: A New Look at Federal Policies and Civil Rights Protections and California's Recent Initiatives, 19 Hastings West Northwest J. of Envtl. L. & Pol'y 41 (2013)

[11] Exec. Order No. 12,898, 59 Fed. Reg. 7629 (Feb. 16, 1994); Memorandum on Environmental Justice, 30 WEEKLY COMP. PRES. DOC 279 (Feb. 11, 1994).

took its place as a defining event in the history of the environmental justice movement.

Environmental justice understood as a human and civil right. As a civil right, it is enforceable under Federal and State law by way of the federal Civil Rights Act of 1964 and California Government Code 11135. These laws impose on agencies and other Federal or State aid recipients an obligation to ensure that their programs and policies do not have a discriminatory effect. All participants in the State's AB 617 program, whether recipients of assistance, are implicated in this obligation and should bear it in mind as they participate in the program.

Disparities in pollution burden can result from differences in levels of scrutiny and enforcement by regulatory agencies. There are differences in the attention to technological innovation for emissions from passenger vehicles compared to stationary sources of air toxins. Both clustering of sources and lower level of control of sources in environmental justice communities contribute. Conventional monitoring and modeling strategies have not detected pollution levels or disproportionate burdens at the community scale.

Some problematic practices originate in actions by local governments and financial institutions. These include:

- discrimination in housing;
- construction of municipal boundaries that contribute to segregation;
- redlining and racially based policies for home loans;
- land use practices that fail to separate polluting activities from places where people live, work, and play; and
- transportation and freight transport that elevate emissions in certain places.

Each and all of these can play a role in creating disproportionate and discriminatory environmental and public health burdens on disadvantaged communities. It is essential to be cognizant of this history and take active, overt steps to overcome it.

Leading with respect and dignity

It is important to ensure that all AB 617 participants are treated with respect and dignity. Conflicting interests are likely always to be at play, and participants must be willing to engage respectfully with each other in addressing the conflict. The first round of AB 617 communities operated without any direction or tools from CARB to carry out principles of respect and dignity in any meaningful process. Without this guidance, the first round of AB 617 communities experienced conflict related to steering committee selection, boundary lines, governance, among others. To that end, listed below are strongly recommended steps for anyone who wants to be involved in AB 617 processes should take to prepare themselves to have these conversations but still holding respect.

A first step is to provide comprehensive training to prepare all participants to maintain respect and dignity for others and within a group. A baseline list of training topics is included in Chapter 4 of the People's Blueprint.

A second step is to provide written principles for engagement or a code of conduct that reflect the training. Participants should agree to the principles for engagement soon after they become engaged in the process. Examples of code of conducts developed by current AB 617 communities can be found in [list of resources].

A third step is to review such principles or code of conduct as necessary during meetings for those who have not received the training or need to be reminded.

A fourth step is to prepare participants to address situations that may arise promptly. Leaders and key participants should be encouraged and empowered to interrupt actions or interactions contrary to the principles. This step is also called a Request to Back Up.

Failure to abide by these principles is grounds for individuals to be removed from the program by their institutions. Any participant who does not demonstrate respect for others and support dignity for all should not be sent to work in communities. Chapter 2: Governance chapter describes a process for removing participants.

It is understandable that actions and interactions can fail to reflect respect and that exclusion can occur without explicit intent or awareness. Training and coaching are often useful to reduce this. The development of awareness of equity can increase over time. Leaders and managers at institutions should be responsible for preparing personnel for engaging with impacted communities with respect, dignity, and cultural humility. A detailed list of related core training topics is included in Chapter 4: Readiness for Partnership and Collaboration.

Adoption of Institutional Policies and Practices for equity, inclusion, and civil rights

Relevant institutions at the local, State, and federal levels should all have policies and practices to promote equity and inclusion in their actions. This section outlines key advancements made by relevant institutions. It includes recommended actions to institutionalize further policies and practices that promote equity, inclusion, and civil rights in the implementation of AB 617 and the Community Air Protection program. As noted in a previous section, obligations under the Federal Civil Rights Act and California Government Code 11135 apply to AB 617 program participants. For example, The California Strategic Growth Council for the State of California, which includes representatives from the California Environmental Protection Agency, recently adopted a policy to promote equitable practices among the State agencies.[12] This policy framework is one with commitments to take further action to advance equity in the State's organizations, operations, programs, and policies.

CARB is subject to several Federal nondiscrimination and civil rights policies[13]. For example, CARB is, and has been for several years, obligated under Federal requirements to have a designated official responsible for compliance with Title VI of the Civil Rights Act of 1964.[14] California Government Code 11135 mirrors, almost verbatim, Title VI and its implementation by all State agencies is overseen by the California Department of Fair Employment and Housing[15].

The CARB Governing Board recently passed a resolution on racial equity and committed to establishing equity centered policies and actions for the agency.[16] The resolution is largely focused on internal actions and was adopted in response to an analysis presented by employees of color that is referenced in a footnote in previous sections.[17]

Several Federal and State[18] statutes mandate external actions by California agencies and recipients of federal or State assistance to reduce disproportionate impacts and promote environmental justice. The CARB

[12] California Strategic Growth Council. Updated Racial Equity Action Plan (2019-2022). https://sgc.ca.gov/about/docs/20200922-Updated_2019-2022_SGC_Racial_Equity_Action_Plan.pdf

[13] Equal Employment Opportunity Office https://ww2.arb.ca.gov/equal-employment-opportunity-eeo-office; https://ww3.arb.ca.gov/eeo/eo-eeoo-32%20discrimination-complaint%20form-rev04-16.pdf

[14] See EPA form 4700-4. https://www.epa.gov/sites/production/files/2014-09/documents/epa_form_4700_4.pdf

[15] The employment opportunity office only oversees employment (incl. under Title VII of the CRA) and not the nondiscrimination requirements of Title VI or 11135. For many years 11135 was seen as the responsibility of each state agency, with the result that most CA agencies, incl CARB and CalEPA, ignored it. In 2014 the Legislature "reformed" 11135 and centralized it at DFEH, with at best mixed results since. But they are trying.

[16] A commitment to Racial Equity and Social Justice Resolution 20-33. https://ww3.arb.ca.gov/board/res/2020/res20-33.pdf

[17] https://ww2.arb.ca.gov/sites/default/files/2020-11/Letter-Action%20Plan%20for%20Racial%20Change%20at%20CARB.pdf

[18] Civil Rights Act of 1964, Title VI; California Code 11135.

Governing Board adopted a policy for environmental justice in response to these in 2001.[19] More recently, AB 617 mandated actions toward this end at the community level, though the pace is slow.

It is apparent to many community representatives that analysis and action by CARB to better direct its own actions for the agency are needed. The Governing Board has recognized this in its discussions of AB 617. Well-developed strategies and metrics to support sustainable communities and eliminate disparities are needed. The following list identifies some steps for relevant institutions to advance the institutionalization of policy and practices that promote equity and inclusion:

- **Adopt a policy to ban discriminatory actions or behaviors** and establish the rights of participants in the AB 617 process and other areas of action for the agency. The CARB resolution referenced above regarding equity is a valuable step. Still, it does not address, with sufficient specificity, external activities related to outside entities and does not address the Community Air Protection program.
- **Appoint a Community Air Protection Program equity officer at CARB**. The officer should oversee the implementation of equity, inclusion, and civil rights policies for AB 617, including those cited in this blueprint. The equity officer should monitor instances that arise and seek institutional responses to patterns of action or practices contrary to equity, inclusion, and civil rights. The officer in consultation with local Air Districts and community steering committees should serve as the liaison to CARB staff and other leadership across the State. As a liaison, the role is to document and communicate compliance issues and provide support in the conflict resolution process selected by the CSC.
- **Operationalize compliance with Title VI of the Civil Rights Act** and its counterpart in State law, California Code 11135. Developing this capacity will require training and some degree of coordination with the Department of Fair Employment and Housing[20], CalEPA, and possibly the State Department of Justice. Attention must be paid to both the procedural requirements and the substantive[21] requirements.
- **Define and implement a process to address issues that the participants do not have the time or tools to adequately manage** at the time of occurrence. The process to be developed should allow for confidentiality, investigation, and actions for redress, and protection from recriminations by complainants.

Institutionalize equity analysis for substantive actions and plans

Anyone involved in the AB 617 implementation must understand and have an awareness of the history of communities that have been disproportionately impacted by environmental hazards, the history about how people living in these communities came to be in those situations, and history of the role agencies. As AB 617 communities analyze data in developing and implementing the Community Air Protection Program, the historical context and actions are needed to address disparate impacts. They must fully represent the priorities of communities most impacted by environmental hazards. In this section, we include questions all participants are to consider methodologically and systematically when evaluating Community Emission Reduction Program (CERP) actions:

- How could the recommendations in the CERP redress disproportionate impacts?
- Who is or will experience burden based on the recommended actions?
- Who is or will experience benefits?
- What strategies or alternatives might mitigate or avoid potentially discriminatory consequences for Black, Indigenous, or other People of Color (BIPOC)

The strategies and actions identified from the consideration of these questions should be documented,

[19] California Air Resources Board. Policies and Actions for Environmental Justice (2001). https://ww3.arb.ca.gov/ch/programs/ej/ejpolicies.pdf

[20] Department of Fair Employment and Housing, which is the lead agency for California Code 11135.

[21] "Substantive" requirements differ from procedural in that they address the programmatic policies and practices that have an effect on material conditions, public health and wellbeing at the community and individual level.

shared with participants, approved, rejected, or modified accordingly by the impacted community. Considering these questions should be a practice that is part of the work to integrate equity into the AB 617 process. It must be integrated into the larger context of CARB's approach to tracking (for purposes of improvement) disproportionate exposure to air pollution based on race, ethnicity, income. Similar analysis should be done to track investments in communities, i.e., both financial benefits and outcomes in terms of air quality improvements. Underlying evaluation, reporting procedures, and development of metrics need to take race and ethnicity into account.

Excerpts from AB 617 legislation and California Code, Health and Safety Code - HSC § 39711 specify that:

"The California Environmental Protection Agency (CalEPA) shall identify disadvantaged communities for investment opportunities related to this chapter. These communities shall be identified based on geographic, socioeconomic, public health, and environmental hazard criteria, and may include, but are not limited to, either of the following:

1. Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation.

2. Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment."

3. Governance

Governance of Community Steering Committee (CSC)

Pursuant to AB 617, the Community Air Protection Program provides a formal mechanism to better support community efforts to address air pollution and integrate community-driven solutions that go beyond existing State and regional programs to reduce pollution burdens in their communities. To that end, CARB and air districts will work with residents to identify individual communities where focused emission reductions are needed. CARB and air districts will work with the community to develop local air pollution reduction and mitigation plans and air quality monitoring plans in these communities. CARB and the air districts will also work with other State, regional, and local agency partners to include community-level benefits in the development and implementation of all statewide and regional programs to reduce air pollution.

During the first-year implementation of AB 617, neither the AB 617 statute nor the 2018 Blueprint lay out the responsibilities of the different parties in achieving this mission. Much was left to the air districts and corresponding communities to work out.[22] This work not only consumed precious time, but as might be expected, conflicting views and practices emerged that led to conflict and confusion, further derailing the process. This individualized approach often reinforced existing disparities in power between community members and government leads, and highlighted equity concerns in the differential implementation of the program across California. Sections below lay out expanded and clearer discussions of governance issues for Community Steering Committees (CSCs) and proposed solutions to these issues.

Forming an Effective CSC

Community members have intimate familiarity with their neighborhoods and a vision for what they need their communities to become. AB 617 creates a way to incorporate community expertise and direction into the development and implementation of clean air programs in these communities. To create new, and foster existing, local partnerships, according to the 2018 Blueprint, air districts were to be responsible for convening a CSC committee using an open and transparent nomination process. Since then, Steering Committees have come together in a variety of ways. Regardless, the nomination process must be accessible to all residents from designated communities. To ensure that the CSC focuses on the needs of the residents, a majority of the members must be community residents. The CSC will include community members who live, work, or own businesses (non-management nor big industry) within communities designated for focused action through CERPs and community air monitoring. For example, additional members may include:

- participants from local community-based organizations (including social justice organizations);
- public health organizations that work in the selected community;
- schools; city/county officials; land use planning agencies;
- transportation agencies; local health departments (e.g., hospitals, clinics, physical rehabilitation centers, public health counseling services);

[22] The 2018 blueprint did not illustrate different forms of governance or steps to identify a governance structure. AB 617 communities had to adopt different structures on their own. The legislation, CARB board, or CARB staff did not provide any orientation or education on what governance should look like.

- academic researchers; and labor organizations, as appropriate.
- Industry representatives, at the discretion of the convenors.

The final community steering committee (CSC) membership should reflect the diverse makeup of the community it represents.

Establishing Charters and Governing Structures for CSCs

Once formed, each CSC must prioritize establishing a charter or some sort of written protocol to govern the CSC. The governing guidelines should address all levels of partnering or collaboration, for instance (1) between the District and local co-convenors, (2) among members of the CSC and governing the functioning of the CSC. These agreements should explicitly reference goals, roles, responsibilities, decision-making and conflict resolution processes. Explicit values of the group (e.g., racial equity, environmental and social justice) and a clear leadership structure[23] should be included as part of the governance documenting process. Decisions must be made by the CSC itself and should be codified in the CSC charter. As part of this initial launch phase, it is the responsibility of the CSC to reach agreement on collective goals that lay out specific elements that the CSC wants to achieve and through what processes it will accomplish such goals. Based on time, place, and conditions, the CSC may need to realign its governance structure to address roles and expectations among the involved parties. For example, the CSC, Air District, and EJ community may need to agree on how items will be added to the agenda, how outside presenters are brought into meetings, or strict protocol related to strategies.

At minimum governing documenting structures should:

- **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. Committees should establish co-chairs who represent an environmental perspective and will have equal authority over planning and facilitation of meetings. Co-leads should be ex-officio members of the CSC in voting manners to prevent any conflicts of interest.
- **Include an option for an independent and neutral facilitator** who will work closely with the CSC, air districts, and CARB to establish a facilitation strategy which include meeting roles and responsibilities. A culturally responsive framework and scope of work for use by external facilitator should be developed in collaboration with AB 617 communities, air districts, and CARB staff. Prospective CSC members, community organization and representatives should be part of the decision-making process when the air districts contract external facilitators. As a best practice, an independent facilitator under the direction of the co-chairs and contracted by the air district should facilitate the meetings to help maintain neutrality and document decision making processes.
- **Specify how decisions will be made**[24] and whether achieving consensus, majority vote,

[23] Based on the experiences of the first round of communities, a co-lead in West Oakland, co-chair in Imperial County, or a co-host in San Bernardino, consisting of community representative and a district representative appears to work best.

[24] One of the ways that community power was represented was through a provision which required that the CSCs have a membership with majority of residents. However, this majority could have been diluted if the decision-making process used a consensus instead of a majority vote. In some cases, the air districts began the CSCs with the consensus model, but community organizations and residents pushed back against the consensus model. In many cases, CSCs prevailed in implementing a majority vote process.

supermajority, or other method will be used to achieve "approval."

- **Specify key moments when the CSC declares approval or disapproval**, such as with the passage of the Charter, the community boundaries, the CERP, the Community Air Monitoring Plan (CAMP), the purchase of air monitoring technology, all budget decisions, and other events as defined by the CSC[25]. In most public meetings where decisions that impact community wellbeing, adopting the Brown Act[26] or Robert's Rule of Order[27] may provide an important safeguard such as appropriate time for review of documents by the members of the CSC and public. CARB will make available a training on these meeting procedural practices (see Readiness chapter for more guidance). **Include provisions for dispute resolution** (see section on Conflict Resolution below); **Define what constitutes a quorum;**

- Define how new members may be added, existing members may be removed for "cause," define "cause," and how the 51% community majority will be maintained at all times.

- **Define expectations for when and how information is distributed** and with what deadlines, such meeting announcements and agendas;

Include a strong conflict-of-interest policy;

- **Define the threshold languages to be supported and how**; and

- **Identify who and how the recordings of discussions and decisions will be documented**, and where these documents and other supporting materials will be stored.[28]

[25] During the implementation of AB 617 in 1st and 2nd-year communities, air districts have repeatedly failed to receive consent for various actions, big and small. In Fresno, the air district failed to allow the CSC to vote on the Community Air Protection Plan for their community, a defining moment in the process. The San Joaquin Valley Air Pollution Control District also failed to receive consent from the CSC on air monitoring technology purchases, determining the type and kind of air monitors to be used in the community without consent from the community. There is fear that as first-year plans are implemented, budget decisions and program changes will be made, again, without the consent of the Steering Committees.

[26] The Ralph M. Brown Act, located at California Government Code 54950 is an act of the California State legislature that guarantees the public's right to attend and participate in meetings of local legislative bodies. (https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=2.&chapter=9.&part=1.&lawCode=GOV&title=5.)

[27] Robert's Rules of Order is a manual that establishes rules and practices. In government meetings of a diverse range of organizations that have adopted it as their parliamentary authority. (https://robertsrules.com/)

[28] Improved transparency is key to ensuring the community plans are, in actuality, community-driven. In Stockton, residents consistently brought up the need for increased enforcement in the Port of Stockton. However, this issue did not make it into the meeting notes, and therefore failed to make it into the draft CERP. A lack of transparency around meeting minutes and other documents allows air districts to unduly take power from the community. To remedy these issues in Stockton and communities across California, the Blueprint should ensure Community Steering Committee members and the Air District co-review meeting minutes, the Air District publicly provides proof of receipt of documents, comments and complaints that were submitted electronically, and Air Districts publish detailed budgets and expenditures.

An effective protocol or partnering agreement[29] documents the following:

- Background - description of project, key players, actions taken on the project thus far.
- Goal Statement – broader goal of project, specific enough to be achievable.
- Objectives – specific achievable goals expected to be completed in this project.
- Roles of co-leads - To maintain the balance of power, each project will assign a co-lead to help the project management and team facilitation for each of the entities.
- Roles of partners – outline any partners involved and their specific roles.
- Roles of workgroup or committees – outline the roles of any workgroups that may be connected to the project.
- Facilitation - Partners should decide whether facilitation will be done internally or externally, and by which partners. Facilitation is general needed for a dispute or a general meeting between any of the partners for the purposes laid out in this agreement.
- Duration of the contract
- Decision-making and conflict resolution

Collaborative Problem Solving (CPS)

Some communities may choose to pursue a more community-driven "problem solving" approach. "Collaborative problem solving" (CPS) has been a general term of art in the field of conflict resolution for several decades. In one of the earliest AB 617 communities (West Oakland), a structured community-driven CPS approach had evolved several years prior to the advent of AB 617. As applied here, collaboration was understood as one approach along a spectrum of approaches to managing "conflicting", or differing, interests. In this community-driven CPS approach, it is essential to have agreement by all participants in the process on the following elements, some of which overlap with those listed above:

- Defined goals.
- Roles of the co-leads. There should be a community co-lead at every level of the project.
- Facilitation, conduct of meetings.
- Roles of participants at the "table". Critical elements include:
    - Commitment to identifying obstacles or barriers and working creatively and collectively to identifying solutions to overcome those barriers;
    - Identifying existing and needed capacities and resources. These may take the form of regulatory or discretionary authorities; administrative, technical, financial or legal assistance; meeting space; etc.
- Decision-making, conflict resolution.

In its most productive form CPS has intentionally sought the participation of all parties necessary to come up with a solution to the problem a hand. For instance, if a local business operation is seen as posing an environmental burden in a community, the operator/owner of that business may be invited to the table. On the other hand, if the business owner/operator is not seen by other participants as ready and willing to work creatively and collaboratively towards a solution, then the solution will likely have to be developed without their involvement.

[29] https://ww2.arb.ca.gov/sites/default/files/2018-06/collaborative_partnering_agreement_west_oakland.pdf

Roles and Responsibilities

For effective community engagement and equitable outcomes, it is important to identify the roles and responsibilities and areas of independent action among the different parties, including the CSCs, the local air districts, and the state Air Resources Board. It is also important to ensure CARB and regional air districts uphold values of respect, equity, and accessibility to ensure their collaborative approach with CSCs is one of cultural humility and understanding. The following section provides an overview of the recommended roles and responsibilities and restrictions for each identified party.

Community Steering Committees (CSC)

As previously described, CSCs should institute community co-leads with authority over planning and facilitation of meetings and shared leadership roles. Budgetary decisions regarding incentives, and formally voting on the Charter, the CAMP, the CERP, and other actions as defined in their Charter should be executed in collaboration. CSC should be included in the decision-making process for technical consultants or service that are contracted with AB 617 funds. Committees should have the ability to vote to approve submitted RFPs for services rendered.

Local Air Districts

AB 617 directs air districts to develop local emission reduction and mitigation programs in partnership with community members, CARB, and other stakeholders. The air districts have the powerful tools of consultation at its disposal to arrive at mutual agreement with the CSC and will be responsible for utilizing this to inform CSC decisions. Air districts do not have the authority to override CSC votes and decisions regarding budgets and funding allocations, and other decisions as determined by the Charter. Within a truly honest, trustworthy, and selfless consultative process, this kind of intervention won't be necessary. Additionally, if there is any disagreement concerning the direction a CSC is headed on a decision, an air district's concerns should be expressed to the CSC before the decision is made. Lastly, it should also be made clear that air districts cannot dissolve a CSC or remove committee members without cause ("cause" must be defined in the Charter).

As a best practice, the air districts should also assign a community officer with an environmental justice background to act as the main intermediary between the community and the agency.

California Air Resources Board (CARB)

CARB staff have a critical role to pay in the successful implementation of AB 617. In general, CARB is responsible for statewide measures to ensure compliance with State and Federal air quality standards. This includes authority to reduce criteria air pollutants and toxic air contaminants related to mobile sources, fuels, and consumer products. CARB also issues control measures for stationary sources of toxics, which are implemented, in part, by air districts. CARB has broad authority to develop measures to reduce greenhouse gases and while greenhouse gases are not harmful to human health at ambient levels, greenhouse gas reductions may also reduce criteria air pollutants and air toxic contaminants. Statewide measures may include a variety of approaches to reduce emissions, and, in some cases, CARB regulations may include provisions to reduce specific exposures near sensitive receptors.

CARB staff, as active participants in the community-driven process, should support conflict resolution processes, clarify People's Blueprint guidelines and implementation, intervene in equity concerns, and provide technical support as needed. Direction and guidance provided from CARB should align with those provided by air district. CARB staff are expected to develop the competency needed to be effective leaders at each of the local CSCs by participating in needed trainings, engaging in active dialogue and constructive

consultation with community members, not just active listening,[30]and participate in CSC meetings as presenters providing technical expertise and consultation. CARB has the capacity to present on a variety of topics related to the community air monitor plans, community emissions reduction program strategies, program implementation, among others. Presentations should be transparent and clear about the purpose and relevance while also ensuring presentations are accessible for community members at large. CARB's engagement should be culturally responsive and appropriate for the region and community profile and context.

It is also the responsibility of CARB to review each air district's community emissions reduction program to ensure they meet the requirements and that plans will indeed reduce air pollution exposure in the designated community. After CARB's review process and after a public comment period, each community emissions reduction program will be presented to the CARB Governing Board for action. The CARB Governing Board may take one of four actions in considering a community emissions reduction program: approve, conditionally approve, partially approve, or reject (collectively represented as a CARB Governing Board action). CARB is committed to working closely with the air districts and the community steering committees throughout community emissions reduction program development to track progress and ensure effective implementation.

There will be consequences when air districts fail to prove progress (as evidenced by the assessment of the CSC), or when they move ahead with decisions without consent and consensus from the CSC. These consequences will be linked to funding. For example, when an air district fails to receive a majority "AYE" vote from the CSC regarding the CERP, CARB will withhold funding for the CERP's implementation. CARB will also withhold funds from air districts when they fail to prove progress or when they fail to comply with the Blueprint. CARB is a part of the California Environmental Protection Agency, an organization which reports directly to the Governor's Office in the Executive Branch of California State Government (See https://ww2.arb.ca.gov/about/organization-california-air-resources-board for divisions and offices).

Local Agencies: Cities, counties, and other local agencies are responsible for land use planning and zoning, which cover siting, design, and permitting for new or modified facilities. Zoning codes can include design requirements to mitigate exposure (e.g., mandatory setbacks buffers, barriers). Any given development project may require permits or approvals from multiple agencies. For example, land use planners provide zoning permits, air districts are responsible for permitting allowable emissions from facilities, and transportation agencies approve projects like roadway expansions.

Conflict Resolution

Conventional ways of addressing air pollution have not been successful in identifying or mitigating disproportionate burdens on communities. The AB 617 program charges air pollution control agencies to contribute to a process to fix this in partnership with new players from the community. It will be especially important to critically examine how their current operations, conceptual approaches, and way of conducting work need to adapt to achieve these equitable outcomes. Some of the conflict is around how agencies will adapt and find ways to solve problems while respecting and following CSC decisions. To align expectations among all parties involved, CARB [should/will] develop a best practice handbook as well as orientation for all

[30] CARB has taken a very backseat approach to engagement during first- and second-year community processes and failed to provide information when it was needed. By staying quiet, CARB lays the burden of dispelling misinformation, correcting processes, and relaying Blueprint and other air quality information unjustly upon the community. For instance, advocates have routinely had to quote the Blueprint, provide excerpts of the document and appendices, and provide details about community boundary selection, metrics, and other elements of the Blueprint during meetings. This "policing" of meetings for compliance with the Blueprint should be led by CARB, the originator of the Blueprint.

AB 617 communities. The handbook will provide guidance on how to address conflicts as well as best practices for facilitation. For the established air pollution control agencies, there is a need to approach the process with an intent to find ways to say "yes" to solving problems rather than to finding new ways to say "no."

When conflict arises the first step is to try to work out the conflict among those who are involved. That is, setting aside time for honest and constructive dialogue. Seeking facilitation and clarification from respected parties who are not part of the conflict is a standard practice that often works too. It is also recommended for the parties involved to refer to their Collaborative Partnering Agreement for guidance on how the issue may be resolved.

If conflicts remain after informal efforts to resolve them, a formal process is needed. Facilitation or mediation is a valuable process to engage in if parties can not arrive at solutions by themselves. CARB will be responsible for providing a list of independent and professional facilitators or mediators who are an expert in conflict resolution and understand environmental justice. The CSC and local air district may also contribute to the list of potential facilitators and mediators.

As a best practice, CARB should arrange to obtain services by retaining an appropriate practice so that this step can be activated when needed without delay. Upon the activation of these service, the selection of the facilitator or mediator should be approved by the CSC – especially the resident members of the committee. CARB will ensure that this formal mediation process and funding are available to CSCs and Districts as needed. The goal of the mediator is to facilitate a settlement that is agreed upon by all parties involved. Therefore, enforcement of this agreement will be through the legislation. Once a decision is made, it should be publicly shared with the community and memorialized.

As previously mentioned, failure to abide by principles of equity and justice is grounds for removal from program participation. Any participant including, CARB staff, air district staff, CSC, community representatives in the public may be removed from participating in AB 617 program related activities. Removal can happen because of failure to abide by principles of equity and justice, demonstrating respect for others, and support dignity for all. The CSC may also include other grounds for removal in their Collaborative Partnering Agreements or Charters, such as for failure to attend several consecutive meetings without notice. The only participants with the power to remove someone on any grounds is the CSC. CARB staff, air district staff, or consultants may not remove participants. However, these groups may bring a request to remove a participant to the CSC during public comment. The CSC can decide to remove any participants by vote or consensus, depending on their governing structure. An ad hoc committee of the CSC may be formed to investigate the situation and person in question.

Difference between Arbitration and Mediation

Although mediation and arbitration have the same goal in mind, a fair resolution of the issues at hand, there are some major differences which both parties must understand beforehand.

The main difference between arbitration and mediation is that in arbitration the arbitrator hears evidence and decides. Arbitration is like the court process as parties still provide testimony and give evidence like a trial, but it is usually less formal. In mediation, the process is a negotiation with the assistance of a neutral third party. The parties do not reach a resolution unless all sides agree.

Mediators do not issue orders, find fault, or make determinations. Instead, mediators help parties to reach a settlement by assisting with communications, obtaining relevant information, and developing options. Although mediation procedures may vary, the parties usually first meet with the mediator informally to explain their views of the dispute. Often the mediator will then meet with each party separately. The mediator discusses the dispute with them and explores with each party possible ways to resolve it. It is common for the mediator to go back and forth between sides several times. The focus remains on the parties as they work towards a mutually beneficial solution. Most disputes are successfully resolved and often the parties will then enter into a written settlement agreement. Many people report a higher degree of satisfaction with mediation than with arbitration or other court processes because they can control the result and be part of the resolution.

Arbitration, on the other hand, is generally a more formal process than mediation. An arbitrator could be a retired judge, a senior lawyer, or a professional such as an accountant or engineer. During arbitration, both parties are given an opportunity to present their cases to the arbitrator. Much like a regular court proceeding, lawyers can also question witnesses from both sides. During arbitration, there are usually little if any out-of-court negotiations between parties. The arbitrator has the power to render a legally binding decision which both parties must honor, and the award is enforceable in our courts and the courts of 142 countries.

From: http://bcicac.com/about/what-is-mediationarbitration/difference-between-arbitration-and-mediation/

Excerpts from AB 617 legislation specify that:

"This bill would require the state board to select locations around the state for the preparation of community emissions reduction programs, and to provide grants to community-based organizations for technical assistance and to support community participation in the programs."

"The [CARB Governing Board], in consultation with districts, shall establish a uniform statewide system of annual reporting of emissions of criteria pollutants and toxic air contaminants for a stationary source."

"…the state board shall prepare, in consultation with the Scientific Review Panel on Toxic Air Contaminants, the districts, the Office of Environmental Health Hazard Assessment, environmental justice organizations, affected industries, and other interested stakeholders, a monitoring plan regarding the availability and effectiveness of toxic air contaminant and criteria air pollutant advanced sensing monitoring technologies and existing community air monitoring systems, as well as the need for and benefits of establishing additional community air monitoring systems. In preparing the monitoring plan, the state board shall conduct at least one public workshop in each of the northern, central, and southern parts of the state."

4. Readiness for Partnership and Collaboration

Building the capacity for partner collaboration and shared understanding

AB 617 brings diverse participants to work together to create a vision and plan to reduce disproportionate burdens of air pollution. A key element of the Community Air Protection Program is to create a common base of knowledge and understanding of the program, air quality standards, contaminants and mitigation opportunities for all AB 617 participants early in the planning process or even before being selected as an AB 617 community.[31] The legislation also includes additional requirements that work together to support emissions reductions in communities through: accelerated installation of pollution controls on industrial sources like oil refineries, cement plants, and glass manufacturers; expanded air quality monitoring within communities; increased penalties for violations of emissions control limits; and greater transparency and improved public access to air quality and emissions data through enhanced online web tools.

Another key element is to integrate opportunities for ongoing peer learning. All participants[32] should receive initial training to prepare to engage in key AB 617 milestones, such as developing and implementing the community's governance structure, community air monitoring plans, and community emission reduction programs. Each CSC participant will serve different roles requiring additional preparation and therefore appropriate training should be offered to allow community representative to execute their roles and responsibilities.

A core training that all community representatives must complete first is one designed to reinforce engaging with respect and dignity. AB 617 community representatives and agency representatives need to lead with compassion. There should be co-leadership between community representatives, CSCs, air districts, CARB, and other relevant staff in developing training materials and conducting training. If CARB or air districts does not have internal capacity to conduct or convene trainings, appropriate subcontractors may support. One size does not fit all communities. Needs and priorities will vary by community therefore, appropriate strategies and approaches of training will vary as well. Much of the needed trainings will offer strategies on how to work side by side with individuals representing different organizations and views (e.g., sometimes agency staff and community residents might have competing priorities. How will the CSC manage expectations and arrive at solutions?). Other types of training include developing skills to support partnership, collaboration, and conflict resolution. The sequence of trainings should be adapted to meet the needs of a community. Some may be important to prioritize before a community is selected or within the first set of months after a community is selected for AB 617, while other training topics may be more appropriate throughout key months in the first two years.

Training can be conducted throughout the Community Air Protection Program, both in-person and through the online Community Air Protection Program Resource Center[33] in the form of a webinar, learning session

[31] The 2018 Blueprint did not include sufficient attention to preparation and readiness for this process. Greater recognition is needed of the role that communities would need to play in defining how this could work. This model brings together people with different perspectives and backgrounds to solve problems.

[32] Participants include community organizations and representatives, air districts, CARB employees assigned to the community air protection program, and other staff at relevant institutions.

[33] Community Air Protection program is a one-stop shop to obtain data, guidance, and tools to support improving

or tailored hybrid models. A good resource for developing effective training schedules and topics are the AB 617 communities from the first two years of implementation. These CSC are best positioned to identify tools and resources that should be included in the Resource Center.[34]

Preparation and Training for Participants

- **CARB, air districts, and relevant agencies:** Exhibits 1 and 2 outline fundamental training topics for the Community Air Protection Program participants. Some specialized training topics and essential competencies are strongly recommended for all staff of air districts, California Air Resources Board, and other relevant agencies involved in the Community Air Protection Program. Training should support effective community engagement in all phases of the Community Air Protection Program. Some of the competencies will require ongoing training to develop readiness to work with evolving and diverse communities in the program.

- **Community representatives:** Exhibit 1 include fundamental training topics for community representatives participating in the Community Air Protection Program. Training for community representatives should support program orientation and describe the role of each agency to promote capacity building and active program participation. Based on need, some technical concepts discussed during the development of key program milestones should be accompanied by a training.

Exhibit 1. Core training topics for AB 617 participants

Legend

CARB staff, other relevant agencies

Air district staff

Community organizations and representatives

Core training topic	Strongly recommended
1. Leading with Compassion, Understanding, Equity and Inclusion.	
2. Key concepts of environmental justice, and historical examples of concerns in the relevant area affecting the target community.	

air quality at the community scale. The Resource Center serves as a central repository of information and resources for use by community members, air districts, and the public. https://ww2.arb.ca.gov/ocap_resource_center

[34] Community organizations are encouraged to identify key documents to share widely via the Community Air Protection Program Resource Center. Examples include partnership agreements, community guides for addressing environmental concerns, curriculum for popular education that other AB 617 communities can benefit from.

3. History of Environmental Inequities: How disproportionate burdens have been created and sustained in communities across the state.	
4. Title VI of the Civil Rights Act of 1964 and its California counterpart, California Code 11135 in relation to environmental justice. Obligations, liabilities, proactive approaches	
5. Basic tenets of AB 617, and roles of community representatives, air districts, and CARB in the process	
6. Collaborative Problem-Solving methodologies as applied in a multistakeholder context that focus on achieving a shared vision and problem solving	
7. Roles of air quality agencies and others in regulating air pollution	
8. AB 617 program steps, products, and results	
9. Principles of equity and inclusion, cultural humility, and how they relate to this program	
10. Options for governance structure and decision-making processes, including Brown Act and voting processes compared to consensus building and how to participate in each	
11. Developing partnership agreements for collaboration, community steering committee charters	
12. Conflict resolution practices and mediation	
13. How to work in partnership with community representatives and lead with respect and equitable engagement	
14. Historical context: Understanding sources and implications of structural racism, why these need to be addressed, and what their responsibilities are to take actions	

15. Identify community scale air pollution sources and why they may not be detected by conventional methods	
16. Strategies for better addressing disproportionate burdens of air pollution	
17. Demystifying the content: An introduction to environmental justice, CARB and CA Environmental Protection roles and responsibility using language and evidence that might be unfamiliar but necessary to support capacity building efforts	
18. Understand local public health concerns and how to integrate the relationship between environmental hazards and public health into public policy and practices	
19. Promoting relationship building between local, regional, state agencies	
20. Developing skills in co-production of technical products and studies with community participants	
21. Participate in community visits and tours	
22. How to work collaboratively with government agencies including local air districts and CARB	
23. How to effectively work in a multi stakeholder context	
24. Understand collaborative approaches in the context of the broad spectrum of techniques for dealing with conflicting interests and priorities	
25. Understand types of content to be introduced by air districts	
26. Understand their rights and responsibilities in the process	

27. Develop skills in co-production of technical products and studies with community participants	
28. Visits to agency facilities and monitoring sites should also be offered	

Exhibit 2. Essential competencies for CARB, air districts, and relevant agency employees

Specialized competencies	Strongly recommended
1. History of AB 617 community*	
2. Skills in multiple languages*	
3. Cultural humility, competency, and sensitivity and anti-racist actions	
4. Environmental justice history and principles	
5. Basic skills in research translation and science communication	
6. Skills in co-production of technical products and studies with community participants	
7. Skills in active listening, active dialogue, and constructive consultation with community members	

*Applicable in the AB 617 community they are designated to assist

Avenues for Supporting Ongoing Learning Opportunities

AB 617 offers participants an opportunity for sustained opportunities for ongoing shared learning beyond the trainings previously described. AB 617 communities should determine the level of ongoing shared learning that is appropriate and sustainable. CSCs, community representatives, air districts, and CARB should work in partnership to develop and implement the ongoing learning opportunities. Key activities to foster continuous shared learning are outlined in this section.

- **Special training series:** AB 617 communities or agencies throughout California facilitate training series on an ongoing basis. Community organizations throughout the State have developed and implemented innovative practices and techniques addressing community air protection-related issues. A special training series should be offered to AB 617 community representatives.

- **Environmental health leadership conferences:** CARB, air districts, and community-based organizations to work together to convene environmental health leadership conferences focusing on the Community Air Protection program.[35]
- **Mentorship from earlier AB 617 communities:** Newly designated AB 617 communities can benefit from support from AB 617 communities with lived experiences. There is an opportunity to further establish partnerships with statewide representatives and potential mentors. Communication via email, in-person visits, and virtual meetings between AB 617 communities can be intentionally promoted and facilitated. This strengthens the network of AB 617 communities to support regular communication and sharing of lessons learned.
- **Annual AB 617 convening:** Attend the annual AB 617 convening that serves as an opportunity to build relationships with participants from other AB 617 communities, learn from each other's experiences, and provide recommendations for improvements in program implementation. The convening also serves as a place for AB 617 community representatives from across the state to collaborate and provide State and local agencies with feedback about evolving topics, including the People's Blueprint implementation.
- **Participation in future AB 617 evaluation activities:** Participants are encouraged to share their experiences with the Community Air Protection Program, including challenges, successes, lessons learned, and recommendations to improve program implementation and future updates to the Blueprint. Participants provide critical feedback about evolving topics, including the Blueprint as new lessons are learned.
- **Engage in optional training and resources:** AB 617 representatives can engage in optional training to further develop a shared understanding of air quality terms, science, citizen science, existing regulatory frameworks, among other topics. CARB and air districts have been developing pieces of this, and many non-governmental organizations have resources available. An initial list of selected resources has been made available to those willing to learn more.
- **Develop a resource with best practices:** Community representatives, air districts, and CARB work together to document best practices, regularly updating it as the practices are identified.

Optional Existing Training Examples

How to Develop a Budget: This online training course is designed to introduce EPA grant applicants and recipients to key aspects of grant budget development. The training may be used by applicants and recipients of EPA funds when preparing proposed work plans, budgets, and budget narratives for EPA grants.

EPA Grants Management Training for Applicants and Recipients: This online training course is designed to introduce EPA grant applicants and recipients to key aspects of the entire grant life cycle, from preparation of an application through grant closeout.

Grants.gov Workspace Training for Grant Applicants and Recipients: Beginning January 1, 2018 all grant applicants must use Workspace to submit applications through Grants.gov. EPA is hosting a Grants.gov-led session that will provide training and a demonstration on Workspace. No registration is required.

EPA Subaward Training for EPA Assistance Agreement Recipients: This optional training is intended to assist EPA assistance agreement recipients to understand Subawards and their responsibilities for oversight. It includes helpful tools to assist with determining the differences between subawards and contracts, and assists recipients with finding helpful resources.

Understanding EPA's Nondiscrimination Statutes & Regulations: EPA's Office of Civil Rights has prepared this on-line training course to help applicants for and recipients of EPA financial assistance comply with EPA's nondiscrimination requirements under federal law. The course is also aimed to increase the public's understanding of EPA's nondiscrimination regulations and statutes.

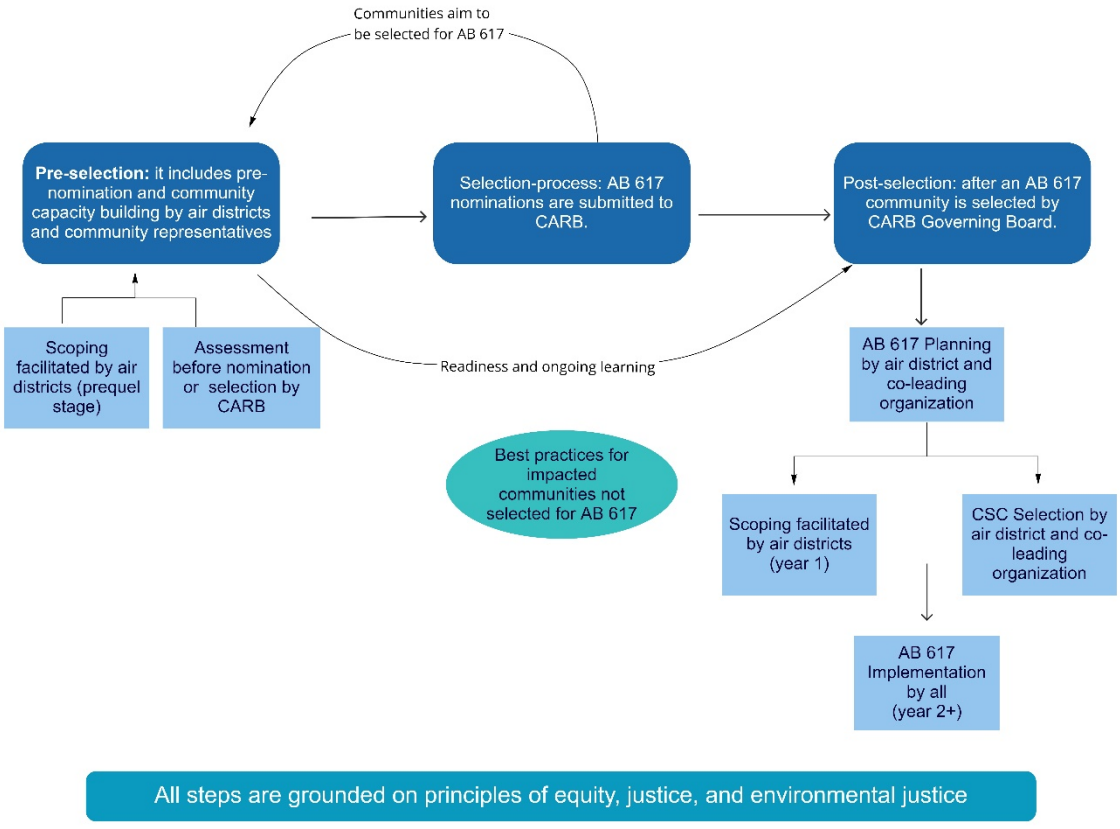
[35] There are several examples of environmental health focused conferences that are convened periodically by environmental justice groups that brings together diverse stakeholder groups including youth, environmental justice organizations, researchers, scientistic to participate in an interactive experience through workshops, presentations, and panels that focus on air quality, health impacts of environmental hazards, environmental justice, AB 617 experience and other related topics.

5. Planning and Implementation Emerging Practices

Defining best practices during the early stages of the Community Air Protection Program

The experience of the first round of selected AB 617 communities provides a unique opportunity to share led lessons learned and provide recommendations on best practices. This section of the People's Blueprint provides implementation best practices based on the learning accumulated as of 2021. Best practices are identified for several processes in the early stages of AB 617, including activities before an AB 617 community is selected (i.e., Pre-selection), during the selection process (i.e., Selection-process), and at post-selection and planning (i.e., Post-selection). Exhibit 3 illustrates the early stages of AB 617.

Exhibit 3. AB 617 Community Air Protection Program



Pre-selection

Assessment and identification of eligible AB 617 communities

As part of the assessment in the annual process of identifying and selecting AB 617 communities[36], CARB and air districts ***should*** be working collaboratively to assess cumulative air pollution exposure burden in each community, identifying disadvantaged communities in California and locations with sensitive receptors. The universe of priority areas and communities that meet the criteria of disadvantaged communities and sensitive receptor locations is explicitly defined in appendix B of the 2018 blueprint and should be followed.

As a best practice, the pre-selection process should include a readiness and technical capacity assessment for eligible communities facilitated by CARB and in collaboration with the air districts and community representatives. Ideally, assessment findings should reveal the technical capacity and strengths of potential community representatives. The results should also be used by CARB, air districts and other government agencies to develop a plan to support potential communities. Plans could include support for additional data collection or analyses by local air districts, CARB, or other technical assistance providers. Results will also demonstrate the feasibility for community representatives to collect data and information to inform analyses to support emissions reductions in all eligible communities in the foreseeable future. These assessments would also potentially inform future decisions about areas to support community-level work preparation for entry into the program. Ideally, results would help identify where community leadership, infrastructure or organization does not yet exist and where partnership building, trust, and engagement between the community and air districts could be cultivated and consider ways to address this.

AB 617 mobilized many communities to apply to be selected as an AB 617 community. Given budgetary constraints and a myriad of barriers to being selected for AB 617 program, several potential communities are on hold. For example, CARB has not approved applications from all the communities that seek to enter the program, due to constraints rather than lack of capacity of the communities. As a best practice, a funding strategy should be designated to support all highly impacted communities. CARB should at the very least engage disadvantaged communities and facilitate active dialogue about their eligibility into the Program. Ongoing and transparent engagement with air districts and communities is critical to ensure a shared understanding of a community's eligibility for the program. For example, communities are asked to leverage funding to complete projects but due to limited capacity to develop competitive projects in some communities. As of 2021 the process to select eligible AB 617 communities is not equitable, inclusion or just. Rather than having a selection process that forces communities to compete against each other, the State should develop a process to gradually phase in eligible communities.

Scoping

Shared leadership and decision-making should be prioritized in the approach for completing scoping steps. Considerable preparation is required before a community is officially selected as an AB 617 community. To prepare AB 617 communities to actively engage in a collaborative process, it is essential to build the capacity of all stakeholders[37] There are funds available to support the capacity building efforts of potential AB 617 community representatives. For example, several Community Air Protection grants have been awarded to agencies seeking to organize or prepare communities for the

[36] Appendix B. Identification, assessment, and Selection of communities. Final Community Air Protection Blueprint. California Air Resources Board (October 2021) https://ww2.arb.ca.gov/sites/default/files/2020-03/final_community_air_protection_blueprint_october_2018_appendix_b_acc.pdf

[37] It is important to recognize this preparation stage in the design and funding of the program. This would allow essential preparatory work to be done before the start of the mandated one-year planning process.

AB 617 program process.[38] Communities that do not have established community-based organizations to support capacity building efforts can consider whether individual community organizers, advocates, or resident-led groups can support the scoping steps that are required to be completed *prior* to being selected as an AB 617 community.[39] As previously noted, CARB can provide AB 617 communities technical assistance support to increase readiness and capacity by offering trainings, webinars, and providing technical support and funding for eligible communities prior to being selected.

Air districts are ultimately responsible and may receive funding for facilitating a transparent and inclusive scoping process that is responsive to its communities. Air districts should consider subcontracting with an independent or neutral facilitator and/or technical assistance provider to support prospective community steering committee members and air districts to work in partnership. CARB staff evaluates additional considerations such as regional diversity, sources, and assessment of the history of the relationship and level of collaboration between the air districts and community representatives in the scoping and assessment prior to applying to be considered for AB 617. The following key steps should be completed with community representatives interested in participating in AB 617:

- Conduct inclusive outreach to recruit community representatives to participate in AB 617 community steering committee and related activities. Strategies should go beyond print and social media to yield participation from community representatives committed to the community's wellbeing.
- Conduct a Program orientation.
- Facilitate a discussion about the AB 617 governing guidelines.
- Convene initial scoping session(s) to identify key issues from the point of view of community representatives and air districts. The range of issues identified helps inform the applications submitted for AB 617 consideration.
- Discuss and develop a preliminary proposal of geographic boundaries for AB 617 community designation.
- Develop and submit application to CARB for selection.

Selection

AB 617 nomination and selection process reflections

As currently designed (2021), the annual AB 617 selection process creates community competition for AB 617 selection. As part of selecting communities, CARB staff makes recommendations to the CARB Governing Board. At this point in the process, communities are in a waiting period.

Communities waiting to be selected need an estimated timeline for when they can expect to be selected. The length and purpose of the current annual waiting period is unclear (e.g., in 2021 some communities are still waiting for feedback from their 2017 submission). There are several recommendations for CARB to consider during the AB 617 selection process while communities are waiting for selection during the annual section process. CARB should engage in the following:

- To not lose the momentum and capacity building efforts of community representatives and air districts, it is important to continue to allow communities to self-identify as ready and interested in becoming an AB 617 community.

- Keep community representatives engaged with updates on progress on selection (e.g., do they meet basic criteria, are there recommendations for improvement, etc.).

- While waiting for selection, communities should be encouraged to document existing infrastructure

[38] This step is important to prepare communities in the absence of existing capacity for air quality project implementation.
[39] The AB 617 process has worked best in communities that are organized before they were selected for this process.

and be ready to share with CARB. Infrastructure elements to document include:

    - Community-level monitoring capacity, partnerships (i.e., types of partnerships, number of partnerships, history, etc.), level of air district and community trust, readiness to engage in planning, and community engagement readiness levels.

- Community representatives and air districts not selected for AB 617 should receive feedback from the CARB Board on the best practices to advance community-focused and community-driven action to reduce air pollution and improve public health in their communities.

- Assessment conducted during the pre-selection process should also include other important topics such as exposure, land use, proximity, and enforcement. Assessment sources should include hyperlocal monitoring and modeling.

Post-selection

Planning: CSC selection, establish governing structure, and designate geographic boundaries

After a community is selected for AB 617, community representatives and air districts ***should*** facilitate co-leadership in the decision-making of Program planning and implementation. Air districts are ultimately responsible for facilitating the Program planning and implementation to be transparent and inclusive. Air districts hold all the initial power and therefore need to be responsive to community representatives and share the power.

Best practices for the planning process for AB 617 communities to select the community steering committee include:

- Air districts assign culturally competent staff to the Program and identifies internal roles and responsibilities.
- Air district provides opportunities for training and orientation to for staff and community representatives.
- Air districts identify co-lead community-based organization(s), including organizations engaged during pre-selection.
- CARB and air districts distribute Community Air Grant resources, if awarded.
- Convene community steering committees with co-leadership from community-based organizations leading local environmental or social justice.[40]
- CSC adopts a governing charter.

[40] This has been an effective model. In some cases, there may be more than one organization interested and prepared to participate in the convening. Generally, organizations in the community should work out mechanisms to share leadership when this is desirable. This might take the form of rotating the lead role over time. Districts or CARB could play a role in advising community organizations but defer to them in making a decision about this.

Planning: Scoping

As part of the planning process, air districts and community representatives scope out the range of air quality concerns and possible approaches to address concerns and begin developing priorities. Ideally, the results of the scoping process are used to define additional needed technical analysis and information gathering. The first goal is to develop community-informed community air monitoring plans and/or community emissions reduction programs.

As part of an effective scoping process, it is normal for air districts and community representatives to elevate additional training or capacity building needs. The scoping process should enable community representatives to have a strong foundation of the most significant air quality issues. The following steps are designed to guide a scoping process that results in a more refined and community-driven approach:

Red Flags to watch out for in the Scoping process

- Lack of accessibility to documents and deliverables, including language needs not being met, documents hiding on a website, etc.
- Inadequate time for review of documents
- Air districts come in to scoping with a plan already built, without community engagement, contributing to lack of trust between community and local Air Districts
- CSC has too many members to allow for meaningful discussion and consensus-building

1. **Convene scoping session(s) to identify key air quality concerns and possible solutions.** The air district, community representatives, and CARB need to agree on concerns and solutions. No concerns or solutions should be omitted because of jurisdictional issues or for any other reason during the scoping process. Agricultural emission sources, including pesticides, are specifically eligible for inclusion within the scope of the plan. Solutions for problems identified by the technical analysis and community representatives should be discussed openly and broadly by the CSC and the air district. Experts and representatives of other organizations should be brought into the discussion.

2. **Designate geographic boundaries for AB 617 communities.** While CARB staff are not recommending a specific or uniform size for selected AB 617 communities, in general, staff recommend preliminary geographic boundaries that reflect an area for the CSC to prioritize. Air districts will work with the community steering committees to finalize community geographic boundaries. The community steering committees with a cohesive community partnership will focus on addressing specific air pollution concerns with measurable actions in the designated areas. To ensure the process is open and inclusive, CARB staff must vet the proposed map with community representatives before finalizing. The process must also ensure that areas with high CalEnviroScreen scores (i.e., 85 and above) are prioritized. For communities whose geographic boundaries have already been determined, a retroactive process may take place if community representatives express concern about representation. While strategies may vary by AB 617 community, there should at least be space in meetings for community representatives to share their concerns or grievances about the geographic boundaries.

Example: Imperial County's process for identifying areas of community concern.

Communities may face a myriad of different kinds of air pollution problems. The scoping phase helps build a feasible Year 1 timeline, and identify what other areas should be revisited towards the latter half of year one, and a plan to get the emissions reduction and monitoring plan complete

Community representatives might consider distributing a survey to ask community members about the most important air quality issues to them. See [list of resources] for a survey used by Imperial County in Year 1 to identify pressing community concerns.

3. **Technical analysis and community information gathering** from all relevant sources including comments from community representatives, air monitoring data, mapping of pollution sources, mapping of data, or other data sources. Air district staff are responsible for entering into the scoping

process with technical expertise, initial research completed that can help lay the groundwork for the scoping process and be informed about the history and specific air pollution issues in the AB 617 community. These materials and knowledge should not be a pre-determined plan, but rather include local data and resources that the community representatives can utilize to lead the scoping process. CARB does not always have adequate air quality data at the neighborhood level. Community representatives' lived experiences and perspectives are key in this process and should be regarded as equal or greater in importance to quantitative data. For example, community representatives may provide insight on air pollution sources that only pollute at specific times and are thus not captured by the existing air quality monitoring infrastructure.

4. **Conclusions from the analysis** should be approved by the CSC with advice from CARB, the air district and other technical advisories, experts, and community representatives. If further research is needed, the CSC and the air district come to an agreement (as dictated by their governing documents) to determine next steps for conducting additional assessment. Additional assessment can include engaging the broader community to hear their perspectives; broader community engagement is important to demonstrate the CSC's success and hold the program accountable in the public eye.

   CSCs may also determine a need to divide into subgroups that meet in between all-committee meetings. These subgroups may tackle specific research or planning concerns that need more attention.

5. **Scoping meeting materials and data needs to prioritize accessibility** that promotes effective engagement.[41] Additional funding should be made available by the air district to utilize best practices for community engagement. Scoping sessions might consider using a mix of small- and large- group discussions.

As the CSC transitions into the next phase involving the development of the community air monitoring plans and/or community emissions reduction program – the research, discussion, and processes built through the scoping process will serve as the basis for future engagement and action.

Best practices for effective community engagement during planning and implementation

Effective community engagement is critical to Program planning and implementation that is community driven. Air districts and the CSC should share leadership and decision making when carrying out effective community engagement. The following should be considered:

1. **Non-technical language:** Easily digestible, non-technical language is vital to ensuring that all community representatives can actively participate in discussions of air quality issues. Community representatives define what clarity means, and what kinds of engagement processes need to happen in key milestones such as developing an action plan. For an example of non-technical language, see "Owning Our Air: The West Oakland Community Action Plan" in [list of resources].

2. **Translation and interpretation:** The CSC will determine which language materials should be translated to ensure equitable participation for all members. Translation includes written materials and real-time meeting interpretation using consultants or other experts to fill these roles as needed. Written materials should be available in all languages at the same time.
3. **Clearly state purpose of presentation, discussion or informational item** and how it

[41] Historically, during several AB617 processes, community members have felt excluded from processes with use of highly technical language, the lack of adequate interpretation, and lack of willingness to meet communities where they are at from the part of air districts.

related to AB 617.

4. **Accessibility:** Processes should be created for any CSC member who does not read or prefers oral communication. Text-heavy presentations should be avoided to increase engagement from all members.
5. **Adequate review time**: All materials will be given proper time for review and comment by community representatives. Each AB 617 community will determine an adequate timeline, with at least 5-7 days as a minimum. The CSC can decide on the extensions to timelines as needed to reach a plan that is equitable and actionable.
6. **Appropriate format for discussions**: Large-group discussion may not be a comfortable arena for discussion for all community representatives, especially members that are communicating through an interpreter. CSCs might consider using a mix of small- and large- group discussions.
7. **CSC and community representative ownership:** Ensure the ownership is felt by the community representatives. Clear guidelines about how consensus should be reached and centering the CSC as the joint author of key milestones such as the community emissions reduction program plan.
8. **CSC approval:** the community emissions reduction program plan and community air monitoring plans must first be authored and approved by the CSC before being sent to Board for approval.

6. Monitoring and Modeling for Community Air Protection

Excerpts from AB 617 Legislation:

- "Community air monitoring system" means advanced sensing monitoring equipment that measures and records air pollutant concentrations in the ambient air at or near sensitive receptor locations and in disadvantaged communities that may be useful for estimating associated pollutant exposures and health risks, determining trends in air pollutant levels over time, and in supporting enforcement efforts.

- The programs shall result in emissions reduction in the community based on monitoring or other data."

Introduction

In addition to selecting communities for the development of community emissions reduction programs, CARB must also select communities for community air monitoring. This monitoring will enhance the governing board's understanding of pollution impacts within selected communities and support effective implementation of community emissions reduction programs.

The monitoring component and the emissions reduction planning components of AB 617 are best integrated into one process with one CSC. While it may be useful to conduct some level of monitoring before engaging in planning, it may equally be valuable to conduct at least scoping first to establish more specifically what the monitoring needs are. Monitoring and modeling strategies may vary by individual communities, this chapter aims to provide general guidance around monitoring and modeling, what the processes entail, parameters for accessibility and reporting, and opportunities for collective partnership among stakeholders. Each community has the freedom to choose their research staff, data collectors, air monitoring staff, and air districts to interpret findings. The purpose of modeling is to circumvent reductions in the community.

Engaging Community in Air Monitoring Design and Decision-Making

A central requirement in AB 617 is for CARB and the air districts to work with local communities to identify what information is already available and what additional data needs to be collected to better understand air quality in their communities. For example, lower cost sensors and other emerging technologies can provide real-time measurements in more locations within communities to support daily health alert programs and record variations in air pollution across a community. These broader systems can complement the more costly, regulatory-grade monitoring systems in place today.

There is a need to provide education around technology for air monitoring and community action plan for community representatives. A more equitable process is one that provides community representative with the foundational understanding of the technology or monitoring being discussed or used. AB 617 communities should have education meetings to develop an understanding around technology and plans of action. Plans should focus on air monitoring efforts to provide residents better information and support actions to reduce emissions and exposure within communities.[42] Air districts should collaborate with CSC

[42] As it stands, many AB 617 communities do not have monitors that capture continuous exposure which informs

and community residents to identify the appropriate monitoring plan based on the community needs and priorities.

The CSC and residents should be at the forefront of recommending what information they want to learn regarding the air quality in their communities. This might include decisions on:

- What types of monitoring equipment and technologies need to be procured
- Where the monitors will be placed
- What contaminants should be prioritized

Depending on the air district's capacity, monitoring and modeling may be outsourced. If this is the case, the air districts should work closely with the CSC in the selection process to ensure the impacted community provides input before a final decision is made. It will be important to consider whether the contracted agency will also be conducting the analysis, reporting back to the community, and giving data ownership back to the district and communities.

Community Air Monitoring Plan (CAMP)

A Community Air Monitoring Plan describes objective methods for community air monitoring in the designated communities. Air districts must collaborate with the CSC and community residents in designing the CAMP. The plan should ultimately address the following objectives:

- Rationale for conducting community air monitoring;
- Description of how community air monitoring will be conducted; and
- Process for how the data will lead to actionable steps to reduce air pollution within the community.

The CAMP should be designed to generate air quality data that is accurate, accessible, transparent, understandable, and ultimately used to improve local air quality. When designing the CAMP, air districts should work with local community residents and organizations with existing monitoring networks to integrate data and lessons learned. Since Air Districts and CSCs are not privy to the City's development plans, there is currently no timeline for monitoring. The CAMP should also include a timeline that will ensure recurring and continuous monitoring.

As part of this statewide monitoring plan effort, CARB provides criteria and guidance for community air monitoring so that air districts and communities throughout the State can implement a process that results in action-oriented data collection to meet the needs of each community. This guidance includes discussion of the importance of selecting the appropriate air monitoring method and equipment to address the monitoring objective.

Community organizations and air districts have conducted successful community air monitoring programs that provide best practices and valuable learnings to jumpstart implementation under AB 617[43]. A number of activities that are essential to support the successful implementation of community air monitoring include developing criteria and best practices, supporting collaborative partnerships between communities, air districts, and CARB in conducting community air monitoring, and ensuring the data is accurate, accessible, transparent, and understandable. Different types of monitors and monitoring strategies produce different data. Building on these existing programs, CARB has developed a checklist for community monitoring consisting of 14 elements that are flexible enough to apply to a variety of monitoring needs, yet stringent

the public about frequency and sequence of pollution. Monitoring should be a continuous and fluid process.

[43] https://ww2.arb.ca.gov/sites/default/files/2020-03/final_community_air_protection_blueprint_october_2018_appendix_e_acc_0.pdf

enough to support action.

Accessibility of monitoring data

Data will be sent to CARB and entered the state's online portal where it will be accessible to the public. Currently, the data that have been collected are nested in CARB's website, which poses barriers to accessibility and ease of use for community residents. The air district and the party implementing the monitoring plan will be responsible for ensuring that the data are publicly and easily available to the public (including non- AB 617 communities).

Data-driven action

Under AB 617, air quality data from both community-operated and agency-operated monitoring will be made available to the public through easily accessible online tools. CARB will provide access to community-level source and emissions data so the public can easily track emissions sources in their communities. When monitoring identifies high levels of pollution/emission, regulatory action needs to immediately take place. Additionally, a communication plan should be put in place to warn surrounding residents. For example, districts can partner with local agencies to develop a notification system which send air quality warnings via text messages to residents' mobile devices.

Data collected through AB 617 monitoring efforts can be integrated with data from other sources to support an action-plan and inform local policy, including public health guidance. One of the main goals of providing community members with more local air quality data is so they can act on it. Namely, local cities, public health officials, and schools should have access to the data and be able to use it in a way that helps informs their decisions.

Community air monitoring has significance to the community to help people to understand pollution sources and levels and to become proficient to engage in air quality issues. Strategies to better link community generated data to actions will need to be developed.

Modeling to enhance AB 617 processes

Data modeling is also essential to air pollution control. CSCs and the air districts should consider strategies for appropriate uses of modeling to enhance the AB 617 process. Air districts will be responsible for carrying out due diligence in modeling for their respective communities. Modeling can be used to track and project high levels of emissions/pollution and predict trends and sources of such levels which can inform emissions reduction efforts. Modeling can also inform the CAMP by identifying locations and particulates that need to be monitored.

Over time, a community-driven goal is to see an increasingly integrated and sophisticated surveillance approach able to inform and engage local communities and that accounts for community scale conditions, identifies impactful sources, provides a basis for better assessing cumulative impacts within the CEQA process, determine trends, and illustrate the results of actions to reduce emissions. Data should be publicly available and provided in ways that make it useful to audiences.

Exhibit 4. Checklist for Developing Community Air Monitoring

CATEGORY	PLANNING ELEMENT	DESCRIPTION
WHAT IS THE REASON FOR	Community	Establishes community steering committee to inform the

CONDUCTING COMMUNITY AIR MONITORING?	partnerships	development of community air monitoring.
	Community-specific purpose for air monitoring	Identifies the air pollution concern(s) within the community.
	Scope of actions	Describes the range of potential actions that air monitoring data will support.
	Air monitoring objectives	Defines what will be measured, when and where it will be measured, and why (e.g., document highest concentration).
	Roles and responsibilities	Identifies all parties responsible for air monitoring.
HOW WILL MONITORING BE CONDUCTED?	Data quality objectives	Establishes level of data quality required to meet objective (e.g., precision, bias, sensitivity).
	Monitoring methods and equipment	Identifies selected methods and suitability of method to meet data quality objectives.
	Monitoring areas	Indicates where monitoring will be conducted and the rationale for selecting those areas.
	Quality control procedures	Specifies procedures that will be utilized to support scientifically defensible data.
	Data management	Describes how data will be collected, managed, and stored.
	Field measurements	Lays out the air monitoring timeline and field procedures for those conducting monitoring
HOW WILL THE DATA BE USED TO TAKE ACTION?	Evaluating effectiveness	Designates a procedure to check that original objectives are being met.
	Analyze and interpret	Outlines approach for analyzing data (e.g., comparing trends, identifying sources).
	Communicate results	Establishes how information will be shared with the community, decision-makers, and CARB to inform appropriate actions.

7. Analysis and Opportunities

Conducting sound, useful, and informative analyses reflecting technical and community knowledge

Excerpts from AB 617 Legislation:

> (5) The programs shall result in emissions reductions in the community, based on monitoring or other data.
> (7) A district encompassing a location selected pursuant to this subdivision shall prepare an annual report summarizing the results and actions taken to further reduce emissions pursuant to the community emissions reduction program.

Defining technical analysis

Technical analysis and community information gathering should include all relevant sources including community comments, monitoring data, mapping of pollution sources, mapping of data, and other data sources as needed. There are many approaches to data analysis and interpretation that vary in scope and complexity. Ultimately, results from data analysis should be responsive to the community air monitoring objectives. The types of analyses will depend on the specific community's goals, and each community is likely to require a unique analysis. The technical analysis within AB 617 includes at least the following:

- Analysis from CAMP monitoring and modeling processes
- Analysis from CERP monitoring and modeling processes
- Emissions inventory

The analysis must be driven by what the community wants to discover about their own environment and pollution hazards. Most importantly, the analyses produced by the CSC and the air district must be understood by the community, since the results will inform planning and action.

Leveraging local data collected by the air district & other agencies (e.g., department of transportation, land development, permitting, etc.) can prove beneficial to the analysis phase. Data considered for analysis may include other sources of relevant data including community-based initiatives, citizen science, university-assisted analyses and any other sources accepted by the community leads or CSC co-chairs as relevant.

Identifying parties who will conduct analyses

Once all relevant sources of data have been identified and collected through the monitoring and modeling processes, the CSC needs to determine who will conduct the analysis and share back key findings. The CSC should consider several options:

1. **Conduct the analysis internally through in-house experts.** If the district has the capacity (such as in the Bay Area or South Coast), it might be feasible for internal experts to conduct an analysis of relevant data. This process should be objective, and the analyst(s) should have the capacity to work with other parties to present findings to the CSC in a community-friendly manner. CSCs might consider the benefit of saving resources through this avenue.

2. **Outsource the analysis to agree upon experts in the field.** If the CSC does not have internal experts, contracting a trusted external party to conduct the analysis is an option. The CSC should

work to design a transparent bidding and vetting process grounded in their unique governance processes. The CSC should also consider:

a. The consultant must be able to deliver technical services as well as present findings in an accessible way to the CSC.

b. How to develop a contract that stipulates the scope of work and hours, ensures appropriate/relevant data interpretation, and defines a timeline for one-time and repeated analysis

c. How this is tied to or separate from the monitoring plan

Reporting: effective and meaningful communication of data

Communicating results is critical for ensuring that air monitoring results in effective action. The analytic team will also be responsible for sharing results with air districts, CSC, and CARB. Reporting should be done in a way that is accessible to those without prior technical or scientific training ensuring that the information and data presented are relevant and appropriate for community representatives. Air districts and the CSC must also ensure that results are made publicly available and easily accessible to the community (i.e., not nested in multiple webpages).

Data-driven community action

Technical analyses should contribute to the development of effective planning and implementation (e.g., when developing CERPs and CAMPs, and conducting source attribution) to address public health. Much of the accumulation and presentation of the materials are done by the air districts and CARB. As mentioned before, understanding how to effectively share this information with the CSCs needs to be an ongoing discussion where feedback is incorporated with the goal of taking information that is typically technical by nature and presenting it in a manner that can be easily understood.

While it is helpful to have models to consider, this should not be solely dictated by CARB and air districts. Below are questions to consider when developing an analysis plan for community actions:

- How will these data inform updates to the implementation of CERP, CAMP, and public health policy?
- How will data analyzed be disseminated with the larger community? And how often?

There may be varying perspectives regarding the interpretation of technical information. When faced with varying conclusions, additional effort and resources should be invested in ensuring fuller conversations that recognize the different perspectives, with the goal of reaching more broadly supported conclusions. This approach focuses on finding common ground, rather than concluding who is right or who is wrong. In some cases, consulting additional experts may be valuable. In other cases, a conflict may not be within the range of expertise of an expert.

Using data for transformational community change

Once data are analyzed and shared back to air districts and CSCs, there will be an opportunity to leverage findings to ensure stakeholders and policymakers are responsive to the needs identified by the data. To avoid biased conclusions, air districts and CSCs will have an opportunity to provide input on the interpretation. Empowerment occurs when the local governments are influenced; the local governments should be having more regulations around not impacting the local people's health, This influence comes from having the data on land use, permits, proximity. Too often environmental justice priorities are not reflected and therefore community residents must be ready to advocate for modification to a plan and analyses before

a motion to vote is brought to the CSC. The following conditions must be met for developing proper conclusions:

- **Community engagement is high.** Community representatives are engaged from the scoping phase to analysis and conclusions
    - For example: CEQA representatives, CSC, CARB, air district reviewed enforcement policies and conducted a community profile). Local stakeholders who can inform what can/can't be done should also be included in the discussion
- Analyses and conclusions should be usable for assisting in developing mitigation strategies for the issues identified in the community air monitoring objectives.
    - For example: Particulate matter (PM), ozone, methane, or other concerns with oil and gas are all possible primary issues identified in the monitoring plan. Solutions to solve a secondary issue that is not of concern to the CSC should not take priority over primary issues. Too often conclusions and recommendations include high-cost solutions that do not effectively solve for the primary issues that contribute to major health disparities.
- Data must be inserted into local planning and development to support public health. Currently, AB617 does not indicate if the local government identifies data use in this way as a possible solution.
- Furthermore, it is important to recognize that the data on land use, permits, and proximity can influence local governments to have more regulations around not impacting the local community's health.

Ultimately the understanding and use of the data and analyses will be up to the governance of the project, such as the co-leads or the SC.Authentic and transparent collaboration is essential

Ideally, the goal should be to foster a culture of collaboration at all stages of analysis and plan development that includes government agencies (e.g., CEQA, air district, and CARB), stakeholders (e.g., CSC, AB617 Consultation Group) and community representatives. If this is not possible, then the group must strive for an equitable balance and look to bring in an independent facilitator who will ensure all parties engage in meaningful and productive conversations.

It is important to account for sufficient time to disseminate conclusions to community members for their input. The dissemination plans should be culturally relevant and appropriate. Do not present technical jargon to community members. Do provide translations services and host public meetings for community members to interact with CSCs, air districts, and CARB.

Once the primary issues are identified and finalized, resources may be leveraged to develop adequate implementation plans and recommendations. CSCs and community representatives reserve the right to leverage CARB resources (both financial resources and knowledge) to effectively execute the plans. CARB has specific guidelines for how much communities can spend down on a specific strategy, community representatives will likely need to leverage other financial resources. Leveraging resources can be problematic [see budgets chapter]. In most cases, air district leadership can leverage funds from their operating costs or from a supplementary inter-project, or another grant through climate investment. Navigating these conversations requires intentionality and having the right stakeholders at the table. For example, the San Diego CSC includes county representatives and direct communication to county supervisor's office and planning department folks who can help troubleshoot problematic solutions and provide more feasible recommendations that can quickly evolve into actionable next steps. These folks bring a wealth of knowledge that is typically missing as part of the analyses and conclusions phase of the work (e.g., knowledge of jurisdiction laws, health experts, land use planning, etc.). When leveraging resources

community representatives must be cautious of third-party interests that are lobbying for industry needs and not considering the long-term impact of their business models.

Too often community members do not feel empowered to speak up and protest industry led recommendations. CSCs should not be misguided by industry representatives trying to advocate for their own interests. Community representatives and CSCs have the right to ask questions and be skeptical of conclusions. Industry and government agencies arrive at conclusions drawing from their expertise. Community representatives and CSCs need to be prepared to demand just conclusions, no matter how polished a presentation is delivered. CSCs reserve the right for agencies to bring back a presentation for a final decision.

There are trade-offs to having industry at the table. On one hand, they can provide an overview of the science and the analyses they conducted as part of their own employment. On the other hand, it could lead to inequities where community members do not feel like they are empowered to speak because they may feel like they do not have anything else to add. It becomes a balance of power, and it may evolve into conflict.

Finding the right balance to arrive at meaningful and equitable conclusions requires diligent planning. At times, advisors may be brought into AB 617 CSC meetings, other times, EJ representatives lead community-driven processes that result in direct collaboration between community, CARB, and air districts. Regardless of who is part of the decision-making process, an underlying goal should be to build the capacity of community members so that they can actively participate and help drive conclusions. For example, if community members need to consider conclusions from either emission inventories, health assessment, permitting rules, then they need training on how to interpret analyses. Or at the very least understand the outcome. **Bottom line, information must be community friendly.**

It is not just the responsibly of the community representatives to build their own capacity, it is also important to ensure that CARB and the air districts build their internal capacity to deliver culturally appropriate and effective community engagement. If they are not willing to develop their cultural competency, then they must plan to bring in facilitators or consultants who can explain analyses and conclusions to community. The community-based organizations need to educate the community members outside of the air district, because the air district is not effectively engaging in manner that allows community representatives to feel comfortable in making decisions that are going to impact the way that the funding is going to be spent out in the community.

CARB staff who are present at the meetings must take on more accountability and responsibility for ensuring that their expertise is leveraged, and valid conclusions can be developed in partnership with the community at large. Currently, there is no standard to ensure the accountability and responsibility of CARB staff as there is no information regarding who they are and their role as a CARB staff member. Community representatives should consider questioning why CARB staff are attending these meetings. It is a waste of time to arrive at conclusions just to later find out that CARB deems them invalid or not possible. CARB should know exactly what is possible within the boundaries of the law. Therefore, having CARB as a partner will results in equitable outcomes that translate in direct community action.

8. Developing Solutions and Action Plans

CARB has adopted comprehensive air quality and climate plans over the last several years that lay out new emission reduction strategies. The **Community Air Monitoring Plans (CAMPs)** are perceived as one of the more innovative elements of AB 617, because of their extensive community engagement in informing what is monitored, where, and how. However, CAMPs work effectively only when community members are engaged equitably with dignity and respect. Community representatives have the power to develop people-centered plans. Similarly, the **Community Emissions Reduction Plans (CERPs),** when designed properly, can be effective means by which the policy can meet its intended goal of improving air quality in disadvantaged communities. Approved CERPs serve as a framework for implementation but may need to be amended to address changing conditions or understandings.

Identifying strategies for needed emissions reductions.

After AB 617 communities review the technical analysis and develop a shared understanding about the air quality issues affecting the community, it's time to focus on what needs to be done to improve conditions and create a community where everyone can thrive.

Developing solutions is a community-driven process and requires many perspectives. Historically, community representatives have faced many structural barriers to developing their own solutions. The goal of the Program is to put the power back in the hands of the community to craft solutions that will create real change. These solutions might require different ways of thinking from the air district, since "business as usual" has not always worked out in the best interest of communities' health.

It should be noted that, while the legislation emphasized reductions in emissions, to accomplish the community health goals of the legislation, consideration also has to be given to the effects of proximity and exposure levels.

Implementation and tracking progress for community projects

Actions to achieve solutions should be identified as completely as possible in the plan reviewed by the CSC and its advisors. If actions cannot be identified, this gap should also be identified and included as part of the findings of the planning process for possible actions by CARB and other relevant agencies. No actions should be rejected on the grounds that it is not within CARB's or other parties' jurisdiction to require them. Working with CARB staff to learn more about how other AB617 communities have addressed similar issues may also be helpful.

This phase involves the development of action plans that are specific to each community to determine what actions need to take place. First, subcommittees need to identify the impacts and strategies for relief with CSC support to develop a list of hotspots down to the block or parcel level. At the same time, AB 617 communities should receive education and training on metrics to help identify what measures the CSC, community representatives, air districts, and CARB will follow to gauge success and reduction Community training and co-developing adequate metrics are critical steps for ensuring AB 617 communities can track progress and elevate concerns for statewide action as appropriate. One of the most powerful mechanisms that can be used by the CSC is development of successful metrics that measure the progress of the AB 617 community.

Bottomline, any plans developed by the CSC must be approved by the CSC as provided in the governing agreement, prior to being sent to the CARB Board for final approval. The CSC is the original author of the plan, but the plan should belong equally to the community representatives and to the air district, and both

parties should be seen as owners of the plan. Agreements between CARB and air districts should specify that district governing boards may consider plans for approval only after they are approved by the relevant CSC.

Strategies that yield inclusive processes

Developing successful action plans can quickly evolve into a very difficult process. The goal is to gain consensus on strategies to ensure that action planning is participatory, transparent, and successful. This will result in the need for different strategies that meet community demands. Keep in mind that the action plan conclusion should answer the AB 617 community primary questions which may include:

- Details for effective monitoring plans – what is it going to be and who is going to implement it?
- What emissions reduction strategies are going to be used?

Equitable plans will include:

- A process for ensuring majority input and a transparent vote on the action plan.
- The specific actionable steps, schedules, and metrics to track achievement of these steps should be clearly highlighted and understandable.
- Placing equity at the center. This should occur not only in the process for developing the plan, but also the content of the plan itself and how it is implemented and tracked.
- Where applicable, plans should be written in English and other languages as appropriate to the community to ensure accessibility.
- Generally, shorter documents are better than longer documents.
- Every plan should be written in a style and at a reading level for a motivated lay audience. Plans should not be written in styles tailored to technical experts.
- Graphics should highlight and illustrate key points and the overall structure of the plan.
- Appendices or technical support documents may be appropriate for required technical content as required by CARB.
- Succinct summaries of the plan and infographics should be made available.
- There should be funding in each community for hiring or contracting with experts, for capacity filling.
- Environmental justice community representatives need to be included; in the absence of a process to engage them, community representatives can go to Cal Resources Board Environmental Justice Division.

- Community representatives are provided with proper education and training on the content presented in plans.

Building Partnerships and collaborative solutions

While developing solutions is a community-driven process, partnerships with the air district, CARB, and community representatives are necessary to build sustainable and coordinated solutions.

The CSC should identify who else needs to be at the table to discuss solutions. Experts and representatives of other organizations that can contribute to solutions should be brought into the discussion to provide relevant information to the CSC. This might include presentations and/or ongoing participation in meetings from entities such as:

- City and county planning and transportation departments
- Local utilities commissions
- City and county departments that regulate oil and gas production
- City and county departments that regulate agriculture industry (such as pesticide regulation)
- Air pollution technical experts
- Industry representatives[44]
- Academic partners with relevant expertise

Presentation made by experts and representatives of other organizations should engage in the best practices for community engagement. These individuals may be permitted to participate in CSC meetings while restricted to a **non-voting** capacity and should be considered resources to the CSC. They should also disclose any affiliations or conflicts of interest which may influence their contributions, and the CSC should consider those affiliations when incorporating their perspectives. For example, a representative from industry may provide some valuable insights to the solutions-building process; however, the community should keep in mind that industry has vested interest in keeping pollution regulations lenient.

Decision making

As discussed in the earlier Governance chapter, the process for decision making should be decided and agreed upon before reaching this stage, preferably as defined in some form of written protocol or partnering agreement. In some communities this has been described as "collaborative problem solving", governed by a partnering agreement describing shared goals, roles and expectations of all participating in the process.

It should be noted that a true "problem solving" approach goes beyond brainstorming and requires all participants to consider, among other things, (1) what they can contribute to developing solutions and (2) how they can assist other participants in overcoming their barriers or limitations in developing solutions.

Partnership in San Diego Example

San Diego CSC partnered with representatives from the planning department to implement their solutions developed by the community. The planning department attended CSC meetings to help advise how solutions could be implemented and built into ongoing city planning processes.

What qualifies as an expert?

The AB 617 Program offers many opportunities for the community to consult with experts and incorporate their technical knowledge. It's important that each CSC have an established vision about what qualifies as an expert, and how the CSC can maintain their autonomy even when seeking external advice.

At the end of the day, **community members** are experts in the priorities and experiences of their own families and neighborhoods. We all come to the table with biases and influences, which are important to recognize. Members of the government, industry, and academia will also bring their own interests to the table which may conflict with those of the community.

[44] In West Oakland, industry, subject to certain constraints (local only etc) participate and vote in the CSC, their presence is welcomed and helpful as long as abiding by the governing agreements.

Putting Equity at the Center

Equity: While there is a general awareness that the AB 617 program has equity among its general goals, there are in fact methodologies available to effectively incorporate equity into the decision-making process. Every AB 617 community project should consider whether and how to address equity.

There are several publicly available sources of ideas for addressing equity or taking anti-racist approaches, and there are also examples of practical and currently implemented methodologies, among them the City of Oakland's "Racial Equity Implementation Guide". This methodology poses questions for any action or decision regarding identifying equity gaps (distribution of burdens and benefits) and identifying options for reducing or eliminating those gaps.

Civil rights: Applying an equity methodology as described above could also go a long way towards meeting the obligations imposed by Title VI of the 1964 Civil Rights Act on recipients of federal funds or other assistance (and likewise under California Code 11135 on recipients of State funds or other assistance.) For example, resolution of Title VI complaints alleging disparate impacts often comes down to whether there was a "less discriminatory alternative" available[45].

What both have in common is the systematic consideration of (1) disparities in the distribution of benefits and burdens resulting from particular policies, actions or decisions, (2) consideration of options for reducing or eliminating such disparities and (3) adoption of such options or alternatives whenever reasonably possible.

To state the above slightly differently, due diligence regarding the requirements of Title VI and California Code 11135 implies a mandate to apply a methodology along the lines of those described here. Those requirements are potentially relevant to any action taken by any entity receiving federal or state funding or other assistance. Equity and civil rights are inextricably interrelated.

Strategies that yield exclusive processes and bad actions

When developing an action plan the ultimate intention is to develop measures to reduce air pollution in disproportionately burdened communities across the State. Identifying effective solutions will require multiple strategies and measures at both the statewide and local level to deliver emissions and exposure reductions directly within these communities. This will also require steps to avoid decisions that shift environmental burdens to other communities. AB 617 communities need to be prepared to recognize strategies that will likely yield exclusive processes and produce community harm. Many AB 617 communities have managed to have equitable and meaningful engagement up until actions are developed.

Some warning signs that things may be going wrong include:

- CSC identifies problems, suggest actions, and the plans are written with inappropriate vocabulary such as vague language that lets industry continue with the status quo or jargon that confuses AB 617 communities.
- A number of residents tell you the document is not comprehensible.
- Community does not clearly understand how action plan will be implemented.
- Approval of the Action Plan is not moderated by vote or transparent.
- If more time is necessary, CSC can vote to approve or determine whether an official extension is needed.

[45] "U.S. EPA's External Civil Rights Compliance Office Compliance Toolkit"; https://www.epa.gov/sites/default/files/2020-02/documents/toolkit_ecrco_chapter_1-letter-faqs_2017.01.18.pdf.

- The air districts are not directly identified as responsible for components of implementation and monitoring.

- Community awareness, education and training is not established.

Practical recommendations for success

The 2018 Blueprint identified a multi-pronged set of actions that CARB and air districts will undertake, as well as specific guidance on the process for air districts to follow in identifying new local actions. These statewide actions may leverage core efforts under current air pollution and climate planning programs, with additional measures to provide a further focus on specific local exposure issues. The goal is to develop implementation and tracking plans that allow communities to elevate issues that are appropriate for local or statewide action.

Do not get locked into existing solutions and actions that have only propagated the community inequities and health disparities at the local community and at the state level.

When communities are disenfranchised residents may not show up ready to engage with materials and processes that are favored by government agencies. It is the job of government to ensure that they help bring community residents along by providing proper education and training. If that is not happening at the local level, then consider bringing in outside expertise. Leveraging needed resources will fill immediate capacity needs and will help sustain community engagement and built trust which is pivotal for creating transformational change.

There are several organizations that work in communities and already have groups of residents who they work with to promote data literacy, environmental justice capacity building and policy awareness. Such organizations should be leveraged to help educate community residents about the planning process to avoid making them feel "rolled over" by government agencies. Train the trainers models and mentoring models are another effective strategy for building community awareness and knowledge. Helping community residents build their own capacity and collaboration within the CSC is essential for developing equitable plans.

In the end, the process needs to be accountable to the community. Community members can show up to CSC meetings to ask questions and receive real responses. They should be empowered to ask for updates on a process and clarity on any plans. CSC meeting facilitators need to ensure community members have an active voice at the meetings.

Institutionalizing Community-Driven Solutions

Government partners have a vital role to play to uphold the vision of the community for improved air quality. Both the air districts and CARB should invest in examining and institutionalizing the solutions identified by the CSC at this stage of the Program. This might include:

- Incorporating community perspective at defined stages in the implementation of solutions.
- Recognizing that real partnerships include shared power. This includes transparency and inclusion of all parties.
- Ensuring that collaboration happens at the onset of the creation of important policies, processes, and documents. Environmental justice isn't an afterthought, but an integrated part included at every step.
- Establishing the norm that air district leaderships' responsibilities include working towards environmental justice. This should also be incorporated into their performance evaluation.
- Creating checkpoints to ensure that community accessibility criteria are consistently met (see Chapter 5); ensuring that there are transparent processes for what happens when these accessibility criteria are not met (see Chapter 4).

9. Participatory Budgeting and Funding

Budgeting processes during the initial years of the AB 617 Program have left many learnings for new communities. In the first years of AB 617, many community budgets were built by air district staff and approved by the air district board without any participation of the CSC. Although this is the way some government agencies may be accustomed to operating, **AB 617 radically returns power back to residents** to dictate how these funds are spent. Participatory budgets for spending AB 617 funds are built by the CSC in partnership with air district staff prior to final approval by the air district board.

What is participatory budgeting?

Unlike other government initiatives, the community steering committee of AB 617 is involved in a process of participatory budgeting. This means that each CSC has the autonomy to design their own budget from the scoping phase all the way through implementation. The annual amount of funds available to each community is pre-set by CARB.

For example, if your community is given $8 million for each year of AB 617, you would work with other CSC members and the air district, as needed, to figure out how much to allocate for each step of the way.

While the budget must be approved by the air district board, your CSC has the power to design the budget that works best for the needs of your community.

The budget needs to be built from the ground-up, not the top-down!

Whether the budgeting occurs at a community- or regional-level, the Participatory Budgeting Worksheet provides a list of examples to reference and build off for your own group's budget development.

What are the guiding principles of participatory budgeting for AB 617?

1. Budget development and expenses are **transparent** and conversations around budget development and expenses must occur *before* funding is disseminated to the air districts. The overall process is accountable to all participants so that all have an equal role in decision making. Currently, there is no standard form of communication across all parties involved where there is a critical need to have transparent and open processes will ensure that budget discussions are efficient and effective. This process can look like determining who is engaged in these conversations, how is the community engaged, the input from the board of directors, and staff implementation. *The CSC should seek community input in developing the budget to ensure the process is accountable to the broader community, too.*
2. Cost estimates are backed up by credible sources.
3. The budget should include explicit allocations that support community involvement, such as:
   - ✓ Stipends for CSC members
   - ✓ Translation of materials and live interpretation during CSC meetings and sub-committee meetings
   - ✓ Childcare and food for evening meetings
   - ✓ Adequate funds for facilitation
   - ✓ Adequate funds for community engagement
4. Budgets are developed and managed by the CSC in collaboration and with support, when needed, from the air district and CARB.
5. As stated in the governance documents of each CSC, members should have adequate time to review the monthly or quarterly expenses before the relevant CSC meeting (at least 7 days).
6. *Additional governing principles, developed and approved by each CSC, may inform the approach to participatory budgeting. (See "Governance").*

7. The blueprint needs to call out incentive pay for residents.

Each CSC has autonomy to determine how to structure their budgeting process, and should consider the following questions as a group:

- What has worked well in other budgeting processes that CSC members have been a part of? Where did other budgeting processes fail to be accountable to the community? How can that be avoided?
- How much of air district staff salary should be funded through AB 617?
- How should the CSC work to develop the budget? How often should a subcommittee present drafts to the entire CSC for input during the budget development process?
- What are the benefits of developing a budget collectively with other communities in the air quality district, if relevant? What are the drawbacks?

The air district works with the CSC to develop a timeframe for budgeting activities to ensure decisions are made in time for air district governing board budget approvals. Air district officials will prepare an accessible, clear learning process that transparently outlines CARB and air district budgeting processes so that CSC member are on the same page.

Option 1: Community-level budgeting

Each individual CSC forms its own budget subcommittee to work with air district staff develop a budget annually for its own CERP or CAMP. The size and membership of the subcommittee is be determined by the CSC. The selection process for the budget subcommittee is determined by the CSC's charter (see Chapter 4). Exhibit 1 details the steps for each phase of the participatory budgeting process and the recommended time frame.

The CSC may also consider collaborating with organizations awarded Community Air Grants to amplify or expedite the start-up AB617 community activities.

Exhibit 1. Participatory Budgeting Process (Community-level) [46]

Phase	Goals/Steps	Time frame
Planning and design	○ Confirm total funding allocated ○ Engage CSC members in budgeting process, particularly resident members	CARB to PROVIDE EXAMPLES
Proposal development	○ Form budget subcommittee or other structure within CSC ○ Schedule idea collection meeting/agenda item with entire CSC ○ Collect cost estimates ○ Transform initial ideas into full proposals for approval ○ Delegate tasks to subcommittee members or air district representatives as needed	CARB-TBD
Vote and discuss with CSC	○ Delegates present final proposals to CSC ○ CSC votes on budget approval and makes amendment recommendations where necessary	CARB-TBD
Revision	○ Budget subcommittee amends budget according to CSC recommendations	TBD

[46] Adapted from: https://organizingengagement.org/models/participatory-budgeting/

Final vote	○ Air district board reviews, resulting in approval or return to CSC for adjustments	TBD
Implementation and monitoring	○ Budget committee implements approved budget and provides budget updates at agreed upon intervals to entire CSC ○ Any proposed funding allocation changes made by the CSCs may require additional air district Governing Board or CARB approval.	TBD

Depending on CSC members' availability and capacity, desire to participate in the details of the budgeting processes, and other factors, **a CSC may also delegate the task of developing the implementation budget to air district staff**. However, a final budget would be approved by vote by the CSC before being sent to the air district board for approval.

Option 2: Region-level participatory budgeting

There are 35 air districts across the state of California. (See Figure 1). In geographic areas where there are multiple AB617 communities, and communities' CERPs or CAMPS outline similar implementation steps, communities may opt for a collective, regional approach to budgeting.

When relevant, this process may help alleviate the burden of designing individualized budgets for each community. Additionally, each CSC may have the opportunity to collectively leverage their resources and secure more favorable prices for air monitoring equipment. For example, some implementation plans may involve investing in school air filtration equipment and HVAC systems. Developing an aggregate budget for purchasing these systems across communities can save subcommittee members the efforts of developing individual budgets. Exhibit 2 details

At least 51% of the Regional Budget Committee should be comprised of CSC members. This committee would follow requirements of AB617 steering committee.

Participating in a regional model is not mandatory for any community.

Exhibit 2. Participatory Budgeting Process (Regional)[47]

Phase	Goals/Steps	Time frame
Planning and design	○ Confirm total funding allocated for region; confirm distribution across communities ○ Form budget subcommittee or other structure across CSCs with at least 2 members from each community, with at least one resident member from each community	TBD
Proposal development	○ Schedule idea collection meeting/agenda item with individual CSCs ○ Collect cost estimates ○ Transform initial ideas into full proposals for approval	TBD
Vote and discuss with	○ Delegates present final proposals to individual CSCs	TBD

[47] Adapted from: https://organizingengagement.org/models/participatory-budgeting/

CSC	○ Each CSC votes on budget approval and makes amendment recommendations where necessary	
Revision	○ Budget subcommittee amends budget according to individual CSC recommendations	TBD
Final vote	○ Air district board reviews, resulting in approval or return to CSC for adjustments	TBD
Implementation and monitoring	○ Budget committee implements approved budget and provides budget updates at agreed upon intervals to individual CSCs ○ Any proposed funding allocation changes made by the CSCs may require additional air district Governing Board or CARB approval.	TBD

10. Evolution: Contributing to Sustainable Communities and Achieving Justice

The first cohort of AB 617 communities forged an important pathway for making strides towards environmental justice. This People's Blueprint outlines the many ways new AB 617 communities can form meaningful partnerships and achieve the clean and healthy environments they are guaranteed under state and federal law.

It is imperative that government agencies, community organizations, and community representatives continue to advocate for **bolder visions of racial and environmental justice** that transcend the current application of the AB 671 legislation. Improving conditions for all communities that experience disproportionately dangerous air quality is a human and civil rights emergency for which local, state, and regional governments must address. Recommended strategies to carry this vision forward include:

- **The state must establish a plan to eliminate air pollution disparities for all California communities by 2030.** The limited number of communities that have implemented AB 617 each year is one of the program's most significant drawbacks. Ensuring that all communities experiencing environmental health disparities have pathways to create community-driven solutions towards eliminating these injustices should be a priority. Expanding the infrastructure and funding for AB 617 so that all impacted communities can access the benefits of the legislation is an important equity consideration.

- **Impacted communities must be full partners in all actions to address environmental justice.** Actions taken at the local, regional, state, national, or international levels should be driven by community consensus. This applies to actions related to the implementation of AB 617 and all other programs dedicated to addressing environmental injustices.

- **The air pollution control sector of California must be trained, prepared, and energized to engage with impacted communities.** A sustainable and just California requires increased standards and expectations for the government sector. The trainings, expectations, and processes outlined in this People's Blueprint should be used to continuously evaluate the efficacy of how government partners are able to engage with impacted communities and implement their visions for environmental justice.

- Systems approaches that **transcend the silos of air, water, land, and materials should replace the state's current approach to remediation.** Ignoring the social and ecological interconnectedness of these systems creates further barriers to communities fighting against compounded threats in their environment.