

In examining the Committee's recommendations for expanded boundaries for the South Central Fresno Community, the District is applying the following guiding principles:

1. Fully acknowledge and consider committee's recommendations and concerns:

a. Committee's request to expand the boundary to include sources of emissions that are nearby, but are outside, the existing CARB-defined boundary

For example, committee members have frequently mentioned industrial sources of pollution in the greater Malaga area, as well as warehouse activities in the "reverse triangle" bounded approximately by South Golden State Blvd, Central Ave, and South Cherry Ave, as areas of concern.

b. Committee's wishes to focus AB 617 resources on the most disadvantaged areas in and around Fresno

Consider making adjustments to the community boundaries based on the recommended objective of including the top 1% of the most disadvantaged areas in the South Fresno vicinity. Note that limiting the boundary to the top 1% would eliminate certain census tracts in the northern portion of the existing CARB-defined boundary that are not in the top 1% most disadvantaged areas, and would have the effect of removing six members from the committee. Such impacts on Committee membership must be considered in the larger context (see "Analysis of impact on Committee's responsibilities" below).

2. Acknowledge and honor CARB's decision with respect to original community selection and their Blueprint guidance on selecting community boundaries:

Under AB 617, the California Air Resources Board is specifically tasked with selecting communities for action under the Community Air Protection Program. CARB's initial community selection and boundary recommendation for South Central Fresno was based on extensive air quality analysis, health indicators from the state's CalEnviroScreen tool, and various other socioeconomic factors. Upon initial selection, the AB617 Blueprint allows the District to work closely with the community Steering Committee to finalize the community geographic boundaries.

a. CARB's consideration of urban versus rural communities

The 2018 CARB first-year community selections for the San Joaquin Valley were specifically intended to provide models for future AB 617 communities in the

Valley. CARB expressed an interest in selecting an urban community and a more rural community, so that they could provide that model, a starting point for their respective urban and rural communities that would come after. CARB specifically chose South Central Fresno to represent an urban community. The City of Shafter was chosen specifically to represent the more rural areas of the Valley.

b. CARB community selection and Blueprint community boundary guidance

CARB's AB617 Blueprint recommends that selected communities reflect an area that lends itself towards addressing specific air pollution issues to ensure focused, measurable actions. To that end, any expansion of the CARB-selected community boundary should be consistent with this goal, and should consider whether any additional regions are distinct communities in and of themselves, or represent markedly different pollution issues and community dynamics.

For instance, each of CARB's community selections was specific to an identifiable community. When expanding the boundaries, consideration should be given to whether including entire additional communities within the existing community boundary would be consistent with that initial CARB community selection.

In addition, consideration should be given to whether a proposed community boundary expansion changes the nature and scope of the emissions in the community, and therefore the emissions reduction opportunities. The discussion above regarding urban versus rural is an example of this issue. The CARB-selected boundary for South Central Fresno is an urban setting, with urban industrial, mobile, and area sources of emissions. Expanding the boundary into rural areas adds additional and distinctly different types of stationary, mobile, and area sources, and these differences and their impacts on ability to focus, and not dilute, resources should be considered in any boundary expansion discussion.

3. Carefully consider impact of boundary changes on committee's responsibilities:

a. Recognize extremely short timeframe for completing tasks under AB 617

The Committee is responsible for advising the District in a timely manner that allows for the implementation of an Air Quality Monitoring Plan by July of 2019 and allows the Air District Governing Board to consider and adopt a thoughtful and fully vetted Community Emissions Reduction Program before October 2019.

Any expansion of community boundaries must include a careful consideration of the potential impacts on the Committee's ability to meet those timeframes. Of

particular interest are how the following two guiding principles might impact the ability of the community to meet the timeframes for completing their tasks.

b. Must provide for education of new committee members regarding AB 617, including informational materials provided to the committee, and discussion of activities and recommendations of the committee to date

Any expanded boundary decision should acknowledge that new committee members will need to be brought up to speed on all related activities that have taken place to date, and new members should be made aware of the potential extra time obligations involved in that process.

c. Committee membership must represent the community

This is an obvious and inviolate guiding principle, established first by the law (AB 617 legislation), and supported and reinforced by the CARB Blueprint, guidance by the District's governing board, and the committee's own charter.

Any expansion of the boundaries will require a reassessment of the committee to ensure the committee continues to accurately represent the community.

Less significant expansions of the boundary that do not involve large new segments of population may be able to be accommodated on the fly, through quick recruitments for applications of a small number of additional members, and personalized education of those small numbers of new members.

Significant expansion of the boundaries will trigger more significant committee membership impacts in a number of ways. Under any scenario where the boundaries are significantly expanded, there will be an inherent and unavoidable delay to the process as new members are brought into the committee, and are brought up to speed. These impacts should be considered in any final boundary discussion and decision.

For instance, significant expansions of the boundaries, such as that recommended by the committee, add a great number of residences and businesses. Potential impacts on the ability of the committee to meeting its obligations in a timely manner must be considered, including the following questions:

- Is it practical to add an additional 15-20 members to the community steering committee? This number is approximately the necessary number of additional members to provide the same level of population-based representation from the recommended boundary to that which exists in the current committee. Issues of practicality include, but are not limited to: finding a venue in which such a large committee can meet, bringing the new members up to speed in a timely manner as discussed above, and whether

it's possible for so many voices to be heard such that all members can be a constructive part of the process.

- Alternatively, the committee could be reconstituted in some way, if adding 15-20 members to the existing committee is determined to be impractical. Some options and potential impacts to consider:
 - Changing the committee in a way that removes any members from the existing committee seems impractical and unfair to those members that have devoted their time and energy to be a part of the process thus far. However, consideration of some process that removes members may be necessary if a significantly larger committee is considered impractical. If so, it should be done thoughtfully and under a set of pre-approved rules.
 - The community boundary could be adjusted to those census tracts in the top 1% most disadvantaged census tracts, as has been recommended by some committee members in public settings and correspondence. Impacts of this would include dropping census tracts that are within the current boundary that are not in the top 1%, eliminating six current sitting committee members, which would make some room for additional members from the new boundary areas.
 - A new, stand-alone application process could be undertaken for the new areas added to the boundary, with adjustments to the existing committee member list made as necessary to make room to add new members.

d. Assure meaningful use of available resources

Any adjustment to the boundaries must consider the impacts on the ability to use the available resources to achieve meaningful monitoring and emissions reductions that have an impact within the community boundaries. Analysis of the potential dilution of those resources, although difficult to anticipate and quantify, should be considered. For instance, for a given pot of money made available to fund replacement of privately owned automobiles or fireplaces (some of the more important sources of pollution in the Valley's disadvantaged communities), dilution of those efforts over a greater geographic area necessarily and negatively affects the ability to achieve reductions within the CARB-selected community.