

Evaluating the Clean Up Green Up Program

A Multi-Stakeholder Assessment of Programmatic Understanding & Alignment

Monika Shankar



A comprehensive project submitted in partial satisfaction of the requirements for the degree
Master of Urban and Regional Planning

Disclaimer: This report was prepared in partial fulfillment of the requirements for the Master in Urban and Regional Planning degree in the Department of Urban Planning at the University of California, Los Angeles. It was prepared at the direction of the Department and of the City of Los Angeles Mayor's Office as a planning client. The views expressed herein are those of the authors and not necessarily those of the Department, the UCLA Luskin School of Public Affairs, UCLA as a whole, or the client.

Cover Photo: Union de Vecinos members at a Clean Up Green Up press conference in 2011.
Credit: Esteban Ramirez / Liberty Hill Foundation.

Executive Summary

The Clean Up Green Up program was established in April 2016 after a decade of energetic organizing and advocacy by community-based organizations and residents across Los Angeles. These environmental justice communities were and continue to be disproportionately afflicted by the presence of pollution sources in their neighborhoods, both mobile and stationary. The goal of the Clean Up Green Up program is to utilize land use and zoning mechanisms, coupled with industry support, to address incompatible land uses - a condition where a hazardous use of land, such as a freeway or industrial facility, is sited in close proximity to sensitive uses like homes, schools, parks, etc. By addressing land use incompatibility, the program endeavors to improve the cumulative health burden of the impacted communities. Three pilot areas were established through the creation and application of Clean Up Green Up supplemental use districts: Pacoima/Sun Valley, Boyle Height and Wilmington.

April 2020 marks the five-year anniversary of the passage of the ordinances that established the program. This milestone provides a novel opportunity to evaluate what has happened thus far in order to forecast the future direction of the program. A number of reasons exist that warrant an evaluation. First, an evaluation has yet to occur to date, obscuring measurable progress towards the goal and objectives. Second, community-based stakeholders involved in the program's implementation (and many who were instrumental in campaigning for the creation of the program) have expressed uncertainty of whether the program is meeting its objectives. Third, the process of evaluation could potentially catalyze the re-engagement of city and community stakeholders and re-invigorate programmatic implementation. Lastly, engaging stakeholders in providing their insights may help shape the future direction of the program and offer a model for participatory and community-engaged program evaluation.

Given this opportunity, the following research question was defined: To what degree are city stated goals and implementation strategies for the CUGU program aligned with or divergent from the community's understanding of the goals, and experiences with the strategic interventions? While a full-scale program evaluation by a neutral third-party evaluator was not feasible given time and resource restrictions, the research project advanced the task of evaluating the program through a qualitative assessment of stakeholder perspectives. Mainly, progress towards meeting the goal and advancing the main responsibilities of the program were measured through the perspectives of one group of stakeholders engaged in implementation: community partners. Data was gathered in two phases. In the first phase, a logic model (a diagrammatic representation of the program's goals, functions and outcomes) was developed from an analysis of regulatory literature and verified through interviews with city representatives. Reactions to the logic model by external stakeholders were collected through surveys and interviews in the second phase of evaluation, allowing for an assessment of where external stakeholders aligned with, or diverged from, the core components of the program. Open-ended survey questions and interview transcripts were coded for major themes using qualitative software. It is important to note that the data collected in this phase represents one viewpoint of

CUGU function and progress. Mainly, it summarizes the perspectives of external stakeholders rather than the perspectives of city officials.

The two-phased methodological process yielded a number of relevant findings to answer the research question. Following the completion of the logic model in the first phase, it became clear that the implementing departments act largely independently with minimal inter-departmental coordination. Some departments lack systems of evaluation to track progress towards objectives over time, leaving a gap in understanding the program's outcomes and impacts. This is partially explained by the fact that only one staff person is fully funded and housed in one of the three responsible departments. Lastly, a distinction exists between activities that were mandated by the 2016 policy, and those activities that were incorporated into the program's docket of responsibilities over time. The lack of a centralized description of the full program structure may explain the confusion felt by community-based stakeholders in understanding the main functions of the program.

In the second phase, it was revealed that the vast majority of community stakeholders aligned around the goal of the CUGU program. However, the coded data revealed that community stakeholders thought that parts of the program's main functions were being inconsistently or poorly executed, while other components were missing entirely. Robust community engagement and enhanced departmental and agency collaboration topped the list of areas for improvement. The data also revealed that stakeholders found program evaluation, data collection and tracking compliance and enforcement mostly absent from the program's structure. One additional theme that emerged was the desire to see a more thorough industrial assessment in the three pilot areas. Specifically, respondents suggested a more detailed inspection of CUGU facilities, including facility identification, categorization and compliance tracking.

Given the data findings, five preliminary recommendations are proposed as guidance for the future evolution of the CUGU program. First, public-facing communication through the creation of a central website and supplemental documentation can clearly relay the form and functions of the program to external stakeholders. Second, the city should re-evaluate the program's current governance structure, by identifying point persons at each implementing department and assigning a central coordinator role to oversee implementation. The latter position could feasibly be housed in the Office of the Mayor. Third, systems of evaluation for each department can support the setting of objectives, metrics and milestones to track progress over time. Evaluation tools such as department scorecards and central databases could streamline data collection and tracking of enforcement and compliance efforts. Fourth, enhanced engagement with community partners will maximize collaboration with pilot districts and leverage the resources that community partners bring to the table including local knowledge and eyes-on-the-streets. Consideration should be given to the formation of a community advisory committee for each pilot community to formalize partner engagement. Lastly, the city should conduct an industrial landscape assessment to hone in on the location, categorization and compliance of CUGU industries in the pilot areas.

Advancing the proposed recommendations could lead to a number of positive outcomes, including a more effective program, a fully engaged cadre of city and community stakeholders

and robust data on industrial sources of pollution. Most importantly, re-shaping the CUGU program could meaningfully address the cumulative health burden experienced by environmental justice communities by improving community health, cleaning the environment and supporting industries to green up their operations.

Table of Content

EXECUTIVE SUMMARY	3
TABLE OF CONTENT	6
ACKNOWLEDGEMENTS	8
LIST OF FIGURES	9
LIST OF TABLES	10
LIST OF ACRONYMS & ABBREVIATIONS	11
INTRODUCTION	12
CONTEXT & BACKGROUND	14
THE ORIGINS OF CLEAN UP GREEN UP	14
CUGU REGULATORY LITERATURE	15
PRELIMINARY DISCUSSIONS WITH CUGU OMBUDSPERSON	16
METHODOLOGIES	18
PHASE 1: LOGIC MODEL DEVELOPMENT	19
PHASE 2: STAKEHOLDER PERCEPTION ASSESSMENT	20
INDUSTRY AND COMMUNITY STAKEHOLDER SURVEY	20
INDUSTRY AND COMMUNITY STAKEHOLDER INTERVIEWS	21
DATA ANALYSIS & FINDINGS	21
PHASE 1. LOGIC MODEL PHASE	22
PHASE 1. REGULATORY LITERATURE REVIEW	23
PHASE 1. INTERVIEWS WITH DEPARTMENTAL STAKEHOLDERS	27
MAIN TAKEAWAYS FROM PHASE 1	29
PHASE 2. STAKEHOLDER PERCEPTION PHASE	29
PHASE 2. EXTERNAL STAKEHOLDER SURVEY	29
PHASE 2. STAKEHOLDER INTERVIEWS	32
MAIN TAKEAWAYS FROM PHASE 2	35

PRELIMINARY RECOMMENDATIONS	36
CONCLUSION	38
REFERENCES	40
APPENDIX	42

Acknowledgements

There are many individuals who contributed to this report and the research project which it describes. I would like to offer my sincere gratitude and appreciation to the following individuals and institutions for guiding me through this process.

Faculty Advisor:

KIRSTEN SCHWARZ, Ph. D.

Associate Professor

Department of Urban Planning, UCLA Luskin School of Public Affairs

Department of Environmental Health Sciences, UCLA Fielding School of Public Health

Clients:

IRENE BURGA

Air Quality Advisor, Sustainability

Office of Los Angeles Mayor Eric Garcetti

MELISSA PLAMONDON

Clean Up Green Up Ombudsperson

LA Sanitation and Environment Executive Division

Mentorship Support:

COLLEEN CALLAHAN

Deputy Director

Luskin Center for Innovation

UCLA Luskin School of Public Affairs

JASON KARPMAN

Staff Researcher and Project Manager

UCLA Luskin Center for Innovation

Luskin School of Public Affairs

MARTHA M. MATSUOKA

Associate Professor

Urban & Environmental Policy Department

Occidental College

The UCLA Luskin Center for Innovation provided financial support for this study via an Environmental Justice Fellowship.

List of Figures

Figure 1: CUGU Pilot Area Map	Page 12
Figure 2: The Basic Structure of a Logic Model	Page 18
Figure 3: Two-Phased Methodological Process	Page 22
Figure 4: CUGU Logic Model (Draft March 2021)	Page 25
Figure 5: Arnstein's Ladder of Citizen Participation (1969)	Page 34

List of Tables

Table 1: Data Sets for CUGU Outcomes & Responsible Agency	Page 19
Table 2: Differences in Phase 2 Survey Questions for Industry vs Community Stakeholders	Page 20
Table 3: Role of LASAN Divisions That Coordinate Their Efforts with CUGU Ombudsperson	Page 26
Table 4: Summary of Responses from Community Stakeholders (Q4-6)	Page 30-31
Table 5: Themes for Goal & Outputs from the Community Survey Open-Ended Questions	Page 31
Table 6: Overview of Thematic Responses & Code Count by Theme	Page 32-33

List of Acronyms & Abbreviations

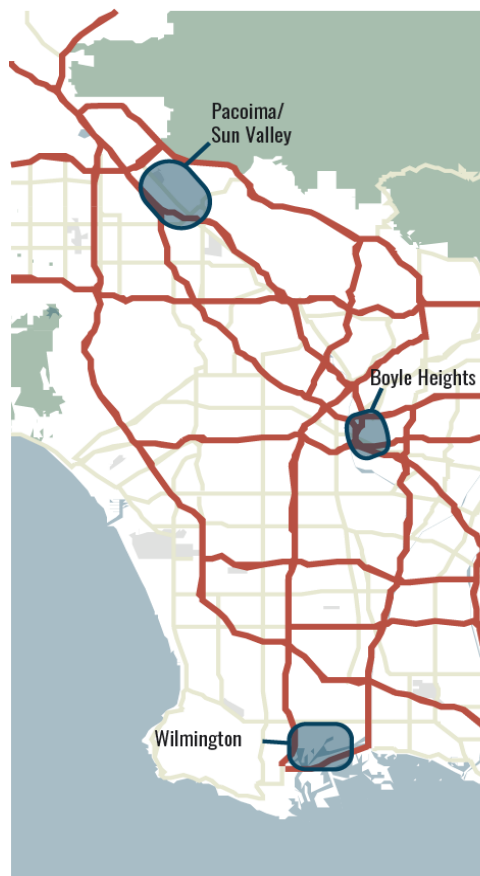
CARB	California Air Resources Board
CUGU	Clean Up Green Up
CEMO	Climate Emergency Mobilization Office
DBS	Department of Building & Safety
DCP	Department of City Planning
DOT	Department of Transportation
LACEHJ	Los Angeles Collaborative for Environmental Health and Justice
LAPD	Los Angeles Police Department
LASAN	LA Sanitation & Environment
SCAQMD	South Coast Air Quality Management District
SUD	Supplemental Use District

Introduction

The designation of specific neighborhoods in Los Angeles as “toxic hot spots” is well supported by research from the last two decades. These neighborhoods (largely low-income and communities of color) contain a high concentration of stationary and mobile sources of pollution located adjacent to or in close proximity to residential and sensitive land uses (LACEHJ, 2010; Morello-Frosch et al., 2001; Pastor et al., 2001). While the City of Los Angeles has expressed intentions to address the challenges posed by land use incompatibility and nonconforming uses through various planning documents (ReCode LA 2020; A Plan for Healthy Los Angeles 2015; LA’s Green New Deal 2019), few policy vehicles were developed that directly tackled these challenges through specific and implementable measures. This was until the Clean Up Green Up program was signed into law by Mayor Eric Garcetti on April 25th, 2016, following a decade of organizing by residents and environmental justice organizations from heavily polluted communities. The Clean Up Green Up program, or “CUGU”, established three pilot overlay districts in the communities of Pacoima/Sun Valley, Boyle Heights and Wilmington (Figure 1) (CEJA, 2018). Within these districts, the ordinance legislated protective health and development standards for new and expanded industrial operations, the creation of “buffer zones” between auto-related uses and residences, consistent site inspections and improved site planning. Changes to the zoning code also mandated citywide applications of conditional use permits for oil refineries and asphalt manufacturing, as well as higher grade air filtration for new and expanded development within 1000 feet of a freeway. Lastly, an Ombudsperson position was created and housed in the city’s sanitation department (known as LA Sanitation & Environment) to support businesses and promote environmental regulation compliance (Ordinance 184245, 2016; Ordinance 184246, 2016).

April 2021 marks the five-year anniversary of the CUGU program and provides a unique opportunity to reflect on the first phase of program implementation (year 1-5). A review of early planning documents, campaign materials and departmental memorandums reveal that the original intent of CUGU was to address the condition of incompatible land uses through changes in the zoning and building code. The two primary departments that were responsible for implementing the provisions of the ordinances were the Department of City Planning (DCP) and the Department of Building and Safety (DBS). However, in more recent years, the program has more widely come to be associated with LA Sanitation & Environment (LASAN) which houses the CUGU

Figure 1: CUGU Pilot Areas



Ombudsperson. A scan of the current CUGU work plan developed by LASAN in 2019, and spearheaded by the Ombudsperson, shows a comprehensive and ambitious effort to streamline the department's resources to businesses and to build the capacity of existing LASAN programs (e.g., the Industrial Waste Management division and LA Industry) to monitor, inspect and collaborate with industries in CUGU pilot areas. Yet despite these impressive efforts, it is clear that a gap exists between the original mandates of the ordinance and what the current CUGU program structure has come to be. This gap has resulted in ambiguity for external stakeholders invested in implementation in comprehending the structure and individualized department functions of the program, and whether CUGU is living up to its original intent.

Given this situation, a novel opportunity is presented to clarify the form and function of the program with all stakeholders involved in order to shape its future trajectory. This research project attempts to clarify whether CUGU is living up to its goal and fulfilling its main activities by assessing and contrasting the perspectives of city officials and community stakeholders in evaluating programmatic implementation. It does so by asking the following research question: To what degree are city stated goals and implementation strategies for the CUGU program aligned with or divergent from the community's and industry's understanding of the goals and experiences with the strategic interventions? The project utilized a mixture of qualitative approaches to answer the research question. First, a logic model¹ was developed to visualize the shape of the program and to create a baseline understanding of what the program had accomplished over the span of five years. It was generated through an assessment of regulatory documents and interviews with departmental officials who played a role in implementing various portions of CUGU. Second, surveys were distributed and interviews conducted to gauge the community's and industry's reaction to the logic model. The intended outcome of gathering input from industry and community stakeholders was to explore their particular understanding of the CUGU program's goal and main functions, and subsequently assess the degree of alignment or misalignment between these external stakeholders and the city.

The content of this research study is presented in five parts. Drawing from a scan of relevant literature, Section 1 (Context & Background) provides additional background on the establishment of the CUGU program, as well as a review of current CUGU regulatory literature. Section 2 (Methodologies) elaborates the main methods employed to answer the research question, whereas Section 3 (Data Analysis & Findings) presents the analysis conducted in the shaping of the logic model, the logic model itself and the data findings from the surveys and interviews with key stakeholders. Section 4 (Preliminary Recommendations) presents a set of five preliminary recommendations. The paper concludes by highlighting the relevance of the research findings and potential future trajectories for the CUGU program.

¹ A logic model is a program evaluation tool that graphically depicts the relationship between a program's goals, components and outcomes (Wholey et al, 2010).

Context & Background

The Origins of Clean Up Green Up

The campaign to establish the Clean Up Green Up program has its roots in a collaborative effort between the Liberty Hill Foundation (a Los Angeles based foundation that supports local environmental justice initiatives), community-based organizations and their members, and academic allies to advance an environmental planning policy that would address high concentrations of pollution sources adjacent to sensitive land uses (e.g., homes, schools, daycare center, etc.) in over-burdened neighborhoods. Since 2006, these partners have worked together for over ten years through the Los Angeles Collaborative for Environmental Health and Justice (LACEHJ) to develop solutions at the intersection of land use planning and environmental regulation to transform toxic hot spots into healthy Green Zones (CEJA, 2018).

The 10-year process was marked by a high level of community engagement and a particular emphasis on including both community and industry stakeholders in the formation of policy solutions. To identify the zones with the greatest concentration of land use incompatibility, the LACEHJ worked closely with residents of each neighborhood to collect data on industrial sources through a data collection method called “ground-truthing”. Namely, this is a practice where individuals who are familiar with their own neighborhoods document the location, type and range of hazards and sensitive land uses in particular areas. The data collection process and analysis were supported by academic partners who detailed the findings in a critical report called “Hidden Hazards”, which exhibited meticulous maps and documentation of each neighborhood’s environmental and land use conditions (LACEHJ, 2010). The cooperative efforts by the members of LACEHJ in the years preceding the campaign were instrumental in building strong and long-term support for the policy vehicle that was ultimately developed in the 2013 in collaboration with the LA DCP.

Following over two years of campaigning, the program was officially established with the passage of Ordinances 184245 and 184246 on Earth Day, April 22, 2016. The latter amended the Los Angeles Municipal Code’s building regulations to enhance mechanical and green building codes for certain uses (Ordinance 184245, 2016). The former established CUGU Supplemental Use Districts (“SUDs”) (also commonly referred to as CUGU Overlay Districts and CUGU “Green Zones” communities) and applied them to three Los Angeles neighborhoods: Boyle Heights, Pacoima/Sun Valley, and Wilmington (Ordinance 184246, 2016). The stated goal of the policy was to reduce cumulative health impacts resulting from incompatible land uses within the three communities, by establishing health and development standards for new and expanded industrial operations, creating “buffer zones” between auto-related uses and residences, enforcing consistent site inspections, and improving site planning (Ordinance 184246, 2016). The ordinance also mandated restrictions on the expansion of oil refinery operation, but applied this mandate at a city-wide scale. Following the passage of the ordinance, an Ombudsperson position was created within LASAN to assist local businesses to clean up their operations and implement the new regulations (Kimbrough, 2017).

CUGU Regulatory Literature

The most current and comprehensive regulatory document that details CUGUs current purpose and implementation measures is the 'Clean Up Green Up Work Plan' (work plan), the most recent version which was drafted in February 2020 by a LASAN team including the Ombudsperson. This document expresses the intent of the department to lay out a course of action for the program by outlining a set of core objectives. A central part of the work plan is delineating where the program can collaborate with existing LASAN divisions, including the Industrial Waste Management Division and LA Industry team, which are characterized as branches that naturally overlap with CUGU's objectives.

The work plan lays out well-defined objectives for each goal alongside preliminary metrics. It is the most substantially developed documentation of the initial mandate that accompanied the establishment of the Ombudsperson position in the first place – mainly, industry support and environmental regulation compliance. A cross evaluation of the workplan against the ordinances shows that LASAN has taken the lead to develop additional measures that go above and beyond the original ordinances, and that advance ambitious targets for industry regulation and community support. This includes a resource and incentive program to businesses operating in the SUDs, an enhanced focus on environmental compliance and enforcement through various LASAN divisions, and robust education and outreach to the community. However, the work plan does not detail the ways in which the land use mandates of the ordinances (e.g., permits and code compliance) will be implemented or tracked. This is reasonable given that such responsibilities fall under jurisdiction of DCP and DBS, while the work plan is a guidance document primarily for LASAN. While the work plan undoubtedly outlines positive strides and attempts to improve health and environmental conditions in the CUGU communities, it does pose the challenges of clearly defining the boundaries of the CUGU program and disentangling what can be considered a CUGU specific measure and what can be attributed to the work of another program. This is an important distinction to make because it influences perceptions of impact of the CUGU program.

There are three documents that detail the preliminary outcomes and impacts of the CUGU program, which are three PowerPoint presentations that were presented to stakeholders, elected officials and agency collaborators between September 2019 and August 2020 (LASAN 2019; LASAN Feb 2020; LASAN Aug 2020). These presentations provide a high-level overview of the primary strategies being implemented in the CUGU program, including preliminary outcomes of those strategies. For example, in February 2020, LASAN reported their intent to plant trees in the CUGU SUDs in an effort to “green up” the communities. In August 2020, LASAN reported the number of compliance officers who have inspected businesses in CUGU areas. However, as a whole, the PowerPoint presentations are high-level reports that lack quantifiable and outcomes-driven data. For example, this includes figures on enforcement rates, number of industries out of compliance, resolutions to non-compliance, and the outcomes of inspections. The absence of regulatory documents listing and quantifying preliminary outcomes is a gap that will need to be further considered in the evaluation of the CUGU program. Other gaps that pose obstacles to fully evaluating the program include any formal evaluations of the program in the last five years, and feedback from community and industry stakeholders.

LASAN's departmental counterparts – DCP and DBS – do not have CUGU work plans or supplementary documents that explain their role and tasks in programmatic implementation. However, any business within a CUGU SUD that enters into the permit application process for a new, expanded and modified building must fill out the appropriate permit application form. Application and check-list forms exist that outline this process for three uses: (1) subject uses, (2) subject uses adjacent to publicly habitable space, and (3) publicly habitable space adjacent to subject uses. These three forms collectively provide the most detailed description of the role of DCP and DBS in CUGU implementation.

Preliminary Discussions with CUGU Ombudsperson

Prior to the launch of the evaluation research project, 5 preliminary meetings were held with the current CUGU Ombudsperson to identify and highlight the work that had been conducted to-date. Specifically, this included actions that pertained to program implementation, partner engagement and regulatory collaboration. These discussions, held between June and December 2020, revealed that comprehensive work had and was taking place at multiple levels and across diverse spaces to ensure that the CUGU program was reaching the objectives laid out in the draft LASAN work plan. This section briefly summarizes major progress accomplished by the LASAN Ombudsperson, in collaboration with LASAN and other city departments and officials, towards meeting the objectives laid out in the draft CUGU work plan.

Since 2019, the CUGU Ombudsperson has hosted quarterly forums with regulatory stakeholders and community partners to share progress on CUGU implementation and gather input from stakeholders and partners. In each CUGU forum, the Ombudsperson assembles both internal LASAN staff as well as other city department partners (e.g., city council district, the South Coast Air Quality Management District (SCAQMD), and the Los Angeles Police Department (LAPD) representatives) to provide updates on specific measures such as Industrial Waste Management Division (IWMD) inspection activities (CUGU Forum February 2020), tree planting progress (CUGU Forum August 2020), and the development of data tracking tools such as the newly created EJ Dashboard. Prompted by feedback from community partners, the EJ Dashboard is a GIS mapping system initiated by the Ombudsperson and LASAN staff to gather and visualize LASAN data sets and track inspection activities across businesses in the three CUGU pilot communities, as well as across the city of Los Angeles.

In addition to hosting regular forums, the Ombudsperson has also conducted numerous individual meetings with community organizations, neighborhood councils, separate city departments, and regional and state agencies to streamline implementation and enhance collaboration. This long list includes the DCP, DBS, the Mayor's Office, the City Council Offices, the SCAQMD and the California Air Resource Board (CARB). For example, the Ombudsperson and LASAN have made a concerted effort to review and build internal capacity to identify air quality issues via their collaboration with SCAQMD and CARB. This included an AQMD Inspector training, participation in SCAQMD AB 617 Community Meetings, and No-Commercial-Vehicle-Idling efforts. More recently, the CUGU program also established a working relationship with the new Community Emergency Mobilization Office (CEMO), which launched in January 2021 to advance equitable community driven engagement in LA's implementation of climate and environmental justice initiatives through the Green New Deal. Since early 2021, the CUGU team

and the CEMO have met twice and intend to continue finding ways to collaborate and enhance complementary efforts.

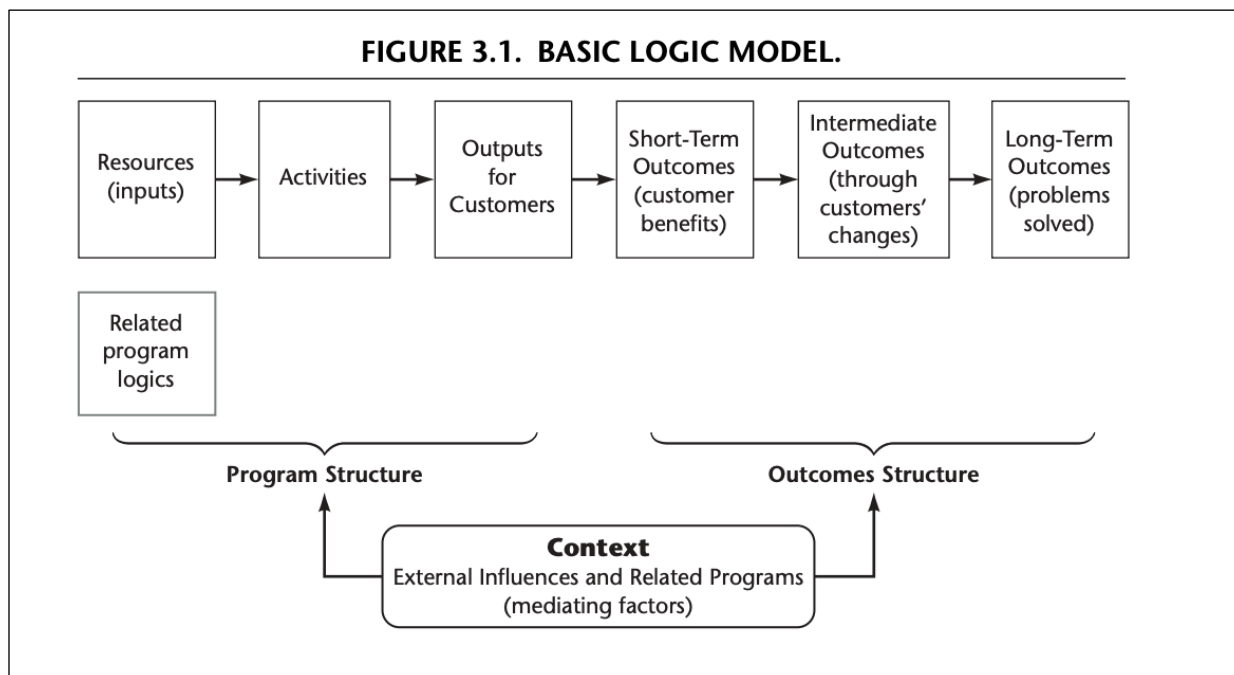
The CUGU Ombudsperson, in collaboration with LASAN branches, have also made significant strides in building working relationships with and providing resources to businesses that pose toxic consequences in communities. Primarily through the IWMD and one of its subdivisions LA Industry, LASAN has held workshops with industry specific sectors (e.g., the LA Industry Business Resources Event held on January 28, 2021) to provide resources for industries to advance greener options for industrial operations. For example, LASAN's Green Chemistry program looks at a business' internal manufacturing and provides resources for cleaner and greener processes. Additionally, LASAN divisions enforce compliance with LASAN permits and environmental regulations. Inspectors perform annual inspections of all business permittees and provide these businesses support to be brought into compliance. The department continues to explore novel ways to clean up and green up LA's industrial sector.

Methodologies

This project utilized a mixture of qualitative methods to gather evidence to answer the central research question: To what degree are agency stated goals and implementation strategies for the CUGU program aligned with or divergent from the community's and industry's understanding of the goals and experience with the strategic interventions? The research drew on case study, survey and interview analysis, in order to understand the perceptions of stakeholders engaged in the program.

The collection of data followed two primary phases. The first phase, called “logic model development”, was dedicated to the construction of a logic model that visualized the current shape of the program and created a baseline understanding of the program's work and progress to date. A logic model is a program evaluation tool that graphically depicts the relationships between a program's goals, components and outcomes (see Figure 2). Given that no centralized regulatory program document exists which fully and clearly conceptualizes the CUGU program as a whole, a logic model was an appropriate first step in conducting the evaluation of the program. In the second phase, called the “stakeholder perception assessment”, industry and community stakeholders' experiences with and expectations of the CUGU program were assessed through a preliminary survey and follow-up one-on-one interviews. The methods used in each phase are further detailed next.

Figure 2: The Basic Structure of a Logic Model (Wholey et al, 2010)



Phase 1: Logic Model Development

The logic model was developed through a content analysis of regulatory documents that detail the goals, outputs and implementation actions of the CUGU program. This included two policy ordinances, the CUGU work plan, over a dozen departmental memos and reports, and five departmental power point presentations. The literature was reviewed systematically for (1) a clear and succinct program goal, (2) any language or content pertaining to the responsibilities (or outputs) of one of the three responsible agencies, and (3) data detailing any outcomes and/or impacts of department actions. Additionally, a high-level understanding of the preliminary outcomes and impacts were determined primarily through interviews with city officials. While the original intent had been to access and consolidate available data from participating departments, it became clear in this early phase of evidence-gathering that certain data was not available at a granular scale. For example, data was requested for permits approved through DBS for new or expanded operations in CUGU districts. This data was not made available upon initial request. Table 1 summarizes the key data sets that were requested and could ultimately contribute to a deeper understanding of CUGU's outcomes and impacts. It points to potential areas of future research and investigation. Given this data gap, the logic model focuses more on programmatic structure as opposed to the outcomes structure.

Table 1: Data Sets for CUGU Outcomes & Responsible Agency.

Outcomes →	Building permits	Zoning code updates	Stormwater Discharge	Wastewater Discharge
Data Set:	Approved permits for new, expanded or modified buildings	Zoning code compliance and inspection rates	Stormwater permits compliance & facility inspections	Wastewater discharge permit compliance
Department:	Department of Building & Safety	Department of Building & Safety	LA Sanitation & Environment	LA Sanitation & Environment

Once a preliminary logic model draft was developed, accuracy and complexity in stating the goal, outputs and outcomes were established through interviews with principal CUGU interlocutors including City of LA officials, and representatives from the DCP, DBS, and LASAN. Interviews were secured through snowball sampling, with an initial interview with the CUGU Ombudsperson serving as the catalyst. All interviewees played a role at one of the three departments responsible for CUGU implementation, and were suggested based on their knowledge of and/or participation in the program. In total, eleven interviews were conducted digitally via Zoom between January 5 and February 10, 2021. Interviewees were asked to react to the draft logic model. Questions aimed to clarify all parts of the logic model, emphasizing any inaccuracies or omissions. Lastly, interviewees were asked to provide any data to elaborate the preliminary outcomes and impacts. However, as noted above, this data was not made available for this project.

Phase 2: Stakeholder Perception Assessment

The second phase of the research study focused on gathering input from community and industry stakeholders to gauge perceptions of the program's shape and functions. Early dialogue with community-based organizations revealed that there was some confusion as to what the program was supposed to accomplish and why LASAN was the responsible agency for a policy that was at its heart a land-use based policy approach. The main objective of this phase was to gather evidence of stakeholder perceptions of the CUGU program through a survey and interview, using the logic model developed in phase one as a sounding board. The data collected in this phase does not necessarily represent the views of the city as it relates to the form and function of CUGU.

Industry and Community Stakeholder Survey

Perceptions of the program's form and function were initially collected through a survey distributed to targeted stakeholders. Two surveys were created each targeting the two primary stakeholder groups: community and industry. While both sets of survey questions gauged alignment with programmatic goals, outputs, and outcomes (as elaborated through the logic model), they differed slightly in an attempt to reflect the fact that each stakeholder group engages in the CUGU program in a marginally different way. Industry stakeholders are affected directly by CUGU implementation given they have to comply with the updated and enhanced regulations. Community groups, on the other hand, are invested in the implementation of the program from the policy side. However, parity between surveys was gained by focusing the majority of questions on the logic model goals, outputs and outcomes. Table 2 outlines the key differences between the two surveys.

Table 2: Differences in Phase 2 Survey Questions for Industry vs Community Stakeholders

Question type	Industry stakeholders	Community stakeholders
Stakeholder identification	Q1-2: Geographic location & industry type	Q2-3: Community role & manner of engagement in CUGU
Perceptions of outputs	NA: Question not asked given stakeholder is not involved in policy implementation.	Q8: Included based on engagement in policy implementation.

Industry stakeholders were identified through LASAN's industry database, and cleaned based on email domain names (e.g., emails with .gov were deleted given they represented city officials rather than industry stakeholders). In total, 304 industry stakeholders were identified for survey distribution. The first two questions of the industry survey ensured stratification based on geographical target area (i.e., the three CUGU supplemental use districts), and industry types (i.e., those that are listed under the CUGU ordinance). In total, seven questions were generated for the industry survey, with a mixture of closed- and open-ended questions. Surveys were distributed between February 8 and 19, 2021, using a SurveyMonkey as the primary method of distribution, and resulted in 3 responses. One potential bias in the survey is that the survey was

distributed only in English (due to funding limitations), potentially limiting the responses from non-English speaking business owners.

Sampling of community stakeholders was accomplished through a strategic targeting of individuals who are representative of a CUGU pilot area (either through organizational affiliation or place-based affiliation), and who were or had been engaged in program implementation over the last five years. This included representatives from community-based organizations, neighborhood council members and residents. A total of 20 individuals were targeted for survey distribution, resulting in 11 responses. Surveys were distributed between February 8 and 19, 2021, using a SurveyMonkey as the primary method of distribution.

Industry and Community Stakeholder Interviews

Following a qualitative analysis of the survey responses, individual interviews were conducted with community stakeholders to clarify data gaps or discrepancies resulting from the surveys, and to allow survey respondents an opportunity to share more in-depth answers. A semi-structured (SSI) interview format was selected due to the qualitative approach to evaluating the CUGU program. The program evaluation was primarily geared towards gauging perspectives on programmatic alignment and support. The SSI approach allowed the principal researcher to gather more in-depth insights on the research question, and independent thoughts that were not answered by the close-ended questions of the survey.

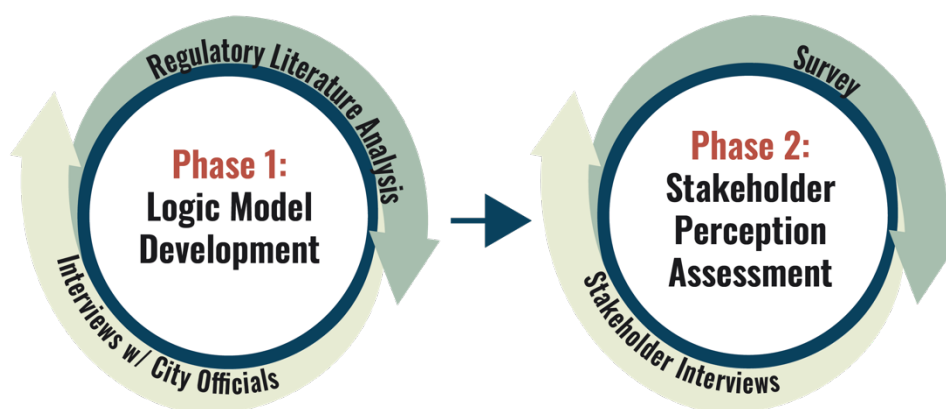
A total of 9 interviews were conducted digitally via Zoom between February 17 and March 3, 2021. All nine interviews were with community stakeholders. The three industry stakeholders who completed the survey and indicated an interest in doing a follow-up interview were reached out to at least twice, but no responses were received. Community stakeholder interviews lasted between 30 and 60 minutes, depending on the interviewee, and focused on unpacking the stakeholder's perceptions of the CUGU program. Each interview was transcribed using Otter (a speech to text transcription application) and cross-referenced against the Zoom recording for accuracy. The transcripts, as well as the free-form answers from the surveys, were uploaded into a qualitative data analysis software called MAXQDA and coded for themes. All identifying markers (including names and organizational affiliation) were redacted from survey responses and interview transcripts ensuring the privacy of the interviewees and the confidentiality of the data collected.

Data Analysis & Findings

The two-phased data collection process (see Figure 3) yielded a number of results and insights. From the 'logic model development' phase ("P1"), it became evident that there did not exist a centralized document or site that described in totality the full form and function of the CUGU program (hence, necessitating the creation of the logic model in the first place). Interviews with key governmental interlocutors revealed that each responsible department acts largely independently of the other in implementing the policy mechanisms of the program. Furthermore, the program went through an evolution over time that shifted the focus from land-use based strategies to address incompatible land uses, to mechanisms focused on business support and

environmental compliance. In the second phase of data collection – the ‘stakeholder perception assessment’ phase (“P2”) – the perceptions of external stakeholders (industry and community) were gauged through a survey and follow-up interviews. A major gap from this phase of the data process was a lack of responses from industry stakeholders, which skewed the perceptions analysis towards community stakeholders. Exploring the industry perspective should be an area of further investigation in the future. While there was general agreement about the programmatic goal, stakeholders varied in their understanding of the main responsibilities. Some were surprised to see particular responsibilities listed, while others felt that the program missed certain key elements including regulatory compliance, targeted enforcement, and community engagement. In this section, the findings and outcomes from the two phases are described in greater detail.

Figure 3: Two-Phased Methodological Process



Phase 1. LOGIC MODEL PHASE

In order to paint a clear picture of the current shape of the CUGU program, a logic model was created to graphically depict the program’s goal, components and initial outcomes and impacts. A preliminary draft was developed through a content analysis of regulatory documents, including two policy ordinances, a program work plan, over a dozen departmental memos and reports, and five departmental power point presentations. To ensure that the diagram accurately depicted the shape and primary functions of the program, interviews were conducted with departmental representatives who provided feedback and comments on the logic model. The final draft of the logic model (see Figure 4 on page 19) portrays the following diagrammatic sections:

- Inputs: resources, contributions, and investments that go into the creation of a program (denoted by the purple boxes on the left of the diagram);
- Program goal(s): a statement of the long-range purpose and objective of a program (denoted by the solid gray box to the right of the inputs);
- Outputs: the main responsibilities and activities of a program (denoted by the color-coded boxes to the right of the goal);

- Outcomes: short and intermediate changes or benefits that result directly from the outputs (denoted by the grey outlined boxes to the right of the outputs); and
- Impacts: broader changes that occur in a targeted community or area over time (denoted by the solid light gray boxes on the right side of the diagram).

Phase 1. Regulatory Literature Review

The three main inputs that led to the creation of the CUGU program were two ordinances and the allocation of funding for an Ombudsperson position. The passage of Ordinances 184245 and 184246 authorized the creation of three SUDs in the City of Los Angeles and created SUD-specific and citywide developmental standards through zoning code amendments. Following the passage of the ordinances, the city approved funding for the creation of an Ombudsperson whose role was to assist in the implementation of the CUGU program. The position was ultimately housed within LASAN at the recommendation of city representatives and advocates.

The goal of CUGU, as stated in the ordinances, is to address cumulative health impacts resulting from incompatible land use patterns within the City of Los Angeles primarily through enhanced regulation of development standards. This goal is referenced in early regulatory documents including memorandums and power point presentations from the DCP. These documents reveal that the crux of the policy was rooted first and foremost in land-use based mechanisms, i.e., overlay zones and updated development standards through zoning code amendments. However, early memorandums from DCP also acknowledged that in order for the program to be successful, a part of the program would have to provide assistance to businesses to comply with environmental regulations. As such, the Ombudsperson role was conceptualized, and a secondary emphasis on supporting businesses was incorporated into the overarching programmatic goal. The most current iteration of the CUGU goal can best be described as including both enhanced regulation of development standards *and* industry support in complying with an expanded set of regulatory programs.

The programmatic outputs of CUGU can best be understood through a breakdown of departmental roles and responsibilities. Three city departments play a role in implementing CUGU: DCP, DBS and LASAN. The two ordinances charged DCP to amend the zoning code in order to update development standards in the three SUDs and across the city. DBS is responsible for enforcing compliance with code amendments through a permit application process. All new, expanded and modified buildings that fit the category of industry listed in the ordinance and that are located in one of the three SUDs are required to comply with SUD-specific development standards. Additionally, there are four updated code regulations that apply across the entire city. Compliance is enforced through DBS inspections. The specific code amendments are listed below.

Enhanced development standards within SUDs:

- Improved site planning, landscaping, parking design, lighting, enclosure, signage, fencing, distancing requirements, building height, yard setback, surface parking lot design, driveway, noise, and storage of merchandise and materials.

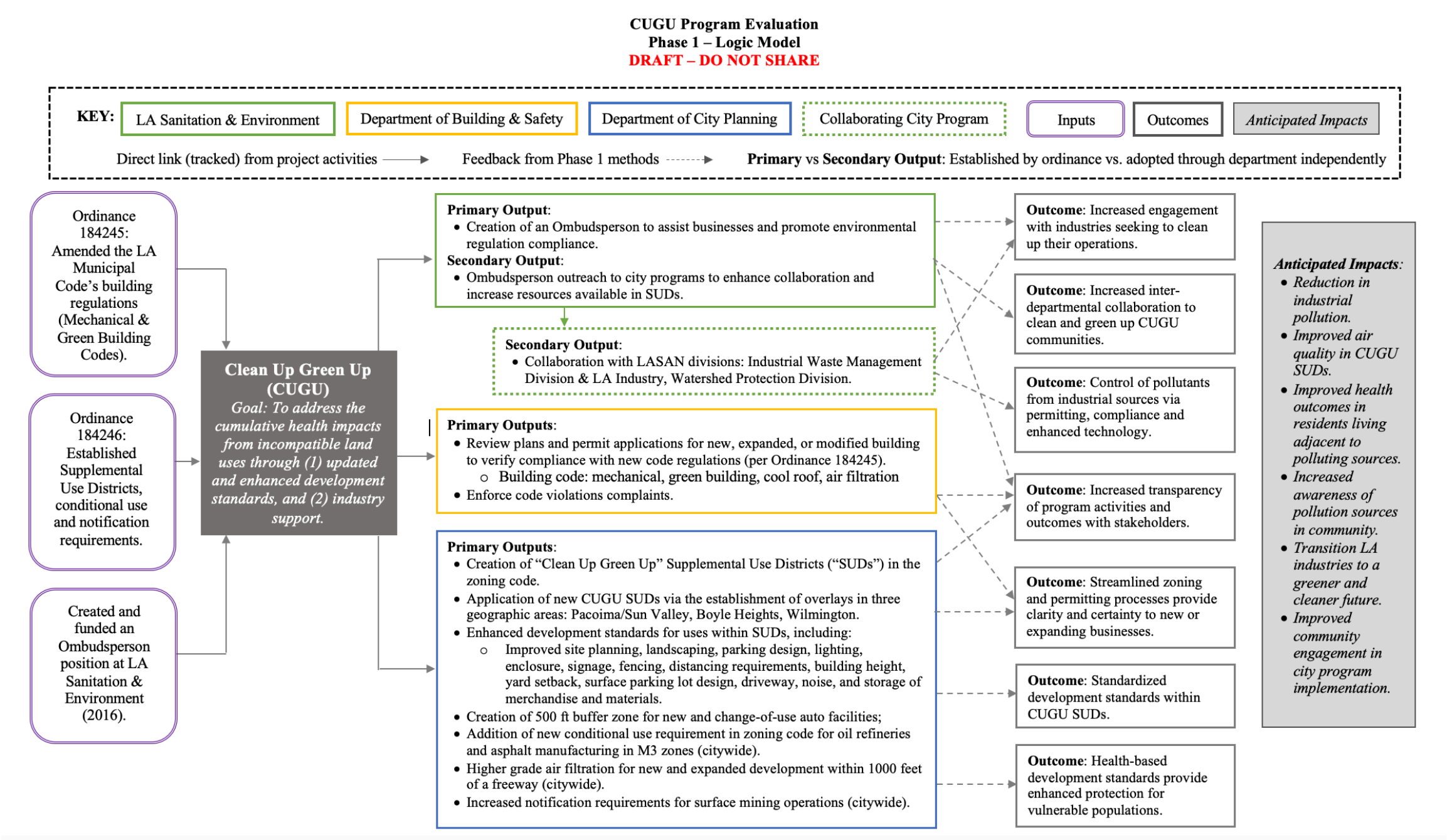
Updated citywide regulations:

- Creation of 500 feet buffer zones for new and change-of-use auto facilities;
- Addition of new conditional use requirements for oil refineries and asphalt manufacturing in M3 zones;
- Higher grade air filtration for new and expanded development within 1000 feet of a freeway; and
- Increased notification requirements for surface mining operations.

As mentioned above, LASAN was selected as the home of the Ombudsperson shortly following the passage of the ordinances. According to a DCP memorandum dated August 13, 2015, the role was tasked with providing assistance to businesses within the three SUD communities to navigate the complex system of environmental regulations from the state to local level (LADCP Memo, 2015). Additionally, the position was charged with maintaining a database of business incentive programs and increasing collaboration across the city. While the position was initially recommended to be housed at the Mayor's Office, LASAN ultimately became the home of the Ombudsperson. This city department focuses on the regulation of wastewater, solid waste management and stormwater regulation. Given these jurisdictional boundaries, current efforts for industry support logically focus on LASAN initiatives around environmental regulation.

A second distinction in outputs is between those which are directly mandated through the ordinances, and the work that currently falls under the scope of the CUGU program through the programming of the Ombudsperson in coordination with LASAN. The latter was more fully incorporated into the CUGU programmatic structure in recent years as the department took a stronger lead in fulfilling the CUGU goal. In the logic model, this distinction is denoted through the designation of primary versus secondary outputs. Primary outputs are directly linked to the ordinances' mandates, while secondary outputs

Figure 4: CUGU Logic Model (Draft March 2021)



are responsibilities and activities that were incorporated through departmental coordination over time. Current secondary outputs are primarily encapsulated by LASAN's collaboration of its internal divisions and include the Industrial Waste Management Division, one of its subdivisions LA Industry, and the Watershed Protection Division. The role of each division is described further in Table 3.

Table 3: Role of LASAN Divisions that Coordinate their Efforts with CUGU Ombudsperson

Division	Role
Industrial Waste Management Division (IWMD)	To protect the City's water reclamation plants and their byproducts, biosolids, and treated wastewater. IWMD accomplishes this by utilizing staff engineers and inspectors to administer the City's EPA-approved pretreatment program in accordance with LA City's Industrial Waste Control Ordinance.
Watershed Protection Division	To protect the beneficial uses of receiving waters while complying with all flood control and pollution abandonment mandates. The program employs a multi-pronged approach to ensure the City of Los Angeles is in compliance with regulations and reduces the amount of pollution flowing into and through regional waterways.
LA Industry Programs Initiative	To aid economic development and business continuity in the LA region, and align with the City's Sustainability Plan. This is an ongoing effort to explore the strategies and opportunities with a collaborative network of internal and external partners to cultivate a business-friendly environment for businesses and industries to thrive in LA region, while meeting regulatory compliance objectives and goals.

The most current regulatory document that details LASAN's plans for CUGU implementation measures is the CUGU work plan, the most recent version which was drafted in February 2020. Developed by a LASAN team, it lays out a course of action by outlining a set of core objectives. A central part of the work plan is delineating where the program can collaborate with LASAN's Industrial Waste Management division, and the Industry Programs team in particular, to streamline efforts to support businesses in the three SUDs, and to take a first step in increasing the overall reach and impact of CUGU. Six primary goals are defined and elaborated in the work plan, which are:

1. Enhance and better coordinate clean-up activities and evaluate LASAN operations to mitigate environmental impacts;
2. Expand Green Up activities in disadvantaged communities and coordinate with existing programs to reduce climate impacts;
3. Improve environmental compliance, regulatory assistance and enforcement;

4. Deliver resources, incentives, and grant opportunities to businesses to support the adoption of green chemistry, clean technology, and Just Transition principles;
5. Develop environmental education programs in CUGU communities and work in conjunction with the City's climate emergency management efforts; and
6. Enhance public engagement in developing policy, decision making, implementation, and working with the Liberty Hill Foundation and the LA Collaborative.

As stated above, outcomes are the anticipated benefits or changes that result from a program directly. A thorough scan of the regulatory literature revealed that outcomes were loosely defined and not documented in a central location at the inception of the CUGU program. Their relative absence in the early stages of the program's implementation posed challenges in finding clear evidence of progress towards outcomes in the first several years. More recently since 2018, LASAN has worked to elaborate a clear set of desired outcomes through the CUGU work plan that extend directly from their outputs. Each of the six goals mentioned above contains a set of objectives and performance measures. These influenced LASAN's outcomes in the logic model. The outcomes derived from DCP and DBS's primary outputs, on the other hand, remain largely unspecified and not communicated on their website or departmental forms. Given these limitations, the outcomes listed in the logic model were defined by the principal researcher for the purposes of this research study through an interpretation of the main outputs of the two departments. Constructed outcomes were shared with departmental stakeholders from DCP and DBS through interviews to ensure accuracy.

A significant challenge in the exploration of programmatic outcomes was attempting to access data that described the preliminary outcomes in greater detail. The following data sets were requested but not shared by the responsible departments: permits approved in CUGU SUDs through DBS and permit clearances approved through DCP. Through their quarterly CUGU Forum's, LASAN shared high-level data on trees planted in CUGU SUDs, inspections rates by IWMD compliance officers, and progress on training inspectors in recognizing air quality violations. However, sources and granular data sets were not shared. This gap in data presents an opportunity to focus future research on more clearly defining the preliminary outcomes and potential future impacts of the program.

Similar to the process of defining preliminary outcomes, the anticipated impacts listed in the logic model were shaped by the principal researcher through an analysis of regulatory literature, and substantiated through interviews with departmental stakeholders. The barriers to gauging impacts included a lack of tracked data, the relative brevity of the program's existence (only five years), and confounding variables skewing the correlation of the CUGU program to community change. Given these limitations, the listed impacts were painted with a broad stroke.

Phase 1. Interviews with Departmental Stakeholders

Eleven city officials were interviewed to ensure that the logic model was accurately conceptualized. All represented one of the three implementing departments (DCP, DBS, or LASAN) and had a role to play currently and/or historically in the implementation of CUGU. Interviewees were shown the logic model and asked to react to each diagrammatic component, gauging for the accuracy of each part, any missing pieces and whether the diagram was easy to

comprehend. The logic model went through several iterations based on their feedback. Additionally, interviewees were asked to share their perception on the overall function of the program: where and how it functioned well, where and how the program could be strengthened, dynamics that influenced programmatic implementation and the historical context. Discussions with departmental representatives resulted in four observations regarding (1) the roles and particular dynamics of the three implementing departments, (2) the incorporation of new outputs over time, (3) the lack of clear evaluation metrics, and (4) funding restrictions. These observations are further elaborated next.

First, while there are three main city departments that are responsible for implementing CUGU, each department acts largely independently with minimal coordination inter-departmentally to sync-up activities and gauge progress across the program. DCP and DBS's interaction is limited to the building permit process. In short, DBS will determine whether a project is subject to CUGU based on the qualifying criteria, while DCP's Development Services Center approves and provides administrative clearance for all permit applications. Unlike the Ombudsperson who plays a coordinating role at LASAN, there are no CUGU point-persons at DCP and DBS. This has resulted in challenges to ascertaining information about CUGU data such as permitting, compliance with regulations, and code inspection rates. One interviewee pointed out that funding restricts the level of involvement of staff at DCP and DBS, including more proactive code enforcement. Lastly, because the only funded CUGU role is the Ombudsperson, the whole program often becomes associated with this individual, even though they are housed at LASAN and largely restricted to LASAN's jurisdictional boundaries.

Second, the research conducted in phase one made it clear that a distinction existed between outputs that were codified through the mandates of the two ordinances, and outputs that were incorporated into the CUGU program structure over time. This distinction is presented in the logic model through the categorization of primary and secondary outputs. A primary output is one that extends directly from the language of the ordinance, whereas a secondary output is an activity or responsibility that was added independent of the ordinances. While interviewees confirmed and supported this distinction, the reason for incorporating secondary outputs over time remained unclear. For example, why were the particular LASAN divisions targeted for collaboration rather than other city departments? While not explicitly justified, it can be surmised that this happened because of where the Ombudsperson was located shortly after the signing of the ordinances. Additionally, outward facing communication with external stakeholders tends to focus on secondary, rather than or in addition to primary outputs, leading to some confusion as to what comprises the full CUGU program.

Third, a scan of the literature revealed a lack of clear evaluation metrics such as indicators and milestones, which prompted the principal investigator to develop the majority of outcomes listed in the logic model. While LASAN's CUGU work plan has established certain performance measures for the six goals outlined, these are still in draft form and it is unclear if data tracking has begun. The two other implementing departments (DBS and DCP) maintain a database that tracks what businesses apply for permits, but this data was not made available to this research study. Furthermore, these departments do not appear to have any indicators or metrics set to

track progress over time. It was also noted by one interviewee that granular data (e.g., the specific type of development standard that is being complied with) is not tracked.

Lastly, a lack of funding poses a challenge in implementing the program. Currently, the only official staff position that is funded by the city is the Ombudsperson housed at LASAN. As mentioned above, DBS and DCP do not have CUGU point-persons, and do not have funding for more proactive code-enforcement. Because the only CUGU staff person is housed at LASAN, the program inevitably ends up focusing more on water and waste, because the Ombudsperson has access to those divisions at LASAN. This elevates the jurisdictional barriers of how the program is currently structured. However, the Ombudsperson has advanced efforts to collaborate with the CARB and the SCAQMD to address air quality issues.

Main Takeaways from Phase 1

The first phase of data collection elevated a number of insights about the form and function of the CUGU program. Key takeaways from this data collection phase included the following:

- There does not exist a centralized document or site that described in totality the full form and function of the CUGU program, leading to some confusion about the boundaries and main activities of the program;
- Each responsible department acts largely independently of the other in implementing the policy mechanisms of the program;
- The program went through an evolution over time that shifted the focus from land-use based strategies to address incompatible land uses, to mechanisms focused on business support and environmental compliance;
- Funding is a challenge in implementing the program; and
- There exists ambiguity as to who is supposed to be tracking progress and how.

Phase 2. STAKEHOLDER PERCEPTION PHASE

The second phase of research aimed to unpack whether the city's conceptualization of the CUGU program (as visualized in the logic model) aligned with external stakeholders' understanding of the program. In short, is the CUGU program as envisioned by community organizations (who worked to pass the policy in 2016 and stayed engaged in implementation since) and industries (who are impacted by the code changes and enhanced focus on 'cleaning up' their operations) similar or different from the one that the city advances? Through the use of surveys and interviews, the 'stakeholder perception assessment' phase sought to uncover and elevate the particular nuanced perspectives of the diverse set of stakeholders who are involved or impacted by the roll-out of the program. Code analysis was conducted using MAXQDA – a qualitative data analysis tool – to draw out major themes.

Phase 2. External Stakeholder Survey

Two main stakeholder groups were targeted for survey distribution: community and industry stakeholders. Surveys distributed between February 8 and 19 yielded a 55% response rate from community stakeholders (20 individuals were targeted for survey distribution), but only a 3% response rate from industry stakeholders (304 individuals were targeted for survey distribution).

The low industry response rate was expected to some extent as industry stakeholders are less likely to engage in program evaluation due to time restrictions, and because they may not be familiar with the CUGU program and therefore less likely to click on an email survey.

Each survey was between 7 and 8 questions long, with a mixture of close and open-ended questions. As mentioned in the Methods section, community and industry stakeholders were given slightly distinct surveys given their particular engagement in CUGU. The first three questions of the community survey, and the first four questions of the industry survey aimed to identify the stakeholder's role and the nature of their engagement in CUGU implementation. The remainder of the survey questions asked the respondents to react to a simplified logic model and provide their thoughts on the goal and outputs of the program.

Of the 11 community stakeholders who responded, the vast majority (90%) were familiar with the CUGU program. Respondents ranged from being representatives of an organization within a CUGU SUD, to organizations outside of CUGU SUDs that were invested in CUGU program implementation. The particular type of engagement spanned the spectrum and included participation in the CUGU campaign prior to 2016, implementation immediately after the signing of the ordinances, engagement with LASAN's initiatives and the work of the Ombudsperson, and participation in discussions with the City of LA to expand into other areas of Los Angeles.

In the community survey, three close-ended questions (questions 4-6) gauged the respondents' alignment with the CUGU goal, as well as their understanding of and alignment with the CUGU program's main outputs. The majority of respondents (6) are aligned with the CUGU goal, while 4 are somewhat aligned, and 1 does not agree with the goal. While 3 respondents said that the CUGU outputs outlined in the logic model were exactly what they thought the program entailed, 6 responded that it was mostly what they thought, suggesting that perhaps some components were missing in their understanding of the outputs. Lastly, 4 respondents were very aligned with the outputs of the logic model, while 6 were somewhat aligned. The charts in Table 4 summarize the responses from questions 4-6 of the community survey.

Table 4: Summary of Responses from Community Stakeholders (Q4-6)

Q4: In response to the CUGU goal (as stated in the logic model), do you support this goal?		
6 Fully Aligned	3 Mostly Aligned	1 Disagree w/ Goal
(NOTE: 1 respondent skipped this question)		
Q5: In response to the outputs (as outlined in the color-coded boxes in the logic model), do these correspond with your understanding of the program's main outputs?		

3 Exactly This	6 Mostly This	1 Had No Idea...
-----------------------	----------------------	-------------------------

(NOTE: 1 respondent skipped this question)

Q6: In reflecting on the main outputs, how aligned are you with the programmatic outputs?

4 Very Aligned	6 Somewhat Aligned	1 Do Not Agree
-----------------------	---------------------------	-----------------------

The industry survey yielded a low and statistically insignificant response rate (N=3) from the 304 industries originally targeted for survey distribution. As such, the responses gathered do not reflect the general perspective of industry stakeholders. This is a gap in the research study, and points to an important area of investigation in future evaluations of the CUGU program.

While the close-ended questions established a baseline understanding of programmatic alignment, each question around goal and outputs also included a comment box where respondents could further explain their answer. This feature of the survey produced rich and nuanced insights. The open-ended answers from the survey were uploaded into MAXQDA and qualitatively analyzed for major themes, and then subsequently used to guide the individual interviews. The themes for the goal and outputs are summarized in Table 5 below, and highlight what the community stakeholders perceived to be poorly implemented and/or missing from the CUGU program entirely.

Table 5: Themes for Goal & Outputs from the Community Survey Open-Ended Questions.

Themes	
Goal	<ul style="list-style-type: none"> • Defining “industry support” including what type of industry, and what qualifies as “environmental regulation compliance” • A focus on community engagement
Outputs	<ul style="list-style-type: none"> • A lack of compliance and enforcement of environmental regulations • The absence of setting metrics, data collection and progress evaluation • Increase inter-department and inter-agency collaboration • A particular focus on business: distinguishing between interested businesses versus “bad actors”, big business and mom-and-pop businesses • Community engagement (moving from consultation to collaboration) • Department transparency and accountability

Phase 2. Stakeholder Interviews

The main purpose of the interviews was to clarify gaps or remaining questions resulting from the survey analysis. It also allowed survey respondents an opportunity to explain their answers and share more in-depth perspectives. In total, 9 community stakeholder interviews were conducted between February 17 and March 3, 2021. Each semi-structured interview lasted between 30 and 60 minutes. However, as noted earlier, no industry stakeholders were interviewed due to a lack of responses to the survey, leaving a research gap in understanding how industry stakeholders view and align with the CUGU program.

Coding of the survey open-ended questions and interview transcripts surfaced a number of themes reflecting community stakeholders' perceptions of the programmatic goals, primary outputs and initial reflections on the outcomes and impacts. Six main themes emerged from the code analysis: community engagement and communication, departmental and agency collaboration, program evaluation, compliance and enforcement, data collection and industry assessment. Each theme is described in greater detail next. Additionally, Table 6 summarizes the main responses by theme and identifies the number of times it was coded in MAXQDA providing some insight into how important the theme is to community stakeholders.

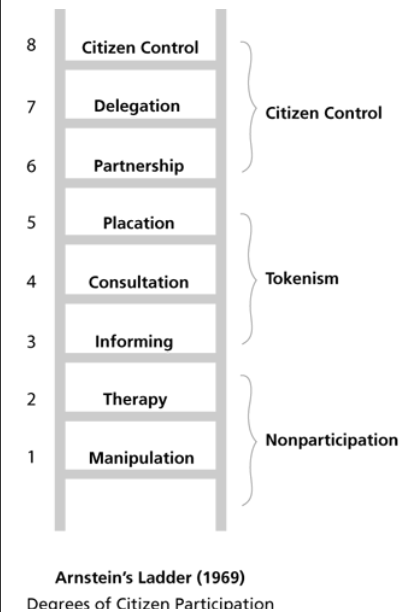
Table 6: Overview of Thematic Responses & Code Count by Theme.

Theme	Count	Responses & Observations
Community Engagement & Communication	24	<ul style="list-style-type: none">• Information about CUGU's implementation is poorly communicated to the community.• There needs to be a point-person who can share information, data and progress.• How can community organizations get more involved in decision-making and the ongoing evaluation of the program?• Community organizations could liaison with industry, if funding was available.• Funding community participation is essential.• Communicating clearly with each pilot community is essential.• Codifying community participation into CUGU's structure. Suggestion: community advisory committee.• CUGU education for community partners and residents.
Department & Agency Collaboration	19	<ul style="list-style-type: none">• How do you increase collaboration between the three implementing departments, but also with a broader set of city departments and regional agencies?• CUGU has to intersect with other departments and agencies to work. For example: AQMD.• Jurisdictional boundaries are a hindrance to effective implementation.• The Mayor's Office should be responsible for some portion of implementation.

		<ul style="list-style-type: none"> • CUGU should work with the CEMO.
Program Evaluation	11	<ul style="list-style-type: none"> • We need a full process and outcomes evaluation. • What is the actual impact of the program? • What is missing is metrics and target setting. • Needing tools of measurement, which the city could provide. • Transparently communicating progress to stakeholders.
Compliance & Enforcement	22	<ul style="list-style-type: none"> • How is the city enforcing the new code? Is this process documented? • Tracking business compliance with the new zoning and building codes. • Tracking building inspections: rates and outcomes (was the matter resolved?). • Transparency in sharing compliance and enforcement data. • Code enforcement only happens when a complaint is filed, but this requires education on how to file complaints. How do you ensure compliance regardless of complaints? • CUGU has teeth on the books, but is enforced poorly.
Data Collection	8	<ul style="list-style-type: none"> • Permits: how many permits were approved, denied, modified? • Violations: who violated the zoning and building codes? • Inspections: how many inspections were conducted and what were the outcomes? • Compliance & enforcement data. • Impacts assessment.
Industry Assessment	17	<ul style="list-style-type: none"> • Distinguishing between mom-and-pop businesses and big polluters. • Targeted support to smaller, local businesses who need it. • Ensuring that CUGU is not a burden to industry. • Creating more industry engagement and outreach. • Sector specific analysis of CUGU impact. • CUGU is about new and expanding businesses, but what about existing businesses? How many are there, and how do you get them into compliance? • Mapping each pilot area: where are facilities located, which are “bad actors”, who is in compliance?

The majority of interviewees had feedback on the role of community engagement in CUGU implementation, with the theme mentioned 24 times. Many individuals pointed out that the origin of the program was driven by community leadership and participation, and that they had hoped the program would set a model for how stakeholders could more fully engage in government initiatives. Reflecting on their current engagement, interviewees felt inconsistently communicated with, with only minimal data conveyed about the progress of the program. Referencing Sherry Arnstein's work on citizen participation (Arnstein, 1969), one interviewee mentioned that stakeholders involved in CUGU implementation were mostly informed and consulted, rather than partnered with through collaborative efforts (see Figure 5). The sentiment to get more involved in direct decision-making and evaluation of the program was echoed throughout most of the interviews. One interviewee mentioned formally incorporating community collaboration into CUGU's structure through a community advisory committee. Another requested that community partners and their members were provided with education about CUGU. Lastly, funding was mentioned a few times as a barrier to full participation.

Figure 5: Arnstein's Ladder of Citizen Participation (1969)



A second theme that emerged through the interviews addressed collaboration between the three implementing departments, as well as a broader set of city departments and regional agencies (coded 19 times). While there was appreciation for LASAN's efforts to host quarterly forums and share information about their progress, interviewees wondered why DCP and DBS were largely absent from the table. One interviewee observed that CUGU must intersect with and collaborate more closely with other departments and agencies to work, including the SCAQMD and the Department of Transportation (DOT). LASAN's outreach to the SCAQMD to train inspectors to observe and report air quality violations was referenced as a successful example of cross-agency collaboration. However, many noted that jurisdictional boundaries hindered full participation across departments and agencies, and that the city structure does not provide one department authority over another. One solution offered by an interviewee was enhancing the role of the Mayor's Office to streamline collaboration and implementation across agencies. Another interviewee mentioned the opportunities offered through the newly created Climate Emergency Mobilization Office (CEMO).

The third set of interrelated themes addressed the question of evaluation, metrics and target setting. These three themes are program evaluation (coded 11 times), compliance and enforcement (coded 22 times), and data collection (coded 8 times). Broadly speaking, interviewees noted that the CUGU program lacks structures of evaluation including baseline goals, methods to track progress over time and milestones to evaluate impact. A central hindrance in conducting proper program evaluation was collecting data across implementing departments. For example, interviewees noted the lack of information on permits approved by

DCP/DBS, data on compliance and enforcement, code inspections and violations. Some exceptions to the data collection gap were LASAN's conveyance of data on tree planting and inspections of LASAN divisions. More recently, LASAN developed a tool that aggregates compliance data collected by their divisions called the EJ dashboard. The tool presents an opportunity to include data requested by community stakeholders.

Lastly, a theme emerged around conducting a more thorough assessment of industry in the three pilot communities, with a focus on understanding where facilities were located, which were the "bad actors" and who was out of compliance. Some interviewees strongly felt that the CUGU regulations should not be burdensome to local businesses, especially to the smaller mom-and-pop shops that may be disproportionately impacted by enhanced regulation. One interviewee requested that more targeted support be provided to these smaller businesses. In focusing on local businesses, interviewees appeared to be making a clear distinction between small, local business and larger polluting industries. There appeared to be some desire to target the larger polluters for increased regulation. Additionally, interviewees felt it was necessary to increase engagement and outreach to smaller businesses to ensure they felt supported. Finally, one interviewee lamented that the CUGU program only targeted new and expanding businesses, rather than existing businesses, and wondered how the latter could get into compliance.

The six themes honed in on major areas of misalignment between community stakeholders and the city. However, it is important to note that in conducting interviews, there occasionally appeared to be confusion as to what CUGU was and was not. Some interviewees felt that CUGU should encompass a much larger programmatic scope than what the ordinances had originally outlined. One city official interviewee pointed out that CUGU's regulatory reach was, in fact, rather limited. Due to the jurisdictional restrictions of DCP, the program could only rely on certain land use based mechanisms to try to mitigate the impact of polluting sources. In contrast, some interviewees wanted to expand CUGU to include direct pollution controls, inclusion of a broader set of industries (e.g., the ports), existing businesses, amongst others. While these strategies are absolutely necessary for the long-term goal of cleaning up targeted communities, these types of measures do not currently fall under the programmatic mandates of CUGU. This points to the need to clearly define and convey to external stakeholders the boundaries of the program.

Main Takeaways from Phase 2

The surveys showed that there is broad agreement about the programmatic goal between the city and community stakeholders. However, the themes that were generated through qualitative coding of survey responses and interviews revealed that community stakeholders varied in their understanding of and alignment with the main responsibilities. From the perspective of these individuals, there are a range of challenges that impede the efficient and effective implementation of the CUGU program, including weak community engagement, poor program evaluation and data collection, uncertain compliance and enforcement, insufficient inter-departmental and agency collaboration, and a lack of understanding the industrial landscape in CUGU SUDs. These challenges would need to be addressed for all stakeholders to be fully aligned and therefore more willing to engage in program implementation.

Preliminary Recommendations

Based on the findings from the two-phased data collection process, a number of preliminary recommendations have been developed that could beneficially inform the future direction of the CUGU program. Each recommendation is stated below and is accompanied by a short explanation of what applying the recommendation would entail, as well as any foreseeable challenges to implementation.

Recommendation 1: Enhance communication with external stakeholders to clarify the form and main functions of CUGU.

Feedback from stakeholders indicated confusion as to what falls within the boundaries of the CUGU program, and what does not. The ordinances that established the program narrowly defined the land-use regulations of the program based on amendments to the zoning and building code. However, the task given to the Ombudsperson to provide industry with support and ensure environmental regulation compliance was loosely defined and therefore left up to interpretation of implementing departments and the stakeholders involved. Several interviewees expressed surprise at various elements of the logic model, and requested that the logic model be shared as part of CUGU education and communication. Given these observations and outcomes, it is advisable that the city expends some resources to create centralized communication tools and documents to clearly relay what CUGU is and is not, how it functions and who is responsible for various components of program implementation. This could be accomplished through a central website, brochures and materials, and by establishing points of contact at each department.

Recommendation 2: Re-evaluate the current governance structure of CUGU to create defined and functional roles.

The current CUGU structure has only one dedicated staff person who is housed in LASAN, which is the Ombudsperson. This role was created to support industries clean up their operations and comply with environmental regulations. However, because the program only has one official staff role, the burden falls on the Ombudsperson to implement all programmatic activities regardless if they fall under LASAN's jurisdiction or not. This poses challenges to implementation due to jurisdictional boundaries. Given that the program spans at least three city departments, and requires a high level of collaboration with other departments and agencies across the city, the CUGU program should be restructured to establish counter-parts to the Ombudsperson in DBS and DCP. Furthermore, it is advisable that a lead facilitator or coordinator role is established and housed in the Mayor's Office where this individual could coordinate across departmental jurisdictions. This recommendation might require the allocation of additional funding.

Recommendation 3: Employ an alternative model for community participation.

Coding the interviews and open-ended survey responses revealed that the manner of communication and engagement of community participants was the biggest concern of the community stakeholders who participated in this research project. A broad set of interviewees felt that communication of CUGU's progress by the city was sporadic, lacked specific details and was more consultative rather than collaborative. Many expressed a desire for a more formalized partnership between the city and community groups, and one that reflected the origins of the program which were deeply community-driven. As such, it is recommended that CUGU incorporate community stakeholders directly into the governance structure through formations such as a community advisory committee in each pilot area. The model for participation should shift from consultative to collaborative, with community stakeholders seen as partners in implementation. The alternative community participation model should promote transparency by sharing data with community partners at consistent intervals.

Recommendation 4: Formalize consistent program evaluation by setting indicators, metrics and milestones.

The first phase of data collection emphasized the challenge of accessing comprehensive data sets over time. This barrier was brought up again by community stakeholders in the survey responses and follow-up interviews when expressing a desire to see evidence of measurable progress towards outcomes and impacts. Data that stakeholder wanted to see as evidence of the program's effective implementation included compliance and enforcement, inspection rates, violations, and permits granted and denied. Tracking progress based on predetermined indicators of success is instrumental in evaluating the success of a program. Given this, it is recommended that each department establish a system for evaluating progress towards their departmental outcomes via metrics and milestones. Intermittent reports would be produced and delivered to the CUGU coordinator for tracking and reporting. One suggested tool that may be helpful in coordinating evaluation efforts is a departmental scorecard.

Recommendation 5: Assess the industrial landscape in each CUGU district to better understand conditions over time.

The business theme revealed the need for a comprehensive assessment of the CUGU industrial landscape. Respondents noted that oftentimes, major polluters were evading compliance and not targeted directly by the program. Additionally, the businesses that needed support the most (i.e., small, local, mom-and-pop businesses) required augmented and focused assistance. Based on these responses, an industrial landscape assessment is recommended where the most current data on CUGU industries in each pilot area is compiled including industrial types, locations, permits approved (and denied), inspections (and outcomes), compliance rates, and outreach support from the Ombudsperson. Pending availability of funding and resources, mapping this data could help inform targeted support and enforcement efforts.

Conclusion

This report presented qualitative data, analysis and findings to illuminate stakeholder perspectives on the form and function of the CUGU program. The effort was undertaken with the intent to better understand if stakeholders involved in implementation were aligned with or divergent from the city's conceptualization of the programmatic goal, activities and outcomes. A two-phased data collection process surfaced a number of observations around programmatic understanding and alignment. First, because there does not exist a central synthesis of the program, a logic model was developed to create a visualization of its current components. To date, this diagram is the most current and accurate representation of the CUGU program structure, according to feedback from departmental interviewees. Second, while there is broad alignment around the CUGU goal, alignment around programmatic activities and responsibilities is less definite amongst stakeholders. This can be attributed to a range of potential causes including poor communication and education, the inclusion of additional activities over time, a lack of point-persons at DCP and DBS, and insufficient programmatic tracking and evaluation.

Based on an analysis of the findings, a set of five preliminary recommendations were made to inform the future direction of the CUGU program:

- (1) Enhance communication with external stakeholders to clarify CUGU's form and main functions;
- (2) Re-evaluate the current governance structure to create defined roles and stream-line implementation;
- (3) Employ an alternative model for community participation to increase and enhance the community's role in programmatic implementation;
- (4) Formalize consistent program evaluation by setting indicators, metrics and milestones. This will allow for measurable progress to be tracked over time; and
- (5) Assess the industrial landscape in each CUGU district to better understand conditions over time.

While the data and analysis yielded rich and useful observations about the CUGU program, certain research gaps limit the findings to particular perspectives. The lack of survey responses by the industry community means that the perspective analyzed is mainly that of community organizations and entities who are involved in CUGU from the role of policy implementation. What is missing is the perspective of those stakeholders who are affected directly by the program, such as the business community. Another limitation of the research was the lack of data to quantitatively elaborate initial outcomes, including permits granted and denied by DBS and DCP, compliance with LASAN environmental regulations, inspections, violations and resolutions. These gaps in the research could serve as points of departure for successive phases of evaluation of the program.

There are numerous directions that this work could go next. On the horizon is the planned expansion of CUGU into the South and Southeast LA Community Plan areas. While these communities are undoubtedly deserving of the environmental planning regulations that the

CUGU program extends, extensive ground-work has to be laid in order to ensure that the appropriate sites are chosen through a community-driven and approved process. Additionally, cultivating an existing network of community partners (including organizations, neighborhood councils, residents and businesses) would be imperative for expansion to be successful.

Another area of potential future exploration is assessing the criteria for industries regulated under CUGU. Currently, code regulations in SUDs only apply to new, modified or expanding industries. However, a significant portion of industries located in CUGU SUDs have existed there for a long time and contribute to the cumulative health burden of these communities. While these businesses are still targeted for industry support to clean up and green up, an assessment should be conducted on the feasibility of folding in existing business to comply with the updated development standards.

When first imagined by community partners in the early 2010s, the CUGU program was envisioned as a ground-breaking policy that was inspired by the principles of environmental justice, influenced by models of equitable land use planning, and envisioned as a just transition for industries towards a cleaner and greener future. While in practice the CUGU program has had mixed reviews in fulfilling its original intent, the potential for a truly transformative program is there, written into the municipal code. If implemented correctly, the program has the potential to set an amazing precedent in the field of land use and environmental justice.

References

- Arnstein, S. (1969). A Ladder of Citizen Participation. *Journal of the American Planning Association*. 35(4): 216-224.
- California Environmental Justice Alliance (“CEJA”). (2018). *Green Zones Across California: Transforming Toxic Hot Spots into Healthy Hoods*. California Environmental Justice Alliance.
- City of Los Angeles Mayor’s Office – Sustainability Division. 2019. LA’s Green New Deal: Sustainable City pLAn. Office of the Mayor.
- Kimbrough, C.J. (2017). Los Angeles’ “Clean Up, Green Up” Ordinance: A Victory in the Environmental Justice Fight. *National Civic Review*, 1-8.
- LA Department of City Planning. (2015). *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*. LA Department of City Planning.
- LA Department of City Planning. (2020). *ReCode LA Article 12 – Nonconformities*. LA Department of City Planning.
- LA Department of City Planning. (August 2015). *Memorandum: Recommendation Report*. LA Department of City Planning.
- LA Sanitation & Environment. (2020). *CUGU Work Plan (Draft February 2020)*. LA Sanitation & Environment.
- LA Sanitation & Environment. (Aug 2020). *Clean Up Green Up Forum 2.0, Aug 2020* (PowerPoint presentation). LA Sanitation & Environment.
- LA Sanitation & Environment. (Feb 2020). *Clean Up Green Up Forum, Feb 2020* (PowerPoint presentation). LA Sanitation & Environment.
- LA Sanitation & Environment. (2019). *Clean Up Green Up Program* (PowerPoint presentation). LA Sanitation & Environment.
- LAC Ordinance 184245, 2016. L.A.M.C. §95.314.3, §99.04.504.6, and 99.05.504.5.3
- LAC Ordinance 184246, 2016. L.A.M.C. §12.04, §12.20 and §12.32 and §13.03, §13.18, and §13.19
- Los Angeles Collaborative for Environmental Health and Justice (“LACEHJ”). (2010). *Hidden Hazards: A Call to Action for Healthy, Livable Communities*. Liberty Hill Foundation.
- Morello-Frosch, R. et al. (2011). Understanding the Cumulative Impacts of Inequalities In Environmental Health: Implications For Policy. *Health Affairs*, 30(5), 879–887. DOI: <https://doi.org/10.1377/hlthaff.2011.0153>

Pastor et al. (2001). Which Came First? Toxic Facilities, Minority Move-in, and Environmental Justice. *Journal of Urban Affairs*. 23(1): 1-21.

Wholey et al. (2010). *Handbook of Practical Program Evaluation*. Jossey-Bass, A Wiley Imprint.

Appendix

A. Community Survey Questions

Question 1: Are you familiar with the Clean Up Green Up (or CUGU) program?

- Yes, I am familiar with the program.
- I have heard some things about the program.
- I might have heard about the program, but I am unsure.
- I am not familiar with the program.

Question 2: In what capacity have you engaged with the CUGU program in the last five years?

- As a representative of an organization located in a CUGU pilot area.
- As a representative of an organization located outside a CUGU pilot area, but who is interested and invested in the implementation of the program.
- As a member of a CUGU community's neighborhood council.
- As a resident of a CUGU pilot area.
- Other (specify)

Question 3: Listed below are ways you may have engaged with the CUGU program. Please check all boxes that apply to your engagement.

- I participated in the CUGU campaign before the ordinance was signed into law in April 2016.
- I engaged in program implementation with the Department of City Planning and Department of Building and Safety after the ordinance was signed in 2016.
- I have engaged in the efforts of LA Sanitation & Environment (LASAN) and the CUGU Ombudsperson to enhance programming in the pilot areas.
- I have been engaged in discussions to expand CUGU into other areas of Los Angeles.
- Other: please describe.

Questions 4-7 will ask your reaction to the diagram below, which illustrates the current structure of the CUGU program.

[Insert simplified CUGU logic model]

Question 4: The goals of the CUGU program are stated in the grey box on the far left. Do you support these goals? Please explain in the space provided, if necessary.

- I fully support these goals
- I am somewhat supportive of these goals
- I mostly disagree with these goals
- I do not agree with the goals
- *Provide comment box*

Question 5: The color-coded boxes to the right of the goals are the main responsibilities of the CUGU program. Do these correspond with your understanding of the program's main responsibilities? Please explain in the space provided, if necessary.

- Yes, this is exactly what I thought were the main responsibilities of program.
- This was mostly my understanding of the main responsibilities of the program, although I was not aware of all of them.
- I was not expecting to see many of these responsibilities as part of the program.
- I did not know any of these responsibilities were a part of the program.
- *Provide comment box*

Question 6: In reflecting on the main responsibilities of the CUGU program, how aligned are you with the primary responsibilities of the program? Please explain in the space provided, if necessary.

- Very aligned
- Somewhat aligned
- Not very aligned
- I do not agree that these should be the main responsibilities of the program
- *Provide comment box.*

Question 7: The grey boxes labeled 'outcomes' (to the right of the color-coded boxes) describe the short-term and intermediate achievements of the CUGU program. Please describe your level of agreement with the stated outcomes, noting where you think the program has been effective and where it could be more effective.

- *Provide space for feedback.*

Question 8: Do you have any feedback about the CUGU program that you would like us to consider in our evaluation?

- *Provide space for feedback.*

B. Industry Survey Questions

Question 1: Are you an industry located in one of the following communities: Pacoima/Sun Valley, Boyle Heights, or Wilmington?

- Yes
- No
- I think so, I might be adjacent
- I don't know

Question 2: What category of industry do you consider yourself? Note: if you fall into two categories (for example: metal manufacturing), please select other and specify.

- Drop down menu (in alphabetical order) listing all industry types:
 - Automotive
 - Fabric
 - Food & Animal
 - Manufacturing
 - Metal
 - Transportation
 - Petroleum-Related Use
 - Warehouse / Distribution
 - Waste Disposal / Management
 - Other (please specify)

Question 3: Are you familiar with the CUGU program?

- Yes, I am familiar with the program.
- I have heard some things about the program.
- I might have heard about the program, but I am unsure.
- I am not familiar with the program.

Insert a short description of CUGU:

The Clean Up Green Up (CUGU) program is an initiative launched by the City of Los Angeles to address the presence of pollution in three specific communities: Pacoima/Sun Valley, Boyle Heights, and Wilmington. CUGU tries to address the problem of pollution in two main ways: (1) through improved development standards (for example: improved signage in the community) and (2) by supporting industries to clean up their operations, and green up their practices. There are three main departments involved in implementing CUGU: The Department of City Planning, the Department of Building and Safety, and LA Sanitation & Environment (LASAN). As such, there are several ways you might have engaged with the CUGU program, including by applying for a building permit through the Department of Building and Safety, or by engaging with one of the inspectors from LASAN's Industrial Waste Management Division.

Question 4: Let us know what City Offices and/or Staff you have engaged with. Check all the apply.

- Department of Building and Safety
- Department of City Planning
- CUGU Ombudsperson (LASAN)
- LA Sanitation & Environment – Industrial Waste Management Division
- LA Industry
- Other (please specify)

Questions 5-6 will ask your reaction to the diagram below, which shows the current structure of the CUGU program.

[Insert simplified CUGU logic model]

Question 5: The goals of the CUGU program are stated in the grey box on the far left. Do you support these goals? Please explain in the space provided.

- I fully support these goals
- I am somewhat supportive of these goals
- I mostly disagree with these goals
- I do not agree with the goals
- Provide space for feedback

Question 6: The color-coded boxes to the right of the goals are the main responsibilities of the CUGU program. Do these correspond with your understanding of the CUGU program?

- Yes (explain your answer)
- No (explain your answer)
- I don't know (explain your answer)

Question 7: Do you have any feedback about the CUGU program that you would like us to consider in our evaluation?

- Provide space for feedback.

C. Community Interview Design Plan

Primary Research Question: To what degree are agency stated goals and implementation strategies for the CUGU program aligned with or divergent from the community (i.e., advocates and industry representatives) understanding of the goals and experience with the strategic interventions?

Interview Objectives:

- To clarify gaps or remaining questions from survey analysis.
- To allow survey respondents to share more in-depth answers.

Type Justification: A Semi-Structured Interview (SSI) method was selected due to the qualitative approach to evaluating the Clean Up Green Up program. This program evaluation is primarily geared towards gauging programmatic alignment and perspectives on the main responsibilities of the program. The SSI approach will allow the interviewer to gather more in-depth insights on the research question, and independent thoughts that were not answered by the close-ended questions of the survey.

Anticipated interview length: Approximately 1 hour

Method: Online (zoom)

Format: Prior to the interview, the interviewer will share the 'Research Information Sheet' via email (see below). Before starting the interview, the interviewer will verbally read a summary of the purpose of the interview and highlight the expectations of the interviewee. The name of the interviewee will be collected prior to asking questions, and coded using the coding logic. The interviewee will also be shown the logic model in order to respond to questions about outputs, outcomes and impacts.

Interview questions:

- What are three words you would use to describe the CUGU program?
- Do you agree with the goal as described in the logic model? If not, what do you think is missing? What is inaccurate?
- How would you describe the main responsibilities of the CUGU program? How are they similar or different from what is presented in the logic model? Why do you think there is a difference?
- What were your expectations of what the CUGU program could accomplish when it first started? What are they now? How and why have they changed?
- What do you think have been the main outcomes and impacts of the CUGU program?
- What would you like to see changed in CUGU in the future?
- Is there anything else you would like to share with me about the CUGU program?

D. Industry Interview Design Plan

Primary Research Question: To what degree are agency stated goals and implementation strategies for the CUGU program aligned with or divergent from the community (i.e., advocates and industry representatives) understanding of the goals and experience with the strategic interventions?

Interview Objectives:

- To clarify gaps or remaining questions from survey analysis.
- To allow survey respondents to share more in-depth answers.

Type Justification: A Semi-Structured Interview (SSI) method was selected due to the qualitative approach to evaluating the Clean Up Green Up program. This program evaluation is primarily geared towards gauging programmatic alignment and perspectives on the main responsibilities of the program. The SSI approach will allow the interviewer to gather more in-depth insights on the research question, and independent thoughts that were not answered by the close-ended questions of the survey.

Anticipated interview length: 30-60 minutes

Method: Online

Format: Prior to the interview, the interviewer will share the 'Research Information Disclosure Sheet' via email (see below). Before starting the interview, the interviewer will verbally read a summary of the purpose of the interview and highlight the expectations of the interviewee. The following information will be collected prior to asking questions: (1) Name of interviewee, (2) where the interviewee's business is located. These identifiers will be coded immediately following the interview. The interviewee will also be shown the logic model in order to respond to questions about outputs, outcomes and impacts.

Interview Questions:

- What are three words you would use to describe the CUGU program?
- What have you heard about the CUGU program, if anything?
- Do you associate the CUGU program with the departments listed in the logic model, and their respective responsibilities?
- Could you describe your engagement with these various departments?
- Do you agree with the goal as described in the logic model? If not, what do you think is missing? What is inaccurate?
- Are the main responsibilities listed in the logic model (labeled outputs) your understanding of the responsibilities of the CUGU program? Do you agree these should be the main responsibilities?
- On a scale of 1-10, how would you rate your experience with the CUGU program? Please explain your answer.
- Do you think that CUGU has had an impact in your community?
- Is there anything else you would like to share with me about the CUGU program?

E. Research Information Sheet:

The information sheet was shared via email to all participants of the survey and interviews.

University of California, Los Angeles

RESEARCH INFORMATION SHEET

Clean Up Green Up Program Evaluation Research Project

Introduction

Monika Shankar, a graduate student from the Department of Urban and Regional Planning Program at the University of California, Los Angeles (UCLA), is conducting a research study on the Clean Up Green Up (CUGU) program on behalf of the City of Los Angeles Mayor's Office. The goal of the research study is to better understand the specific ways in which stakeholders engage in, and are impacted by the CUGU program. You were selected as a possible participant in this study because you work for or are a member of a nonprofit or community-based organization located in a CUGU pilot area and may have participated in CUGU program implementation in the past five years. Your participation in this research study is voluntary.

What Should I Know About a Research Study?

- You can choose to participate in this research study.
- You can choose not to take part in it.
- You can agree to take part and later change your mind.
- Your decision will not be held against you.
- You can ask any and all questions regarding this study before you decide.

Why Is This Research Is Being Done?

April 2021 marks the five-year anniversary of the CUGU program. This milestone offers an opportunity to reflect on the program's impacts to date. The purpose of this Phase 2 survey is to gather information from a crucial program stakeholder – a representative of a CUGU pilot community who may have insights on CUGU implementation measures in the last five years through your direct engagement in the program. This study seeks to gather feedback and input from these stakeholders in order to evaluate the program's function and effectiveness.

How Long Will The Survey Last And What Will I Need To Do?

Completing the survey should take no longer than 30 minutes. If you choose to participate in the survey, the researcher will ask you the following: to share your perceptions of the CUGU program.

How Long Will The Interview Last And What Will I Need To Do?

The interview should take no longer than 60 minutes. If you choose to participate in the interview, the researcher will ask you the following: to elaborate on your responses in the survey and to share your perceptions of the CUGU program.

Are There Any Risks If I Participate?

There are no anticipated risks in participating in this survey.

Are There Any Benefits If I Participate?

While there are no direct benefits to your participation (for example; monetary compensation), your input and feedback will help shape the future programming and implementation of the CUGU program.

How Will Information About Me And My Participation Be Kept Confidential?

The survey will allow the respondent to remain anonymous, unless the respondent indicated that they are willing to be contacted by the researcher, in which case contact information will be requested. Any information about you will be handled confidentiality. Study data will be physically and electronically secured. As with any use of electronic means to store data, there is a risk of breach of data security.

How Long Information From The Study Will Be Kept

Data will be maintained for 5 years.

Who Can I Contact If I Have Questions About This Study?

If you have any questions, comments or concerns about this research study and/or the survey, you can reach out to the principal researcher. Please contact Monika Shankar at mm112009@ucla.edu.