



Bay REPAIR Local Community Benefits Fund – Round 1 Summary of Public Comments and Responses

Public comment on the Draft Guidelines for the Local Community Benefits Fund was open for thirty days from October 27, 2025 – November 25, 2025.

57 total public comments were received. Most of the comments came from Benicia stakeholders. The Air District presents the following summary of key public comments received and responses.

Recognize Benicia's Unique Circumstances of Refinery Closure

In response to the projected Valero refinery closure in 2026, a majority of the overall comments supported an alternative proposal for the Local Community Benefits Fund that encompasses the following components: allocate 50% of settlement dollars or \$5 million per year over five years to the community experiencing a major industrial facility withdrawal; allocate funds to the City of Benicia's General Fund; eliminate the Co-Applicant requirement for Catalyst Grants; and disburse grant funds on a faster timeline.

Response

Due to the ongoing strain on the Benicia community's civic and organizational capacity resulting from the impending refinery closure, the Air District is making the following exceptions for Catalyst Grant applications in Benicia:

- *Partnerships:* The partnership requirements in Section 4.1 of the Grant Guidelines are waived. While Co-Applicants will not be a required element for the Catalyst Grant in Benicia, applications demonstrating diverse community support will be prioritized.
- *Application Review and Award Timeline:* Should there be a small number of applications for the Catalyst Grant in Benicia, the Air District may expedite the review of the applications within this grant category.

These exemptions recognize the unique circumstances facing Benicia and aim to facilitate Benicia's ability to pursue funding that supports the transition away from the reliance on fossil fuels, while remaining within the Air District's statutory authority under Sections 40004 and 40701 of the California Health & Safety Code to promote projects that will lead to the prevention, mitigation, or cure of the adverse effects of air pollution, including the adverse health effects of air pollution, and to cooperate



and contract with third parties to accomplish the purposes for which the Air District was established.

Expand Grant Goals

Several comments recommended expanding the Local Community Benefits Fund's goals to encompass broader definitions of community health, community resilience and environmental justice.

Response

The Local Community Benefits Fund will maintain its focus on its Program Goals: reduce air pollution, improve health and build economic resilience for a just transition away from the harmful effects of a fossil-fuel-based economy. These Program Goals are tied to the Air District's overall statutory authority under Sections 40004 and 40701 of the California Health & Safety Code to sponsor, coordinate, and promote projects that will lead to the prevention, mitigation, or cure of the adverse effects of air pollution, and to cooperate and contract with third parties to accomplish the purposes for which the Air District was established.

The Air District recognizes that many other factors, such as overall community well-being and resilience, impact a community's ability to address air pollution. The Guidelines have been designed to offer flexibility for applicants to propose projects that address the Program Goals as well as various community needs. Section 5.1 has been updated to ask applicants to identify and address an overall environmental justice, public health and/or just transition challenge. Appendix C (Examples of Eligible Projects) provides a list of illustrative eligible projects that are inclusive of projects addressing community well-being.

Align Grant Requirements with Ecosystem Capacity

Several comments noted that Solano County receives the fewest philanthropic dollars of any Bay Area county, and that the ecosystem lacks the capacity to manage grants at the scale proposed by the Local Community Benefits Fund. Commenters made recommendations to better align the grant requirements with the existing ecosystem capacity, such as: allow capacity building and planning phases or set-asides; provide phased funding options and smaller pilot grants; provide a simplified application; allow funding to be invested in financial reserves; allow more flexibility for grant funds to be used for fundraising; increase the indirect costs percentage; provide support for fiscal sponsorships and other kinds of technical assistance.

Response

The focus of the Local Community Benefits Fund is to fund consolidated, larger grants. The Air District recognizes, however, that this may miss the needs and capacities of smaller organizations and ecosystems. The Guidelines offer the following updates or clarifications:

- Section 3 was updated to explicitly note that applicants may propose a mix of planning, capacity-building and implementation activities needed to achieve measurable outcomes.
- Section 3.2 was updated to allow Opportunity Grant applicants to submit proposals re-granting funds to other entities, particularly smaller entities with lower capacity. Such re-granting proposals are exempt from the Co-Applicant requirement.
- Section 8.1 increased the indirect costs cap to 15% of the total budget.
- The Seed Grant will have a simplified application compared to the Opportunity and Catalyst Grants.
- Application technical assistance will be offered, and will be prioritized for applicants with fewer resources or limited grant experience.

Provide Definitions and Standards for the “Build Economic Resilience for a Just Transition” Section

Several comments recommended that the Guidelines strengthen the “Build Economic Resilience for a Just Transition” section. Commenters recommended defining terms and standards, encouraging local workforce development and the use of local suppliers and contractors to promote high road economic development within the eligible communities, and incorporating high-road labor standards for construction projects.

Response

The Guidelines have been updated to provide greater clarification:

- Section 6.2 has been updated to clarify overall language.
- Sections 6.2 and Appendix D have been updated to prioritize high-road economic development that keeps financial resources within the region and ensures that high-quality local jobs are created.
- Appendix B has been added to define terms.
- Appendix D has been added to provide guidance on “maximizing high-quality job creation for construction projects.”



Remove or Lessen Measurable Outcomes

Several comments recommended removing or lessening the measurable outcomes requirement. Commenters noted that such requirements place a high burden on applicants, particularly community-based organizations or smaller applicant entities. Commenters also noted that overemphasis on quantitative measurements can lead to artificial indicators.

Response

The Measurable Outcomes Plan requirement is intended as a logic model, tying measurable outcomes to milestones, tasks, indicator tracking and the requested budget. The Measurable Outcomes Plan will support grant reviewers to evaluate different kinds of projects, and will support selected grantees to track progress, reporting and learning over the life of the grant.

Once application solicitation opens, a resource to developing measurable outcomes that provides guidance and examples on developing quantitative and qualitative outcomes and indicators will be published on the [Air District](#) website. Technical assistance during the application phase may support applicants to identify appropriate measurable outcomes for their proposals, and technical assistance during grant implementation for selected awardees may support in strengthening data metrics and accountability.

Increase Indirect Costs to 15%

Several comments recommended increasing the indirect costs cap from 12% to 15% of the overall budget, in line with federal grantmaking standards.

Response

Section 8.1 of the Guidelines has been updated to increase the indirect costs cap from 12% to 15%.



Reduce Readiness Requirements for Permits, Approvals and Site Control

Several comments recommended reducing or eliminating the readiness requirements related to permits, approvals and site control.

Response

Section 7.3 of the Guidelines has been updated to clarify the readiness requirements for permits and approvals:

- *Permits and approvals:* Applications must identify any necessary permits or approvals required to implement projects, and demonstrate that such permits or approvals can be obtained within the grant term.
- *Site control:* Demonstration of site control will be required by the time of the execution of the Grant Agreement.