

Making Policy Accountable to Community: Lessons from Boston and Seattle

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ABSTRACT

Governments across the U.S. are increasingly exploring the use of Community Accountability Boards (CABs) to guide the design and implementation of climate policies, such as Building Performance Standards (BPS). These boards are intended to ensure that communities that have been historically excluded from policymaking, such as residential tenants, EJ communities, and low-income laborers, have the power to make decisions on policies and procedures that impact their communities. Yet, few studies examine whether these boards meaningfully shift power to frontline communities or merely provide symbolic participation. To date, only Boston, Massachusetts, and Evanston, Illinois have a formally established CAB for their BPS. In Boston, the Review Board's role is to ensure the equitable implementation of the city's BPS, with the Healthy Buildings Accountability Board in Evanston playing the same role respectively. Seattle's Green New Deal Oversight Board is similar; it broadly represents the aforementioned communities but falls short of granting members decision-making authority.

This paper presents a dual case study of the respective boards in Boston and Seattle, two of the nation's most established models. We evaluate each board's legislative authority, transparency, influence, and shifts in representational makeup. We also assess design choices, membership selection, data access, and how much staff support and compensation they receive. We conclude with design recommendations for evolving these bodies into enforceable accountability structures. By analyzing these two models, this paper offers actionable lessons for governments seeking to embed equity in climate governance and institutionalize community power.

Primary Research Questions

This paper is an attempt to explore the following research questions:

1. How do Boston's and Seattle's community boards differ in mandate, authority, and lived practice?
2. What institutional and political conditions enable true accountability?
3. What policy lessons can be learned from allowing flexible compliance (and the sometimes complex processes and documentation this entails) while also enabling greater community accountability?
4. Beyond the legal and institutional frameworks, what other structures and/or processes enable or hinder CAB development?

Methodology

This paper uses a qualitative, comparative case study approach to assess whether CABs meaningfully shift decision-making power to historically excluded communities, or if they primarily function as advisory bodies. Together, the Boston and Seattle case studies allow us to compare two distinct governance designs: one embedded directly in the implementation and enforcement of a BPS, and one operating with a broader policy remit but more limited formal decision authority. Our analysis draws on two primary evidence streams: 1) legal and administrative document review, and 2) “lived practice” assessment using interviews and records.

Legal and Administrative Document Review

We review the laws and regulations that establish each board and define its scope, composition, and powers. For Boston, this includes the Building Emissions Reduction and Disclosure ordinance (BERDO) and implementing regulations. For Seattle, this includes the municipal code provisions establishing the Oversight Board and the legal framework connected to Seattle’s Green New Deal and related climate programs. We use these sources to code each board’s formal mandate and powers, including: appointment and membership rules; decision-making authority; procedural requirements; transparency obligations; and any formal role in enforcement, funding allocation, or approvals.

“Lived Practice” Assessment Using Interviews and Records

Because formal authority does not fully describe how boards function in practice, we assess how each board operates on the ground through interviews and review of administrative materials. We draw on semi-structured interviews conducted with two BERDO Review Board members, one City of Boston staff member, three Seattle Green New Deal Oversight Board members, and one City of Seattle staff member. The seven interviews were conducted virtually and each lasted approximately one hour.

We also reviewed available operational documentation such as board workplans, meeting agendas, and materials, hearing records, budget recommendations, and adopted budget actions, funding awards, and enforcement actions where applicable. This evidence is used to evaluate how influence is exercised (formally and informally), how priorities are set, how technical information is communicated and weighed, and how accessible the board’s processes are to the communities it is intended to serve. Based on this evidence, this paper uses the following operational definitions and framework to facilitate comparisons between both boards using the same dimensions:

- **Mandate:** The stated purpose of the board and the domains it covers.
- **Authority:** The board’s formal decision-making power, including any ability to approve or deny requests, allocate funds, set binding requirements, or trigger enforcement actions.
- **Transparency:** The extent to which deliberations, materials, decisions, and rationales are accessible to the public, and whether affected communities can observe, participate, and contest outcomes.

- Influence: The board’s demonstrated ability to shape policy or implementation outcomes, including informal influence through relationships, agenda-setting, and coalition-building.
- Representation: Who holds seats and how seats are filled, including which communities and interests are substantively represented and which remain marginalized.
- Staff support and compensation: The staffing, training, technical support, and stipends or other resources available to enable meaningful participation and decision-making.

To synthesize findings on “power,” we use an original four-part typology of board authority developed for this paper that distinguishes between advisory functions and binding decision-making:

- Model 1: Advisory (recommendations only).
- Model 2: Agenda-setting / Workplan Authority (the ability to define priorities, workplans, or policy focus areas).
- Model 3: Co-decision / Approval Authority (the ability to approve variances, flexibilities, or funding allocations, including conditional approvals).
- Model 4: Enforcement / Remedies (the ability to issue or adjudicate notices of violation, recommend or initiate corrective actions, and influence penalties or other remedies).

Limitations

This paper is not intended to provide a comprehensive census of CABs nationwide. Instead, it offers actionable lessons from two well-developed models, recognizing that the operation of community governance bodies is shaped by local political conditions, legal constraints, staff capacity, and community organizing context. Evanston’s Healthy Buildings Accountability Board (HBAB), while similar in scope to Boston’s, has only been meeting regularly since November 2025. In addition, Evanston’s BPS policy followed the Institute for Market Transformation’s (IMT)’s short model law, sketching out high level ordinance parameters but leaving the majority of the detailed policy design to rule-making. The HBAB is currently working through the policy design elements that link to their mandate, including defining equity priority building criteria and advising on alternative compliance pathways. This paper’s authors felt the work was too preliminary to assess impact at this time. Where available, we examine claims across legal texts, administrative records, and interview perspectives, but we also acknowledge that some key dynamics—especially informal influence—are difficult to quantify and are best assessed through qualitative evidence.

Introduction to CABs and “Community Governance”

CABs are an emerging, innovative tool for climate governance—a way for local governments to embed community leadership into policy design and implementation, rather than relying primarily on one-time engagement processes. However, evidence on *actual power shift* is thin. As defined in IMT’s CAB Toolkit, “A community accountability board is a community-led, local governmental board that has the authority to impact power systems and move towards transparent, inclusive, and responsive policies and practices that directly serve community needs.”(IMT 2024). In this paper, we use “community governance” to mean structures that move

beyond consultation by creating an ongoing, formal role for impacted communities in shaping how policies are interpreted, implemented, and adjusted over time. While the CAB model can function in various contexts, this paper focuses on CABs that operate within a local government framework and have influence over implementation of BPS or similar emission reduction policies and programs.

Why Use a CAB?

CABs are a response to a common implementation problem: even when climate policies include equity goals, those goals can be weakened or applied inconsistently. Even with the best of intentions from policymakers, realized and experienced equity outcomes are often determined after a policy is adopted—through implementation rules, technical determinations, budget choices, enforcement discretion, and the day-to-day practices that shape who benefits and who bears burdens. Properly designed, CABs can help ensure that climate governance is both technically credible and democratically legitimate by creating a standing venue where impacted communities can 1) define equity priorities in operational terms, 2) interrogate how technical decisions affect people and neighborhoods, and 3) hold government accountable over time—not just during one-time stakeholder engagement.

CAB Structure

A CAB consists of a board of people who represent different community interests, generally with a specific number or percentage of seats set aside for specific members, such as representatives from environmental justice (EJ) organizations or youth representatives. Like a planning board or other government commission, a CAB has authority to make decisions and recommendations as to specific types of policy. In IMT's framing, a CAB is a community-led government board designed to make policymaking more equitable, transparent, inclusive, and responsive to frontline communities—ideally with enough authority and resources to influence outcomes beyond one-time public engagement. Where relevant, CAB design also benefits from basic safeguards against regulatory “capture,” which occurs when regulated parties or other well-resourced interests gain undue influence over the body meant to oversee or regulate them. In the CAB context, “anti-capture” safeguards may include clear conflict-of-interest rules, transparent decision rationales, balanced membership requirements, and limits on participation by regulated parties in nomination or appointment processes (Heims 2024).

CABs and Building Performance Standards

CABs, or similar community governance boards or commissions, are relatively common in governance, but CABs have particular relevance for BPS. A BPS requires existing public and private buildings over a certain size to meet performance targets by specific deadlines (IMT 2022). These targets focus on measures of building performance—energy use, water use, and/or greenhouse gas emissions—and become more stringent over time. BPS implementation often requires governments to make equity-sensitive choices about compliance flexibility, alternative pathways, enforcement discretion, and redistribution of any funds collected through penalties or

alternative compliance payments¹. These choices can meaningfully impact tenants, workers, and EJ communities, even when they are not the regulated parties. For that reason, BPS can be viewed as a “stress test” for CABs: it demands that boards hold community equity and complex building-science evaluation in the same space, with the same actionable importance, and then translate that into decisions that shape implementation outcomes over time.

In the sections that follow, we examine how Boston’s BERDO Review Board and Seattle’s Green New Deal Oversight Board operate as governance bodies in practice; compare the mechanisms that enable (or constrain) accountability and inclusion; and distill design lessons for jurisdictions seeking to build enforceable, community-led oversight structures.

Case Studies: CABs in Boston and Seattle

Boston’s BERDO Review Board and Seattle’s Oversight Board represent different approaches to a CAB structure, with the former having direct control over a fairly narrow range of policy implementation and the latter primarily providing recommendations on a broad set of programs.

Case Study 1: Boston — BERDO Review Board (BPS-Embedded Accountability)

The Review Board was established as part of Boston’s BPS, BERDO (Boston Code 2024 § 7-2.2(S)). The Review Board has nine seats, six reserved for members nominated by community-based organizations (CBOs) and two reserved for members nominated by the general public (Boston Code § 7-2.2(S); BERDO Regulations 2025, § XVI.b(vii)). The final board position is reserved for the current Chair of the City Council’s Environmental Justice, Resiliency and Parks Committee (Boston Code § 7-2.2(S)(2)). The City government maintains some control over the membership: nominating CBOs must be approved by the City’s Environment Department and each Review Board member must be appointed by the Mayor and approved by the City Council (Boston Code § 7-2.2(S)(2); BERDO Regulations 2025, § XVI.a). No single CBO may have more than two of its nominees on the Review Board at any one time, except in special circumstances (BERDO Regulations 2025, § XVI.b(vi)).

No Review Board seats are set aside for representatives from specific communities or fields, unlike Seattle’s Oversight Board. However, each Review Board member must be a resident of Greater Boston and have expertise in one or more fields relevant to BERDO. This can include lived experience or professional or academic training in fields such as environmental justice (Boston Code § 7-2.2(S)(1)-(2); BERDO Regulations 2025, § XVI.a(i)(a)). Other than the Environmental Justice Committee Chair, no Review Board members can be elected officials or full-time City staff (BERDO Regulations 2025, § XVI.b(ii)).

The Review Board has a substantial amount of responsibility over BERDO implementation; that responsibility can be divided into four areas. First, the Board has authority to approve or deny certain applications for compliance flexibility from the owners of buildings covered by BERDO. One such flexibility measure is to treat multiple buildings with the same owner as a single “portfolio,” allowing overcompliance in one building to make up for undercompliance in another (Boston Code § 7-2.2(C)). Notably, the Review Board may

¹ Alternative compliance payments are monies collected from building owners in lieu of a covered building achieving required performance targets.

condition approval of a portfolio on a plan for emissions reductions that prioritizes neighborhoods with lower incomes or higher shares of “minority” populations. The Review Board may also grant variances from BERDO’s requirements, including Individual Compliance Schedules, which allow buildings to delay compliance with some emissions targets, and Hardship Compliance Plans, which allow further variations on buildings’ emissions targets (Boston Code § 7-2.2(K)-(L)).²

Second, the Review Board allocates money from Boston’s Equitable Emissions Investment Fund (EEIF) to greenhouse-gas emission reduction projects (Boston Code § 7-2.2(G)). The EEIF is funded by penalties and alternative compliance payments (Boston Code § 7-2.2(G)(1)). The Review Board holds periodic public hearings to review applications for funding, which must reduce greenhouse-gas emissions and prioritize benefits to low-income and “minority” populations as well as other people disproportionately impacted by air pollution (Boston Code § 7-2.2(G)(2), (4); BERDO Regulations 2025, § XVII.c). Although BERDO is not yet collecting penalties or alternative compliance payments, Boston allocated \$3.5 million in seed money to the EEIF, of which the Review Board allocated about \$1.5 million to 7 decarbonization projects in 2024-2025, and an additional \$0.5 million to the Building Decarbonization Advisor Program, which provides expert support to projects in multifamily buildings (Ngo 2026, pp.10-11).

Third, the Review Board may recommend changes to various aspects of BERDO implementation. The Review Board can propose updates to the BERDO emissions-reduction targets—arguably the most important element of a BPS—on the request of Boston’s Environment Department (Boston Code § 7-2.2(I)(2)). The Review Board may also recommend changes to the categories of energy use that can be excluded from building’s emissions calculations, such as backup generation and electric-vehicle charging (Boston Code § 7-2.2(J)(2)). Finally, the Board can recommend changes to the alternative compliance options that they do not have direct control over. Currently, these alternative compliance options include: using energy from Boston’s municipal electricity aggregator, purchasing renewable energy certificates, entering into power purchase agreements with zero-emission generators, or making alternative compliance payments (Boston Code § 7-2.2(M)).

Last, the Review Board has a direct role enforcing BERDO. The Review Board is the body that issues notices of violation to building owners (or commercial tenants) that violate BERDO’s requirements and will hold a hearing on any disputed notices (Boston Code § 7-2.2(Q)(1)-(3)). The Review Board can also decide *how* to enforce the code—specifically, the Board determines whether the City should ask a court to order a person in violation to correct the violation (as opposed to merely paying a fine), and whether the City should place a lien on a building in violation to collect a fine (Boston Code § 7-2.2(Q)(5)-(6)).

² It is important to note that each of the Review Board’s approval authorities is subject to appeal to the Air Pollution Control Commission (e.g. BERDO Regulations 2025, § XI.d(ii)(b)). This possibility of review is common in administrative agencies and may help to ensure that the Review Board meets constitutional due-process requirements. It does, however, mean that the Review Board may not get the final say in its decisions.

Mandate and powers. The Review Board's activities fall under Model 3 (co-decision/approval) and Model 4 (enforcement/remedies) in the framework of community accountability established in the methodology section. The Review Board can also exercise power under Model 1 (advisory) by proposing changes to the BERDO regulations.

The Review Board does not have formal authority under Model 2 (agenda-setting/work-planning). Boston's City Attorney advises against interpreting the Board's authority beyond what has been clearly established by law, thereby limiting the Board's ability to define its own scope of work. According to interview feedback, board members can informally discuss changes to the Board's scope and structure with City staff but there is no established process to effect changes.

Transparency and process ("lived practice"). Communities are empowered to influence the makeup of the Review Board through the CBO nomination process. This helps build trust and familiarity between community members and the Review Board. Still, the nomination process is not without risk of regulatory capture: outside entities could hypothetically ask CBOs to make nominations in their interest. Additionally, the City has complete control over vetting and confirming nominees, and their deliberation processes remain somewhat of a "black box" based on interview feedback.

Massachusetts' Open Meeting Law requires all the Review Board's agendas, meetings and decisions to be open and accessible to the public. However, building and portfolio owners who have applied for flexibility measures are typically the only members of the public who attend Board meetings. Some Board members conduct outreach with tenants and workers in impacted buildings outside of meetings while other Board members only interface with the owners of those buildings during meetings. Occasionally the Board will host public meetings for specific stakeholder groups such as tenants, but these meetings are poorly attended. Ultimately, the centering of community priorities in Board decisions is dependent on the degree to which Board members are engaging with community members outside of open meetings.

Open meeting laws often pose a procedural challenge because Board members are prohibited from deliberating on matters within the Review Board's jurisdiction with a quorum of members outside of public meetings. Decision-making necessarily becomes an iterative process where City staff bring proposals to the Board, get feedback during public meetings, and return with updated proposals for further discussions at subsequent public meetings. Board members are allowed to speak with City staff outside of meetings and can uplift community questions or comments via these conversations. One Board member expressed a desire to more frequently exercise the Board's authority to put conditions on approvals of flexibility measures, but described this as a challenge given the limited amount of time for discussion during meetings.

Support and capacity. Interviewees concurred that City staff play a critical role in the establishment and maintenance of Review Board operations. Setting up the Board was itself a full-time job requiring the development of processes for invoicing, appointments, onboarding and legal compliance. Staff continue to support the Board's daily operations by setting agendas, preparing application summaries, posting meeting materials publicly, and providing technical, procedural and policy guidance.

A primary responsibility of City staff is to review flexibility measures and EEIF fund applications—which can be long and full of technical jargon—and prepare summaries and recommendations for the Board. This helps Board members to decipher applications, but also

creates a power dynamic where members are nudged towards particular decisions based on staff suggestions. Despite interviewees describing a positive, collaborative relationship between Board members and staff, this dynamic could be a barrier in shifting power back to community. Still, given that Board members are part-time volunteers who may have limited experience reviewing technical applications, City staff support is essential.

In addition to guidance from staff, the onboarding process helps new members understand Board processes and responsibilities. For one cohort of Board members, the City hired a consultant to answer technical questions related to building science. Such resources may cost the City money, but they help to break down barriers that usually preclude residents without technical expertise from serving on boards. One interviewee discussed the need for a larger narrative shift around what it means to have “expertise” (ie, technical knowledge vs deep knowledge of community priorities), and pointed to training during onboarding as a useful tool.

Key takeaways. Boston’s BERDO Review Board has a narrow mandate and a notable amount of formalized decision-making authority. One Board member expressed preference for the formal authority granted by the Review Board model because it is more effective in shifting power when compared to the advisory model. Despite this authority, City staff hold considerable sway over the Board, and their recommendations tend to influence Board outcomes. Having a narrowly defined scope of work can also be disempowering; the Review Board does not have clear avenues to consider broader consequences and co-benefits of building decarbonization, particularly impacts to tenants and workers. Another Board member highlighted an interest in potentially concentrating the mandate of the Review Board further still, and wondered whether separating broad decisions around the EEIF from the review of individual compliance flexibility applications may allow the Board to act more efficiently.

Case Study 2: Seattle — Green New Deal Oversight Board (Broad Oversight and Agenda-Setting)

Seattle established its Green New Deal Oversight Board in 2019 as part of a broader policy program known as the Green New Deal for Seattle (Seattle Ordinance No. 125926 2019). The goals of Seattle’s Green New Deal are to: eliminate greenhouse-gas emissions by 2030; prioritize investments for communities hit hardest by economic, racial, and environmental injustice; “ensure that those with the least amount of power and wealth are positioned to lead during this transition;” and create stable jobs with labor protections (Seattle Resolution No. 31895 2019). The Green New Deal has received dedicated funding from Seattle’s “JumpStart” payroll tax, which applies to high salaries at large employers in the city (e.g. Pennucci & Mikesell 2024). The Oversight Board’s mandate includes both “advanc[ing] the Green New Deal” and defining the specific policies that fit within those broad goals (Seattle Code § 3.14.979.A.1, 5).

The Oversight Board has 19 seats: 8 are selected by the City Council, 8 by the Mayor (subject to City Council confirmation), and 3 by the Board itself (also subject to City Council confirmation). The requirements for filling the board are quite detailed: 8 members must be “members of communities directly impacted by racial, economic, and environmental injustices” and also part of a CBO, with 2 of those 8 seats set aside for members of local Tribes and 2 for youth; 3 members must represent environmental-justice organizations; 4 must represent labor unions; 3 must have “depth of experience in greenhouse gas reduction and climate resiliency

strategy”; and 1 must represent a workforce-training organization (Seattle Code § 3.14.979.A.5). The Oversight Board also has a three-member Executive Committee, which interfaces with the City and the media on behalf of the Board (Green New Deal Oversight Board Bylaws § 3; Pinckney Interview 2026).

Unlike Boston’s BERDO Review Board, Seattle’s Oversight Board is not directly tied to a specific policy. Instead, it defines its own scope of authority through occasional “workplans” submitted to the City Council and Mayor (Seattle Code § 3.14.979.A.5). In practice, budget recommendations are a key element of the Oversight Board’s work. These have resulted in specific budgetary policy changes (e.g., Seattle Ordinance No. 126675 2022).

The Oversight Board also provides recommendations as to the substance of Seattle policies. In particular, the Board advocated for specific changes to Seattle’s BPS, the Building Emissions Performance Standard. These included: requiring net-zero standards by 2035, increasing the alternative compliance payments required from buildings that do not meet those standards, and setting aside a percentage of those payments for “building decarbonization in environmental justice communities” (OSE 2023, pp.131-133). While the BPS does not require net-zero greenhouse gas emissions until 2046 (Seattle Code § 22.925.070), it does have an alternative compliance payment of \$190 per MTCO₂e, and 40 percent of these payments (together with fines and fees under the BPS) will be “prioritized towards buildings serving people with low or no incomes and communities historically most harmed by economic, racial, and environmental injustice” (Seattle Code § 22.925.140).

Mandate and powers. In terms of this paper’s framework of community accountability, the Oversight Board’s authority sits mainly in Model 1 (advising) and Model 2 (agenda-setting). The Board’s primary formal role, as described by both City staff and Board members, is making budget recommendations to the City Council and Mayor, primarily on how to spend money allocated to Green New Deal programs from the JumpStart payroll tax. Board members are also included in other City decision making processes, such as the workgroup to design Seattle’s BPS and the City’s Climate Action Plan.

The Board also has a high level of authority to define its own scope. Its “workplan” mechanism and the open-ended nature of its budget recommendations allow the Board to determine for itself what programs it considers within its mandate. The Board has used this to place new policies on the City’s agenda, such as an effort to incorporate mechanical insulation inspections into existing utility or plumbing programs. This flexibility extends to how the Board operates, as well: the Board instituted a series of “Community Assemblies” to engage members of their communities more directly in the Board’s process and, by extension, the City’s.

Transparency and process (“lived practice”). City staff and Oversight Board members describe much of the Board’s influence as being exerted in informal ways. Many Board members are organizers and have experience building and wielding power outside of formal processes. One Board member also noted a recent shift from the majority of members being policy experts towards a higher number of individuals more deeply rooted in grassroots and environmental-justice organizing. Their Board membership gives them a formal position from which to advocate within the City, a space to coordinate and strategize with other Board members who work on different but related policy issues, and resources for creating new connections with the groups they represent, such as the Community Assemblies. This allows what a Seattle city staffer called an “inside-outside strategy”: the Board has direct access to the

City through their formal position and the support of City staff (the “inside”) and can also draw on Board members’ existing connections with the communities they represent (the “outside”).

The breadth of the Board’s scope has helped it remain flexible to incorporate immediate community concerns and priorities—such as the impact of extreme weather—as they develop, as well as encourage the City to apply a “Green New Deal lens” to new areas of policy. However, it also necessitated a long process of identifying and setting priorities in the Board’s initial years. This breadth also means that the Board’s areas of focus potentially overlap with a large number of other boards and committees within the City, requiring ongoing coordination. The Oversight Board Executive Committee is largely responsible for consulting with these entities and strategizing on how to leverage each group’s political power.

Support and capacity. Board members report that the support of City staff at the Office of Sustainability & Environment (OSE), has been very important to the Board’s role. OSE staff provide formal training on the City’s processes as well as informal advising on how to accomplish the Board’s goals. The staff also facilitate connections between Board members, both formally, at open meetings, and informally through one-on-one conversations or retreats. Board members find that this insider knowledge and networking are a good complement to their existing relationships and expertise outside the City. Political savviness and an understanding of the unwritten norms of City processes are particularly important because the Board does not have formal decision-making power.

OSE staff for the Board currently consists of an advisor as well as support staff equivalent to 1.5 full-time positions and one communications intern. The advisor provides strategic support, translation between the terms used by the Board and those used by the City, and “internal organizing” in support of the Board’s priorities. The support staff handle many of the details necessary for setting up and running meetings as well as taking questions from Board members and connecting them with City staff. The communications intern handles some of the Board’s official external communications, including a monthly newsletter, coordinating with OSE social-media staff, and updating the Board website.

None of the staff make suggestions to the Board on substantive policy. As discussed earlier, this dynamic is not the same as that which plays out between staff and the BERDO Review Board. Staff for the BERDO Review Board are responsible for summarizing compliance flexibility and funding applications and presenting recommendations on how the Review Board should decide, with limited clear guardrails in place to protect against potential undue influence from staff. By contrast, staff for the Seattle Oversight Board strictly avoid making recommendations on Board policy choices, focusing instead on helping the Board operate and implement its policy decisions.

Key takeaways. Seattle's Oversight Board has a broad and flexible scope but very little formal decision-making power. The Oversight Board's official role is almost entirely limited to recommendations, meaning that the Board relies heavily on relationship-building, political savvy, and the power of the communities they represent. In some ways, the Board operates more like a well-resourced coalition space than a policy apparatus: its influence comes from convening representatives from different communities with different areas of expertise and giving them access to the City. This is not to say that the Board structure is ineffective, but that its effectiveness is as part of broader networks and is mostly not contained within its formal structure.

Comparative Analysis of the Boston and Seattle CABs

The two boards have starkly contrasting approaches to community involvement in decision-making. Boston's board has a narrow remit but a high level of decision-making authority within that scope, while Seattle's has a broad and flexible mandate but has a primarily advisory role. The agenda for Boston's board is generally set by the immediate activities necessary for BERDO implementation. Seattle's board, by contrast, sets its own work plan based on the priorities proposed by members and the communities they represent. In both cases, City staff are crucial to enabling board members to operate amid the complexities of city processes and to accomplish the day-to-day tasks necessary to hold board meetings.

The Boston board works primarily in Model 3 (co-decision making): its key function currently is to make decisions that implement BERDO. It is also poised to participate through Model 4 (enforcement) as the mandatory elements of BERDO begin to take effect this year and has a theoretical role under Model 1 (advising) because it has authority to recommend changes to BERDO rules. The Seattle board, by contrast, works primarily in Model 1 (advising) and Model 2 (agenda setting). The Oversight Board has essentially no authority to implement policy decisions, except in the narrow sense of defining its own workplan and holding the community assemblies for which it has requested funding. The Seattle board has no enforcement role at this time.

In keeping with this understanding, a Seattle interviewee expressed concern with the lack of concrete decision-making power her board had, while a Boston interviewee expressed frustration with the limited scope of his board. Interestingly, while some Seattle interviewees noted the large amount of new material board members needed to learn, none expressed a concern with finding new board members. By contrast, one Boston board member noted that finding new members for that board was difficult. This may be because the Seattle board's relatively broad scope allows members to advocate for a comprehensive, progressive climate agenda that also supports their work outside the board, while the Boston board's narrow scope takes members away from the work they might otherwise be doing.

To draw the line even more starkly, some interviewees suggested that the Seattle board's role as a coalition space is as important, if not more, than its role in formal decision-making processes. Under this conceptualization, the Oversight Board is less an actor in its own right and more a single tool in a broader toolbox for organizing and power-building. This raises a broader question as to the role of CABs in community power: Should they *embody* community power, taking community preferences as an input and outputting policy decisions? Or, should they *enable* community power by facilitating existing campaigns to exert power over existing

decision-making functions? The formal differences between the two boards are described in Table 1.

Table 1. Differences between Boston BERDO Review Board and Seattle Green New Deal Oversight Board

Aspect	Boston BERDO Review Board	Seattle Green New Deal Oversight Board
Mandate	Reducing building emissions and ensure BERDO implementation benefits and EJ communities	Supporting the implementation of the Green New Deal of Seattle to align with community needs
Authority	● Approve or deny applications for BERDO flexibility measures ● Approve or deny applications for funding from the Equitable Emissions Investment Fund ● Enforce against violations ● Recommend updates to regulations and policies	● Identify and define programs that advance the Green New Deal goals ● Make recommendations to the Mayor and City Council on advancing the Green New Deal Goals ● Engage with represented community
Transparency	● Nearly all work takes place in public meetings ● Public meetings are recorded and recordings, presentations, and minutes shared with public ● Annual meeting for residential tenants, but poorly attended	● Board members meet publicly for official business but work such as relationship-building takes place outside public meetings ● Public meetings are recorded and recordings, presentations, and minutes shared with the public ● Community Assemblies for specified communities, well attended
Influence	● High level of control within formal authority ● Low ability to influence policy outside of formal authority ● Board tends to approve city staff recommendations	● High level of control over own agenda, moderate level of control over specific revenues ● Some persuasive power over other parts of city policy, built on power of represented communities and desire for city to align with board
Representation	● Six members nominated by community-based organizations ● Two members nominated by anyone	● Eight members of frontline communities that are part of a community-based organization, including two members of local Tribes and two youths

	• One position occupied by Chair of City Council’s Environmental Justice, Resiliency, and Parks Committee or designee	• Three representatives of environmental-justice organizations • Four labor representatives • Three people with climate mitigation and resilience experience • One representative of a workforce-training organization
Staff support and compensation	• High level of support from staff, especially in evaluating applications • Compensation of \$200/day, up to \$4,800/year, provided where service on board is not part of member’s job	• High level of support from staff, especially in connecting board with city • Compensation of \$50/hour provided where service on board is “financial hardship”

Design Recommendations: How to Build CABs that Actually Shift Power

Boston and Seattle suggest two legitimate theories of change for community governance. In one model, a CAB embodies community power by holding defined decision-making rights that directly shape policy implementation (e.g., approving compliance flexibility requests, allocating funds, or participating in enforcement). In the other, a CAB enables community power by serving as a durable, resourced coalition space that strengthens inside-outside strategy—coordinating priorities across constituencies and converting community power into influence over existing decision-making venues (e.g., budgets, rulemaking, and agency workplans).

The case studies also highlight potential risks for CABs: CAB members that are responsible for highly technical implementation questions can be hampered by a lack of training or staff support, while CABs focused on enabling community power will only duplicate existing power structures unless they have access to government agencies and policymakers. Additionally, CABs with less formal decision-making power may be more impacted by shifts in local government priorities, budgets, and political will. On the other hand, while CABs focused on technical implementation are more insulated from changing political conditions, their general ability to wield political influence is limited by their structure.

In practice, jurisdictions should be explicit about which kind of CAB they are creating, because the design requirements—and what “success” looks like—differ. The following recommendations outline considerations for effective design of both CAB types, as well as non-negotiables for either model.

To Embody Community Power (Decision-Making CAB)

Write decision rights into law (not just “advise”). If the CAB is meant to function as a decision-making body, its authority should be unambiguous and tied to specific implementation

levers—such as approval/conditioning of compliance flexibilities, allocation of reinvestment funds, or a defined role in enforcement and remedies.

Anchor power in concrete “control points.” Design CAB authority around the moments where equity outcomes are made real, such as:

- Approvals/conditions on flexibility, waivers, timelines, portfolios, hardship plans;
- Public dollars (e.g., penalty/ACP-funded reinvestment); and
- Enforcement discretion (e.g., hearings, notices of violation, corrective orders).

Make technical capacity a right, not a privilege. BPS decisions involve complex documentation and modeling claims. A decision-making CAB needs built-in supports: plain-language staff memos, structured onboarding/training, and access to independent technical review to avoid deference to staff or regulated parties by default.

Guarantee data access and intelligibility. A CAB cannot oversee what it cannot see. Require timely access to underlying applications, datasets, and staff analyses, with summaries that make assumptions and tradeoffs contestable.

To Enable Community Power (Coalition/Agenda CAB)

Design for durable agenda-setting (and protect the “workplan” function). If the CAB is primarily a coalition space that influences policy through agenda-setting and budget recommendations, its workplan process should be resourced, recurring, and linked to formal government response (e.g., required written responses from agencies, annual hearings, or budget memos).

Build formal pathways into existing decision venues. Because enabling CABs rely on influence rather than binding votes, they need predictable access points: seats on rulemaking workgroups, structured coordination with departments, standing meetings with budget staff, and an expectation that recommendations are formally considered.

Invest in convening and community infrastructure—not just meetings. Seattle’s experience underscores that convening, relationship-building, and an inside-outside strategy can be central to impact. Design should support cross-constituency coordination (labor, EJ, advocates, tribes, youth, technical experts), community assemblies/listening structures, and communications capacity that sustains public pressure and legitimacy.

Cross-Cutting “Non-Negotiables” for Either Model (Embody or Enable)

Pair representation with independence safeguards (“anti-capture”). Regardless of authority level, CAB legitimacy requires guardrails: conflict disclosures, recusals, and norms that prevent any single constituency—especially regulated parties—from dominating. Without these, the risk of regulatory capture grows, where the regulated parties hold such sway over a regulating entity that the latter no longer acts in the public interest (Heims 2024).

Resource the work so that participation is feasible. Both models can fail when under-resourced. Staffing, stipends/compensation, training, and operational support should be commensurate with the board's workload and expectations. In cases where there may be limited resources to support a CAB, it is advised that the scope and mandate reflects the capacity of members and any staff that would support them.

Design transparency for accountability, not just compliance. Open meetings are the baseline. Publish materials in advance, document decision rationales (or recommendation rationales), and use clear criteria so communities can track consistency and contest outcomes.

Hardwire equity into decisions. Equity must be operational and durable. There should be prioritization rules for reinvestment, explicit criteria for conditioning approvals (where applicable), and requirements to assess who benefits and who bears burdens in implementation choices.

Conclusion

Boston and Seattle show that CABs can advance equity through very different mechanisms: Boston's BERDO Review Board illustrates a narrower-but-strong model where authority is embedded in BPS implementation and tied to concrete control points (flexibilities, funding, and enforcement-related functions), while Seattle's Green New Deal Oversight Board demonstrates a broader-but-softer model that can shape outcomes through agenda-setting, budget recommendations, and coalition-style "inside-outside" influence—especially where a dedicated funding stream exists and the board is positioned to make recurring recommendations. In both cases, the practical ability to shift power depends heavily on staffing, process design, and whether community members can access and challenge technical information in real time.

This paper is intended to examine and evaluate diverging approaches to the development of CABs that have influence over BPS implementation and other building decarbonization policies. Further research is needed to assess the impact of the policy choices outlined here and to fully develop a typology of CABs.

Acknowledgements

The authors would like to thank the following individuals for sharing their time and insights: Jessica Boatright (BERDO Review Board member), Hesan Farooqi (BERDO Review Board member), Peter Hasegawa (Seattle Green New Deal Oversight Board member), Hannah Lindell-Smith (Seattle Green New Deal Oversight Board member), Emily Pinckney (Seattle Green New Deal Oversight Board member), Elise Rasmussen (City of Seattle staffer), and Diana Vasquez (City of Boston staffer).

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