Bureaucrats' Tacit Understandings and Social Movement Policy Implementation: Unpacking the Deviation of Agency Environmental Justice Programs from EJ Movement Priorities

Jill Lindsey Harrison

University of Colorado-Boulder

ABSTRACT

Scholarship at the intersection of social movement and organizational theories has illuminated intra-organizational factors that shape agencies' efforts to implement policies social movements have fought for, emphasizing the roles of agency leaders' ideological commitments to movement policy, organizational capacity, and sanctions to ensure compliance. I argue that social movement policy implementation is also shaped by *bureaucrats' tacit understandings of key movement concepts*, albeit conditioned by how able they feel to implement those interpretations in light of political contexts. I make this argument through the case of government agency environmental justice (EJ) grant programs, analyzing program documents, funding patterns, and confidential interviews with agency representatives to explain why most EJ grant programs deviate from longstanding EJ movement priorities while one program coheres with them. I show that these outcomes stem from the fact that many staff—even while avowing support for EJ policy—hold tacit understandings of key movement concepts that differ from those of advocates. Social movement policy implementation can align with movement principles when institutional logics consistent with the movement are held, promoted, and defended by agency representatives who feel that their institutional environment permits them to implement those ideas.

KEYWORDS: environmental inequalities; environmental justice; institutional environments; social movements; social movement policy implementation.

In the past 20 years, state and federal agencies have adopted and implemented "environmental justice" (EJ) policies, programs, and practices. These are widely understood as a direct response to the demands of the EJ movement (Bullard et al. 2007; Cole and Foster 2001), a network of grassroots and other activists fighting the unequal clustering of environmental problems in low-income communities of color (Bullard 1990; Cole and Foster 2001; Mohai, Pellow, and Roberts 2009). However, agencies' EJ efforts have largely disappointed movement supporters by deviating from longstanding movement priorities—namely, failing to reduce the environmental burdens that disproportionately burden low-income communities of color and reform the structures that create those inequalities (Bullard et al. 2007; Harrison 2015a; Holifield 2004, 2012, 2014; Liévanos 2012; London, Sze, and Liévanos 2008; Payne-Sturges et al. 2012; Shilling, London, and Liévanos 2009; Vajjhala 2010; Walker 2010).

Studies of social movement policy implementation—programs instituted per policy that a social movement advocated for and won—provide insights into how and why such efforts often fail to meet advocates' expectations. Social movement scholars have identified numerous *intra-organizational factors* that neuter agencies' efforts to implement policies social movements have fought for, including industry capture (Gamson 1975; Selznick 1966), organizational capacity (Bonastia 2000; Liévanos 2012; Rogers-Dillon and Skrentny 1999; Sabatier and Mazmanian 1980; Skocpol 1985; Skrentny 1998), agency leaders' support for the policy and the movement (Banaszak 2005; Jenness and Grattet 2001; Santoro and McGuire 1997; Shilling et al. 2009; Stearns and Almeida 2004), and sanctions to ensure compliance (Zald, Morrill, and Rao 2005).

Notwithstanding these important contributions, scholars have scarcely attended to the perspectives of bureaucrats[1] who design and administer social movement policy implementation efforts. Ethnographic studies of other agency contexts have shown why bureaucrats' perspectives matter: they often wield considerable discretion and can influence agency outcomes through exercising their beliefs (Hays 2003; Lipsky 1980; Watkins-Hayes 2009). Of course, they do so not within the conditions of their own choosing; staff are situated within their organizations' institutional environments that impose material limits and institutional logics about "how things are done," which structure staff practices and beliefs (Meyer and Rowan 1977; Scott 2014). Thus, to more fully explain social movement policy implementation outcomes, I look at how bureaucrats themselves interpret their responsibilities and institutional constraints, and how those factors influence their implementation of social movement policy.

I do so through the case of government agency EJ grant programs. I analyze program documents and their funding patterns to demonstrate that most EJ grant programs deviate from longstanding EJ movement priorities in problematic ways. Through analyzing interviews with agency representatives, I demonstrate that these outcomes are shaped by EJ grant program representatives' interpretations of EJ and whether their political contexts permit them to implement the grant programs consistent with those beliefs. In most agencies, many EJ program staff evince the ideological influence of the movement, interpreting EJ in line with EJ advocates' longstanding priorities—yet they feel the broader political context is hostile to those principles and thus refrain from asserting them. Many of their coworkers interpret EJ in a competing way that reflects the dominant neoliberal context within which they work; these staff feel able to implement their grant programs accordingly. In the grant program aligning closely with EJ movement principles, its staff interpret EJ in line with EJ advocates' priorities *and* feel that their institutional environment allows them to design the grant program accordingly. I thus argue that social movement policy implementation outcomes are shaped not only by the factors others have rightly noted, but also by the ways that agencies' institutional environments shape the *meanings* staff attach to key movement principles and the extent to which they feel able to implement policy consistent with those tacit understandings.

---

1   Following Lipsky (1980) and others, I use the term "bureaucrat" in a non-pejorative sense. Per local parlance within environmental regulatory agencies, I use "bureaucrat" and "bureaucrats" interchangeably with "staff."

In the next section, I situate this study within the extant scholarship on social movement policy implementation. I then provide background on EJ policy and critical evaluations of it. I then describe my cases—agency EJ grant programs—and research methods. Subsequently, I describe agency EJ grant programs' rules, priorities, and funding patterns, demonstrating how most programs deviate markedly from a key priority of EJ advocacy. I then analyze my interviews with agency representatives to explain those outcomes, demonstrating the important role played by bureaucrats' tacit understandings of key movement principles. I conclude by summarizing my findings and argument and offering suggestions for future research.

SOCIAL MOVEMENT POLICY IMPLEMENTATION

Scholars have identified numerous characteristics of social movements that shape their abilities to successfully organize, mobilize, achieve favorable policies, and influence institutional priorities and resources. They have emphasized the roles of movement organizational structures, leadership, membership, inter-organizational networks, material resources, political opportunities, claims, ideology, tactics, and support from media and academics (Almeida and Stearns 1998; Amenta and Young 1999; Andrews 2001; Andrews and Edwards 2004; Benford and Snow 2000; Edwards and McCarthy 2004; Jenness 1995; Meyer 2004; Oliver and Johnston 2000; Piven and Cloward 1977; Rochon 1998; Sawyers and Meyer 1999; Stearns and Almeida 2004; Tarrow 1998).

Following Phillip Selznick's (1966) influential work on cooptation, William Gamson (1975) and others problematized the fact that state actors, to manage dissent, can formally legitimize a social movement without providing substantive political gains, such that movement policy implementation becomes "decoupled" from movement principles (Meyer and Rowan 1977). Scholars subsequently identified intra-organizational factors mediating agencies' efforts to implement policy social movements have fought for. Some emphasized state capacity limitations (e.g., funding and political autonomy; Bonastia 2000; Liévanos 2012; Rogers-Dillon and Skrentny 1999; Skocpol 1985; Skrentny 1998). Others pointed to the role of key agency representatives' expressed support for movement principles (Jenness and Grattet 2001:131; Shilling et al. 2009). Others highlighted the role of "insider activists" (Banaszak 2005; Santoro and McGuire 1997), "tempered radicals" (Meyerson and Scully 1995), and other state actors who participate in state-movement coalitions (Stearns and Almeida 2004). Scholars have found that similar mechanisms shape how military, religious, industry, and other non-state organizations respond to activist pressure (Katzenstein 1999; King and Pearce 2010; Soule 2012).

Upon reviewing such scholarship, Mayer Zald, Calvin Morrill, and Hayagreeva Rao (2005) offered a model of the primary types of factors that shape how organizations implement social movement policy—"a framework to help explain the extent to which movement goals, in all of their complexity, are enacted or resisted in organizational policy, symbolism, and practice" (p. 277). They identified three key intra-organizational factors: ideological commitment to movement policy—whether relevant staff exhibit a "pro- or anti-movement orientation" (p. 275); organizational capacity to respond to movement claims; and surveillance and sanctions that compel compliance. They acknowledged that their framework is a preliminary one: "more work needs to be done on how organizations deter and divert movements, thwart the enactment of laws, undermine regulations, and shape their environments" (p. 278). In particular, they acknowledged that their model treats organizations as "more or less unified actors" (p. 257) and that they could use a "more complex treatment."

Ethnographic studies of state bureaucracies and organizational theory on institutional environments together show why a more complex treatment of agencies' internal workings could strengthen scholarship on social movement policy implementation. Ethnographic studies have shown that state actors' interpretations of their responsibilities can shape policy outcomes. Building on Michael Lipsky's (1980) study of "street-level bureaucrats," Sharon Hays (2003) showed that welfare office staff maintain a "logic of care" as the dominant norm that "lives on in the welfare office" (p. 92)

despite punitive sanctions instituted by late 1990s policy reforms that radically restructured welfare services. Even in bureaucratic contexts as highly structured as welfare offices, staff interpret their responsibilities in ways that might differ from those of formal policy, wield some discretion over how to administer programs, and thus can shape policy outcomes. John Skrentny (2006) also emphasized the need to investigate state actors' beliefs. He demonstrated that advocates' abilities to achieve affirmative action policies were shaped by how political elites defined social groups the movements represented, their moral deservingness, and their degree of threat to social order (see also Andrews and Gaby 2015). Thus, to more fully explain social movement policy implementation outcomes, we must examine agency representatives' beliefs and how they apply them.

Organizational theory emphasizes the *structured* nature of bureaucrats' beliefs. In an early and influential publication, John Meyer and Brian Rowan (1977) showed that organizations are shaped not only by rational decisions about efficiency but also norms, shared meanings, pressure from movements and politicians, and other factors constituting an organization's "institutional environment" (see also DiMaggio and Powell 1983). More recently, scholars have shown that organizations often face "fragmented and contending institutional pressures" (Scott 2014:182; see also Pache and Santos 2010, 2013). Institutional demands can be conveyed not only by actors external to an organization but also by organization members, "who adhere to and promote practices, norms, and values" (Pache and Santos 2010:459; see also Binder 2007; Hallett and Ventresca 2006). Anne-Claire Pache and Felipe Santos (2010, 2013) thus encouraged scholars to treat organizations not as "unitary actors developing strategic responses to outside pressures," but instead as "pluralistic entities" in which conflicting institutional demands may be internally represented among staff and thus shape organization practices (2010:456, 459). Although many social movement scholars attend to institutional environments and logics, scholarship on social movement policy implementation has paid relatively little attention to how the complexity of those environments may produce, among agency staff, competing interpretations of key movement principles and how they should implement social movement policy.

I apply these insights to contribute to scholarship on social movement policy implementation. I do so through a case of agency EJ grant programs, most of which deviate markedly from a key priority of EJ advocacy. I ask: How do staff interpret their "EJ" responsibilities and perceive their institutional constraints? How do those interpretations and perceptions shape how they implement EJ grant programs?

EJ MOVEMENT AND POLICY

A diverse network of primarily grassroots activist groups known as the environmental justice (EJ) movement since the 1980s has rallied against environmental injustice: the ways in which economic inequality and group-based oppression leave low-income communities and communities of color with a disproportionate burden of environmental problems (Bullard 1990; Cole and Foster 2001). "Environmental inequalities" research has helped substantiate this claim (Crowder and Downey 2010; Downey 2006; Grant et al. 2010; Mohai et al. 2009).

Part of a long history of struggle against environmental racism in the United States (Taylor 2009) and gaining steam with the civil rights movement, EJ activists argue that freedom from environmental harm should be a *right* to be protected by the state, not a privilege available only to wealthy whites and others with means. Although EJ activism includes many tactics, observers have emphasized that EJ activists focus on asserting and defending environmental rights and thus principally pursue change through regulatory and policy protections and more democratic state decision-making processes (Benford 2005; Bullard 1990; Bullard et al. 2007; Cable and Shriver 1995; Capek 1993; Cole and Foster 2001; Faber 2008; Faber and McCarthy 2003; Harrison 2011, 2014; London et al. 2013; Pellow and Brulle 2005; Sandweiss 1998; Schlosberg 2007; Schlosberg and Carruthers 2010; Taylor 2000). Angered by discriminatory government policies and polluting industries exploiting their communities, and unable to buy their way into safer environments, EJ activists criticize mainstream

environmental organizations and the state for relying on undemocratic market-based and individualized mechanisms of change that obscure the structural causes of environmental inequalities, let industry off the hook, and fail to redistribute power over decision making to communities of color and other disenfranchised communities overburdened with environmental harms.

For example, in his now-classic treatise on the EJ movement, *Dumping in Dixie* (1990), scholar-activist Robert Bullard described trends in EJ mobilization, highlighted activists' demand that environmental protections are rights to be guaranteed by the state, and articulated a model EJ framework that foregrounds the pursuit of change through regulatory and policy protections:

> Environmental justice activists have targeted disparate enforcement, compliance, and policy formulation as they affect public health decision-making . . . The environmental justice framework incorporates the principle of the *right* of all individuals to be protected from environmental degradation. This will require legislation . . . to prohibit environmental discrimination based on race. (pp. 113, 122)

Recently, Jonathan London and colleagues (2013) characterized EJ activism in similar terms:

> Environmental justice scholarship and social movements have launched critiques of the retrenchment of state regulation and the ascendency of market-based public policy as perpetuating unjust distributions of environmental hazards . . . A preference for public over private sector solutions by many environmental justice advocates derives from a relatively positive generational history of civil rights legislation and litigation on the one hand and the experience of being "dumped on" by corporations operating according to market logics on the other . . . Advocates emphasize the importance of social movement pressure on the state apparatus to ensure alignment with environmental justice values and to regulate the market to reduce its structural inequities (pp. 792, 795).

In response to EJ advocacy for formal EJ policy (Bullard et al. 2007; Cole and Foster 2001), some regulatory agencies in the United States have created EJ offices and hired "EJ" staff; instituted EJ grant programs; developed EJ screening tools; trained staff in EJ principles; and started to develop EJ protocol for permitting, enforcement, rulemaking, and other core regulatory functions. Agencies have convened EJ advisory committees and held community "listening sessions" to solicit EJ activist and resident input about how agencies should design their EJ programs, and some hired grassroots activists to help administer them.

However, observers have found that agency EJ efforts deviate from core movement goals, doing little to redistribute power over decision making or reduce hazards in poor communities and communities of color (Bullard et al. 2007; Harrison 2015a; Holifield 2004, 2012, 2014; Liévanos 2012; London et al. 2008; Payne-Sturges et al. 2012; Shilling et al. 2009; Vajjhala 2010; Walker 2010). Their explanations have highlighted many intra-agency factors: unsupportive agency leadership, insufficient funding for EJ programs, narrow definitions of "EJ community," industry actors' antagonism toward key EJ principles, and conflict between EJ policy and agency mission (Holifield 2004, 2012, 2014; Liévanos 2012; London et al. 2008; Payne-Sturges et al. 2012; Shilling et al. 2009). In addition to state mechanisms channeling social movements in general (McCarthy, Britt, and Wolfson 1991), EJ policy implementation faces other institutional environmental challenges characteristic of neoliberal politics, including industry actors' and political elites' attacks on the environmental regulatory protections that EJ activists advocate (Faber 2008; Harrison 2011; Holifield 2004, 2012, 2014; Liévanos 2012; Ottinger 2013; Park and Pellow 2011; Shilling et al. 2009) and widespread colorblind ideological hostility to the EJ movement's explicit concern with institutionalized racism (Bonilla-Silva 2014; Harrison 2015b; Omi and Winant 2015).

To augment these accounts and thus further explain EJ policy implementation outcomes, I analyze agencies' EJ grant programs, which provide funding to grassroots organizations to address environmental issues in marginalized and overburdened communities. To my knowledge, two studies have evaluated agency EJ grant programs (London et al. 2008; Vajjhala 2010). Although offering valuable description, each addressed only one agency EJ grant program, provided minimal detail about the projects funded, and did not explain those patterns. In contrast, I systematically characterize five government EJ grant programs and all projects funded, and I explain why these grant programs deviate from the traditions of the EJ movement that fought for them. In addition to being the first comprehensive analysis of all agency EJ grant programs, this is the first multisited investigation of intra-agency factors that shape EJ programs.

CASES AND METHODS

I analyze government "environmental justice" grant programs as an instance of social movement policy implementation. EJ advocates lobbied for these programs to address the gap in funding for grassroots EJ organizations (Faber and McCarthy 2001). All agency EJ grant programs were implemented early in these agencies' EJ efforts, and grant program staff work on agencies' other EJ activities. EJ program staff are few in number, but they and the programs they implement influence agencies' overall EJ programming, which constitutes part of the institutional environment channeling EJ advocacy (McCarthy et al. 1991).

I compare and contrast five programs from the United States: California Environmental Protection Agency (CalEPA) EJ Small Grants Program (93 grants awarded from 2005 to 2015), San Francisco EJ Grants Program (55 grants awarded from 2001 to 2010), New York EJ Community Impact Grant Program (121 grants awarded from 2006 to 2013), U.S. Environmental Protection Agency (U.S. EPA) EJ Small Grants Program (1,345 grants awarded from 1994 to 2013), and U.S. EPA EJ Collaborative Problem-Solving (CPS) Cooperative Agreement Program (51 grants awarded from 2003 to 2014). These constitute all of the grant programs in the United States meeting the following criteria: they are government programs; are explicitly called "EJ" grant programs; fund community-based, nonprofit organizations and tribes (not university researchers or non-tribal government agencies); fund projects to improve environmental conditions in disadvantaged communities; and are not restricted to a narrow range of issues (e.g., transportation or tree planting).

Most grants awarded are between $15,000 and $30,000, though EPA CPS awards are $100,000 to $120,000. Program administrators recruit reviewers from within the agency representing different areas of technical expertise, who score proposals per program requirements (description of project objectives, work plan, and detailed budget).

I describe how well the programs align with a key aspect of EJ advocacy: the pursuit of change through regulatory and policy protections. I analyzed program materials to identify the rules and other language that specify which mechanisms of change each program encourages: *regulatory and policy protections* (e.g., fighting for stronger environmental regulations, greater enforcement thereof, state provision of key municipal services, and greater public participation in regulatory decision making) or *other mechanisms of change* (e.g., modification of individual lifestyle behaviors, market-based measures, charitable service provision, or voluntary agreements with industry).

I also analyzed the universe of funded projects in this regard. I analyzed the abstracts (available online) of all funded projects and, when available, the full application narratives (procured through public records requests). These documents identify the proposed activities the agency judged when determining which projects to fund. They do not indicate the outcome of the project nor grantees' broader suite of activities, so I do not evaluate the projects or grantees in those regards. A research assistant and I independently coded each funded project according to whether it pursued change *through regulatory and policy protections* (and perhaps other

mechanisms) or *only through other mechanisms of change*. I then calculated frequencies for each program. Here, I report my findings for the 985 projects specifying a mechanism of change (59 percent of the 1,665 projects funded).

To explain these descriptive findings, I draw on confidential, semistructured interviews I conducted with agency representatives. Qualitative interviews help illuminate variations in how organization representatives interpret key concepts that otherwise appear to be widely shared, the institutional demands that they feel structure their work, and how they claim to enact their beliefs in light of those constraints (Lofland et al. 2006). The semistructured nature of the interviews allowed me to pursue certain themes of interest while also allowing the participants to narrate and interpret their experiences, and to develop the rapport necessary to discuss politically controversial issues. Confidential interviews enabled agency representatives to express their beliefs that cannot appear in formal agency documents.

Central to this article are the interviews I conducted since 2012 with 28 current and former agency staff who helped design and/or administer these grant programs or closely observed their administration. I purposively recruited current grant program staff from all of the grant programs and former staff who led their design. I used snowball sampling to recruit additional key staff identified to me as particularly knowledgeable about the programs' design, administration, and evolution. Of these 28 staff, 18 helped design their agency's grant program or administer it since its inception, and 6 others worked with the agency's grant program for many years. I interviewed some staff multiple times and had follow-up correspondence with many others. I estimate that these staff represent approximately half of all individuals who have administered these grant programs. I recruited most participants by contacting them directly; in several cases, interview participants then recruited coworkers for me to interview. I asked staff to describe grant allocation criteria and process, explain what shaped program design, identify their own role in program design and administration, and identify the program's major accomplishments, limitations, and opportunities for improvement. Environmental regulatory agencies are arranged hierarchically, with rank and file "staff" reporting to managers, who report to senior management (which includes political appointees and senior-level "career" managers). The EJ grant program representatives, who are showcased here, are "staff."

To situate their accounts within agencies' other EJ efforts, I interviewed 35 additional staff and managers who helped design and/or administer other EJ programs in these and other agencies. I used a snowball sampling strategy to recruit agency representatives who had actively participated in agencies' EJ efforts, seeking variation in race, gender, tenure at the agency, level of authority within the agency, and degree of apparent enthusiasm for agency EJ programs (based on coworkers' characterizations). I conducted all interviews at locations chosen by each participant (their office, a meeting room at work, a restaurant, or outdoors), except for eight interviews conducted by telephone. Each interview lasted up to two hours and was audio recorded if the participant gave permission.

I interviewed nearly all of the agency representatives I contacted. I failed to interview five individuals: one did not receive my request because it was intercepted and rejected by the agency's press office; two declined my requests; and two did not return my calls and e-mails. I believe that these failed requests do not compromise my findings. I have no reason to suspect that their narratives would contradict the patterns I detail here, and I succeeded in interviewing multiple representatives of all five agency grant programs, including former and current employees.

To contextualize grant program administrators' narratives, I observed a two-day training workshop for CPS grantees in 2014, one "question and answer" conference call about the U.S. EPA application process in 2014, and various other meetings at these and other agencies.

To analyze the interview and observational data, I read and coded transcripts and field notes. Many of my codes emerged from the literature: agency representatives' expressed support for EJ policy, political economic and cultural contexts they identify as constraining their work, and how those constraints shape how they administer the grant program. Several themes emerged unexpectedly in the interviews: the mechanisms of change they express as consistent with EJ, other ways they define

EJ, categorizations of activist activities, and how those beliefs influenced how they administer the grant program. Accordingly, drawing on the principles of grounded theory (Bryant and Charmaz 2007), I then recoded transcripts and field notes for these emergent themes. I also identified a case that did not fit the broader pattern (the CalEPA program) and used analytic induction to explain that deviant case. I use secondary data to help explain my findings and triangulate bureaucrats' claims.

Of the agency representatives I interviewed, approximately half are men and half are women; 46 percent are white, 33 percent are black, 10 percent are Latino/a, 8 percent are Asian American, one is Native American, and one's racial identity is unknown to me. Because they expressed acute, repeated concerns about the need to maintain internal confidentiality (Tolich 2004), I have used pseudonyms, obscured each participant's racial identity, and obscured many participants' gender. Doing so does not undermine my arguments, as my findings in this article do not vary by gender or racial identity. All uncited quotations are from my own interviews or observational data.

AGENCY EJ GRANT PROGRAM DISCURSIVE EMPHASES AND FUNDING PATTERNS

Notwithstanding the diversity of EJ activists' tactics, they have historically prioritized regulatory and policy protections against environmental hazards. Agencies' EJ grant programs do not evince that model of change. This is reflected in program documents and the funded projects.

Most programs' requests for applications (RFAs) implicitly discourage applicants from proposing projects that pursue environmental change through regulatory or policy mechanisms. Where the San Francisco and New York RFAs list examples of eligible projects, most entail individual behavior modification ("teach local residents and school children about the nutritional and public health benefits of growing and eating fresh produce") and market-based change ("promote purchase of environmentally preferred products and the use of less toxic consumer goods"). None include policy reform, regulatory enforcement, or increasing public participation in regulatory decision-making processes (NYSDEC 2011:6; San Francisco 2010:9). U.S. EPA's program documents encourage industry-friendly collaborations. CPS documents promote collaborations "with various stakeholders such as communities, industry, academic institutions, and others" (U.S. EPA 2008:1). The U.S. EPA (2008) proclaims: "When multiple stakeholders work together, they create a collective vision that reflects mutually beneficial goals for all parties" (p. 3). Similarly, the U.S. EPA EJ Small Grants RFA specifies that proposals "should include strategies for . . . building consensus and . . . should demonstrate collaboration with other stakeholders," including industry and government agencies (U.S. EPA 2013:3-4). Emphasizing collaboration implicitly discourages organizations from proposing activities industry actors would reject, such as advocating for stronger environmental regulations or increased enforcement.

CalEPA's RFA differs from the others. It explicitly encourages projects aimed at regulatory and policy reform and increasing public participation in environmental decision-making processes, which are featured in its RFA's stated program goals and example projects (CalEPA 2013:1, 4). For example, the first page of CalEPA's RFA 2013 specifies that projects must address one of five "Program Goals," which include getting community residents to "develop skills and competencies to meaningfully participate in decision-making," such as through "training and educational programs on governance and regulatory processes" (p. 1). In the RFA's "Examples of Project Activities," the first is "Identifying and assisting EJ stakeholders to participate in the decision-making processes" (p. 4). The remaining six examples include "Improving communication and coordination among EJ stakeholders and Cal/EPA entities to address exposures to environmental pollution and hazards;" "Providing bilingual services for hearings, workshops and outreach in non-English speaking communities;" and "Promoting Tribal Government involvement in addressing environmental justice related issues."

Most programs' funded projects also deviate from EJ advocates' prioritized model of change. Only 33 percent (327 of 985) held the state accountable for improving environmental conditions

(e.g., organizing residents to participate in regulatory or land use planning events, or pressing agencies for basic municipal services, stronger environmental regulations, or enforcement of existing laws). Two programs had especially low rates of such projects: San Francisco at 11 percent (6 of 53 projects) and New York at 12 percent (11 of 90 projects). Again, the CalEPA program stands apart; 76 percent of its projects (56 of 74) pursue change through regulatory and policy mechanisms.

The remaining projects sought change only through non-regulatory means, typically through urging individual residents to modify their own lifestyles (e.g., reducing consumption of fish from contaminated rivers, eating organic produce, growing one's own produce, increasing physical activity, or recycling household waste). Others encourage local industry to voluntarily reduce emissions (e.g., educating truck drivers about diesel idling). Others sought change by providing goods or services (e.g., solar panels or energy audits) at a reduced cost.

To be clear, such projects are not antithetical to EJ, and EJ activists sometimes use these practices. Also, the grant programs do meet EJ activists' call to allocate more resources into disadvantaged and overburdened communities. However, the programs' discursive *emphasis on* and *predominance of* projects relying on residents and industry actors to voluntarily improve environmental conditions deviates from the EJ movement's longstanding insistence that the state protect environmental rights. This decoupling (Meyer and Rowan 1977) of EJ policy implementation from EJ advocates' prioritized model of change implies that EJ does not require stronger regulatory and policy protections, and that residents and industry actors can and should handle those responsibilities. This emphasis thus absolves the state of its responsibilities and accommodates the neoliberal rollback of regulatory protections in recent decades that EJ activists and others have so stridently contested (Cable and Shriver 1995; Faber 2008; Harrison 2011, 2014; Schlosberg and Carruthers 2010). It also dovetails with industry's and conservative elites' longstanding tactic of blaming residents for their own health problems and obscures structural contributors to disease. The dangers with such approaches are evidenced by Erin Winkler's (2012) finding that children in Detroit have internalized the narrative that black people created their own impoverished and contaminated urban conditions.

Also, "collaborative" agreements between residents and industry often undermine organizing efforts. Although the EPA RFAs list various possible stakeholders, and one EPA representative claimed that projects need not include *all* relevant stakeholders, multiple grantees told me that they felt pressured to reach consensus with industry in ways that undermined their goals. One grantee who proposed to help his community address its concerns about multiple polluting facilities in their vicinity said that EPA required their project "to be totally collaborative." He lamented that because industry actors in the collaboration rejected most activities residents and activists proposed, they only did activities "that didn't upset industry." They addressed indoor air quality, smoking, and diesel bus routes—which he considered "the lowest common denominator"—and were unable to tackle "the big issues" that mattered most to residents. He feels that the project actually undermined his future organizing prospects, as many residents felt frustrated with his organization for pursuing a limited array of activities (see also Ottinger 2013; Pellow 2000).

Additionally, few grant projects cohere with EJ advocates' longstanding goal of bolstering the ability of marginalized residents to influence environmental decision making. This applies to the individualized projects described above and projects that provide technical services (home energy audits, installing indoor air filters, or building green roofs). Finally, these funding patterns signal which kinds of projects are most likely to get funded and thereby channel organizations into proposing and conducting such work (McCarthy et al. 1991).

To some extent, program rules contribute to these problematic funding patterns. Most of the grant programs' RFAs specify that, pursuant to state and federal laws about government grants, EJ grants cannot be spent on lobbying or litigation, which many activists use to pursue regulatory and policy reform (CalEPA 2013:5; NYSDEC 2011:8; U.S. EPA 2013:14, 2014:4). Additionally, the RFAs require that projects be completed and demonstrate measurable outcomes within one or two years, and most grants are quite small (CalEPA 2013:3; NYSDEC 2011:9; San Francisco 2010:1;

U.S. EPA 2013:2, 5, 2014:2, 6). These parameters conflict with the long-term and resource-intensive nature of policy and regulatory reform. Yet the CalEPA program shows that these rules do not determine grant program outcomes. These major restrictions and requirements apply to the CalEPA program just like the others, and yet the CalEPA grant program's outcomes *do* reflect the EJ movement's model of change.

To understand why most of these grant programs' implementation deviates from EJ advocates' priorities—and why CalEPA's differs from the others—we need to hear from agency representatives. They tailor grant program RFAs, select grant recipients, and work on agencies' other EJ efforts, thereby shaping EJ movement policy implementation outcomes.

BUREAUCRATS' INTERPRETATIONS OF EJ AND THEIR STRATEGIC PRACTICES

All agency EJ grant program representatives I interviewed expressed enthusiastic support for EJ policy when describing their opinions about EJ and detailing their efforts to implement EJ within and beyond their formal duties. All characterized agency EJ efforts as requested and informed by EJ advocates, all characterized EJ advocacy as distinct from mainstream environmentalism, all applauded the grant program for supporting EJ organizations and lamented its limited funds, some noted having worked for EJ organizations before joining the agency, and many shared personal experiences of oppression and/or environmental contamination. Yet, most have crafted agency EJ grant programs that deviate from the model of social change that has long dominated EJ activism.

Below, I analyze interviews with agency representatives to explain EJ grant program outcomes. I show that they stem not only from factors other scholars have identified, but also from the ways agency representatives interpret EJ and whether they feel free to implement those beliefs. Among agency representatives, I found three dominant approaches in terms of how they interpret EJ and administer EJ grant programs. The first two prevail among agency representatives from all programs except CalEPA's; I show how both of these approaches contribute to the predominant funding patterns I described above. The third section features CalEPA representatives and illustrates that social movement policy implementation can align with movement principles when staff wield interpretations that align with the movement and feel that their political contexts allow them to apply their beliefs.

Neutering EJ Programs to Protect Them

Many staff from the New York, CalEPA, and U.S. EPA EJ grant programs interpret EJ in ways that align with longstanding movement priorities—as pursuing environmental change in marginalized communities *through regulatory and policy reform and enforcement*. They spoke favorably of EJ advocacy and expressed wanting to support its goals. For example, Jamie[2] lamented that although "easy" projects like community gardens increasingly win grants, advocates' "harder work" of reducing contamination through legislative reform needs more funding: "There is a dire need for dollars . . . so that they can do the harder work . . . to be able to understand the real serious impacts from some chemicals that might be inside of their community, to be able to deal with proposed legislation." Like the other staff featured in this section, Jamie views EJ organizations as examples that the agency should follow in designing its EJ programs and emphasized that he seeks EJ advocates' input about how to design and administer his EJ programs.

However, many of these staff from U.S. EPA and New York, and staff from other agencies' EJ efforts, feel unable to implement EJ programs consistent with these beliefs. Many confessed that the context they work in is hostile to agency EJ programs and to regulatory actions against industry. Given the grant programs' vulnerability to the whims of legislative appropriations, these staff cast them in a non-regulatory light to protect them from being defunded. Often after asking me to turn off my recorder, many agency representatives lamented that they feel exceptional pressure from their

---

2   As noted above, this is a pseudonym, as are all other names used in the article.

management and elected officials to avoid activities that challenge industry practices or regulations. Chris noted, "[My agency] has received a lot of scrutiny, including political scrutiny over not issuing permits fast enough to keep up with the speed of business," pressure that "is coming from the governor directly." Angela explained:

> There's a business community that is making absolutely sure that you don't do one more thing than that regulation requires you to do. It may be nice to get that stream up to this standard. But the law doesn't say that you have to, so don't you dare do that because I'll sue you if you do . . . We are not in the business of saying no. We are in the business of saying yes.

In an interview I conducted with Jamie and Alex, one of them stated that "conservative" legislators

> are always looking for ways to eliminate these programs. They go after EJ grants, they go after [the agency's EJ advisory committee], they try to dismantle the [agency's other EJ programs]. They think that if they can eliminate the programs that have elevated the voice of the community, then they will be able to keep dismantling EJ programs that serve EJ communities.

I asked whether this hostility has increased in recent years. Both replied, "Oh yeah!" emphatically and in unison, looked at each other, and then laughed briefly, although the mood was not particularly jovial. They elaborated that legislators use budgetary arguments to justify their attacks on particular programs. Consequently, EJ program staff minimize their program's expenditures. Alex explained, "We also need to reduce evidence of expenditures . . . If they can't say that we are a waste of money, then they will need to find a different target." This conflicts with EJ organizations' requests—more, bigger grants—and does not indicate progress in the agency's EJ efforts. However, keeping the grant programs small makes them less vulnerable to elimination by hostile actors and thus protects the shell of the program.

Studies substantiate these assertions. Conservative legislators intent on reducing regulatory restrictions on industry affairs have cut U.S. EPA's budget nearly every year for the past 25 years (Slesinger 2014), increasingly control U.S. political debate, disparage proposed environmental bills as "job killers," and have undermined agencies' EJ efforts (Faber 2008; Harrison 2011; Holifield 2004, 2012, 2014; Liévanos 2012; Shilling et al. 2009). Few EJ programs are mandated by statute, which increases their vulnerability and makes them difficult to legitimize, fund, and implement.

Many EJ program staff also confided that they feel undermined by dominant regulatory culture. Some described how their coworkers beyond the EJ programs use colorblind, "post-racial" forms of racist narratives (Bonilla-Silva 2014; Omi and Winant 2015) to discredit EJ programs (Harrison 2015b). Brian noted:

> The bureaucrats say, "Oh, and EJ's important now again . . . Here we go again." . . . It will take a long time to change. We have so many of these people who've been around here for years . . . Layer after layer of people who are just gatekeepers and do not think that racism exists [or that the] color of your skin has anything to do with anything, that that's all back in the '60s, [that] we shouldn't be worried about that stuff, and you should speak English. Not in leadership, but in the ranks, and the ranks control a lot of stuff . . . They call themselves the "we-bes": We be here before you; we be here after you . . . They say, "We'll wait out this administration. We'll wait out the legislators. Let's just wait them out. They're going to be turned out in a year. We'll just punt it."

Many staff in and beyond EJ programs told me that most (non-EJ) agency representatives fear, loathe, or resent the public engagement required for democratizing decision making. As Janine reflected, "They see it as a pain in the ass, something to be neutralized, dismissed, and disregarded."

She believes that it threatens regulators' sense of authority; managers say, "'Why should I solicit input from the public when I was hired to make these decisions myself?' No one trains you to see the value and inevitability of conflict" (see also Ottinger 2013). Additionally, many non-EJ program representatives I have interviewed at various agencies stated that they resist or resent their agencies' EJ efforts because they view them as contrary to their primary responsibility: approving industry permits (see also Bosso 1987; Harrison 2011).

Hostile pressure from legislators and industry, vulnerability of program funds to legislative appropriations processes, and these cultural dynamics within the agencies compel EJ grant program staff to encourage and privilege projects that do not threaten industry and in which residents are not angry. Paul explained that, because his agency is "risk-averse" and under scrutiny from the legislature ("they want to eliminate us"), his agency has invested fewer resources into traditional enforcement activities and more resources into grants for "greening" projects like community gardens precisely because such projects are seen as "safe." After elaborating about how resistant his coworkers and legislators are to the agency's EJ efforts, Michael noted that his office showcases its least-threatening EJ grant projects—community gardens and parks—"to show that addressing EJ issues can lead to clear returns on investment." He conceded that doing so was not consistent with EJ movement principles: "But when everything of value has to be quantified and monetized and converted into a cost-benefit analysis, it leaves out a lot of the issues that are very important in EJ." Notwithstanding these misgivings, showcasing the least threatening EJ practices helps his office to legitimize EJ programs among their colleagues and elected officials who are otherwise hostile to EJ.

These sentiments are not limited to the agencies with EJ grant programs but were expressed by representatives of many agencies trying to implement EJ principles in other ways. Most EJ program representatives' status as career employees (rather than temporary political appointees) makes them highly concerned with protecting their jobs, which manifests in their willingness to implement EJ programs in ways that contradict their own beliefs. To be clear, some staff did not make these claims. Given that publicly stating such ideas could jeopardize one's job and perhaps career, it is impossible to know exactly how widespread these sentiments are.

In sum, these bureaucrats interpret their charge consistent with EJ advocates' model of change but perceive a high degree of sanction against implementing EJ policy in such a manner. They grapple with conflicting demands from two institutional environments: the EJ movement, with its push for the state to take responsibility for reducing environmental inequalities, and competing pressure from conservative elected officials and industry to reduce regulation of industry affairs. Ultimately, although these EJ grant program staff identify with and want to defend the former, they comply with the latter, as it dominates their organizations and the actors who control those organizations' resources (DiMaggio and Powell 1983; Pache and Santos 2010:459). The outcome is a "selective coupling" (Pache and Santos 2013) of intact elements from both the EJ movement (sending resources to disadvantaged communities) and political elites (pursing change through non-state mechanisms).

Interpreting EJ as Non-confrontational and Industry Friendly

The remaining U.S. EPA and New York program representatives and all San Francisco program representatives reveal that agency EJ efforts are also shaped by a factor social movement scholars have devoted little attention to: bureaucrats' tacit understandings of key movement principles.

These staff expressed a similarly high commitment to EJ policy, yet emphasized that the way to achieve EJ is through non-confrontational, industry-friendly processes rather than regulatory means. That is, although EJ grant programs' RFA language and funding patterns largely deviate from EJ advocates' longstanding pursuit of change through regulatory and policy protections, they *do* align with many program administrators' conceptions of how best to pursue EJ.

Robert led the design of one of these grant programs and lamented that, when he was tasked with designing the program, EJ advocacy had "a very oppositional frame. It was *always* about stopping something, always about *defending*, about *fighting*. And I really wanted it to be propositional." He asserted that the dominant ("oppositional") approach to EJ activism sought stronger regulations on toxic facilities, an approach he characterized as outdated, closed-minded, "limited," "laughable" in the "obvious" nature of its limitations, and lacking solutions. He viewed the grant program as an experimental way to shift EJ activism:

> I was thinking about this stuff when we did the grant program in this way. I just knew that something wasn't right and that we did need to identify some level of solutions . . . I was just like, well, we need to just do something different . . . I think that experiment over time—as I look at it—was the right one.

Robert acknowledges that EJ activists balked at how he designed the program: "People didn't like it . . . It didn't go over too well . . . It was amazing the vitriol we received." Despite this reaction, he designed the grant program to accord with his views of what EJ should look like. Indeed, nearly all of its funded projects pursue environmental change through charitable service provision, individual behavior modification, and green space construction. His status as a political appointee might explain his sense of freedom to design the program as he wanted despite activists' backlash.

Even those expressing a more nuanced perspective on mechanisms of change still hailed industry-friendly approaches as the best way to pursue EJ. For example, Tom, who led the design of one EJ grant program, stated that he "wanted to develop a model for" solving problems in a "collaborative" way, and he applied those ideas when designing the grant program. He explained his goals for that program:

> A lot of the communities themselves are trapped in [thinking that] if you're talking about environmental justice, you're only talking about the regulations, or you're only talking about making the government solve the problem for us . . . But to a large extent, to really be transformative, you can't rely on anybody else to do it—you have got to do it yourself. Those that have succeeded are doing that.

Although implying that both regulatory and collaborative approaches pertain to EJ, he denigrates activists who expect the government to protect them and situates regulatory protections as outside the scope of "really transformative" EJ.

Other EJ grant program staff expressed similar interpretations of EJ when categorizing types of EJ grant projects. For example, Carrie, who managed one agency's EJ program since its inception, effusively praised EJ projects that rely on charitable service provision, individual behavior modification, and green space construction as the program's exemplary projects. For example, when asked about the impacts of the grant program, she replied, "We have funded several wonderful gardens, we have put in over 100 solar systems out there, [and] we have nurtured some activist groups who have been able to come in and yell at the [agency]." Her characterization of groups that engage the agency as those that "come in and yell at" it contrasts markedly with her praise for projects that do not make demands of the agency.

Susan characterized a longstanding EJ organization as "another confrontation-turned-success story." She explained that the organization, which typically used confrontational tactics to publicly shame regulatory agencies and polluting industry actors, used its EJ grant to educate truck drivers about reducing their idling to lower diesel emissions. To Susan, "success" meant dropping confrontational efforts to achieve regulatory protections and instead encouraging industry actors to voluntarily change their behavior.

Karen lauded her program for requiring recipients to partner with businesses. "It forces the residential community to overcome the stressful history and reconcile that history. We forced them to do it if they wanted the grant." Pam similarly advocated getting community groups and industry actors to reach "consensus" about how to address the residents' environmental concerns:

> Folks are collaborating and partnering. And it's not "us or them." It's trying to get everybody to a win-win . . . You want to just try to get a resolution that works for everybody. And so therein lies the whole notion of consensus . . . Everybody wants to live in a healthy environment. And it's trying to move some of the organizations away from communities saying [to industry], "[We want to] just shut you down" . . . Sometimes you have got to help the employer understand, "Well, this is impacting their health" . . . And they become good neighbors. But, until you can get everybody off the gnashing and clawing . . . [trails off].

By framing industry actors as simply unaware of residents' pollution concerns, "success" in terms of pacifying community anger, and all actors as wanting the same thing, Pam casts voluntary agreements as a "win-win" solution and the consensus-oriented grant program as a way to achieve it. Like Robert and Susan, Karen and Pam view EJ advocacy as needing to change—to collaborate with industry and use market-based and voluntary measures.

The staff in this section wield a logic consistent with neoliberal reforms and reflect what some scholars, drawing on Foucault, characterize as neoliberal subjectivity or "governmentality" (Rose 1999)—evidence that neoliberal ideas increasingly permeate and structure social thought and action (Guthman 2011; Harrison 2011, 2014). In contrast to their colleagues described in the previous section, these staff do not convey a sense of conflicting institutional demands. Rather, they conceptualize EJ in terms of the ideology pushed by powerful external actors and thus feel empowered to implement EJ policy in line with their beliefs.

Their interpretations of EJ shape program outcomes in many ways. Some designed the grant programs to implement their ideas that EJ should emphasize building consensus between activists and industry. Staff tailor their RFAs to highlight the types of programs they view as "good examples" of EJ projects and describe "successful" grant projects in outreach events and materials, which influence the types of applications they receive. One representative got his agency to devote a certain portion of the program funding to developing parks and gardens. Staff select reviewers to evaluate and rank the applications. Some staff noted that they actively encourage particular organizations to submit proposals. Some design and administer grant application workshops to educate prospective applicants about the program and how to write a strong proposal, and some design and administer training workshops for grant recipients. Many EJ grant program staff train their colleagues about EJ principles and how the agency can institutionalize them, and some train their peers in other agencies about what EJ means. Through all of these means, bureaucrats' interpretations of EJ—including their ideas about which social change mechanisms are consistent with EJ—shape program outcomes.

Institutionalizing EJ Activist Demands for Participatory Parity and Regulatory Reform

A third group of agency representatives—those from CalEPA—shows that staff who interpret EJ according to EJ advocates' prioritized model of change do not always feel fully constrained by the culture of industry protection that governs and pervades their agency. Instead, they have felt able to create and maintain an EJ grant program that aligns with EJ advocates' priorities.

Like the first group I presented, current and former CalEPA EJ grant program staff argued that their program should focus on helping EJ activists and other residents of marginalized communities influence regulatory and policy decisions. One stated that the "most effective projects" are those that help community organizations "have a better understanding of what we do" and learn how to "affect decision-making processes and permitting processes." Another asserted that

the agency's EJ programs should enable community organizations to have the same access to agency staff as industry does, framing his responsibility as helping EJ activists "get access to information as opposed to trying to wrangle it." Yet another asserted that EJ means increasing public participation in environmental decision making, which requires changing who makes regulatory decisions: "What does meaningful public participation mean? It means that we who were trained in the EJ world actually get into leadership roles, whether that is on a commission, working in the government, or [otherwise]."

Like staff from other agencies, one CalEPA representative characterized CalEPA, beyond its EJ program, as hostile to these goals and dominated by a culture of industry protection. (He was among the representatives I quoted about this in the first section, above.) Scholarship has shown that a culture of industry protection dominates at least one part of CalEPA, California's Department of Pesticide Regulation, where many representatives view voluntary agreements with industry as more fair and reasonable than regulatory restrictions on pesticides (Harrison 2011). Industry actors have helped slash regulatory budgets and neuter some CalEPA EJ programs (Harrison 2011; Liévanos 2012; London et al. 2008; London et al. 2013; Shilling et al. 2009).

However, CalEPA EJ program staff insisted that that they were able to administer the grant program with a certain degree of autonomy vis-à-vis the rest of the agency. Although surrounded by the same culture of industry protection that characterizes other agencies, CalEPA EJ grant program staff do not feel as bound by that context as do their peers in other agencies. Rather, CalEPA EJ staff cited EJ activists—not industry—as most influential over their own ideas and the grant program. A former CalEPA representative who helped design its EJ grant program said that, in agency-sponsored listening sessions around California, EJ activists insisted that CalEPA's nascent EJ programming prioritize increasing public participation in regulatory decision making. "So, when I came in, the question was, 'how do we get folks to participate?'" He asserted that EJ activists demanded that he design the grant program accordingly and that this explains the RFA's strong encouragement of projects that foster public participation in regulatory decision-making processes.

CalEPA bureaucrats' abilities to implement a grant program consistent with advocates' priorities stem in part from the fact that both individuals who have actively led the program have interpreted EJ in this way—that is, neither has held a neoliberal vision of change. Without the internal ideological struggle facing other agencies' EJ staff, CalEPA EJ staff are thus more able to defend EJ advocates' model of change and implement the grant program accordingly.

The CalEPA EJ grant program leaders' sense of autonomy and willingness to design the program in line with their beliefs are also bolstered by aspects of organizational structure and political context. Their status as political appointees likely supports their willingness to implement their principles and suffer the ire of their coworkers outside the agency's EJ program, whereas most other programs are run by career employees understandably concerned with protecting their jobs.[3] Also, CalEPA representatives' ability to craft the grant program according to movement principles is aided by contextual factors like the California legislature's uniquely prominent and rising Latino caucus, the state's demographic transition to a majority people of color state, and its strong EJ movement increasingly focused on state-level policy change (Perkins 2015). These factors help constitute the institutional environment that conditions who gets appointed, hired, and promoted in agencies, and which kinds of programs are perceived as reasonable. Yet the San Francisco grant program—which shares CalEPA's political context but follows a radically different model of change from CalEPA's EJ grant program—demonstrates that these institutional environmental factors do not fully determine the outcome. Despite sharing a context that is arguably more supportive of EJ policy than that of other agencies,

---

3 Within CalEPA's EJ efforts, this autonomy might be limited to the grant program. Scholars have shown that some of the agency's other EJ programs were undermined when industry actors actively shaped their implementation (Liévanos 2012; London et al. 2008).

the two California programs' staff displayed competing interpretations of an EJ model of change—and implemented their EJ grant programs to align with those respective visions.

CONCLUSIONS

This article contributes to social movement scholars' efforts to identify the types of intra-agency factors that shape how well agencies' efforts to implement social movement policy align with movement principles. I have used the case of agency EJ grant programs to show that social movement policy implementation outcomes are conditioned not only by factors other scholars have rightly noted, but also by bureaucrats' tacit understandings of key movement principles and the extent to which they feel able to implement those beliefs in light of competing institutional demands.

The first group's interpretation of EJ aligns with EJ advocates' structural model of change through policy and regulatory reform and reveals the movement's influence on these EJ grant program staff. In contrast, the second group interpret EJ as appropriately pursued through individualized behavior modification or voluntary agreements between communities and industry, reflecting the neoliberal environmental logic widespread among mainstream environmental advocates, foundations, political elites, and the broader public (Brulle and Jenkins 2005; Faber 2008; Faber and McCarthy 2001; Hansen 2012; Heynen et al. 2007; Park and Pellow 2011). Most agencies' EJ grant program outcomes reflect the latter model of change, which coheres with the ideas of elites who control the agencies' resources and priorities and with the culture of industry protection pervading agencies beyond their EJ offices. The first group of staff feel disappointed with this outcome but view it in strategic terms, selectively coupling the EJ movement's call for allocating more resources to disadvantaged and overburdened communities with a neoliberal model of change in order to protect the shell of the programs from actors who would prefer to eliminate agencies' EJ programs altogether.

The CalEPA EJ grant program is the exception that proves the rule. Its staff interpret EJ according to EJ movement principles and have felt able to implement the grant program consistent with that vision. This was facilitated by an absence of conflicting institutional logics within the grant program, an institutional environment relatively supportive of their efforts to redress racial and ethnic inequalities, and their relative autonomy over designing and running the grant program. These ideological, institutional, and organizational conditions enabled CalEPA's EJ grant program staff to craft a grant program honoring advocates' belief that EJ requires increasing public participation in regulatory decision-making processes and otherwise holding the state responsible for protecting environmental rights. These findings align with social movement scholars' findings that political context shapes social movement prospects (Amenta and Young 1999) and that movements with strong infrastructures can shape social movement policy implementation outcomes (Andrews 2001).

My findings illuminate an important aspect of agencies' institutional environments that scholars of social movement policy implementation have scarcely attended to, namely, their ability to shape agency outcomes by *structuring agency representatives' interpretations of key movement principles*. On the one hand, social movement policy implementation outcomes might deviate from core movement concerns when institutional logics contrary to movement principles come to dominate staff members' understandings or when staff perceive that complying with such logics is essential to the survival of movement-inspired agency programs. On the other hand, social movement policy implementation can align more closely with movement principles when institutional logics consistent with the movement are held, promoted, and defended by agency representatives who feel that their institutional environment permits them to implement those ideas. That is, institutional logics are not imposed unilaterally from the outside but are also wielded and promoted by those within agencies. The distinction matters in complex institutional environments in which staff face competing institutional demands, where social movement policy implementation outcomes will vary based on *which* institutional logic internal actors feel committed to and how able they feel to apply their beliefs.

These findings align with studies showing that state actors' perceptions shape other types of social movement outcomes (Andrews and Gaby 2015; Skrentny 2006).

These conclusions indicate several suggestions for future research. Future studies of social movement policy implementation would benefit from more extensive ethnographic observation within agencies to identify the intra-organizational processes and dynamics through which agency members negotiate competing institutional demands (Hallett 2010; Pache and Santos 2010). Second, while my findings are consistent with other studies of EJ policy implementation in that the program outcomes deviate from EJ advocates' preferences, those studies have not specifically characterized those other EJ programs in terms of the mechanisms through which they pursue change (cf. Holifield 2004). Accordingly, future studies should evaluate other agency EJ efforts according to this criterion. Third, my data do not explain why some staff interpret EJ in ways that align with movement priorities while others do not. Bureaucrats' interpretations of EJ in terms of its model of change appear unrelated to their tenure in the agency and/or its EJ programs, whether they consider themselves "insider activists" or at least movement supporters (indeed, all presented themselves in this way), whether they mentioned prior experience working for EJ organizations, their geographic region, or their racial and gender identities (though these do influence their EJ work in other important ways; see Harrison 2015b; Kohl 2015). While beyond the scope of this article, future studies could investigate the roots of bureaucrats' interpretations of key movement principles and explain the variation in their beliefs.

REFERENCES

Almeida, Paul and Linda Brewster Stearns. 1998. "Political Opportunities and Local Grassroots Environmental Movements: The Case of Minamata." *Social Problems* 45:37-60.

Amenta, Edwin and Michael P. Young. 1999. "Democratic States and Social Movements: Theoretical Arguments and Hypotheses." *Social Problems* 46(2):153-68.

Andrews, Kenneth T. 2001. "Social Movements and Policy Implementation: The Mississippi Civil Rights Movement and the War on Poverty, 1965-1971." *American Sociological Review* 66(1):71-95.

Andrews, Kenneth T. and Bob Edwards. 2004. "Advocacy Organizations in the U.S. Political Process." *Annual Review of Sociology* 30:479-506.

Andrews, Kenneth T. and Sarah Gaby. 2015. "Local Protest and Federal Policy: The Impact of the Civil Rights Movement on the 1964 Civil Rights Act." *Sociological Forum* 30(S1):509-27.

Banaszak, Lee Ann. 2005. ""Inside and Outside the State: Movement Insider status, Tactics, and Public Policy Achievements."" Pp. 149-76 in *Routing the Opposition: Social Movements, Public Policy, and Democracy*, edited by D. S. Meyer, V. Jenness, and H. M. Ingram. Minneapolis: University of Minnesota Press.

Benford, Robert. 2005. "The Half-Life of the Environmental Justice Frame: Innovation, Diffusion, and Stagnation." Pp. 37-53 in *Power, Justice, and the Environment: A Critical Appraisal of the Environmental Justice Movement*, edited by D. N. Pellow and R. J. Brulle. Cambridge, MA: MIT Press.

Benford, Robert and David Snow. 2000. "Framing Processes and Social Movements: An Overview and Assessment." *Annual Review of Sociology* 26:611-39.

Binder, Amy. 2007. "For Love and Money: Organizations' Creative Responses to Multiple Environmental Logics." *Theory and Society* 36:547-71.

Bonastia, Chris. 2000. "Why Did Affirmative Action in Housing Fail During the Nixon Era? Exploring the 'Institutional Homes' of Social Policies." *Social Problems* 47:523-42.

Bonilla-Silva, Eduardo. 2014. *Racism without Racists: Color-Blind Racism and the Persistence of Racial Inequality in America*. Lanham, MD: Rowman and Littlefield.

Bosso, Christopher. 1987. *Pesticides and Politics: The Life Cycle of a Public Issue*. Pittsburgh: University of Pittsburgh Press.

Brulle, Robert J. and J. Craig Jenkins. 2005. "Foundations and the Environmental Movement: Priorities, Strategies, and Impact." Pp. 151-73 in *Foundations for Social Change: Critical Perspectives on Philanthropy and Popular Movements*, edited by D. Faber and D. McCarthy. Philadelphia: Temple University Press.

Bryant, Antony and Kathy Charmaz. 2007. *The Sage Handbook of Grounded Theory*. Los Angeles: Sage.

Bullard, Robert D. 1990. *Dumping in Dixie: Race, Class, and Environmental Quality*. Boulder, CO: Westview.

Bullard, Robert D., Paul Mohai, Robin Saha, and Beverly Wright. 2007. "Toxic Wastes and Race at Twenty 1987-2007." United Church of Christ Justice and Witness Ministries, Cleveland, OH.

Cable, Sherry and Thomas Shriver. 1995. "Production and Extrapolation of Meaning in the Environmental Justice Movement." *Sociological Spectrum* 15(4):419-42.

CalEPA. 2013. "Environmental Justice Small Grants Application and Instructions: 2013 Grant Cycle." California Environmental Protection Agency, Sacramento, CA.

Capek, Stella M. 1993. "The 'Environmental Justice' Frame: A Conceptual Discussion and an Application." *Social Problems* 40(1):5-24.

Cole, Luke and Sheila Foster. 2001. *From the Ground Up: Environmental Racism and the Rise of the Environmental Justice Movement*. New York: NYU Press.

Crowder, Kyle and Liam Downey. 2010. "Inter-Neighborhood Migration, Race, and Environmental Hazards: Modeling Micro-Level Processes of Environmental Inequality." *American Journal of Sociology*. 115(4):1110-49.

DiMaggio, Paul J. and Walter W. Powell. 1983. "The Iron Cage Revisited: Institutional Isomorphism and Collective Rationality in Organizational Fields." *American Sociological Review* 48(2):147-60.

Downey, Liam. 2006. "Environmental Racial Inequality in Detroit." *Social Forces* 85:771-96.

Edwards, Bob and John D. McCarthy. 2004. "Resources and Social Movement Mobilization." Pp. 116-52 in *The Blackwell Companion to Social Movements*, edited by D. A. Snow, S. A. Soule, and H. Kriesi. Oxford, UK: Blackwell Publishing Ltd.

Faber, Daniel R. 2008. *Capitalizing on Environmental Injustice: The Polluter-Industrial Complex in the Age of Globalization*. Lanham, MD: Rowman and Littlefield.

Faber, Daniel R. and Deborah McCarthy. 2001. "Green of Another Color." Philanthropy and Environmental Justice Research Project, Northeastern University, Boston, MA.

——. 2003. "Neo-liberalism, Globalization, and the Struggle for Ecological Democracy: Linking Sustainability and Environmental Justice." Pp. 38-63 in *Just Sustainabilities: Development in an Unequal World*, edited by J. Agyeman, R. D. Bullard, and B. Evans. Cambridge, MA: MIT Press.

Gamson, William A. 1975. *The Strategy of Social Protest*. Homewood, IL: Dorsey Press.

Grant, Don, Mary Nell Trautner, Liam Downey, and Lisa Thiebaud. 2010. "Bringing the Polluters Back In: Environmental Inequality and the Organization of Chemical Production." *American Sociological Review* 75(4):479-504.

Guthman, Julie. 2011. *Weighing In: Obesity, Food Justice, and the Limits of Capitalism*. Berkeley: University of California Press.

Hallett, Tim. 2010. "The Myth Incarnate: Recoupling Processes, Turmoil, and Inhabited Institutions in an Urban Elementary School." *American Sociological Review* 75(1):52-74.

Hallett, Tim and Marc J. Ventresca. 2006. "Inhabited Institutions: Social Interactions and Organizational Forms in Gouldner's Patterns of Industrial Bureaucracy." *Theory and Society* 35:213-16.

Hansen, Sarah. 2012. "Cultivating the Grassroots: A Winning Approach for Environment and Climate Funders." National Committee for Responsible Philanthropy, Washington, DC.

Harrison, Jill Lindsey. 2011. *Pesticide Drift and the Pursuit of Environmental Justice*. Cambridge, MA: MIT Press.

——. 2014. "Neoliberal Environmental Justice: Mainstream Ideas of Justice in Political Conflict over Agricultural Pesticides in the United States." *Environmental Politics* 23(4):650-69.

——. 2015a. "Coopted Environmental Justice? Activists' Roles in Shaping EJ Policy Implementation." *Environmental Sociology* 1(4):241-55.

——. 2015b. "Rejecting Recognition: Post-Racial Ideology and Government Agencies' Environmental Justice Programs." Presented at the Conference on the Plurality and Politics of Environmental Justice, University of East Anglia, Norwich, UK, June 26-27.

Hays, Sharon. 2003. *Flat Broke with Children: Women in the Age of Welfare Reform*. Oxford, UK: Oxford University Press.

Heynen, Nik, James McCarthy, W. Scott Prudham, and Paul Robbins. 2007. *Neoliberal Environments: False Promises and Unnatural Consequences*. London, UK: Routledge.

Holifield, Ryan. 2004. "Neoliberalism and Environmental Justice in the United States Environmental Protection Agency: Translating Policy into Managerial Practice in Hazardous Waste Remediation." *Geoforum* 35:285-97.

——. 2012. "The Elusive Environmental Justice Area: Three Waves of Policy in the U.S. Environmental Protection Agency." *Environmental Justice* 5(6):293-97.

——. 2014. "Accounting for Diversity in Environmental Justice Screening Tools: Toward Multiple Indices of Disproportionate Impact." *Environmental Practice* 16:77-86.

Jenness, Valerie. 1995. "Social Movement Growth, Domain Expansion, and Framing Processes: The Gay/Lesbian Movement and Violence Against Gays and Lesbians as a Social Problem." *Social Problems* 42(1):145-70.

Jenness, Valerie and Ryken Grattet. 2001. *Making Hate a Crime: From Social Movement to Law Enforcement*. New York: Russell Sage Foundation.

Katzenstein, Mary Fainsod. 1999. *Faithful and Fearless: Moving Feminist Protest inside the Church and Military*. Princeton, NJ: Princeton University Press.

King, Brayden G, and Nicholas A. Pearce. 2010. "The Contentiousness of Markets: Politics, Social Movements, and Institutional Change in Markets." *Annual Review of Sociology* 36:249-67.

Kohl, Ellen. 2015. "'People Think We're EPA, We Can do Whatever We Have the Will to Do:' Negotiating Expectations of Environmental Justice Policies." Presented at the Annual Meeting of the Association of American Geographers, April 21-25.

Liévanos, Raoul. 2012. "Certainty, Fairness, and Balance: State Resonance and Environmental Justice Policy Implementation." *Sociological Forum* 27(2):481-503.

Lipsky, Michael. 1980. *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services*. New York: Russell Sage Foundation.

Lofland, John, David A. Snow, Leon Anderson, and Lyn Lofland. 2006. *Analyzing Social Settings: A Guide to Qualitative Observation and Analysis*. Belmont, CA: Wadsworth.

London, Jonathan, Alex Karner, Julie Sze, Dana Rowan, Gerardo Gambirazzio, and Deb Niemeier. 2013. "Racing Climate Change: Collaboration and Conflict in California's Global Climate Change Policy Arena." *Global Environmental Change* 23:791-9.

London, Jonathan K., Julie Sze, and Raoul S. Liévanos. 2008. "Problems, Promise, Progress, and Perils: Critical Reflections on Environmental Justice Policy Implementation in California." *UCLA Journal of Environmental Law & Policy* 26(2):255-89.

McCarthy, John D., David W. Britt, and Mark Wolfson. 1991. "The Institutional Channeling of Social Movements by the State in the United States." *Research in Social Movements, Conflicts, and Change* 13:45-76.

Meyer, David S. 2004. "Protest and Political Opportunities." *Annual Review of Sociology* 30:125-45.

Meyer, John W. and Brian Rowan. 1977. "Institutionalized Organizations: Formal Structure as Myth and Ceremony." *American Journal of Sociology* 83(2):340-63.

Meyerson, Debra E. and Maureen A. Scully. 1995. "Tempered Radicalism and the Politics of Ambivalence and Change." *Organization Science* 6(5):585-600.

Mohai, Paul, David Pellow, and J. Timmons Roberts. 2009. "Environmental Justice." *Annual Review of Environment and Resources* 34:405-30.

NYSDEC. 2011. "2011 Application and Instructions: Environmental Justice Community Impact Grant Program for Communities Exposed to Multiple Environmental Harms and Risks in New York State." New York State Department of Environmental Conservation, Albany, NY.

Oliver, Pamela and Hank Johnston. 2000. "What a Good Idea! Ideologies and Frames in Social Movement Research." *Mobilization* 4(1):37-54.

Omi, Michael and Howard Winant. 2015. *Racial Formation in the United States*. New York: Routledge.

Ottinger, Gwen. 2013. *Refining Expertise: How Responsible Engineers Subvert Environmental Justice Campaigns*. New York: NYU Press.

Pache, Anne-Claire and Felipe Santos. 2010. "When Worlds Collide: The Internal Dynamics of Organizational Responses to Conflicting Institutional Demands." *Academy of Management Review* 35(3):455-76.

——. 2013. "Inside Hybrid Organization: Selective Coupling as a Response to Competing Institutional Logics." *Academy of Management Journal* 56(4):972-1001.

Park, Lisa Sun-Hee and David Naguib Pellow. 2011. *The Slums of Aspen: Immigrants vs. the Environment in America's Eden*. New York: New York University Press.

Payne-Sturges, Devon, Amalia Turner, Jessica Wignall, Arlene Rosenbaum, Elizabeth Dederick, and Heather Dantzker. 2012. "A Review of State-Level Analytical Approaches for Evaluating Disproportionate Environmental Health Impacts." *Environmental Justice* 5(4):173-87.

Pellow, David Naguib. 2000. "Environmental Inequality Formation: Toward a Theory of Environmental Injustice." *American Behavioral Scientist* 43(4):581-601.

Pellow, David Naguib and Robert J. Brulle. 2005. *Power, Justice, and the Environment: A Critical Appraisal of the Environmental Justice Movement*. Cambridge, MA: MIT Press.

Perkins, Tracy. 2015. "From Protest to Policy: The Political Evolution of California Environmental Justice Activism, 1980s-2010s." Ph.D. dissertation, Department of Sociology, University of California, Santa Cruz, CA.

Piven, Frances Fox and Richard Cloward. 1977. *Poor People's Movements: Why They Succeed, How They Fail*. New York: Vintage.

Rochon, Thomas. 1998. *Culture Moves: Ideas, Activism, and Changing Values*. Princeton, NJ: Princeton University Press.

Rogers-Dillon, Robin H. and John David Skrentny. 1999. "Administering Success: The Legitimacy Imperative and the Implementation of Welfare Reform." *Social Problems* 46(1):13-29.

Rose, Nikolas. 1999. *Powers of Freedom: Reframing Political Thought.* New York: Cambridge University Press.

Sabatier, Paul and Daniel Mazmanian. 1980. "The Implementation of Public Policy: A Framework of Analysis." *Policy Studies Journal* 8(4):538-60.

Sandweiss, Stephen. 1998. "The Social Construction of Environmental Justice." Pp. 31-57 in *Environmental Injustices, Political Struggles: Race, Class, and the Environment*, edited by D. E. Camacho. Durham, NC: Duke University Press.

San Francisco. 2010. "Grant Program 2010-12 Grant Solicitation." City and County of San Francisco Department of the Environment, San Francisco, CA.

Santoro, Wayne A. and Gail M. McGuire. 1997. "Social Movement Insiders: The Impact of Institutional Activists on Affirmative Action and Comparable Worth Policies." *Social Problems* 44(4):503-19.

Sawyers, Traci M. and David S. Meyer. 1999. "Missed Opportunities: Social Movement Abeyance and Public Policy." *Social Problems* 46:187-206.

Schlosberg, David. 2007. *Defining Environmental Justice: Theories, Movements, and Nature.* Oxford, UK: Oxford University Press.

Schlosberg, David and David Carruthers. 2010. "Indigenous Struggles, Environmental Justice, and Community Capabilities." *Global Environmental Politics* 10(4):12-35.

Scott, W. Richard. 2014. *Institutions and Organizations: Ideas, Interests, and Identities.* Los Angeles: Sage.

Selznick, Phillip. 1966. *TVA and the Grass Roots: A Study of the Sociology of Formal Organization.* New York: Harper and Row.

Shilling, Fraser M., Jonathan K. London, and Raoul S. Liévanos. 2009. "Marginalization by Collaboration: Environmental Justice as a Third Party in and beyond CalFED." *Environmental Science and Policy* 12(6):694-709.

Skocpol, Theda. 1985. "Bringing the State Back In: Strategies of Analysis in Current Research." Pp. 3-43 in *Bringing the State Back In*, edited by P. B. Evans, D. Rueschemeyer, and T. Skocpol. New York: Cambridge University Press.

Skrentny, John D. 2006. "Policy-Elite Perceptions and Social Movement Success: Understanding Variations in Group Inclusion in Affirmative Action." *American Journal of Sociology* 111(6):1762-815.

Skrentny, John David. 1998. "State Capacity, Policy Feedbacks and Affirmative Action for Blacks, Women, and Latinos." *Research in Political Sociology* 8:279-310.

Slesinger, Scott. 2014. "EPA Spending in the President's Budget: Where Does the .22 percent of Federal Spending Go?" Natural Resource Defense Council Staff Blog. March 21. Retrieved August 24, 2016 (www.nrdc.org/experts/ scott-slesinger/epa-spending-presidents-budget-where-does-022-federal-spending-go).

Soule, Sarah A. 2012. "Social Movements and Markets, Industries, and Firms." *Organization Studies* 33(12):1715-33.

Stearns, Linda Brewster and Paul D. Almeida. 2004. "The Formation of State Actor-Social Movement Coalitions and Favorable Policy Outcomes." *Social Problems* 51(4):478-504.

Tarrow, Sidney. 1998. *Power in Movement.* New York: Cambridge University Press.

Taylor, Dorceta E. 2000. "The Rise of the Environmental Justice Paradigm: Injustice Framing and the Social Construction of Environmental Discourses." *American Behavioral Scientist* 43(4):508-80.

——. 2009. *The Environment and the People in American Cities: 1600s-1900s: Disorder, Inequality, and Social Change.* Durham, NC: Duke University Press.

Tolich, Martin. 2004. "Internal Confidentiality: When Confidentiality Assurances Fail Relational Informants." *Qualitative Sociology* 27(1):101-6.

U.S. EPA. 2008. "EPA's Environmental Justice Collaborative Problem-Solving Model." U.S. Environmental Protection Agency, Washington, DC.

——. 2013. "Environmental Justice Small Grants Program Application Guidance FY 2013." U.S. Environmental Protection Agency, Washington, DC.

——. 2014. "Environmental Justice Collaborative Problem-Solving Cooperative Agreement Program Application Guidance FY 2014." U.S. Environmental Protection Agency, Washington, DC.

Vajjhala, Shalini P. 2010. "Building Community Capacity? Mapping the Scope and Impacts of EPA's Environmental Justice Small Grants Program." Pp. 353-81 in *Environment and Social Justice: An International Perspective* (Research in Social Problems and Public Policy 18), edited by D. E. Taylor. Bingley, UK: Emerald Group.

Walker, Gordon. 2010. "Environmental Justice, Impact Assessment, and the Politics of Knowledge: The Implications of Assessing the Social Distribution of Environmental Outcomes." *Environmental Impact Assessment Review* 30:312-8.

Watkins-Hayes, Celeste. 2009. *The New Welfare Bureaucrats: Entanglements of Race, Class, and Policy Reform.* Chicago: University of Chicago Press.

Winkler, Erin N. 2012. *Learning Race, Learning Place: Shaping Racial Identities and Ideas in African American Childhoods.* New Brunswick, NY: Rutgers University Press.

Zald, Mayer N., Calvin Morrill, and Hayagreeva Rao. 2005. "The Impact of Social Movements on Organizations: Environment and Responses." Pp. 253-79 in *Social Movements and Organization Theory*, edited by G. F. Davis, D. McAdam, W. R. Scott, and M. N. Zald. New York: Cambridge University Press.