

Community Air Protection Program

El Centro-Heber-Calexico Corridor

Community Emissions Reduction Program

Staff Report

Release Date: December 18, 2019

CARB Governing Board Hearing Date: January 15, 2020



For more information

Comments: Please submit written comments on this Staff Report by January 7, 2020 to: <https://www.arb.ca.gov/lispub/comm/bclist.php>

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Staff Recommendation

Staff recommend that the California Air Resources Board (CARB or Board) approve the El Centro-Heber-Calexico Corridor community emissions reduction program developed pursuant to Assembly Bill (AB) 617¹ and direct the Imperial County Air Pollution Control District (ICAPCD or District) to take additional recommended actions, as described in this report, to strengthen implementation.

Background

CARB established the Community Air Protection Program (Program) to implement AB 617, which requires new community-focused action to reduce air pollution. On September 27, 2018, the Board selected the El Centro-Heber-Calexico Corridor in Imperial County to develop a community emissions reduction program as one of ten initial communities. The Board also approved the *Community Air Protection Blueprint*² (Blueprint), which, among other things, establishes criteria for developing and implementing community emissions reduction programs, contained in the *Blueprint Appendix C* and summarized in the *Checklist for Community Emissions Reduction Program Evaluation*³ (Checklist).

CARB staff reviewed the *Imperial County Year 1 Community Emissions Reduction Program Plan for the El Centro-Heber-Calexico Corridor*⁴ (Plan), adopted by the ICAPCD Board of Supervisors on October 8, 2019. This staff report summarizes the results of CARB staff's review and evaluation of the Plan to determine if it meets the criteria established in AB 617⁵ and the Blueprint, reflects community priorities, and is likely to reduce exposure to air pollution in the community.

Plan Overview

ICAPCD partnered with Comite Civico del Valle, Inc. (CCV) as co-leads to convene a community steering committee and develop the Plan. The community steering committee consists of 15 members⁶ (with one current vacancy) and held 16 meetings between November 2018 and October 2019. Prior to the Board of Supervisors' approval of the Plan, ICAPCD and CCV also hosted two workshops in June 2019 to allow the public to have an opportunity to learn about the requirements and implementation of AB 617, local and State agency roles, as well as the development of the Plan. During these meetings, the community steering committee helped identify key community concerns⁷ for the Plan to address, including:

¹ Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017.

² The Blueprint is available at: <https://ww2.arb.ca.gov/resources/documents/final-community-air-protection-blueprint>

³ Begins on page C-41.

⁴ To review the Plan and associated documents, visit <https://www.icab617community.org/>

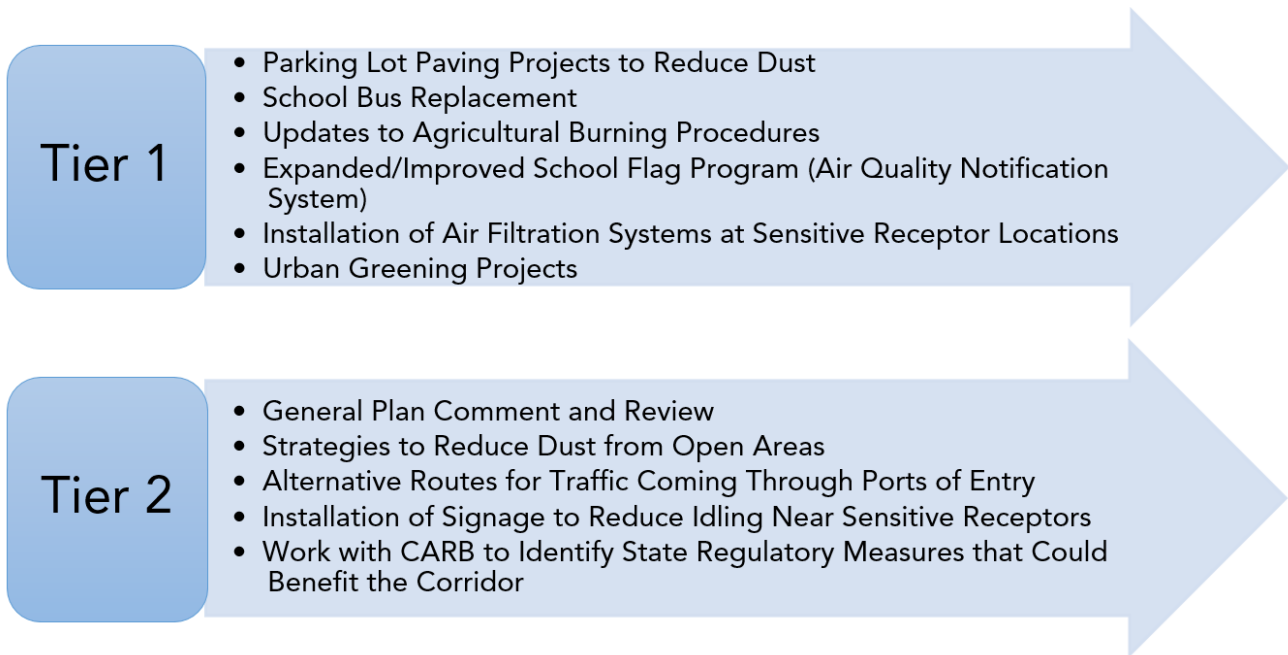
⁵ California Health and Safety Code §44391.2.

⁶ See page 2-2 in the Plan for the community steering committee roster, available at <https://www.icab617community.org/>.

⁷ For additional information on the El Centro-Heber-Calexico Corridor community, see Chapter 3 of the Plan, available at <https://www.icab617community.org/>.

- Truck idling and traffic (specifically, border related);
- Windblown dust;
- Agricultural activities; and
- Vulnerable population’s exposure to pollution.

The Plan focuses on reducing exposure to fine particulate matter (PM_{2.5}) and toxic air contaminants (TACs) from these sources. The community steering committee, ICAPCD and CCV identified 28 emission reduction strategies that are separated into two categories, Tier 1 and Tier 2 strategies. Tier 1 strategies consist of specifically identified projects which can begin implementation immediately, whereas Tier 2 strategies are commitments that require further development and discussion prior to beginning implementation. The following are examples of emissions and exposure reduction strategies included in the Plan:



Summary of CARB’s Evaluation

CARB staff’s review of the Plan follows the framework established in the Blueprint. In addition to the Plan itself, staff also reviewed meeting materials including a record of public comments and responses to those comments by ICAPCD and CCV posted to the Imperial County AB 617 dedicated website.⁸ During the Plan development process, CARB staff attended every El Centro-Heber-Calexico Corridor community steering committee meeting and met regularly with ICAPCD and CCV staff. Finally, CARB staff also hosted a community meeting in Imperial on November 13, 2019, in coordination with ICAPCD and CCV, to solicit additional community input to the CARB staff recommendations.

⁸ Visit <https://www.icab617community.org/>.

State law gives communities and air districts 12 months to develop a community emissions reduction program following CARB community selection. One year is a very short amount of time to organize a community steering committee, develop a process for operation of the community steering committee, establish the technical foundation for understanding the community's air quality status, and develop the strategies to reduce air pollution emissions and exposure.

To ensure that the Plan successfully delivers on the identified strategies, there are elements of the Plan that need additional clarification and detail as the Plan moves from the short time frame provided for development into the implementation phase. While each of the initial communities and their community emissions reduction programs have now been approved by the air districts, the need to focus on strengthening the plans during implementation is a theme that applies to all first-year communities, not just the El Centro-Heber-Calexico Corridor.

Therefore, CARB staff is recommending approval of the Plan with additional Board direction to CARB staff, ICAPCD, and the community steering committee to begin Plan implementation immediately, while taking steps to strengthen implementation of the Plan. These recommendations draw directly from the core principles of the Board adopted Blueprint.

Staff have organized the results of this review into two categories:

- Key strengths of the Plan, which highlights areas staff found particularly noteworthy; and
- Recommended actions to strengthen implementation, including areas where additional discussion, information, clarification and detail will help ensure the Plan is successful and achieves emissions reductions in the El Centro-Heber-Calexico Corridor.

Key Strengths

ICAPCD and CCV developed a strong co-lead partnership based on a joint effort to encourage and establish relationships with environmental justice groups. The representation of the local agency along with community advocates provided an opportunity to discuss, promote and increase community capacity to find solutions to community concerns. The co-leads worked together to select the community steering committee members and met frequently to discuss the process, prepare meeting agendas and review and comment on draft documents. CARB acknowledges and continues to encourage the leadership and commitment established by both ICAPCD and CCV and its importance in helping to expand community involvement, prevent barriers to engagement, and strengthen the partnership between the co-leads.

The community steering committee was very energetic from the start and began work immediately. Members absorbed the presentations and materials and fully participated during discussions of emission reduction strategies. The community steering committee agreed on a variety of strategies to achieve emissions reductions in their community and expressed support for the Plan, approving the Plan by unanimous vote. The identified

strategies to meet emission reduction targets and associated goals are separated into two categories; Tier 1 and Tier 2.⁹ CARB staff appreciates the identification and distinction between the two tiers of strategies and the recognition that there are additional steps that need to be taken as the Plan moves into implementation to further discuss and integrate the two tiers. This will result in implementation of a suite of strategies to achieve long-term emissions reductions. CARB staff also commends the clear identification of specific metrics to track progress for each of the District led strategies in the Plan.

Lastly, the collaboration between the District, CCV and the community steering committee resulted in the development of a Community Air Monitoring Plan, the first such plan developed under the Program to be approved by a community steering committee and submitted to CARB. This new monitoring will build on the existing community-led monitoring network developed by CCV.

Recommended Actions to Strengthen Implementation

On October 2, 2019, the community steering committee unanimously voted to support the Plan. CARB staff recognize the Plan is a living document that will continue to require work in order to meet the implementation goals and targets specified in the Plan. In support of this, staff have developed a set of recommended actions to support implementation in the following key areas: reduction strategies and process. Progress in implementing these recommendations should be included in the annual progress report required by the AB 617 statute.

Reduction Strategies

Throughout the past year of community steering committee meetings, committee members provided comments regarding the development and implementation of strategies and associated community involvement. The Plan documented and responded to these public comments and the emissions and exposure reduction strategies outlined in the Plan are generally responsive to community concerns and recommendations. However, the community steering committee has voiced requests for continued discussion to determine additional strategies that would provide further emissions reductions in the community.

In addition, additional information and clear parameters to help inform the prioritization of the strategies and the individual projects within each strategy should be provided in the Plan's annual progress report. The community steering committee requested their input be solicited during the project selection process and development of criteria for how projects are prioritized for funding.

Finally, border-related emissions have been recognized by the community steering committee as a key contributor to pollution in the corridor. Efforts to reduce emissions from these sources will complement local actions undertaken as part of the Plan. As noted in the Plan, there is currently a collaborative effort between agencies and governments on both

⁹ See Chapter 4 of the Plan for additional information on targets and strategies identified. The Plan is available at: https://ww2.arb.ca.gov/capp_2018_ad_cerps.

sides of the United States and Mexico border to develop a plan for prioritizing actions that should be taken to improve air quality in the border region.¹⁰

To help clarify and enhance strategy development, staff recommend that CARB staff, ICAPCD, CCV and the community steering committee work together to undertake the following actions:

1. Continue to develop the Tier 2 strategies. This process will also identify additional strategies and projects to further reduce PM 2.5 and TAC emissions.
2. Develop specific criteria for project prioritization and selection for funding, which should include clear background information to help inform how projects and locations are prioritized. The identification of available funding per project type, via a clear and detailed budget, will also support prioritization of project types.
3. Continue to coordinate the activities of the plan with California cross-border pollution related activities, and include in these efforts groups such as the United States Environmental Protection Agency, California Environmental Protection Agency, Border Relations Council, Commission of the Californias, and CARB. This inter-agency coordination will support the development and implementation of emissions reduction strategies. As a result, the plan may need to be adjusted in the future in order to meet the objectives of reducing cross-border pollution.

Process

The community steering committee also requested additional time in the future to review the information they are provided in order to enhance their ability to make informed decisions. To benefit the implementation process, staff recommend that CARB staff, ICAPCD, CCV and the community steering committee work together to undertake the following action:

1. Continue to support strategy development and design a process that defines a schedule and appropriate lead time to allow the community steering committee to review documents, ask questions, engage in discussion and provide feedback; consider updating the charter to reflect the agreed upon process.

¹⁰ See Imperial County-Mexicali Air Quality Work Plan to Improve Air Quality in the Border Region. Available at: <https://ww3.arb.ca.gov/planning/border/workplan.pdf>.