

APPENDIX C. CRITERIA FOR COMMUNITY EMISSIONS REDUCTION PROGRAMS

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I. INTRODUCTION

Community emissions reduction programs are the cornerstone of the Community Air Protection Program (Program). Assembly Bill (AB) 617¹ requires the California Air Resources Board (CARB) Governing Board, in consultation with specified stakeholders, to annually consider the selection of communities for the preparation of community emissions reduction programs, as deemed appropriate.² Once CARB selects a community, the applicable air district must develop and adopt the community emissions reduction program within one year of selection and provide annual progress reports.³ Each community emissions reduction program will also be reviewed by CARB staff, based on the checklist in Table C-1. CARB staff will then develop a recommendation and make it available for public review and comment, before presenting each community emissions reduction program to the CARB Governing Board for consideration. The CARB Governing Board may take one of four actions in considering a community emissions reduction program: approve, conditionally approve, partially approve, or reject (collectively represented as a CARB Governing Board action). Figure C-1 provides an overview of the community emissions reduction program process.

Figure C-1 Overview of Community Emissions Reduction Program Process



The purpose of the community emissions reduction programs is to focus and accelerate new actions to provide direct reductions in air pollution emissions and exposure within overburdened communities. AB 617 directs CARB to develop criteria for the community emissions reduction programs and includes a set of minimum criteria and elements, while providing the flexibility for CARB to establish additional criteria, as needed.⁴

CARB has identified specific minimum requirements for each element required by AB 617 – emissions reduction targets, emissions and exposure reduction strategies, an implementation schedule, and an enforcement plan – as well as for additional elements

¹ Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2. See Appendix H for complete bill language.

² California Health and Safety Code § 44391.2(c)(1).

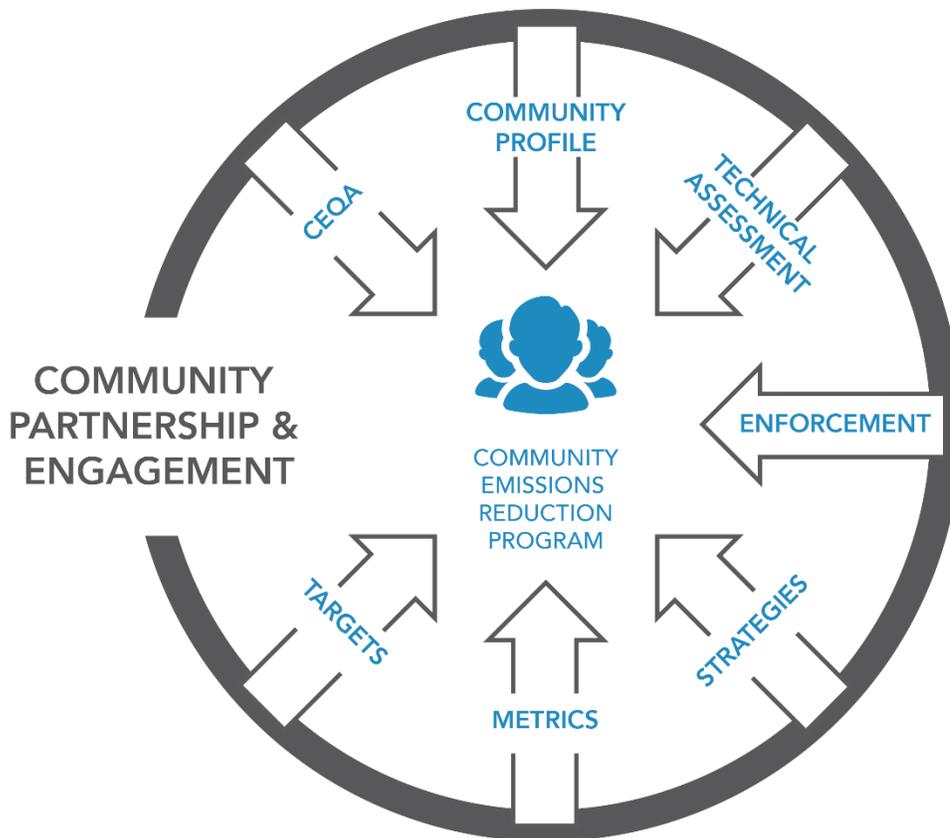
³ California Health and Safety Code § 44391.2(c)(2) and § 44391.2(c)(7).

⁴ California Health and Safety Code § 44391.2(b).

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that are necessary for air districts to develop and implement an effective community emissions reduction program. Figure C-2 provides an overview of the required elements of a community emissions reduction program.

Figure C-2 Community Emissions Reduction Program Required Elements



The requirements included in this appendix apply to an air district who is required to prepare a community emissions reduction program. CARB has developed criteria for each element to ensure a consistent quality and rigor across all communities and to be clear as to what CARB will evaluate when considering approval of a community emissions reduction program. Air districts must provide sufficient information in the community emissions reduction program submittal and annual reports for CARB to assess whether they meet the minimum requirements.

The criteria set out in this appendix provide a comprehensive framework for development of community emissions reduction programs, while recognizing that each community may have different emissions sources, sensitive receptors, and air quality challenges. Understanding these elements is important to ensuring that the design of

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each community emissions reduction program is tailored to community-specific needs, and each community emissions reduction program will have community-specific goals, targets, strategies to implement new actions, and metrics. Community emissions reduction programs must include meaningful engagement and partnerships with community members to develop these community-specific solutions through a collaborative process. CARB staff also encourage the air districts to exceed these minimum requirements, in partnership with community residents and community-based organizations, and support community-driven efforts.

The requirements for community emissions reduction programs include:

- Establishing a community steering committee to guide development of the program elements, with core representation from community members who live, work, or own businesses in the community (e.g., community residents, small businesses, facility managers/workers, school personnel).
- Developing a strong technical foundation for understanding the sources of air pollution impacting the community.
- Characterizing current public health data in the community related to air pollution.
- Setting specific, quantifiable emissions reduction targets to be achieved within five years, along with annual milestones and commitments for specific compliance and technology/control technique deployment goals.
- Identifying applicable regulatory, enforcement, incentive, and permitting strategies to implement new actions and the most stringent approaches for reducing emissions, with a focus on zero emission technologies where feasible.
- Identifying needed land use and transportation strategies to implement and define specific actions for engaging with local government agencies to actively promote these strategies.
- Developing an enforcement plan to ensure effective implementation and engagement with community members on addressing compliance issues.
- Defining specific, quantifiable metrics to track progress.

In addition, a robust public process and specific requirements for annual reporting and continued assessment and modification will provide stakeholders with the opportunity to hold agencies accountable, provide ongoing input throughout the development and implementation of the community emissions reduction programs, and follow progress over time to ensure each community experiences real, quantifiable emissions reductions and reductions in air pollution exposures.

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To ensure expeditious implementation, CARB staff will collaborate closely with communities, affected industry, and the air districts throughout the development of the community emissions reduction program, including identification of appropriate mobile source strategies and reduction plan elements under CARB's authority. If necessary, CARB may issue programmatic advisories or guidance to provide clarity on any aspect of the community emissions reduction programs requirements.

The remaining portions of this appendix include: a discussion of health-based air quality objectives; requirements for community emissions reduction program development; CARB's review process; requirements for ongoing implementation; and a review checklist that summarizes the community emissions reduction program requirements.

II. HEALTH-BASED AIR QUALITY OBJECTIVES

Cumulative air pollution exposure impacts are driven by multiple air pollutants, and our understanding of the interactions between pollutants and the potential for synergistic health impacts between air pollutants is still an emerging field of research. Community emissions reduction programs will therefore focus on reducing individual criteria air pollutant and/or toxic air contaminant emissions to address the impacts of exposure to multiple pollutants. While each community faces distinct health-based challenges, broad health-based air quality objectives provide a consistent foundation for determining the appropriate levels of emissions reductions for community emissions reduction programs.

Toxic air contaminants contribute to a community's cumulative exposure burden. While California's long-term fuel and technology transformation efforts to reduce toxic air contaminants will significantly reduce health risk associated with poor air quality throughout the State, many communities currently experience disproportionate exposures to toxic air contaminants. Exposure to toxic air contaminants can increase the risk of both acute and chronic health effects and cancer, and many communities currently experience disproportionate exposures to toxic air contaminants. Diesel particulate matter continues to be a concern in many communities; however, other toxic air contaminants can also contribute to localized health risk including metals such as hexavalent chromium and lead, air toxics related to fossil fuel production such as

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benzene⁵ and toluene,⁶ and compounds associated with combustion including polycyclic aromatic hydrocarbons and dioxins.

The California Office of Environmental Health Hazards Assessment establishes threshold concentrations for toxic air contaminants at which exposure does not trigger non-cancer health effects, known as reference exposure levels. Although reference exposure levels represent safe exposure levels for non-cancer health effects, there are no safe exposure thresholds for carcinogens. Efforts to significantly reduce exposure to toxic air contaminants therefore rely on identifying technologies and practices that offer the maximum level of emissions reductions achievable.

For criteria air pollutants, the U.S. Environmental Protection Agency and the State of California have set health-protective ambient air quality standards that establish health-protective levels for the following pollutants: ozone, particulate matter 10 microns or less in diameter (PM₁₀), particulate matter 2.5 microns or less in diameter (PM_{2.5}), carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead. California has also set additional air quality standards for sulfates, vinyl chloride, visibility reducing particles, and hydrogen sulfide. California is in attainment with many of these standards, including carbon monoxide, sulfur dioxide, sulfates, vinyl chloride, and visibility reducing particles, with limited areas that have localized nonattainment issues for lead, hydrogen sulfide, and nitrogen dioxide. However, challenges remain to achieve standards for PM_{2.5} and ozone in a number of regions of the State.⁷ Meeting State and federal PM_{2.5} and ozone standards is therefore the current focus of California's criteria air pollutant programs, and ongoing regional planning efforts will continue to drive further emissions reductions in impacted communities.

Ozone is a regional air pollutant that is formed through complex chemical reactions in the atmosphere. While significant work remains to meet ozone standards in many areas of the State, ozone pollution is driven by regional rather than localized source contributions and is most appropriately addressed through regional air quality improvement efforts like the State Implementation Plan. On the other hand, PM_{2.5} concentrations are the result of both regional and local contributions, and controlling PM_{2.5} at the local level can reduce disparities in exposure experienced in communities

⁵ Sources of benzene include: oil refineries, petroleum storage facilities, mobile sources/fuels, solvents/coatings, cement plants, etc. Office of Environmental Health Hazard Assessment, *Benzene Reference Exposure Levels, Final Report*, June 2014, available at: <https://oehha.ca.gov/media/downloads/cnr/benzenerefsjune2014.pdf>.

⁶ Sources of toluene include: oil refineries, coke ovens, mobile sources/fuels, solvents/coatings, etc. Office of Environmental Health Hazard Assessment, *Toluene Reference Exposure Levels, Public Review Draft*, December 2017, available at: <https://oehha.ca.gov/media/downloads/cnr/publicreviewdrafttoluene120117.pdf>.

⁷ The latest PM_{2.5} and ozone designations for both State and federal standards are available at: <https://www.arb.ca.gov/desig/adm/adm.htm>.

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with high cumulative exposure burdens. Exposure to PM_{2.5} is also the dominant cause of criteria air pollutant health impacts such as exacerbation of respiratory and cardiovascular disease, and premature mortality.

To address disproportionate localized air quality impacts and a special consideration of sensitive receptors, community emissions reduction programs will focus on two objectives:

- Maximizing progress on reducing exposure to toxic air contaminants that contribute to cumulative exposure burdens within selected communities.
- Reducing exposure caused by localized PM_{2.5} sources to achieve healthful levels of PM_{2.5} within the community.

There may also be other nonattainment issues within the community for localized criteria air pollutants that need to be addressed (e.g., lead, PM₁₀). In addition, continued reductions in PM_{2.5} concentrations can deliver additional health benefits. In developing strategies to include in the community emissions reduction programs, air districts may want to consider opportunities to achieve further reductions in PM_{2.5} to help reduce the cumulative exposure burden within the community.

In addition to reducing toxic air contaminant and PM_{2.5} emissions, many of the strategies included in community emissions reduction programs may deliver reductions in other air pollutants, including greenhouse gases and ozone precursors. These co-benefits can contribute to statewide and regional emissions reduction efforts, delivering additional local health benefits.

III. REQUIREMENTS FOR COMMUNITY EMISSIONS REDUCTION PROGRAM DEVELOPMENT

This section contains the minimum requirements for developing a community emissions reduction program, including: community partnerships and public engagement; understanding the community (e.g., socioeconomic factors, health burdens); developing emissions reduction targets and strategies to achieve those targets; an enforcement plan; and metrics to track progress toward achieving real, quantifiable emissions reductions.⁸ A brief overview of the California Environmental Quality Act (CEQA) requirements that apply to community emissions reduction programs is also included.

⁸ CARB acknowledges that there may be cases where a community emissions reduction program fails to meet certain procedural requirements but is still being developed in the spirit of these requirements.

COMMUNITY PARTNERSHIPS AND PUBLIC ENGAGEMENT

Each community has unique air quality challenges, and local community members have first-hand knowledge of necessary information, including emissions sources, sensitive receptor locations, and cultural context. Community participation and engagement is critical to developing and implementing successful community emissions reduction programs, and air districts need to foster these active community partnerships.

COMMUNITY STEERING COMMITTEE

Providing an inclusive venue for discussion and meaningful participation of community members is critical to ensuring a collaborative process in developing and implementing community emissions reduction programs and consideration of community-specific challenges and opportunities.

Understanding a community's air quality challenges and developing effective solutions requires the expertise and participation of a variety of stakeholders. Community residents, business owners, and people who work within a community all have first-hand knowledge of the impacts of air pollution within their community and potential solutions. Governmental agencies including air districts, CARB, local health departments and other health organizations, schools, and land use and transportation agencies also have valuable expertise and will be involved in implementing various aspects of the community emissions reduction program.

Building an effective community emissions reduction program will require consistent and frequent engagement with community members and other stakeholders at all stages of the development process. To facilitate community participation and guidance on community emissions reduction program development and implementation, the air district must establish an inclusive, multi-stakeholder community steering committee. To ensure that the committee members can inform the early stages of community emissions reduction program development, the air district should hold a public meeting to discuss the process for convening a steering committee once the community has been selected by CARB. The air district should then hold the first meeting of the community steering committee within 60 days of community selection.

PURPOSE

The purpose of the community steering committee is to support active community involvement and collaboration in the community emissions reduction program process by providing a forum for identifying community issues and potential solutions with all

CARB staff will evaluate the extent to which deviations from these requirements are acceptable on a case-by-case basis and will communicate findings in writing.

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relevant parties. Committee members will be responsible for discussing a variety of topics including: determining the final geographic boundaries of the community; community issues and contributing sources to develop a shared understanding of the community's air pollution challenge; who has responsibility and authority to address those issues; proposed strategies for the community emissions reduction programs; mechanisms for engaging with other agencies; approaches for additional community outreach; and other topics of interest to the committee. The committee will discuss the major elements of the community emissions reduction program as they are developed including: community engagement; the community profile and technical assessment; targets and strategies; the enforcement plan; and metrics to track progress.

PARTICIPATION

The community steering committee must be comprised primarily of community members, which includes participants who live, work, or own businesses within the community (e.g., community residents, small businesses, facility managers/facility workers, school personnel). The air district is responsible for convening the committee and should partner with local community-based organizations to promote broad community engagement and participation. Examples of community focused committee structures (e.g., Transformative Climate Community Program;⁹ Comité Civico del Valle¹⁰) are available in the online Resource Center. To further encourage a comprehensive discussion of issues impacting the community and needed solutions, CARB recommends the air district bring in additional participants from city/county agencies, land use planning agencies, transportation agencies, local health departments (e.g., hospitals, clinics, physical rehabilitation centers, public health counseling services), academic researchers, and labor organizations, as appropriate. CARB staff will participate as observers to support discussion related to CARB strategies and resources and will provide technical support and other input, along with staff from the Office of Environmental Health Hazard Assessment, as appropriate.

OPERATION

The first meeting of the community steering committee should include a discussion of the air quality challenges within the community and relevant existing emissions reduction efforts to provide a common starting point for all committee members.

In convening and coordinating the community steering committee, the air district should work with the steering committee to establish a charter to clearly set out the committee

⁹ More information on the Strategic Growth Council's Transformative Climate Community Program is available at: <http://www.sgc.ca.gov/programs/tcc/>.

¹⁰ More information on the Alliance Healthcare Foundation, Comité Civico del Valle is available at: <https://alliancehealthcarefoundation.org/comite-civico-del-valle/>.

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process and structure.¹¹ Elements of the charter that should be considered include the following topics:

- Committee objectives.
- Roles and responsibilities.
- Meeting frequency.
- Meeting dates, times, and locations to ensure accessibility.
- Use of facilitation services.
- Use of interpretation services at community steering committee meetings and broader public outreach efforts.

PUBLIC PROCESS

In addition to the active collaboration with the community steering committee, the air districts are to engage in a robust public process to provide opportunity for broad engagement both during community emissions reduction program development and throughout implementation. This outreach should include multiple meeting formats and be designed for maximum accessibility for a variety of stakeholders.

In developing the community emissions reduction programs, the air districts should conduct meetings in each of the following formats with the associated requirements:

- *Workshops* – The air districts should hold at least two workshops over the course of the community emissions reduction program development. The workshops should present proposed air district community emissions reduction program elements as they are being developed and solicit public input on programmatic design, priorities, and any other issues the steering committee or air districts would like to discuss. The workshops should provide an opportunity for a community representative of the community steering committee to present the community perspectives.
- *Community meetings* – Community meetings provide an informal opportunity for community residents to engage with the members of the steering committee and the air district to share the needs of the residents and discuss community emissions reduction program elements as they are being developed.
- *Air district board hearings* – Air district public board hearings provide a formal opportunity for air district boards to provide comments and recommendations, and for community members and other stakeholders to provide written and oral testimony. Air district staff must present the community emissions reduction

¹¹ The community steering committee must comply with open meetings laws such as the Bagley-Keene Act and the Brown Act, as appropriate.

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program to the local board for adoption within one year of selection by the CARB Governing Board and should provide an opportunity for a community representative of the community steering committee to present the community perspectives. The air district's presentation should discuss how the community steering committee's discussions informed each element of the community emissions reduction program.

Required outreach elements include:

- *Materials and interpretation services in appropriate languages* – Accessibility refers not only to meeting timing and locations, but also to the ability for non-English speakers to participate fully in ongoing discussion. The specific languages required will depend on the particular community and will be determined by the air district, with input from the community steering committee. Air districts should ensure that materials are provided in appropriate languages and that interpretation services are available at all workshops and air district public board hearings as appropriate.
- *A designated contact person at the air district for each community emissions reduction program* – Each air district should identify a contact person to address general questions regarding community emissions reduction programs and Community Air Protection Program implementation for each selected community.
- *A dedicated webpage for each community selected for community emissions reduction program preparation* – The air district should develop a dedicated webpage for each community emissions reduction program that is available to the public. The air district's primary webpage should include a prominent link to the community-specific webpage, which should at a minimum contain:
 - Phone number and e-mail address for the dedicated contact person.
 - An up-to-date outreach calendar and notices for workshops and community steering committee meetings.
 - Any draft materials that will be shared at air district workshops and public board hearings.
 - Links to any relevant air quality data for the community.
 - A link to CARB's Community Air Protection Program webpage.

This information should be available in appropriate languages, with the specific languages in addition to English depending on the community and interpretation services provided at each meeting. The information should also be distributed broadly to a variety of groups (e.g., environmental justice groups, faith-based organizations, schools) and through various avenues such as the internet, paper mailings, local print, radio, and television media as appropriate and at least five days in advance of each meeting.

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OUTREACH SUMMARY

Community emissions reduction programs should include a summary of the first year of public outreach and an overview of the planned approach for public engagement moving forward. Future updates on public engagement should be included in the progress reports. The summary will discuss the key takeaways from public engagement, including from both the steering committee and the perspectives heard during the broader public process, to ensure that CARB staff and the CARB Governing Board have a clear understanding of what input was considered and how it was assessed.

The outreach summary should also include:

- The community steering committee charter.
- Dates, times, locations, sign-in sheets, agendas, and next steps for all community steering committee meetings.
- Dates, times, locations, and number of participants at all workshops.
- The name of the interpreter used at any steering committee meeting or workshop, if applicable.
- Links to presentation materials and minutes/notes for all workshops and air district public board hearings.
- Any community steering committee invitations sent or other relevant correspondence.

UNDERSTANDING THE COMMUNITY

COMMUNITY PROFILE

In developing the community emissions reduction programs, air districts will prepare a community profile, which will provide context to understand the community attributes and pollution and public health challenges. The community profile will provide a general overview of the community and include a discussion of community issues, including types of pollution impacting the community, a characterization of public health data to establish a current baseline and socioeconomic factors. Some of this community-level information may have been identified through the community assessment and selection process.

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TECHNICAL FOUNDATION

Conducting a technical assessment is a necessary step in community emissions reduction program development. The technical assessment, informed by community input, serves several purposes within the context of community emissions reduction program development and implementation, including: establishing a baseline understanding of the air pollution challenges in the community, identifying the key air pollutants and sources for programmatic focus, supporting the development of targets and strategies, and providing a mechanism to track progress. This assessment will provide the baseline from which emissions reductions can be measured.

REQUIRED ANALYTICAL TASKS

Various data sources exist to support the technical assessment, and generally multiple datasets and analytical approaches will be needed to inform the assessment and potential solutions in a community. The technical assessment will rely on results from a variety of analyses to characterize emissions in the community and inform community emissions reduction program development and implementation. In many cases, community ground-truthing exercises can be useful to validate and enhance emissions and exposure analyses.

Technical assessments include:

- An assessment and description of the existing high cumulative air quality exposure burden within the community that identifies:
 - A list of the key air pollutants driving the exposure burden in the community and current air quality levels.
 - A list of the key sources and source categories both within and directly surrounding the community.
- An assessment of sensitive receptor locations within the community and how land use issues impact exposure.
- A community-level emissions inventory, which estimates air pollutant emissions of the mobile sources (e.g., cars, heavy-duty trucks, locomotives), area-wide sources (e.g., fireplaces, charbroilers, fugitive dust), and stationary sources (e.g., oil refineries, auto body shops, manufacturing facilities) contributing to the high cumulative air quality exposure burden within the community. CARB will provide guidance for development of emissions inventories, based on best available data, in the online Resource Center.¹² Developing more granular community-scale emissions inventories is critical for understanding existing baseline emissions and tracking future emission reductions within a community.

¹² Appendix F provides more detail on CARB's online Resource Center.

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- An assessment of the benefits of existing air quality policies and programs in reducing emissions within the community.
- An assessment of compliance with air quality rules and regulations for sources impacting the community, consistent with the enforcement plan.

The source attribution tasks described below, along with CARB’s recommended source attribution technical approaches provided in the online Resource Center, provide a methodology for assessing, identifying, and estimating the relative contribution of sources or categories of sources, including but not limited to mobile, stationary, and area-wide sources, to elevated exposure to air pollution in impacted communities.¹³ Community emissions reduction programs will include a source attribution analysis that:

- Assesses the share of mobile, area-wide, and stationary source emissions contributing to the high cumulative exposure burden in communities selected for the implementation of community emissions reduction programs and aid in the development of applicable emissions reduction targets and strategies.
- Helps differentiate between the share of pollution contributed by sources within or directly surrounding the community versus the portion from regional or background pollution outside the community.
- Is based on appropriate, representative approach(es) and input data in order to characterize the relative contribution of emissions sources to a community’s high cumulative exposure burden. Representative input data may be from recent or historical studies of the community. As a result, air districts must describe the appropriateness and representativeness of the proposed approaches as well as the data source, vintage, and representativeness of input data utilized in implementing each chosen approach in their source attribution results. Data collection efforts for air quality, emissions inventory, or other data types required for source attribution can continue throughout the implementation of community emissions reduction programs.
- Uses one of CARB’s recommended source attribution approaches, which are provided in the online Resource Center along with requirements for the development or application of new or equivalent approaches that may be developed over time.

Air districts and communities implementing community air monitoring should keep data collection efforts associated with prospective source attribution approaches in mind as community emissions reduction programs and/or community air monitoring are considered.

¹³ California Health and Safety Code § 44391.2(b)(2).

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As part of their submittal of the community emissions reduction program to CARB, air districts are to include documentation of data sources and methods and a discussion of any data gaps, the implications of these data gaps, and potential opportunities to improve technical analysis in the future.

MINIMUM DATA REQUIREMENTS

Several air districts have already conducted detailed analytical work at the community level and have granular, robust data on community-level emissions and exposure. These high-resolution datasets can support a detailed source attribution analysis for strategy development in communities with more complex mixes of contributing sources. In other cases, community emissions reduction program strategies will be focused on broader source categories and more detailed source resolution may not always be necessary, particularly in communities that may have only a small number of source types contributing to the exposure burden.

In developing the community emissions reduction programs, air districts will rely on the best data and methodologies available that are representative for the community. Our understanding of sources, pollutants, receptors, and health impacts in communities will continue to improve in coming years through enhanced community monitoring, new emissions reporting requirements, and an ongoing emphasis across the State and air district efforts to focus on community-level assessment. This increasing granularity in data will support improved analytical and strategic approaches or tools to address and monitor community-specific air pollution problems going forward. The data received from the new annual emissions reporting system will be used to inform: the statewide assessment completed by CARB staff during the community selection process, source attribution developed as part of a community emissions reduction program, and to help track progress of community emissions reduction programs.

DEVELOPING TARGETS AND STRATEGIES

EMISSIONS REDUCTION TARGETS

AB 617 requires that community emissions reduction programs include emissions reduction targets.¹⁴ Establishing specific, quantifiable, and measurable targets is critical to guide strategy development and track progress over time. In recognition of the significant health impacts associated with elevated exposure in identified communities, these specific, quantifiable emissions reduction targets are to be achieved within five years.

¹⁴ California Health and Safety Code § 44391.2(c)(3).

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To address the air pollution disparities that exist in highly impacted communities, with a special consideration of sensitive receptors, and achieve the health-based air quality objectives discussed earlier, community emissions reduction programs must:

- Focus and accelerate actions to provide direct emission reductions within the community to maximize reductions in exposure to applicable toxic air contaminants.
- Focus and accelerate actions to provide direct emission reductions within the community to achieve healthful levels of PM_{2.5} and other air pollutants with localized nonattainment issues, if applicable.

CARB has established a process for air districts to develop appropriate quantifiable targets for each community emissions reduction program based on the health-based air quality objectives discussed previously and informed by the technical assessment elements described in the prior section. The emissions reduction targets should be calculated to achieve emissions reductions relative to the year in which the community was selected. Targets should also commit to air quality benefits beyond existing reductions that are expected to occur from planned rules and regulations. The targets must be developed in consultation with the community steering committee and be consistent with the process laid out in this document.

In consultation with the community steering committee, community emissions reduction programs must identify and include specific, quantifiable emissions reduction targets for applicable pollutants contributing to the cumulative exposure burden including: directly-emitted applicable toxic air contaminants, PM_{2.5}, and any other identified pollutants (e.g., lead, PM₁₀) as defined in the technical assessment.

DEVELOPING EMISSIONS REDUCTION TARGETS

To establish the emissions reduction targets, community emissions reduction programs will first establish specific, numerical goals for compliance and for the deployment or implementation of technology and control techniques that can deliver emissions reductions. These reductions will focus on the identified pollutants and associated precursors contributing to the cumulative exposure burden. The community emissions reduction programs will then calculate the emissions reductions associated with these goals to establish emissions reduction targets that ensure steady progress towards meeting the air quality objectives. The community emissions reduction programs are to include specific, quantifiable emissions reduction targets based on the emissions reduction potential associated with achieving the goals. Figure C-3 provides an overview of the process for establishing an emission reduction target.

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Figure C-3 Process for Establishing an Emissions Reduction Target



The purpose of the compliance goals, technology deployment and control techniques are two-fold: first, to determine the magnitude of the emissions reduction targets; and second, to provide numerical, visible actions that community members and other stakeholders can track as the community emissions reduction program is implemented.

The technical assessment will have identified the mobile, stationary, and area-wide sources causing localized impacts within the community. The community emissions reduction programs will include:

- Commitments to achieve numerical goals for compliance for the identified mobile, stationary, and area-wide sources.
- Commitments to achieve numerical goals for deploying or implementing available technologies or control techniques that provide the greatest emissions reduction potential for the identified mobile, stationary, and area-wide sources.

CARB staff will work with the air district on the goals related to mobile sources under CARB's authority.

To develop the compliance goals, the community emissions reduction program will assess compliance with the air quality rules and regulations for the mobile, stationary, and area-wide sources of the identified pollutants and applicable precursors, consistent with the enforcement plan, then establish specific compliance goals to be achieved within five years. Compliance goals could include goals for increasing compliance to specific levels for individual rules or regulations or achieving incremental improvements in compliance levels over time, with specific mechanisms to improve compliance defined in the enforcement plan.

To develop the technology and control technique goals, the community emissions reduction program will identify source-specific technologies and control techniques that can reduce emissions of the identified pollutants and applicable precursors, with a focus on zero emission technologies where feasible. Specific, numerical goals will then be

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established for deployment or implementation of these technologies and control techniques to be achieved within five years. For example, the goals could include: reducing dust from a specific number of miles of unpaved roads; deployment of a certain number of zero emission buses, replacement of a specific number of older residential wood stoves with cleaner models, and installation of a specified number of control devices at industrial facilities, such as refineries. The community emissions reduction program must consider the technologies identified in the Technology Clearinghouse, but may also use other sources. CARB staff will work with the air district on the compliance and deployment and implementation goals related to mobile sources under CARB's authority.

The same source types within a community may emit toxic air contaminants, PM_{2.5}, and PM_{2.5} precursors and the same technologies can be used to meet the compliance and technology and control technique goals and emissions reduction targets.

PROXIMITY-BASED GOALS

In some cases, even with the cleanest technologies deployed, proximity to emissions sources may continue to pose health risks, particularly for individuals who are especially vulnerable to the impacts of air pollution such as children, the elderly, and individuals with certain medical conditions. Addressing the cumulative exposure burden in communities may require additional, location-based actions that go beyond specific strategies to reduce emissions, such as changes to facility design to reduce exposure, new truck routes to avoid populated areas, installation of air filtration systems at schools or homes, setbacks, or vegetative barriers to reduce pollution dispersion from emissions sources.

CARB recognizes that, in many cases, the authority for implementing these goals will reside with local government agencies. Air districts (and CARB where appropriate) will identify appropriate strategies and approaches to engage with these agencies in an effort to obtain these goals where the air district's regulatory authority is limited. Defining specific proximity-based goals and exposure reduction strategies provides a more effective and transparent basis for this engagement process with local government agencies.

To determine proximity-based goals, the community emissions reduction program will:

- Identify the sensitive receptor locations that are exposed to elevated levels of air pollution because of their proximity to emissions sources.
- For the identified sensitive receptor locations, establish measureable goals for deploying or implementing exposure reduction measures.

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These measurable goals could range from the installation of a certain number of air filtration systems, to goals for specific minimum setback requirements from significant sources, to goals for a reduction in the number of trucks along a route, or a reduction in fence-line concentrations. Figure C-4 provides an overview of the process for establishing a proximity-based goal.

Figure C-4 Process for Establishing a Proximity-Based Goal



EMISSIONS AND EXPOSURE REDUCTION STRATEGIES

After defining the emissions reduction targets, along with associated goals, air districts, working with the community steering committee, need to identify the strategies necessary to meet these goals and targets. In addition to strategies that will deliver the necessary reductions to be achieved within the five-year timeframe, air districts should also identify annual milestones that can provide more immediate reductions. These strategies should also establish a path towards continuing longer-term reductions in PM 2.5 and toxic air contaminants within the community.

The systematic development of targets and strategies should not delay action that can quickly deliver emissions and exposure reductions. CARB encourages immediate implementation of any feasible activities identified in parallel with program development.

The scope of strategies included in each community emissions reduction program will be informed by the technical assessment and the types of sources contributing to elevated pollution levels and the nature of the goals and targets. CARB has identified emissions and exposure reduction approaches that all community emissions reduction programs should draw from to ensure a comprehensive and rigorous evaluation of potential reduction strategies.

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Each community-level emissions and exposure control strategy should incorporate a combination of mechanisms to adequately reduce emissions and exposure, with CARB and the air district responsible for strategies in accordance with their respective authorities. Per the requirements of AB 617, community emissions reduction programs must identify cost-effective measures to achieve the targets.¹⁵ CARB has established criteria that include an assessment of strategies that provide reductions within the community in six categories:

- Regulations.
- Facility risk reduction audits.
- Air quality permitting.
- Enforcement.
- Incentive programs.
- Land use, transportation, and mitigation strategies.

Community emissions reduction programs should include new strategies to address air pollution from stationary, mobile, and area-wide sources that contribute to the cumulative emissions and exposure burden.

Each community emissions reduction program will consider the scope of sources impacting the community and the specific types of strategies within each category discussed below at a minimum, evaluate applicability, and develop community-specific strategies to include in the community emissions reduction program.

In some cases, existing planning efforts such as State Implementation Plans and regional Sustainable Communities Strategies can provide a starting point for identification of strategies for focused implementation within the community. However, air districts should also evaluate additional strategies needed to meet the emissions reduction targets and proximity-based goals within the community and may pursue any additional types of strategies not included in this list as necessary to achieve the targets.

The air district will develop the list of strategies to be included in the community emissions reduction program in collaboration with the community steering committee. This includes a discussion of all potential opportunities identified and why potential new strategies that were applicable to the community's air quality challenges were not selected, including those identified by the community steering committee. The result should include new strategies to address air pollution from stationary, mobile, and area-wide sources that contribute to the cumulative emissions and exposure burden.

¹⁵ California Health and Safety Code § 44391.2(c)(2).

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REGULATORY STRATEGIES

- *Include the best available retrofit control technologies (BARCT) expedited schedule* – AB 617 requires that any air district in nonattainment for one or more criteria air pollutants adopt an expedited BARCT schedule for “each industrial source” subject to the State’s Cap-and-Trade program as of January 1, 2017; the schedule must consider community public health and clean air benefits, cost-effectiveness, and air quality and attainment benefits.¹⁶ The community emissions reduction programs must identify the categories of sources impacting the community that will be subject to these requirements and ensure review and implementation of BARCT measures as applicable.
- *Identify new air district rules and regulations* – The community emissions reduction program must evaluate, identify, and include proposed new or amended air district rules, if appropriate, to deliver further reductions from sources within or directly surrounding the selected community that are impacting the community. The community emissions reduction program must evaluate the most stringent control limits and exemption and applicability provisions in developing new or amended rules, while considering how the State’s overall move to cut greenhouse gases and criteria air pollutants may affect facilities as applicable within the community. This evaluation should also consider other approaches such as:
 - Activity limits and other operational requirements.
 - Indirect source rules and other facility-based approaches.
 - Enforceable agreements.
 - Transportation control measures.

The community emissions reduction program must at a minimum reference the Technology Clearinghouse to identify rules, regulations, technologies, or practices available that could offer emissions or exposure reduction opportunities within the selected community.

- *Coordinate with CARB to identify CARB measures as appropriate* – CARB has included several new statewide regulatory measures in Appendix F and will be implementing these over the coming years. In cases where the sources covered by these new measures contribute to the exposure burden in a selected community, the community emissions reduction programs should incorporate these measures.

CARB will work with the air districts on identifying any additional CARB strategies that may be appropriate in the selected community, with the CARB Governing Board ultimately responsible for determining which measures CARB will implement.

CARB and air districts will continue developing regulatory and incentive actions through separate public processes. Subsequent implementation will be conditional

¹⁶ California Health and Safety Code § 40920.6(c).

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on the successful completion of applicable public processes, necessary financing approvals, technical feasibility analyses, economic competitiveness, safety, and environmental reviews.

FACILITY RISK REDUCTION AUDITS

- *Review facility risk reduction audits for selected facilities and identify and list facilities that will be required to update their emissions reduction plans* – AB 617 requires an assessment of which facilities' risk reduction audits and emission reduction plans an air district should review and update and authorizes air districts to reopen¹⁷ existing plans to strengthen them as appropriate.¹⁸ In the technical assessment, air districts will have identified the major sources contributing to health risk in the community.

The community emissions reduction program must list the facilities within and directly surrounding the selected community that are required to report toxic air contaminant emissions and identify whether the air district has designated the facility as high, intermediate, or low risk pursuant to AB 2588.¹⁹ The air district also needs to identify which of these facilities have existing risk reduction audits and emission reduction plans and select facilities for plan review. The community emissions reduction program should explain how facilities were selected for review.

AIR QUALITY PERMITTING

- *Permitting requirements* – The Technology Clearinghouse includes best available control technologies (BACT) and best available control technologies for toxic air contaminants (T-BACT) determinations for air districts across the State. The air district will use the Technology Clearinghouse as a reference in developing BACT and T-BACT technology determinations for any new or modified source permitting processes within or directly surrounding the selected community.

ENFORCEMENT STRATEGIES

- *Identify and include near-term enforcement strategies to improve compliance with existing rules* – Identify any noncompliance issues within or directly surrounding the selected community and include near-term enforcement strategies. Enforcement of rules and regulations is the responsibility of CARB and air district staff and it is critical to ensuring that CARB and air district policies achieve the anticipated

¹⁷ Air districts may also require updates and resubmissions of emission reduction plans for reasons outside of AB 617, consistent with existing authorities (e.g., California Health and Safety Code § 44391(i)).

¹⁸ California Health and Safety Code § 44391.2(b)(3).

¹⁹ Assembly Bill 2588, Air Toxics "Hot Spots" Information and Assessment Act, Connelly, Statutes of 1987, California Health and Safety Code § 44300; more specifically, the reporting requirements are shown in California Health and Safety Code § 44360(a).

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benefits. Targeted enforcement of existing rules and regulations can be implemented within communities without requiring new regulatory processes, presenting an opportunity to rapidly address community concerns and quickly deliver emissions reductions. The enforcement strategies should be linked to the results of a compliance assessment and a three-year enforcement history, as described in the “Enforcement Plan” section of this appendix.

INCENTIVE PROGRAM STRATEGIES

Air district and CARB incentive funding exists to support the introduction and expedited deployment of the cleanest technologies beyond what is required by regulation. In many cases, deploying these cleaner technologies can contribute to regional air quality goals while providing localized benefits. Incentive programs have played a key role in promoting adoption of next generation technologies and accelerating their deployment to achieve immediate reductions.

- *Identify incentive-based strategies* – Identify and discuss existing funding programs that apply to sources in the community, if any, and how they will be used to support achieving the targets and goals. Also identify and discuss potential funding opportunities that can be used to achieve further reductions and identify specific actions the air district and CARB will take to secure additional funds as necessary (e.g., leveraging other incentive programs such as the Low Carbon Transportation Incentives, Volkswagen Environmental Mitigation Trust, or air district funding programs).

CARB recommends that the air districts reference the Technology Clearinghouse to identify promising technologies to incorporate into incentive programs. CARB will collaborate with the air districts on implementing incentive programs and potential new funding opportunities for mobile sources.

- *Include outreach strategies to promote identified funding opportunities* – A key component of incentive programs is ensuring that the public is aware of the funding opportunities. Community emissions reduction programs should discuss how they will provide information on incentive programs to community members and business owners in the community.

LAND USE, TRANSPORTATION, AND MITIGATION STRATEGIES

In many communities, the proximity of emissions sources to nearby sensitive receptors like schools, homes, day care centers, and hospitals further exacerbates the cumulative exposure burden. Land use and transportation planning processes can also help address these proximity issues, as well as health protective mitigation measures and practices, like indoor air filtration and urban greening to help reduce exposure. Land use decisions rest in the first instance with local government planners and officials. The

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*State of California General Plan Guidelines: 2017 Update*²⁰ makes it clear that these planners have an obligation to consider air quality and environmental justice in their land use decisions. CARB and the air districts do not have direct authority over land use zoning and permitting or transportation plan development, but land use considerations may figure into air quality planning as well, so air quality officials have an important role to play as they work with city and county governments. They can actively engage with these processes to promote improved decision making and outcomes. The community emissions reduction program will:

- *Identify and include community-specific land use strategies to promote through engagement with local government agencies* – There are a number of strategies that cities and counties can implement to reduce emissions and exposure. The community emissions reduction program must, as appropriate, consider each of these strategy types, identify which would be appropriate in the community-specific context, identify the applicable implementing agency, and work with them to encourage specific strategies, such as:
 - Planning permit conditions to require increased setbacks for specific source types like manufacturing facilities or oil and gas operations to reduce sensitive receptor proximity.
 - Planning permit conditions to require buffer zones for specific source types.
 - “Green zone” policies to establish exposure-reducing development requirements for specific areas.
 - Zoning code amendments to prevent or reduce new permitting of incompatible land uses.
 - Processes to terminate existing incompatible land uses within selected communities.
 - General plan updates focused on environmental justice and air quality, through the Senate Bill 1000²¹ process, or other general plan updates.
 - Strategies to promote urban greening.
 - Measures in the applicable Metropolitan Planning Organization’s Senate Bill 375²² Sustainable Communities Strategy that can be implemented within the community.
 - Environmental justice-related components of regional or local plans that can be implemented within the community.

CARB recommends that the air districts refer to the online Resource Center to identify and include any appropriate additional land use strategies that may be applicable to the community.

²⁰ Governor’s Office of Planning and Research, State of California General Plan Guidelines: 2017 Update, July, 31, 2017, available at: <http://www.opr.ca.gov/planning/general-plan/>.

²¹ Senate Bill 1000, Leyva, Chapter 587, Statutes of 2016, California Government Code § 65302(h).

²² Senate Bill 375, Steinberg, Chapter 728, Statutes of 2008, Government Code § 65080(b)(2).

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- *Identify and include community-specific transportation strategies to promote through engagement with State and local government agencies* – Several types of transportation strategies can deliver emissions and exposure reductions in communities. The community emissions reduction program must, as appropriate, consider each of these strategy types, identify which would be appropriate in the community-specific context, identify the applicable implementing agency, and develop specific strategies to promote:
 - Alternative truck routing.
 - Geo-fencing within designated areas.
 - Strategies to reduce vehicle miles travelled and encourage active transportation.
 - “Green zone” policies to implement transportation strategies within certain areas.
 - Preferential access to facilities for the cleanest technologies.
 - Incorporation of zero emission vehicles and equipment into project development, construction, and operation.
 - Measures in the applicable Metropolitan Planning Organization’s Senate Bill 375²³ Sustainable Communities Strategy that can be implemented within the community.
 - Environmental justice-related components of regional or local plans that can be implemented within the community.

CARB recommends that the air districts refer to the online Resource Center to identify and include any appropriate additional transportation strategies that may be applicable to the community.

- *Identify specific mitigation strategies that can further reduce exposure within the community* – Even with robust regulation and deployment of advanced technologies, there may be cases where exposure to emissions sources continues. The community emissions reduction program must incorporate specific strategies to further reduce the impacts of ongoing emissions. The community emissions reduction program must as appropriate consider each of the following types of mitigation strategies, identify which would be appropriate in the community-specific context, identify the applicable implementing agency, and select specific strategies to deploy within the community:
 - Installation of air filtration at sensitive receptor locations.
 - Installation of solid barriers or vegetative buffers between emissions sources and sensitive receptors.
 - Implementation of school flag and other notification programs to communicate air quality information to the community.
 - Urban greening projects.

²³ Senate Bill 375, Steinberg, Chapter 728, Statutes of 2008, Government Code § 65080(b)(2).

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CARB recommends that the air districts refer to the online Resource Center to identify and include any appropriate additional mitigation strategies that may be applicable to the community.

- *Identify and include engagement strategies and implementation mechanisms to promote the identified land use, transportation, and mitigation strategies* – Air districts can engage with land use and transportation planning processes in multiple ways, and many of the land use or transportation strategies may be interrelated. The community emissions reduction program must identify specific opportunities and approaches to coordinate with the appropriate agencies to promote the land use, transportation, and mitigation strategies identified. The community emissions reduction program must, as appropriate, consider:
 - Writing CEQA comment letters on proposed projects that would impact the community, such as increased pollution burden due to indirect sources (e.g., increased truck traffic).
 - Utilizing CalEnviroScreen indicators and other existing data sets to provide an analysis of existing environmental burdens in order to set the baseline conditions and metrics to improve air quality and reduce cumulative exposure burdens.
 - Direct meetings with staff or elected officials.
 - Direct meetings with facility owners and/or equipment operators.
 - Formation of a cooperative information sharing process with land use permitting agencies to review proposed projects that would impact the community.
 - Participation in public meetings on proposed projects that would impact the community.
 - Development of memoranda of understanding with cities, counties, transportation agencies, other public agencies, or facility owners or equipment operators.
 - Direct air district implementation of strategies within the air district's jurisdiction.

For major projects that would impact communities, CARB and air districts should coordinate wherever possible to follow-up on comment letters and the environmental review process. CARB recommends that the air districts refer to the online Resource Center to identify and include any appropriate additional engagement mechanisms that can be used to support the identified strategies. CARB will also engage with State and local government agencies to support the identified land use, transportation, and mitigation strategies as appropriate.

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IMPLEMENTATION SCHEDULE

Air districts need to develop an implementation schedule for the identified strategies in each community emissions reduction program. Schedules will include near-term and annual actions, as well as actions to achieve the specific, quantifiable emissions reduction targets within the five-year implementation timeframe. To demonstrate continued progress beyond the five-year implementation timeframe, air districts will also estimate and describe the ongoing community benefits these strategies will provide for an additional five years.

For each new strategy selected, provide the following, as applicable:

- A description of the strategy.
- The expected emissions and/or exposure reductions by pollutant from each proposed strategy.
- Cost-effectiveness, calculated in accordance with the air district's cost-effectiveness methodologies, along with appropriate documentation.
- Implementation roles and responsibilities, including authority.
- A timeframe for consideration by an air district's board or the CARB Governing Board.
- A timeframe for any necessary coordination with other agencies.
- A timeframe for implementation.
- A description of how the technical assessment informed strategy development, including a discussion of priority pollutants and sources.
- The perspectives of the community steering committee and other public recommendations.

ENFORCEMENT PLAN

Enforcement of regulations by CARB and air district staff is critical to achieving regional and local air quality goals. AB 617 requires that community emissions reduction programs include an enforcement plan.²⁴ A strong and effective enforcement plan can ensure that existing and future regulatory efforts are successfully reducing emissions and improving air quality and public health.

²⁴ California Health and Safety Code § 44391.2(c)(3).

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The enforcement plan should be tailored to address specific community issues and be informed by a baseline understanding of current enforcement efforts at each source in the community, as well as the concerns of local community members. Many of the enforcement provisions may also be integrated into other elements of the community emissions reduction program, including the technical assessment, targets and goals, and reduction strategies.

Enforcement responsibilities are jointly shared between CARB and the air districts, with CARB primarily responsible for enforcement of mobile sources and air districts primarily responsible for area-wide and stationary source enforcement. There are also cases where CARB has established memoranda of understanding with the air districts to delegate enforcement authority. In developing the enforcement plan, CARB and the air district staff will partner together to build on existing enforcement efforts and identify the best path forward for enforcing air quality rules and regulations within and directly surrounding the community. This section discusses the purpose of the enforcement plans; provides an overview of the typical enforcement process and techniques; and presents the requirements for CARB and the air districts in developing these community-specific enforcement plans.

PURPOSE

The primary function of enforcement activities is to deter noncompliance and improve compliance rates with air quality rules and regulations. Enforcement efforts can also be a useful tool in engaging community members and promoting new solutions to air quality issues in communities.

The community emissions reduction program enforcement plans should be designed to achieve five key objectives, as applicable:

- Enhanced enforcement of existing regulations.
- Identification of robust enforcement mechanisms for new regulations.
- Development and implementation of solutions to resolve violations, including coordination with other agencies as appropriate.
- Development of new emissions and exposure reduction strategies based on enforcement activities and results.
- Enhanced community participation in supporting CARB and air district enforcement efforts.

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ENFORCEMENT PROCESS AND TECHNIQUES

Both CARB and the air districts have existing enforcement processes, and the enforcement plan developed pursuant to the community emissions reduction program will enhance these existing efforts to assist in delivering local emissions reductions. Enforcement efforts require coordination between community members, CARB, the air districts, and facility or equipment owners.

Community members can play an active role in supporting enforcement activities conducted by CARB and air district staff. Residents of heavily burdened communities often have a strong understanding of the impacts of air pollution, and sometimes air pollution violations, in their community. Both CARB and air districts have systems for reporting potential violations, referred to as “complaints.” The implementation of the enforcement plan will contribute to the development of improved methods for resolving complaints and reducing air pollution impacts in the community, which can promote active community outreach and communication.

Technology is also becoming increasingly important for enforcement. Traditional enforcement is inspection-based: staff inspect an air pollution source and evaluate compliance against regulatory or permit requirements. Researching and incorporating new technologies, where feasible, may assist and enhance enforcement work in communities. Surveillance techniques can provide evidence for violations during times when inspectors are not at the pollution source. Enforcement plans can draw upon technology to enhance and inform enforcement techniques and provide information to help inform and potentially resolve community concerns.

Through the enforcement process, those found to be in violation are required to come into compliance, and usually also pay a penalty. In some cases, CARB or air districts may allow the responsible party to satisfy part of the monetary penalty by voluntarily offsetting a portion of their civil penalty by performing or funding one or more Supplemental Environmental Projects. These are projects not otherwise required by law that benefit air quality by reducing emissions, reducing exposure to air pollution, or preventing future air quality violations. CARB runs an active program where projects proposed by disadvantaged community groups are matched to violators willing to fund those projects through a Supplemental Environmental Project. Through the community emissions reduction program, community members may identify projects that would benefit their community. If the project meets requirements, it may be funded through the Supplemental Environmental Project program.

ENFORCEMENT PLAN REQUIREMENTS

CARB and the air district will work together to develop and implement enforcement plans as a component of the community emissions reduction program. CARB is committed to providing a variety of enhanced enforcement activities in each selected community related to our enforcement responsibilities, and CARB will work closely with the air district throughout the development of the enforcement plan to identify community-specific enforcement needs.

The enforcement plan should consider the following elements:

- *A three-year enforcement history covering enforcement and compliance issues in the community* – To inform the development of targets, strategies, and the enforcement plan itself, the air districts shall construct and analyze an enforcement history covering at least three years before community selection. This history includes:
 - A summary of complaints received and their resolution.
 - A listing of all permitted facilities, including facility type.
 - Number of inspections conducted, including type, date, and location.
 - Notices of violation and notices to comply issued, including date, location, regulation cited, and description of issue.
 - An assessment of compliance with existing CARB and air district rules and regulations within and directly surrounding the community.
 - A discussion of opportunities for enhanced enforcement activities, including community outreach and communication, based on the historical data.

CARB will provide this same information for CARB mobile programs in the community, and will work closely with air district staff to analyze and draw conclusions from the historical data.

- *A compliance goal to support achieving the emissions reduction targets within the community* – To inform the emissions reduction targets and support emissions reduction, the enforcement plan will include compliance goals for mobile, stationary, and area-wide source types that contribute to the cumulative exposure burden within the community. CARB will collaborate with the air district on the compliance goals related to mobile sources subject to CARB's rules and regulations.
- *Specific approaches to enhance complaint reporting, industry compliance, and enforcement-related community outreach within the community* – The air district and CARB will work together to identify approaches to enhance complaint reporting, outreach, and enforcement within the community. The historical enforcement assessment will point to opportunities for improved enforcement efforts within the community. The enforcement plan will identify specific approaches to address these opportunities.

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CARB will work with the air district to improve the complaint reporting process, including improved reporting methods and procedures to speed response. The enforcement plan will establish a transparent process for follow-up on complaints so that community members will understand how their complaints are being addressed.

- *Formation of a dedicated team to conduct community-level outreach* – Conducting community-level outreach is key to understanding community concerns, including identification of potential violations or unpermitted sources. The air district and CARB will convene a team to work together, engaging actively with the community steering committee, and focusing on responding to community concerns.
- *A process to track enforcement activities and identify potential solutions based on enforcement results* – The enforcement plan will describe how the air district will track and assess enforcement activities in the community. CARB will provide data on its program activities in the community for tracking. Tracking and assessing enforcement activities can provide valuable insight into ongoing air quality and regulatory issues. These lessons can inform technical analyses to characterize community-level air quality challenges and highlight opportunities for improved implementation. In addition to tracking these enforcement activities, CARB and the air districts will identify solutions based on enforcement results.
- *A discussion of potential enforcement mechanisms for each new regulatory strategy included in the community emissions reduction program* – As the air districts are developing new emissions reduction strategies, they will include a discussion of how they plan to enforce new requirements. In some cases, this may fall under existing enforcement programs, but these mechanisms will also incorporate any new data that can support identification of issues, including monitoring, as well as innovative enforcement techniques.

As CARB and the air districts identify and develop new mobile source emissions reduction strategies, CARB will collaborate closely with the districts on identifying improved enforcement mechanisms. This collaboration could include memoranda of understanding with the air districts to delegate enforcement authority, so that both CARB and air district staff can enforce requirements in the community, as appropriate.

CARB will also collaborate with the air districts to develop, include, and implement community-specific provisions as appropriate for each of the following general actions:

- *Community enforcement program* – CARB will develop and implement a new program that will be offered to communities across the State, discussed in Appendix F. The program will cover topics like the fundamentals of enforcement, how the enforcement process works, instructions on filing a thorough complaint, and what to expect from the enforcement process after filing a complaint. Through this program, community members will be able to better support CARB or air district enforcement processes.

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By building capacity within the community to support State and local enforcement efforts, community members will be able to help develop solutions to community issues.

- *Enhanced CARB program enforcement* – CARB will conduct enhanced enforcement activities in areas impacted by mobile sources. Enforcement may be focused on specific types of motor vehicles operating in the community, and the need identified by the historical compliance assessment. CARB may also increase stationary source enforcement in programs it enforces, such as requirements for landfills, oil and gas facilities, or refrigerant management systems, and may increase enforcement for consumer products regulations if warranted.

METRICS TO TRACK PROGRESS

Identifying metrics to track progress is critical for understanding whether the community emissions reduction programs are achieving their objectives. The community emissions reduction programs must include specific metrics and associated data sources that can be used to track progress in each selected community. No single metric alone can capture progress on its own, but taken together this suite of metrics will provide valuable insight and necessary accountability at the community level.

REQUIRED METRICS

AB 617 requires that the community emissions reduction programs result in emissions reductions, which can be demonstrated based on monitoring or other data.²⁵ The community emissions reduction programs must identify and describe how progress on achieving emission reductions for specific categories of sources will be tracked on an annual basis and track emissions for any pollutant that has an identified emissions reduction target. CARB will collaborate with the air district to support community-level mobile source emissions tracking, as appropriate.

ANNUAL IMPLEMENTATION METRICS

The community emissions reduction program must include specific, quantifiable metrics to track progress annually on:

- The emission reductions achieved and progress towards meeting the individual emissions reduction targets for each pollutant.
- The compliance and technology deployment and implementation goals for sources of identified pollutants.
- The proximity-based goals.

²⁵ California Health and Safety Code § 44391.2(c)(5).

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- The status of rules and regulations adopted or other strategies implemented.
- The dollar amount invested and number of projects implemented in and/or benefitting the community if incentive strategies are part of the community emissions reduction program.
- Additional enforcement activities such as:
 - Inspections conducted including type, date, and location.
 - Notices of violations issued including date, recipient, and regulation cited.
 - Number of complaints received by type and their resolution.
 - Percentage of notices of violations/notices to comply that have been resolved.
 - Any additional compliance metrics relevant to enforcement issues in the community.

AIR QUALITY AND EXPOSURE METRICS

The strategies implemented through the community emissions reduction programs are designed to improve air quality in selected communities. To assess whether these efforts have been effective, air districts will identify specific mechanisms and metrics that will be used to track air quality and exposure progress over time. These could include any number of approaches, such as: monitoring data if it is available in the community; air quality modeling to predict air quality concentrations; or modeled cancer and non-cancer risk. It is important to note, however, that as new strategies are developed and deployed, it may take several years to see significant reductions in exposure that can be measured at the community scale. It may also take time to deploy new monitoring systems necessary to measure these changes and to develop and run community-specific air quality models. These air quality and exposure metrics are therefore most appropriate for final assessment at the five-year milestone, though interim assessments and monitoring will inform CARB, air district, and community understanding of a community emissions reduction program's implementation and effectiveness as it goes into force.

RECOMMENDED ADDITIONAL METRICS

CARB recommends that the community emissions reduction programs include additional metrics to track progress in the following areas, as appropriate.

IMPLEMENTATION METRICS

The air districts may consider including additional metrics to track implementation progress, including:

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- Number of public meetings held in the community and number of people in attendance.
- Number of interactions with city and county governments to address local exposure to air pollution.

METRICS ON ADDITIONAL CO-BENEFITS

In addition to the measures tied explicitly to air pollution and implementation, there may be additional co-benefits associated with community emissions reduction programs. CARB recommends that the community emissions reduction programs include metrics to track additional co-benefits, such as trainings, outreach, workforce development, or technical capacity-building.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CARB and the air districts are required to comply with CEQA insofar as activities required by statute are projects subject to CEQA.²⁶ In its development and approval of a community emissions reduction program, air districts (as CEQA lead agencies) will need to determine if CEQA is triggered and if so, the appropriate CEQA analysis required and consult with CARB. For every project that is not exempt, CEQA requires the appropriate level of environmental review be conducted before that project may be considered for approval.²⁷ With regard to activities required by AB 617, this review will generally be conducted during an air district's community emissions reduction program development process, but additional review may sometimes be needed during CARB's review process.

CARB, in its consideration of the air district's community emissions reduction programs, will generally rely on the CEQA analysis completed by the air districts. In certain situations (i.e., where CARB has to add to the air district's community emissions reduction program to make it approvable), CARB may have to conduct additional CEQA analysis under its certified regulatory program. Close and early coordination between CARB staff and the air districts will be essential in identifying the agencies' respective CEQA obligations.

²⁶ California Environmental Quality Act, Public Resources Code § 21000 et seq.; CEQA Guidelines, Title 14, California Code of Regulations § 15000 et seq. A project is defined in CEQA to mean in part an "activity which may cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment" and is undertaken by a public agency. California Public Resources Code § 21065.

²⁷ For non-exempt community emissions reduction program projects, at a minimum, an initial review of the project and its environmental effects must be done. Depending on the potential effects of the community emissions reduction program, a further and more substantial review may be required in the form of an environmental impact report or equivalent document, or a negative declaration or mitigated negative declaration or equivalent document.

IV. CARB REVIEW

The air districts have one year to develop and adopt community emissions reduction programs, which will then be forwarded to CARB for consideration and approval, if all criteria are met. Each community emissions reduction program will be reviewed by CARB staff, based on the checklist in Table C-1. CARB staff will then develop a written staff report with staff's assessment and recommendation, including next steps associated with the recommendation. CARB staff will make the written report available for public review and comment before presenting each community emissions reduction program to the CARB Governing Board for action. The CARB Governing Board may take one of four actions in considering a community emissions reduction program: approve, conditionally approve, partially approve, or reject (collectively represented as a CARB Governing Board action).

As the reviewer and approver of community emissions reduction programs, CARB's responsibility is to ensure that community emissions reduction programs have been designed with sufficient rigor and technical foundation to deliver the needed community benefits. In reviewing air district submittals, CARB will assess the community emissions reduction programs with respect to both completeness and adequacy. Assessing for completeness involves reviewing the community emissions reduction programs to ensure they include all the required elements. Evaluating for adequacy assesses the extent to which each required element is responsive to the criteria included in this appendix, is appropriate to the specific community needs, and will reduce air pollution exposure in the community.

CARB staff will recommend approval of community emissions programs that include all of the required elements and have a robust and specific set of goals, targets, strategies, and enforcement approaches. The CARB Governing Board will review district's proposed targets during the community emissions reduction program review and may not approve a community emissions reduction program if the targets are not consistent with this document or governing law, or if they are not supported by substantial evidence in the record developed by the air district. Community emissions reduction programs that may require additional documentation or consideration of certain elements will be recommended for either partial or contingent approval, depending on the strength of the remaining elements. CARB staff will recommend rejection for community emissions reduction programs that are missing significant elements or are inadequate in their likelihood of delivering emissions reductions within the community.

In considering approval of community emissions reduction programs, the CARB Governing Board may establish requirements for community emissions reduction program updates to the Governing Board and/or identify specific interim implementation

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milestones to gauge progress or appropriately adjust the community emissions reduction program.

AB 617 requires that CARB act on submitted community emissions reduction programs within 60 days of receipt.²⁸ This provides a narrow window for CARB staff to review submittals and develop recommendations for the CARB Governing Board action. CARB is committed to working closely with the air districts and the community steering committees throughout community emissions reduction program development to expedite this process.

V. IMPLEMENTATION REQUIREMENTS

After the CARB Governing Board has approved a community emissions reduction program, additional requirements apply for implementation, including a continued public process and reporting.

COMMUNITY PARTNERSHIPS AND PUBLIC ENGAGEMENT

As with development of the community emissions reduction programs, community participation and engagement is a key piece to ensuring successful implementation. In implementing the community emissions reduction programs, the air district will:

- *Continue to uphold the broad accessibility requirements identified in the “Requirements for Community Emissions Reduction Program Development” section of this appendix* – This includes:
 - Identifying a contact person to address general questions regarding community emissions reduction programs and implementation of the Community Air Protection Program for each selected community.
 - Providing materials and interpretation services in appropriate languages at all workshops and air district public board hearings.
- *Maintain the community steering committee* – Air districts must maintain the community steering committee to support implementation over the course of the community emissions reduction program. The steering committee should meet at least quarterly and provide guidance on implementation, including tracking of metrics over time and the development of progress reports.

²⁸ California Health and Safety Code § 44391.2(c)(4).

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- *Maintain the dedicated webpage for each community selected for community emissions reduction program preparation* – The air districts should maintain the dedicated webpage for community emissions reduction program development with all the previously required elements and include the following additional elements:
 - A dashboard for progress on all community emissions reduction program goals and targets.
 - Draft and final annual progress reports as they are released.
- *Hold air district board hearings* – During implementation, air district staff should present a community emissions reduction program update at least once a year to their board in advance of the release of the annual report.

ANNUAL PROGRESS REPORTS

AB 617 requires air districts to develop annual progress reports on the status of implementation of their community emissions reduction programs.²⁹ This section covers the required content, public noticing, and timing of these reports.

As community emissions reduction programs are implemented over time, CARB and the air districts will have the opportunity to identify promising new strategies for either targeted or statewide implementation. CARB will review the annual progress reports and assess the potential for strategies to be incorporated into the Technology Clearinghouse, online Resource Center, and/or Program revisions as appropriate.

MINIMUM REQUIREMENTS

The annual progress reports are the primary mechanism to monitor progress on the community emissions reduction programs. The annual progress reports will include the following items:

- *A status update on all strategies included in the community emissions reduction program* – The status update includes:
 - Whether the item has gone to the air district board or the CARB Governing Board, if applicable.
 - If the strategy is already being implemented, the steps have been taken to-date.
 - If the strategy has not been implemented, any updates, including public outreach efforts that are supporting strategy development.

²⁹ California Health and Safety Code § 44391.2(c)(7).

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- If a strategy is past its planned implementation date but has not yet been implemented, an explanation of why, a proposed new timeframe or substitute strategy, and a discussion of how the overall emissions reduction targets will still be achieved within the five-year timeframe.
 - Characterization of health-related emissions and exposure reduction benefits of any strategies under development or implemented.
 - Any additional items that may be relevant.
- *Updates on the metrics for tracking progress identified in the community emissions reduction program* – The community emissions reduction program will have identified a suite of metrics for tracking progress and a frequency for assessing these metrics, including progress toward achieving the emissions reduction targets. The progress reports includes information regarding changes in the community as reflected in the identified metrics, an overview of data sources, and a discussion of changes over time.
 - *Updates on the community profile* – The community emissions reduction program will have included a community profile. Annual progress reports will include updates on changes in community attributes that were included in the community profile and incorporate new attributes as appropriate.
 - *A qualitative progress assessment* – In addition to updates on discrete metrics, the annual progress reports will include a qualitative progress assessment. This includes a description of community engagement, data analysis, strategy development, and enforcement. Where appropriate, the air districts should highlight learnings that can be used to support communities with similar sources and air quality challenges.
 - *Planned changes based on progress to-date* – In developing the annual progress report, the air districts will identify any programmatic changes based on progress to-date. This could include any number of modifications such as updating implementation schedules based on new data analysis, revising public outreach, or pursuing new enforcement activities. The annual progress report will identify if an update is needed to address any additional issues with implementation. This includes identification of how any updates will still ensure the emissions reduction targets will be achieved.
 - *Updates on any interim implementation milestones identified by the CARB Governing Board in its initial consideration of the community emissions reduction program for approval or as discussed in any subsequent CARB Governing Board meetings* – In its oversight role, the CARB Governing Board may identify interim implementation milestones. The annual progress report will discuss progress towards these implementation milestones.

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- *Completion of required elements* – If required elements have been completed, in accordance with an approved community emissions reduction program, describe the completion of the required elements.

CARB will provide the relevant information on mobile source strategies and emissions reduction progress for the annual reports.

TIMING AND NOTICING

Annual reports must be made available to the public no later than October 1 of every year after community emissions reduction program implementation begins to support air district implementation and the CARB Governing Board direction on continued enhancements or modifications to the Program. Air districts must post the progress reports on the community emissions reduction program dedicated webpage, then issue a public notification that the report has been released, and last present the progress report to its board at a public hearing to discuss the contents.

CARB REVIEW

CARB staff will review the annual progress reports to assess community emissions reduction program progress. CARB staff will report to the CARB Governing Board on key community emissions reduction program milestones, including emissions reductions and regulatory action. As part of this review and discussion with the CARB Governing Board, CARB staff will provide recommendations for any necessary changes to specific community emissions reduction programs as applicable. CARB staff will also determine whether there is a need for modifications to the overall Program annual reporting requirements, based on learnings or the completion of goals established in each community emissions reduction program.

VI. CHECKLIST FOR COMMUNITY EMISSIONS REDUCTION PROGRAM EVALUATION

CARB has developed a checklist to use in evaluating community emissions reduction programs (Table C-1). This checklist includes a high-level summary of the community emissions reduction program elements and is designed to both guide the air districts in developing the community emissions reduction programs and promote transparency in CARB's consideration and staff recommendations to the CARB Governing Board for action on submitted community emissions reduction programs.

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Table C-1 Checklist for Community Emissions Reduction Program Evaluation

COMMUNITY EMISSIONS REDUCTION PROGRAM ELEMENT: HEALTH-BASED AIR QUALITY OBJECTIVES	
	✓
Provide a description of the health-based objectives, including: <ul style="list-style-type: none"> • Maximizing progress on reducing exposure to toxic air contaminants that contribute to the cumulative exposure burden. • Reducing exposure caused by local sources to achieve healthful levels of PM2.5 within the community. 	□
COMMUNITY EMISSIONS REDUCTION PROGRAM ELEMENT: COMMUNITY PARTNERSHIPS AND PUBLIC	
	✓
Provide documentation on the community steering committee: <ul style="list-style-type: none"> • Date, materials, and attendance for a public meeting that discussed the convening process for the steering committee. • Membership, including core community representation. • Charter that covers the following topics: <ul style="list-style-type: none"> ○ Committee objectives. ○ Roles and responsibilities. ○ Meeting frequency. ○ Meeting dates, times, and locations to ensure accessibility. ○ Use of facilitation services. ○ Use of interpretation services at steering committee meetings and other outreach events. 	□

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	✓
Provide documentation the air district board held a public board hearing when presenting the final program for air district board consideration.	<input type="checkbox"/>
Provide documentation the air district provided materials in appropriate languages and interpretation services were available at workshops and public board hearings in accordance with the steering committee charter.	<input type="checkbox"/>
Provide documentation of a dedicated public webpage for each community emissions reduction program that contains: <ul style="list-style-type: none"> • Phone number and e-mail address for a dedicated contact person. • An up-to-date outreach calendar and notices for workshops and community steering committee meetings. • Any draft materials that will be shared at air district workshops and public board hearings. • Links to any relevant air quality data for the community. • A link to CARB’s Community Air Protection Program main webpage. • Access in multiple languages, as appropriate. 	<input type="checkbox"/>
Provide documentation that outreach materials were distributed broadly to a variety of groups through various avenues such as the internet, paper mailings, and local print, radio, and television media as appropriate at least five days in advance of each meeting.	<input type="checkbox"/>
Provide a summary of the results of the first year of public outreach and an overview of the planned approach for public engagement moving forward that includes: <ul style="list-style-type: none"> • Dates, times, locations, outreach mechanisms, sign-in sheets, agendas, meeting summaries, and next steps for all community steering committee meetings. • Dates, times, locations, and number of participants at all workshops. • Links to presentation materials and minutes/notes for all workshops and air district public board hearings. • Summary of steering committee’s perspectives and other public input and documentation steering committee had opportunity to present at all meetings. 	<input type="checkbox"/>

COMMUNITY EMISSIONS REDUCTION PROGRAM ELEMENT: UNDERSTANDING THE COMMUNITY	
	✓
Provide a description of the community and include a discussion of community issues, including final geographic boundary, types of pollution impacting the community, a characterization of current public health data, and socioeconomic factors.	<input type="checkbox"/>
Provide an assessment and description of the existing high cumulative air quality exposure burden within the community that identifies: <ul style="list-style-type: none"> • A list of the key pollutants driving the exposure burden in the community • A list of the key sources and source categories both within and directly surrounding the community. 	<input type="checkbox"/>
Provide an assessment of sensitive receptor locations within the community and how land use issues impact exposure.	<input type="checkbox"/>

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	✓
Provide a community-level emissions inventory based on best available data and developed in accordance with CARB's community inventory guidance.	<input type="checkbox"/>
Provide an assessment of the benefits of existing air quality policies and programs in reducing emissions within the community.	<input type="checkbox"/>
Provide an assessment of compliance with air quality rules and regulations for sources within the community, consistent with the enforcement plan.	<input type="checkbox"/>
Provide the source attribution analysis that assesses the share of mobile, stationary, and area-wide source emissions contributing to the air quality burden in the community, based on at least one of the source attribution approaches discussed in the online Resource Center.	<input type="checkbox"/>
Provide supporting documentation on methodologies and data sources used in the technical assessment.	<input type="checkbox"/>

COMMUNITY EMISSIONS REDUCTION PROGRAM ELEMENT: TARGETS AND STRATEGIES	
	✓
Specify emissions reduction targets to be achieved within five years for directly-emitted applicable toxic air contaminants, PM2.5, and any other identified pollutants (e.g., lead, PM10) as defined in the technical assessment, designed to maximize toxic air contaminant emissions reductions and achieve healthful levels of PM2.5.	
<p>For the mobile, stationary, and area-wide sources of applicable criteria air pollutants and toxic air contaminants impacting the community, specify:</p> <ul style="list-style-type: none"> • Commitments to achieve numerical goals for compliance with air quality rules and regulations. • Commitments to achieve numerical goals for deploying or implementing available technologies or control techniques, with a focus on zero emission technologies where feasible. 	<input type="checkbox"/>
Specify proximity-based goals to reduce exposure at sensitive receptors:	
<ul style="list-style-type: none"> • Identify the sensitive receptor locations that are exposed to elevated levels of air pollution because of their proximity to emissions sources. • Specify measurable goals for deploying or implementing exposure reduction measures at sensitive receptor locations. 	<input type="checkbox"/>

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	✓
<p>Regulatory Strategies:</p> <ul style="list-style-type: none"> • Include the best available retrofit control technologies (BARCT) expedited schedule consistent with the statutory direction to cover “each industrial source” subject to the State’s Cap-and-Trade program as of January 1, 2017. Identify the categories of sources impacting the community that will be subject to these requirements. • Identify proposed new or amended rules for sources in the community under the district’s regulatory authority, as appropriate. <ul style="list-style-type: none"> ○ Document the evaluation process undertaken in identifying these measures, which include: Evaluation of the most stringent control limits and exemption and applicability provisions used in rules included in the Technology Clearinghouse. ○ Consideration of other approaches such as: ○ Activity limits and other operational requirements. ○ Indirect source rules and other facility-based approaches. ○ Enforceable agreements. ○ Transportation control measures. • Identify mobile source measures that CARB will provide. 	□
<p>Facility Risk Reduction Audits:</p> <ul style="list-style-type: none"> • List the facilities within and directly surrounding the community that are required to report toxic air contaminant emissions under existing statute and identify whether the air district has designated the facility as high, intermediate, or low risk. • Identify which of these facilities have existing risk reduction audits and emission reduction plans. • Document the review process and specify facilities that will require risk review plan updates and the timeframe required. 	□
<p>Air Quality Permitting:</p> <ul style="list-style-type: none"> • Reference how the Technology Clearinghouse will be used in developing BACT and T-BACT technology determinations for any new or modified source air district permitting processes within the community. 	□
<p>Enforcement Strategies:</p> <ul style="list-style-type: none"> • Identify near-term enforcement strategies included in the enforcement plan. 	□
<p>Incentives-Based Strategies:</p> <ul style="list-style-type: none"> • Identify existing funding programs and the specific project types that will be the focus of incentive programs to accelerate deployment of the cleanest technologies within the community. • Identify specific actions the air district and CARB will take to secure additional funding as necessary. • Include outreach strategies to promote identified funding opportunities. 	□

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		✓
<p>Land Use Strategies:</p> <ul style="list-style-type: none"> • Identify community-specific land use strategies that the air district will actively engage on and the applicable implementing agency. Document the review process undertaken in identifying these strategies, which includes consideration of the following approaches where applicable: <ul style="list-style-type: none"> ○ Planning permit conditions to require increased setbacks or buffer zones for specific source types. ○ “Green zone” policies to establish exposure-reducing development requirements for specific areas. ○ Zoning code amendments to prevent or reduce new permitting of incompatible land uses. ○ Processes to terminate existing incompatible land uses within selected communities. ○ General plan updates focused on environmental justice and air quality, through the SB 1000 process or other general plan updates. ○ Strategies to promote urban greening. ○ Measures in the applicable Metropolitan Planning Organization’s Senate Bill 375 Sustainable Communities Strategy that can be implemented within the community. ○ Environmental justice-related components of regional or local plans that can be deployed within the community. 	<input type="checkbox"/>	
<p>Transportation Strategies:</p> <ul style="list-style-type: none"> • Identify community-specific transportation strategies the air district will actively engage on and the applicable implementing agency. Document the review process undertaken in identifying these strategies, which includes consideration of the following approaches where applicable: <ul style="list-style-type: none"> ○ Alternative truck routing. ○ Geo-fencing within designated areas. ○ Strategies to reduce vehicle miles travelled and encourage active transportation. ○ “Green zone” policies to implement transportation strategies within certain areas. ○ Preferential access to facilities for the cleanest technologies. ○ Incorporation of zero emission vehicles and equipment into project development, construction, and operation. ○ Measures in the applicable Metropolitan Planning Organization’s Senate Bill 375 Sustainable Communities Strategy that can be implemented within the community. ○ Environmental justice-related components of regional or local plans that can be deployed within the community. 	<input type="checkbox"/>	
<p>Mitigation Strategies:</p> <ul style="list-style-type: none"> • Identify specific strategies to reduce exposure. Document the review process undertaken in identifying these strategies, which includes consideration of the following approaches where applicable: <ul style="list-style-type: none"> ○ Installation of air filtration at sensitive receptor locations. ○ Installation of solid barriers or vegetative buffers between emissions sources and sensitive receptors. ○ Implementation of school flag and other notification programs to communicate air quality information to the community. 	<input type="checkbox"/>	

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COMMUNITY EMISSIONS REDUCTION PROGRAM ELEMENT: TARGETS AND STRATEGIES (CONTINUED)	
	✓
<p>Engagement Approaches:</p> <ul style="list-style-type: none"> • Specify strategy-specific approaches for CARB and air district coordination with appropriate agencies to implement identified land use, transportation, and mitigation strategies. Document the review process undertaken in identifying these strategies, which includes consideration of the following approaches where applicable: <ul style="list-style-type: none"> ○ Writing CEQA comment letters on proposed projects that would impact the community. ○ Utilizing CalEnviroScreen indicators to provide an analysis of existing environmental burdens in order to set the baseline conditions and metrics to improve air quality and reduce cumulative exposure burden. ○ Direct meetings with staff or elected officials. ○ Direct meetings with facility owners and/or equipment operators. ○ Formation of a cooperative information sharing process with land use permitting agencies to review proposed projects that would impact the community. ○ Participation in public meetings on proposed projects that would impact the community. ○ Development of memoranda of understanding with cities, counties, transportation agencies, other public agencies, or facility owners or equipment operators. ○ Direct implementation of strategies within CARB or the air district’s jurisdiction. 	□
<p>Discuss any potential new strategies that were applicable to the community’s air quality challenges that were not selected, including any identified by the community steering committee.</p>	□
<p>Implementation Schedule:</p> <ul style="list-style-type: none"> • Specify for each new strategy, as applicable: <ul style="list-style-type: none"> ○ A description of the strategy. ○ The expected emissions and/or exposure reductions by pollutant from each proposed strategy. ○ Cost-effectiveness, calculated in accordance with the air district’s cost-effectiveness methodologies, along with appropriate documentation. ○ Implementation roles and responsibilities, including authority. ○ A timeframe for air district board or CARB Governing Board consideration. ○ A timeframe for any necessary coordination with other agencies. ○ A timeframe for implementation, including immediate and annual actions over the five-year timeframe. ○ A description of how the technical assessment informed strategy development, including a discussion of priority pollutants and sources. ○ The expected benefits over an additional five years, beyond the five-year implementation timeframe, to demonstrate ongoing progress. ○ The perspectives of the community steering committee and other public recommendations. 	□

