

California Air Resources Board
Community Air Protection Program

Eastern Coachella Valley Community Emissions Reduction Program Staff Report

Release Date: August 13, 2021
CARB Governing Board Hearing Date: September 9, 2021



For More Information

Please submit written comments on this Staff Report by August 30, 2021 to:

<https://www.arb.ca.gov/lispub/comm/bclist.php>

Community Air Protection Program: <https://ww2.arb.ca.gov/capp>

To receive email updates from "Community Air", please subscribe at:

https://public.govdelivery.com/accounts/CARB/subscriber/new?topic_id=CAPP

This Staff Report is available at: <https://ww2.arb.ca.gov/capp>

Table of Contents

Staff Recommendation.....	1
Background.....	1
Plan Overview	2
Summary of CARB’s Evaluation.....	3
Key Strengths.....	5
Recommended Actions to Strengthen Implementation.....	6

Staff Recommendation

Staff recommends that the California Air Resources Board (CARB or Board) approve the Eastern Coachella Valley community emissions reduction program developed pursuant to Assembly Bill (AB) 617¹ and direct CARB staff to work with the South Coast Air Quality Management District (South Coast AQMD or District) and the Eastern Coachella Valley Community Steering Committee to take additional actions to strengthen implementation.

Background

CARB established the Community Air Protection Program (Program) to implement AB 617, which requires new community-focused action to reduce air pollution. On September 27, 2018, the Board approved the *Community Air Protection Blueprint*² (Blueprint), which, among other things, establishes criteria for developing and implementing community emissions reduction programs, contained in the Blueprint *Appendix C* and summarized in the *Checklist for Community Emissions Reduction Program Evaluation*³. At the same meeting, the Board also approved 10 initial communities to develop and implement community emissions reductions programs, community air monitoring plans or both. On December 13, 2019, the Board selected an additional three communities, including the community of Eastern Coachella Valley in the South Coast AQMD to develop a community emissions reduction program and a community air monitoring plan.

Subsequently, on December 4, 2020, the South Coast AQMD Governing Board adopted the Community Emissions Reduction Plan for Eastern Coachella Valley (Plan)⁴, including a resolution that committed South Coast AQMD staff to continue working with the community steering committee to develop an amendment to the Plan that includes additional details and actions, as requested by the community steering committee, on monitoring objectives, collaborations with other entities, and incentives strategies. The amendment was adopted by the South Coast AQMD Governing Board on June 4, 2021. This report summarizes the results of CARB staff's review and evaluation of the Plan to determine if it meets the criteria established in AB 617⁵ and the Blueprint, reflects community priorities, and is likely to reduce emissions and exposure to air pollution in the community.

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

² The Blueprint is available at: <https://ww2.arb.ca.gov/capp-blueprint>.

³ The Checklist for the Community Emissions Reduction Program Evaluation begins on page C-41.

⁴ To review the Plan and associated documents, visit <http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/eastern-coachella-valley/cerp-archive>.

⁵ California Health and Safety Code §44391.2.

Community Emissions Reduction Plan Overview

In accordance with the Blueprint, South Coast AQMD convened a community steering committee to develop the Plan. The steering committee is made up of 38 primary members, 13 of which are residents, and held 25 meetings between January 2020 and June 2021. These meetings included the regularly scheduled community steering committee meetings along with special meetings which South Coast AQMD hosted, such as the Charter Working Group Meetings, a public workshop involving multiple agencies to discuss the Salton Sea and Pesticides, and an AB 617 Incentives Strategies meeting.

The Plan focuses on reducing emissions and exposure to particulate matter (PM₁₀), diesel particulate matter, and oxides of nitrogen from sources such as: diesel mobile sources; fugitive road dust; open burning/illegal dumping; pesticides; and the Salton Sea. Figure 1 lists examples of the actions and strategies to reduce emissions and exposure for each air quality priority in the Plan. For the full list of strategies, see Chapter 5 of the Plan.

Figure 1. Examples of Actions in the Eastern Coachella Valley Community Emissions Reduction Plan



Summary of CARB's Evaluation

CARB staff's review of the Plan follows the framework established in the Blueprint. In addition to the Plan itself, staff also reviewed meeting materials including a record of public comments and responses to those comments by South Coast AQMD, included in the Plan. During the Plan development process, CARB staff attended every Eastern Coachella Valley community steering

committee meeting and working team meeting and met regularly with South Coast AQMD staff as well as with several CSC members, as requested. Finally, CARB staff also hosted a virtual community workshop on August 3, 2021, to solicit additional community perspectives to help inform CARB staff's recommendations. Five community steering committee members or alternates attended the workshop along with members of the public. When polled, seven attendees indicated they previously or currently live or work in the Eastern Coachella Valley community. Of all attendees that responded to the poll, most chose open burning and illegal dumping, pesticides, and the Salton Sea as the priority concerns for the community. Discussion questions focused on CARB's role in the development of the Plan, the Plan itself, and what was learned during the process that could benefit other communities.

State law gives communities and air districts 12 months to develop a community emissions reduction program following CARB community selection. One year is a very short amount of time to convene a community steering committee, develop a process for operation of the community steering committee, develop relationships within the steering committee and with regulatory agencies, establish the technical foundation for understanding the community's air quality status, and develop the strategies to reduce air pollution emissions and exposure. Additionally, the Eastern Coachella Valley community concurrently developed a community air monitoring plan. The Statewide stay-at-home orders further exacerbated the already short timeline.

The Plan meets the criteria established in AB 617 and the Blueprint, reflects the community's priorities, and is likely to reduce community emissions and exposure to air pollution. However, to ensure that the Plan successfully delivers on the identified actions, there are elements of the Plan that need additional clarification and detail as the Plan moves from the short time frame provided for development into the implementation phase. As each of the selected communities and their community emissions reduction programs are approved by the air districts and CARB, the need to focus on strengthening the plans during implementation is a theme that applies to all communities.

CARB staff recommends approval of the Plan with additional Board direction to CARB staff, South Coast AQMD, and the community steering committee to begin Plan implementation immediately, while taking steps to strengthen implementation of the Plan. These recommendations draw directly from the core principles of the Board-adopted Blueprint.

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

- Key strengths of the Plan, and the Plan development process, which highlight areas staff found particularly noteworthy; and
- Recommended actions for South Coast AQMD and CARB to strengthen implementation, including areas where additional discussion, information, clarification, and detail will help ensure the Plan is successful and achieves emissions reductions in the Eastern Coachella Valley community, as well as commitments CARB will make based on feedback provided about CARB's role in the process to date.

Key Strengths

The key strengths of the Plan for the Eastern Coachella Valley community highlighted below are a direct result of the community steering committee's commitment to working in partnership with South Coast AQMD and CARB. Prior to the stay-at-home orders enacted by the Governor in March 2020, the South Coast AQMD was able to hold two in-person community steering committee meetings in January and February of 2020. South Coast AQMD worked with the community steering committee to continue community engagement virtually, including Zoom meetings for direct participation and Facebook Live for streaming video. South Coast AQMD also provided Spanish specific Meeting IDs for Zoom meetings along with hosting the community steering committee meetings in Spanish as the primary language. Additionally, the District had 15 working team meetings to discuss the charter, budget, and monitoring plan, along with 75 individual or small group meetings with members of the community steering committee to discuss the community steering committee process, provide feedback on the Plan development process and address concerns directly with South Coast AQMD staff.

During the early stages of the development of the Plan, South Coast AQMD staff created informational handouts that summarized the Eastern Coachella Valley community steering committee air quality concerns. These handouts listed the concerns raised by the community steering committee and provided potential strategies and actions to address the concerns for further discussion as they worked through the development of the Plan.

At the adoption of the Plan in December 2020, South Coast AQMD staff was directed by the South Coast AQMD Governing Board to work with the community steering committee to provide additional details on monitoring objectives, collaborations with other entities, and incentives strategies by holding four additional community steering committee meetings between January to April 2021. At the request of the community steering committee for more time to discuss the proposed amendments to the Plan, South Coast AQMD staff held eight meetings over the span of those four months.

The Eastern Coachella Valley community was very active from the first community steering committee meeting. Members of the committee created a draft charter to help establish the purpose and objectives of the committee. To help facilitate a community led process, South Coast AQMD staff scheduled additional meetings with the community steering committee and spent eight months working together on developing a charter which included specifying the

goals of the committee, membership roles and responsibilities, and standard meeting procedures. The committee devoted an extensive amount of time to work with South Coast AQMD staff and to attend all the additional meetings throughout the 18 months of the development of the Plan. The committee remained engaged and never hesitated to seek additional information to ensure the best possible decisions for the community.

South Coast AQMD worked with the steering committee to identify key air quality priorities and developed a set of strategies designed to work together to address each priority. For example, actions to address fugitive road dust and off-roading include expanding the current South Coast AQMD air monitoring network, pursuing a collaborative partnership with appropriate entities to implement paving projects, public outreach, and identification of funding to install and maintain air filtration systems at schools, community centers, and homes to reduce exposure to dust emissions. The Plan also includes many collaborative actions with other agencies, including local and state agencies, local tribes, and community organizations, for air quality concerns that are outside of South Coast AQMD's jurisdiction such as the Salton Sea, pesticides and open burning and illegal dumping.

Finally, last year one of CARB staff's recommendations for the first-year community emissions reduction plans developed for the three communities in South Coast AQMD at the time was to include specific metrics to track progress on actions and goals. Specific metrics will help determine what constitutes successful implementation of the Plan. In this Eastern Coachella Valley Plan, every action includes metrics to track progress that are easy to identify and understand. Furthermore, the inclusion of metrics in early draft versions of the Plan helped the steering committee members identify very specific metrics they wanted included as made evident by the Response to Comments section in the Plan.

Recommended Actions to Strengthen Implementation

Staff recognizes that the Plan is the culmination of an extensive amount of work in a short timeframe. In future efforts, South Coast AQMD, CARB, and the community steering committee should work to refine issues related to implementation as the strategies in the Plan move forward, as well as the periodic status reports required under AB 617.

To support implementation going forward, CARB staff has developed a set of recommended actions in three key areas: process, incentives prioritization, and agency collaboration. Progress in implementing these recommendations should be included in the annual progress reports submitted to CARB as required by the AB 617 statute. Additionally, based on the feedback provided during the August 3rd workshop, CARB commits to providing technical information to support implementation.

Process

The community steering committee recognized the challenges presented with development of the Plan during the stay-at-home order and the resulting transition from in-person to virtual meetings. This transition proved difficult in fostering relationships virtually between the

community and the District. It also added a sense of urgency to meet the deadline for development of the Plan. The volume of information shared with the committee over a relatively short period of time added pressure to make decisions. The committee had requested additional time in the future to review the information they are provided to enhance their ability to make informed decisions. A clear timeline with milestones would prove helpful in keeping the community engaged and will also strengthen their comprehension on how the actions in the Plan are implemented over time. CARB staff recommends the District continue to work with the committee to understand what the committee needs to better inform their decision-making process and increase engagement.

Incentives prioritization exercises with community steering committee

The District held an AB 617 Incentive Strategies Public Consultation Meeting in October 2020 for all the South Coast AQMD AB 617 communities to receive feedback prioritizing the use of AB 617 incentives funds. Once incentives amounts were allocated amongst each community and during Plan implementation, the South Coast AQMD held meetings in January, March, and April 2021 where incentives were discussed specifically for the Eastern Coachella Valley community. The Eastern Coachella Valley community was allocated \$5.57 million for Community-Identified Projects. The community steering committee was asked to prioritize the types of projects for Community Air Protection Incentives⁶ and Community-Identified Projects⁷, which offer unique funding opportunities for emission and exposure reduction projects that are traditionally not funded. Incentive priorities identified by the community steering committee members include:

- road paving;
- home air filtration systems/purifiers; and
- alternatives to agricultural burning.

Additional considerations, as identified by the community steering committee, when prioritizing project funding include:

- residential or school air filtration;
- proximity to the Salton Sea; and
- paving private or public roads.

Throughout the State, communities are asking for more transparency about the incentives projects funded in AB 617 communities. As a result, South Coast AQMD has engaged the Eastern Coachella Valley Community Steering Committee and other AB 617 community steering committees in participatory budgeting for Community-Identified Projects. Participatory budgeting is a democratic process in which community members decide how to spend part of a

⁶ Community Air Protection Incentives: <https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives>

⁷ More information on Community-Identified Projects at: <https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives/stationary-source-and-community-identified>

public budget. This process has empowered community steering committees to prioritize Community-Identified Projects eligible for incentives and determine the distribution of funds for these projects, helping to ensure that the incentives budget reflects the community funding priorities. The budget priorities provide new metrics to gauge the progress of the actionable goals. South Coast AQMD should continue to work with the steering committee on their budget priorities for incentives projects and hold incentives-specific workshops for interested members to further develop Community-Identified Projects for incentive funding. In the future, South Coast AQMD should begin discussion of incentives prioritization sooner in the plan development process.

Agency Collaboration

The Plan addresses certain air quality concerns in the Eastern Coachella Valley that are outside of the jurisdiction of the South Coast AQMD. In recognizing these jurisdictional issues, the Plan includes pursuing agency collaboration to help address these air quality concerns. CARB staff recommends that CARB and the District continue to collaborate with other agencies, such as state and local agencies, local tribes, and community organizations to continue working together to identify actions to better address the air quality concerns.

CARB Commitment

Of the five steering committee members who participated in the August 3rd workshop, several identified relationship building as a very important component during what can be a complicated and long process. It is recommended that CARB staff should be more engaged in the process to better create connections. CARB staff should also be more proactive in offering expertise and accessible technical information to support and oversee implementation. Such information will be tailored to specific needs and offered timely and regularly. CARB staff will be proactive in supporting exchanges across AB 617 communities that are pursuing similar implementation strategies.

The Plan has support from the community steering committee. At a November 19, 2020, community steering committee meeting, a majority of the members in attendance agreed to move forward with the Plan. At a steering committee meeting on December 1, 2020, South Coast AQMD staff committed to continue working on the Plan amendments for all six air quality priorities during the January through May 2021 timeframe. These amendments were then brought to the South Coast AQMD Governing Board on June 4, 2021, for inclusion in the final Plan adoption. The aforementioned suggestions will help serve to strengthen the Plan during the 5-year implementation period.