

AB 617 Community Air Protection Program
Annual Progress Reports for Community Emissions Reduction Programs
DRAFT Data Collection Template

DUE OCTOBER 1

Air District:	Imperial County Air Pollution Control District
Community Name:	El Centro-Heber-Calexico

Reporting Requirement: Assembly Bill (AB) 617 requires that air districts prepare an annual report for each community emissions reduction program.¹

Data Collection: This template is designed to collect the information that is needed to create the required annual reports and is not intended to act as a substitute for the annual reports. After the data are collected, it is expected that air districts will work with their community steering committees to compile the information into their own user-friendly format(s) that reflects community concerns and summarizes progress, challenges, and next steps. California Air Resources Board (CARB) staff will compile data statewide to provide an overall update to CARB's Governing Board and the public.

This data collection template includes: the metrics defined in each community emissions reduction program; action items from CARB Governing Board Resolutions and Staff Reports; and the minimum requirements listed in CARB's Community Air Protection Blueprint.² CARB staff will provide the relevant information on CARB strategies and associated emissions reduction progress for the annual reports. To support transparency, all information will be publicly available.

Due Date for Public Release: CARB's Community Air Protection Blueprint states that annual progress reports must be made available to the public no later than October 1 of each year. Air districts must post the reports on their webpage, issue a public notification that the report has been released, and then present the report to the district board at a public hearing to discuss the contents.

District Staff, please provide the following information for your OVERALL community emissions reduction program³

- Section A: Qualitative progress assessment and status updates for interim milestones identified by the CARB Governing Board; and Quantitative summary of progress

Also, please fill in the attached spreadsheet to provide an update on each strategy in your community emissions reduction program

- Section B: Status update for each strategy (attach spreadsheet)

¹ Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017; codified in California Health and Safety Code section 44391.2(c)(7) which states that each district "...shall prepare an annual report summarizing the results and actions taken to further reduce emissions, pursuant to the community emissions reduction program..."

² California Air Resources Board, "Community Air Protection Blueprint", October 2018, Appendix C, pages C-38 to C-40, available at: <https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/community-air-protection-blueprint>

³ Imperial County Air Pollution Control District, "Imperial County Year 1 Community Emissions Reduction Program Plan for the El Centro-Heber-Calexico Corridor" (i.e., Imperial Plan), October 2019, available at: <https://www.icab617community.org/>.

Section A: QUALITATIVE progress assessment and status updates for interim milestones identified by the CARB Governing Board

1) Provide a *qualitative* progress assessment. Briefly describe the progress made and provide a status update for each of the following items:

[Ref. Blueprint, page C-39, C-40]

- **Community Engagement.**

The District, along with our partners Comite Civico del Valle (CCV), have continued holding monthly public meetings with the Community Steering Committee (CSC) for the El Centro-Heber-Calexico Corridor since CERP adoption. Meetings were held in person through mid-March 2020, at which time the COVID-19 pandemic began affecting Imperial County and its residents. Meetings have since moved to the Zoom platform, being held remotely to adhere to State and local health orders to maintain social distancing due to the pandemic. All outreach activities, whether it is with the CSC, local stakeholders, and the public, will continue to be held remotely until in-person meetings are allowed and deemed safe by State and local health officials.

- **Enforcement.**

District began implementing various improvements to enforcement-related processes upon the CERP adoption in October 2019. Part of the CERP included a three-year retrospective review of enforcement activities in the Corridor, which is detailed in the Spreadsheet Template.

The District has been working closely with the University of California San Diego (UCSD) on designing and implementing the measure of installing two cameras in the western desert of Imperial County, outside of the Corridor. ICAPCD Staff is in the process of finalizing funding agreements to purchase the cameras, data memory, and associated hardware for two identified sites – Superstition Mountain, located approximately 16 miles northwest of El Centro, and Toro Peak, located approximately 24 miles northwest of Desert Shores, CA. The COVID-19 pandemic and recent wildfires in Southern California delayed implementation of this strategy, which affected planning efforts with UCSD, as the institution will host the camera feeds from these two ICAPCD cameras through UCSD's online camera video network and provide data support. Full implementation, with having these cameras online for the public to view, is set to occur no later than August 2021.

Before the close of 2020, the District is planning to host various cross-agency trainings of District Rules to improve violation response time and to hold an annual training for the community and specific industry to improve compliance. The District will schedule an agricultural burning training session to the farming community, with assistance from the Imperial County Farm Bureau, and training of the District's Fugitive Dust Rules (Regulation VIII) to local construction companies between October and December of this year. In the past year, the District hosted two industry-specific workshops for the Imperial Irrigation District (IID) on December 12, 2019 and January 23, 2020, providing training to IID Staff on the District's Fugitive Dust Rules.

On August 31, 2020, the District made improvements to the official ICAPCD website to increase public access to filing air quality complaints and more accurately capture complaint information. The District added a feature to allow the public file a complaint online, which can be accessed through the home page of the ICAPCD's website, and included ICAPCD's phone number for the public to call to file complaints over the phone. These actions have improved access for the public to document air quality complaints and increase agency transparency.

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- **Metrics for Tracking Progress.**

Each of the 28 identified strategies of the CERP include metrics for tracking the progress toward achieving the objectives of reducing air emissions and exposure of emissions within the Corridor. The established metrics for each strategy in the CERP are being followed by the Air District, with the strategy updates in Appendix A reflecting the metrics. The Air District is in the process of reviewing the current metrics with CCV and the CSC, and the Air District will gather input from these groups and applicable local stakeholder in developing specific metrics in 2020-2021 for Tier 2 strategies of the CERP.

Along with the metrics are the established emission reduction targets that were included in the CERP for various Tier 1 strategies. These emissions reduction targets will be updated based on the number of mitigation projects that are achieved through the next five years of CAPP, and are included as Appendix B – *Emission Reduction Targets* of the Corridor Annual CERP Report.

- **Implementation Schedule.**

No formal changes have been made to the implementation schedule since the adoption of the CERP by the CSC in Oct. 2019 and by CARB Governing Board in Jan. 2020. Tier 1 strategies are currently in the process of being implemented, and Tier 2 strategies will continue to be in development for 2020-2021 with coordination and advisement from local agencies and stakeholders. The COVID-19 pandemic did affect the progress made in 2020 for the implementation and development of Tier 1 and Tier 2 strategies, but with health conditions improving significantly in Imperial County since August 2020, the District will be working steadfastly to implement the CERP in 2020-2021.

In addition, the implementation schedule in the CERP may be modified in 2021 with additional input from CSC members, based on continuous advisement provided by CSC members during and between their meetings, and based on the development of Tier 2 Strategies.

- **Data Analysis.**

The District will be analyzing data once available from the fifteen (15) new (additional) community monitors, which will measure PM₁₀ and PM_{2.5} emissions, that partnering agency CCV is in the process of installing in El Centro-Heber-Calexico per the Community Air Monitoring Plan (CAMP) for the Corridor. Five (5) of the 15 monitors have been installed to date, as some setbacks with installation occurred this year due to the closures that occurred in Imperial County because of the COVID-19 pandemic.

The District is also in the process of finalizing the Request for Proposal (RFP) that will be released in fall 2020 for the New River mobile monitoring study in Calexico, CA. The emissions data that will be collected from this temporary mobile monitoring platform will assist the Air District in determining what type of strategies, policies, or rules can be implemented to address emissions from the New River, which impacts residents both in Mexicali, B.C. and Calexico.

For the District's analysis of recent annual regulatory monitoring data, please see District response to Item #7 in this template report.

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- Strategy Development.

The CSC adopted the CERP for the El Centro-Heber-Calexico Corridor on October 2, 2019, and subsequently the Air District Board (Imperial County Board of Supervisors) approved the Plan on October 8, 2019. On November 13, 2019, CARB Staff held a public workshop at Imperial Valley College (Imperial, CA) to present and discuss the objectives and strategies of the CERP. The public took this opportunity to share their opinions on the CERP, and the overall AB 617 Program/CAPP, which CARB recorded as the agency reviewed the CERP prior to CARB Board’s consideration of the Plan. On January 15, 2020, at a special public meeting held in El Centro, CA, the CARB Governing Board considered and voted to adopt the CERP for the Corridor.

Implementation of the CERP has been underway the past year, but the Air District, CCV, and CSC, have endured significant challenges with carrying out Tier 1 strategies and developing Tier 2 strategies due to the impacts of the COVID-19 pandemic. As documented by local and national media outlets in the spring and summer of 2020, the pandemic was very severe in particular in Imperial County, with the County having the worst surge of COVID-19 cases throughout the entire State of California in June 2020. Fortunately, local conditions have improved vastly over the past two months, with Imperial County progressing through the State’s Tier/Phases for reopening the economy. The Air District, along with partners CCV and the CSC, will continue advancing the implementation of the CERP, alongside identified stakeholders and local government agencies, to determine the feasibility and framework for various Tier 2 strategies of the CERP.

For details on the status of implementation for the various strategies in the CERP, please see the Attached Spreadsheet Template.

2) Highlight any “lessons learned” that can be used to support communities with similar sources and air quality challenges. [Ref. Blueprint, page C-39]

The Air District, CCV, and the CSC have learned a great deal thus far in participating in CAPP for the El Centro-Heber-Calexico Corridor, from the formation and early meetings of the CSC in late 2018, through the development and implementation of the Corridor’s CERP and Community Air Monitoring Plan (CAMP) in 2019. From the onset, it was paramount to demonstrate and live up to the spirit of AB 617 and CAPP, and with this in mind, ICAPCD’s Air Pollution Control Officer and CCV’s Executive Director mutually agreed to serve as the Co-Chairs of the CSC to represent a balanced and united effort between the regulatory and environmental justice spheres. Additionally, the Co-Chairs sought to create a CSC with representation consisting chiefly of members of the community who live and work within the Corridor, as these individuals would bring to the table an intimate and well-rounded perspective of the communities of the Corridor that are in great need of assistance to improve air quality.

One of the early priorities of the Co-Chairs, and the Air District and CCV, was to establish a charter for the CSC in order to provide the framework on the functions, procedures, and responsibilities of the Air District, CCV, and the CSC in serving the Corridor to develop the CERP and CAMP. Given the diverse and unique makeup of the CSC, and the significant amount of discussion and planning needed between the partner agencies (Air District and CCV) and CSC to adopt the CERP and CAMP by the one-year deadline, the Co-Chairs also sought to develop a Code of Conduct for the CSC. The CSC’s Code of Conduct outlined procedures for civil and meaningful participation amongst all CSC members and the public, as well as

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how disputes would be resolved. The CSC was able to come to a consensus by February 2019 to adopt the committee’s Charter, and shortly after in March 2019, adopt the committee’s Code of Conduct.

One of the unique components of the CSC’s Charter was the provision establishing stipends for CSC members who attend committee meetings. The Air District and CCV recognized the significant commitment of CSC members to regularly attend meetings in the evening, review documents and plans, and participate in the overall AB 617 process. In order to provide compensation for their time, efforts, and expenses, while promoting consistent attendance, the Co-Chairs agreed on a \$75 stipend for each CSC member (primary or alternate) per regular committee meeting attended.

In keeping with the community-driven approach and spirit of AB 617, the Air District brought on board a professional, neutral/third-party facilitator to run CSC meetings. This decision was made in order to have the facilitator, from an objective and unbiased point of view, ensure that the meetings are run effectively and assist with navigating disputes and complex discussions. From the first CSC meeting in November 2018 through March 2019, Ramboll U.S. Corporation provided facilitation services for CSC meetings. Beginning in April 2019, Harder+Company Community Research (based in California), provided facilitation services and meeting coordination services to assist the Co-Chairs and agency staffs with gathering input from the CSC to develop the CAMP and CERP for the Corridor.

Finally, the Air District and CCV have continued to work on improving communications between the partnering agencies, with CSC members, and the public, and to provide a greater level of transparency in the AB 617 process. The Air District and CCV have made it known to the CSC and public on numerous occasions that we are openly available to discuss AB 617/CAPP objectives and commitments, with the doors of each agency open to share and exchange knowledge and the expertise of ICAPCD and CCV staffs. Any future lessons learned may necessitate revisions to not only the CERP or CAMP, but the CSC’s Charter and Code of Conduct, to ensure the success of implementing CAPP for the El Centro-Heber-Calexico Corridor.

- 3) The community emissions reduction program will have included a community profile. Describe any community profile updates, such as the following information, if applicable: *[Ref. Blueprint, page C-39]*
- Describe changes in community attributes (e.g., revised socioeconomic data).

The Community Profile for the Corridor of El Centro-Heber-Calexico was developed utilizing data from sources such as recent ICAPCD-Imperial County State Implementation Plans, CalEnviroScreen 3.0, and the Southern California Association of Governments (SCAG). These sources have not been updated since the adoption of the Corridor’s CERP; therefore, no changes are necessary to the community profile.

- List any new community attributes that have been identified (e.g., new local public health indicators).

It remains to be seen what the exact magnitude and severity of the impact the COVID-19 pandemic will have on the socioeconomic factors for Imperial County, and more specifically the Corridor. State and local measures to reduce the spread of the virus and mitigate loss of life have had an adverse effect on economy, with Great Depression-level unemployment, interruptions to supply chains, and a sharp decline in taxable sales, according to SCAG. According to recent online data published by the Imperial

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County Public Health Department, a total of 317 deaths have been confirmed since the start of the pandemic through September 23, 2020. ICAPCD will continue to evaluate the short-term and long-term ramifications of the pandemic on Imperial County and the Corridor.

- 4) In its oversight role, the CARB Governing Board may identify interim implementation milestones, either during its initial consideration of the community emissions reduction program for approval, or as discussed in any subsequent CARB Governing Board meetings. Provided below are action items specified during CARB’s Board Meeting in January 2020.⁴ [Ref. *Blueprint, page C-40*]

Please use the form below or provide an attachment that describes updates and progress towards the following interim implementation milestones:

Action Items in CARB Board Resolution 20-1 and CARB Staff Report

- CARB staff, Imperial County Air Pollution Control District (ICAPCD), Comite Civico de Valle (CCV) and the community steering committee work together to undertake the following actions:
 - Board-Directed Action #1: Continue to develop the Tier 2 strategies. This process will also identify additional strategies and projects to further reduce PM 2.5 and TAC emissions.

The Air District has been in contact with local agencies and stakeholders for the communities in the Corridor to work on developing the various Tier 2 strategies in the CERP. The Air District will be scheduling remote workshops and meetings with these groups to identify obstacles, discuss strategy, and the path moving forward for studies and projects to generate additional reductions to emissions and exposure for the Corridor. The Air District will work alongside CCV and the CSC to formulate Tier 2 strategies in 2021, with the hope of implementing viable strategies in early 2022.

- Board-Directed Action #2: Develop specific criteria for project prioritization and selection for funding, which should include clear background information to help inform how projects and locations are prioritized. The identification of available funding per project type, via a clear and detailed budget, will also support prioritization of project types.

The Air District has been working closely with the CSC throughout the summer of 2020 to develop specific criteria for various mitigation strategies in the CERP. The criteria for the implementation of urban greening projects, parking lot paving projects, and the expansion/enhancement of the school flag program are all currently in development with the CSC, which will be included in the required Project Plan for each strategy. The Air District, CCV, and CSC will collaborate to finalize the drafting of these Project Plans before the end of 2020, and submit the documents for CARB approval in order to begin full implementation in 2021.

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The Air District will continue following this approach with additional strategies that are developed and refined, whether they are classified as Tier 1 or Tier 2 strategies in the CERP for the Corridor.

- Board-Directed Action #3: Continue to coordinate the activities of the plan with California cross-border pollution related activities, and include in these efforts groups such as the United States Environmental Protection Agency, California Environmental Protection Agency, Border Relations Council, Commission of the Californias, and CARB. This inter-agency coordination will support the development and implementation of emissions reduction strategies. As a result, the plan may need to be adjusted in the future in order to meet the objectives of reducing cross-border pollution.

The Air District has been directly involved in border-related air quality issues for the past two decades and continues working toward expanding coordination efforts with agencies on both sides of the border. These efforts include serving as a Chair for the Air Quality Task Force (AQTF) of Imperial Valley/Mexicali under the U.S. EPA Border 2020 Program, coordinating with CARB and local stakeholders to develop a work plan to explore measures to improve border region air quality, and coordinating a media campaign to educate residents on activities that are detrimental to local air quality.

The AQTF was formed shortly after the establishment of the U.S. EPA U.S.-Mexico Border 2012 Program in 2002 (pre-cursor to Border 2020 Program) to address issues unique to the border region, with residents on both sides of the border sharing a common environment and having similar exposures to pollutants. The AQTF includes representatives from federal, state and local governments from both sides of the border, as well as representatives from academia, environmental organizations, and the public. The AQTF promotes regional efforts to improve the air quality monitoring network, emission inventories and air pollution transport modeling development, as well as the creation of programs to improve air quality.

In May 2018, direction was given to CARB staff to develop a work plan in coordination with ICAPCD and agencies in Imperial County and Baja California, Mexico to explore additional actions to improve air quality in the border region. Measures for consideration on the U.S. side include assessing how the ICAPCD's enforcement protocols could be strengthened and make a comparison to other similar local air districts in California, and the assessment of the ICAPCD's Fugitive Dust Rules under Regulation VIII. On the Mexican side, the work plan's focus is to address cross-border air pollution impacts, and how CARB can provide assistance within the limits of its jurisdictional authority to Mexican government agencies to mitigate emissions that impact Imperial County. The work plan includes an assessment of priority areas, which direct CARB and other agencies on both sides of the border to: increase education and awareness of PM air quality and health impacts; improve regulatory authority, enforcement protocols, and rule stringency; enhance air monitoring; and identify funding mechanisms to achieve work plan goals.

Mexico is known for its varied customs and traditions, including commonplace activities such as the use of fireworks and the burning of tires and wood during festivities. To educate the public on the health hazards associated with the burning of these materials, the winter media campaign "Ambientalízate,"

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was established by ICAPCD in 2011 with funding from U.S. EPA. The main objective of this campaign is to educate the public, especially sensitive receptors such as the elderly and children, of the hazardous health and environmental impacts these activities cause in the Mexicali region and Calexico, CA. The campaign airs four separate public service advertisements in Calexico and Mexicali covering specific topics on air quality. The campaign is also broadcasted on nine high frequency radio stations and six television stations approximately 1,500 times from November through January each year. The public service advertisements illustrate the impact these activities have on local health and the environment, with the goal of developing a “no burn” mentality and ultimately breaking these traditions.

- The community steering committee also requested additional time in the future to review the information they are provided in order to enhance their ability to make informed decisions. To benefit the implementation process, staff recommend that CARB staff, ICAPCD, CCV and the community steering committee work together to undertake the following action:
 - ☐ Board-Directed Action #4: Continue to support strategy development and design a process that defines a schedule and appropriate lead time to allow the community steering committee to review documents, ask questions, engage in discussion and provide feedback; consider updating the charter to reflect the agreed upon process.

The Air District, CCV, and CARB have been continuously coordinating efforts to determine a schedule that allows adequate time for CSC members to review documents, prior to regularly scheduled meetings, to promote robust and meaningful discussion at CSC meetings on objectives and updates regarding the CERP and all AB 617 related activities. In order to meet Brown Act noticing requirements and give CSC members the opportunity to review materials, the Air District has committed to releasing all agenda documents to CSC members at least five days prior to each CSC meeting. In conjunction with this practice, the Air District also posts the agenda documents to ICACPD’s dedicated AB 617 website – www.icab617community.org – the same day in which CSC members receive the meeting materials.

Additionally, the Air District, CCV and Harder+Co. have worked to develop and expand a running list of questions and answers related to the CERP, CAMP, and AB 617 that were submitted by CSC members and the public. The responses, provided by the Air District, CCV, and CARB allow the CSC and public to obtain the information they are seeking on subjects critical to the success of implementing strategies and programs in the Corridor, and to establish a higher level of transparency to the public for the AB 617 Program/CAPP.

Section A: QUANTITATIVE Summary of progress for the community emissions reduction program

- 5) Status of the Strategies Included in the Program – Summarize the total number of strategies that have been fully implemented, the number that are in progress, and the number that have not yet begun implementation.

[Ref. Blueprint pages C-38, C-39. Imperial Plan, Section 4.4]

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Fully Implemented Strategies – 5

Strategies In Progress – 19

Strategies Not Yet Begun – 4

6) Completion of Required Elements – Describe completion of required elements (e.g., emissions reduction targets, milestones for compliance goals, etc.). Some required elements are provided below in 6a, 6b, and 6c.

[Ref. Blueprint pages C-3, C-4, C-38, C-40.]

6a) Emission Reduction Targets – Summarize progress toward achieving overall emission reduction targets (PM2.5, PM10, DPM, NOX, and VOC, as applicable).

[Ref. Blueprint pages C-16 to C-19, C-38, C-40. Imperial Plan, page 4-2, Table 4.1]

District completed implementation of one (1) school bus replacement project, consisting of funding a new electric (zero-emission) school bus and 1 charging station at Calexico Unified School District (CUSD). Project resulted in emission reductions of: NOx - 0.09 tons/yr, ROG - 0.01 tons/yr, and PM10 - 0.01 tons/yr.

District completed implementation of one (1) parking lot paving project, which was established as an early mitigation project, at CUSD and results in emission reductions of 2.26 tons/year of PM10. Additional parking lot paving projects will be implemented once the specific Project Plan for this mitigation strategy, following the requirements of CAPP Incentives Guidelines, is approved by CARB.

District has thus far implemented air filtration projects at three (3) schools in the Corridor. The District is in the process of determining the specific exposure reduction calculations for this mitigation strategy, based on the advisement and methodologies from CARB.

6b) Proximity-Based Goals - Summarize progress toward achieving proximity-based goals (e.g., for air filtration, urban greening, school flag programs).

[Ref. Blueprint pages C-19, C-20. Imperial Plan, page 4-3, Table 4.2]

One of the CERP's mitigation strategies consists of funding the replacement of five (5) older school buses with zero emission (electric) school buses over the next five years. The District completed the funding and implementation of one school bus project, consisting of the replacement of one ole diesel school bus with an electric school bus, for Calexico Unified School District (CUSD) in September 2020. The project also included funding the installation of one (1) charging station at CUSD for the new electric school bus. To carry out additional projects in this strategy, the District will release a Request for Proposal (RFP) in fall 2020 to receive project proposals from school districts in the Corridor.

Another mitigation strategy included in the CERP is the installation of air filtration systems at sensitive receptor locations such as schools in the Corridor. These systems significantly reduce concentrations of particulate matter (diesel and fugitive dust) and other pollutants in the indoor environment. The

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District has installed air filtration systems in a handful of schools in the Corridor, based on the input received from the CSC in 2019, with the air filtration company IQAir North America, Inc. (IQAir). In July 2020 IQAir installed air filtration systems at Dogwood Elementary School (Heber, CA) and Heber School (Heber, CA), and in September 2020, IQAir installed an air filtration system at De Anza Magnet School (El Centro, CA). These systems will benefit approximately 645 sensitive receptors (students & staff) at Dogwood Elementary School, 783 receptors at Heber School, and 546 receptors at De Anza Magnet School. The Air District will continue working with IQAir to schedule site assessments and air filtration installations at schools, utilizing AB 617 funding and other funding mechanisms to leverage existing allocated funds for this strategy. For additional details, please see the attached Spreadsheet Template.

Under the CERP the Air District, CCV, and the CSC committed to assist as many schools as funding permits to implement the Enhanced School Flag Program, including the consideration of advancing the program to utilize electronic marquee signs to display local air quality forecast conditions instead of the traditional colored flags that are raised on school flagpoles. The purpose of the program is to create public awareness of outdoor air quality conditions and allow schools, faculty, and parents to make decisions on air pollution exposure, including whether it is appropriate for children to exercise outside on any given day. Per CAPP requirements, the Air District is currently working with CCV and the CSC to develop a Project Plan for the implementation of this strategy, with the goal of submitting the proposed Project Plan to CARB for approval before the end of the 2020 calendar year.

6c) Compliance Goals - Provide an update on progress toward achieving compliance goals and improving compliance (e.g., summarize non-compliance rates and other key compliance statistics). [Ref. Blueprint page C-31. Imperial Plan, Section 4.2]

The District conducted an annual retrospective review of enforcement statistics for the 2019 calendar year, in order to identify areas needing improvement. There were a total of 251 inspections conducted by ICAPCD Staff in the Corridor of permitted sources in 2019, out of a maximum possible number of 253 inspections. ICAPCD received 57 complaints in 2019 for locations within the Corridor, and issued a total of 26 Notices to Comply (NTCs) and 49 Notices of Violation (NOVs) for sources within the Corridor. All of these aforementioned NTCs and NOVs were fully resolved between the District and violators. Finally, the non-compliance rate of permitted facilities in the Corridor for 2019 was 26%. For additional details, please see the attached Spreadsheet Template & District Supplemental Enforcement Spreadsheet.

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- 7) Air Monitoring Results - Summarize air monitoring results and describe potential correlations between the Plan and air pollutant levels.

[Ref. Imperial Plan, page 6-5, "...At the end of each calendar year for the next five years, particulate matter data from the El Centro and Calexico regulatory monitors will be evaluated to identify potential correlations between actions taken as a part of this Plan and impacts to air pollutant levels..."]

Indicators for both PM10 and PM2.5 indicate that 2019 was much cleaner overall compared to 2018. 2018 PM10 both El Centro and Calexico have several 24-hour measurements above the PM10 Standard. In retrospect, 2019 has no 24-hour measurements above the PM10 Standard. Calexico however remained slightly elevated overall than El Centro.

Much that same can be said about PM2.5. Except for one measurement above the Standard in 2019, Calexico was much cleaner in 2019 than in 2018.

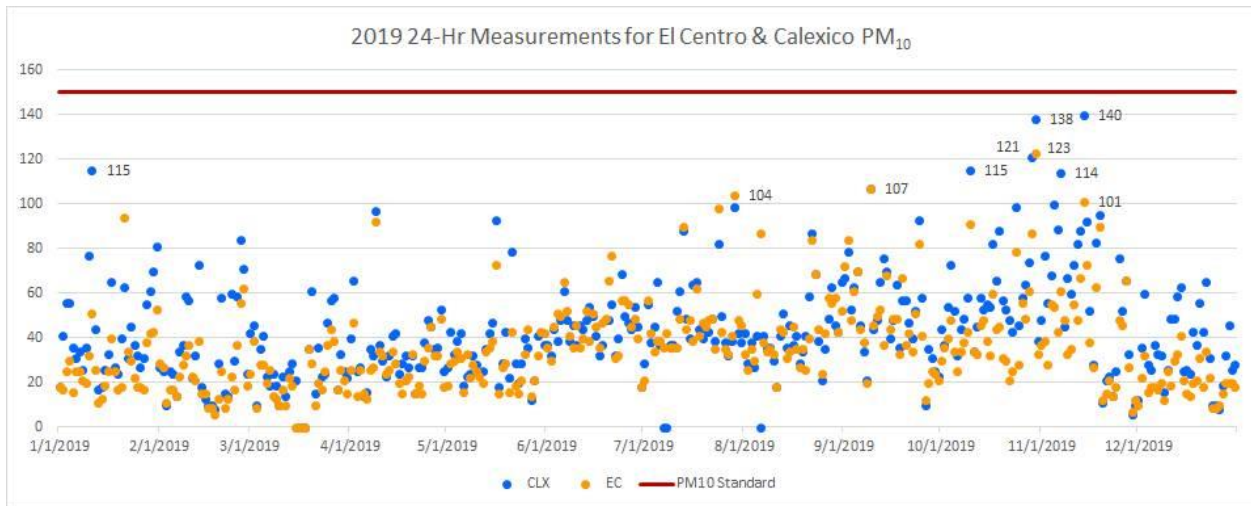
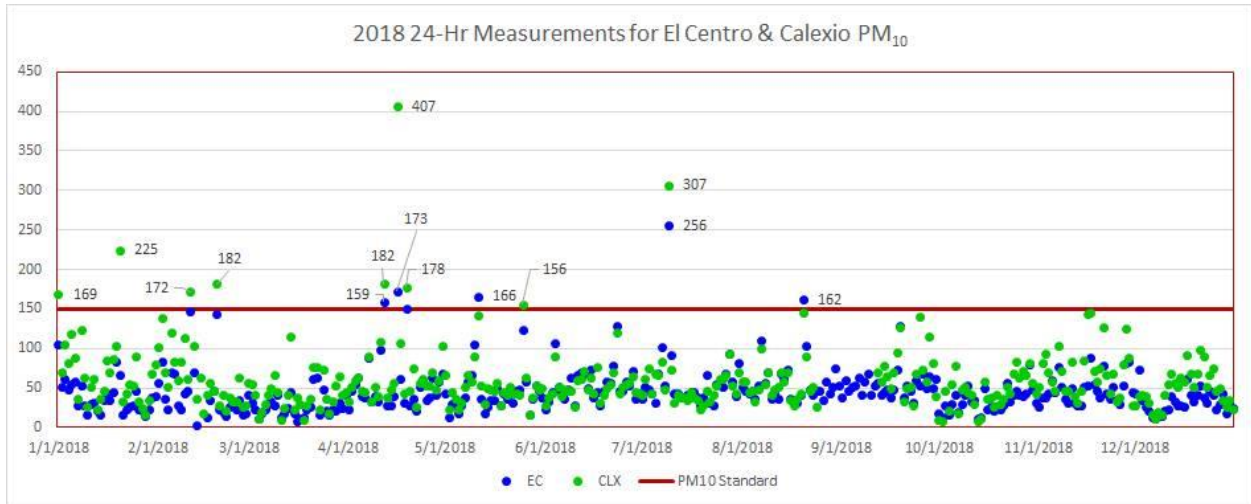
(see Monitoring Graphs on following 2 Pages).

- 8) Incentives Investments - Summarize the total incentives investments for programs that are identified in the community emissions reduction program or for other projects that provide air quality benefits within the community.

This information is included in the District's response to Item #6 and its subsections. Full details on incentives investments to date are included in the Spreadsheet Template that accompanies this Word Data Collection Template.

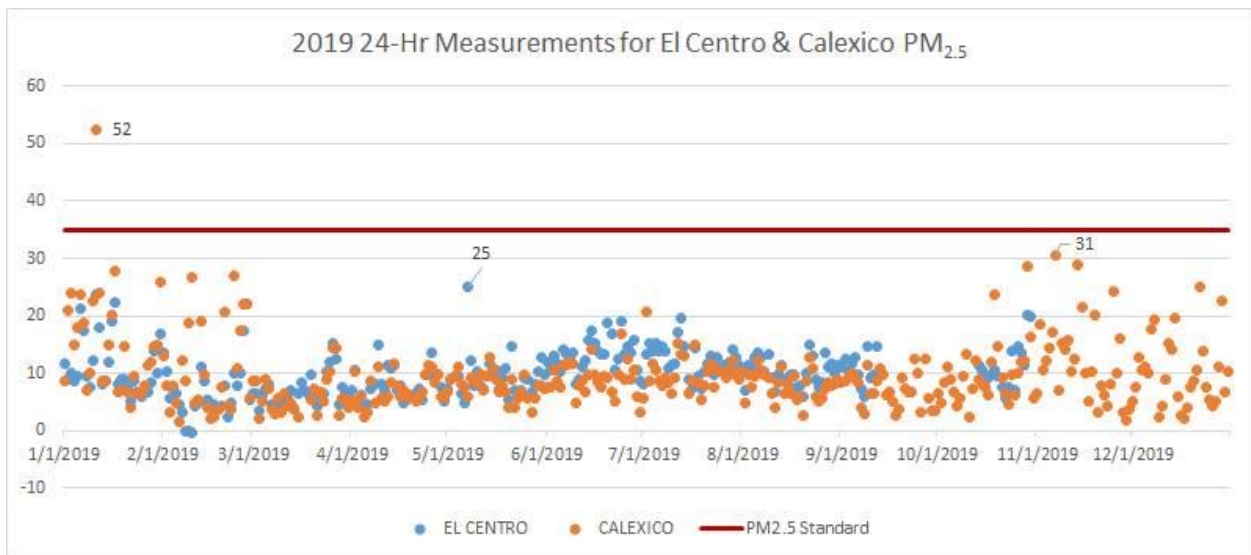
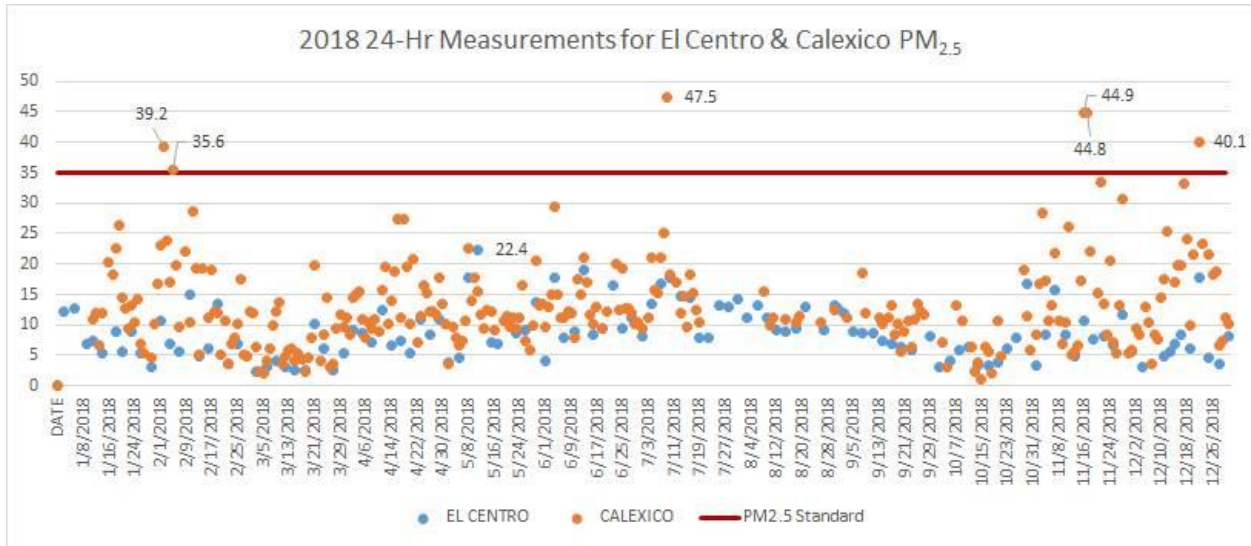
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7. 2018 & 2019 Monitoring Data



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7. (Cont.)



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Section B: Status update for EACH STRATEGY in the community emissions reduction program

Please fill in the attached spreadsheet template and provide an update on the status and specific metrics for EACH STRATEGY. [Ref. Blueprint, page C-39]

Spreadsheet Template was completed by the District and is submitted as a separate attachment, which is an Excel Spreadsheet. The Spreadsheet Template is also accompanied with a District Enforcement Spreadsheet that includes 2019 compliance/enforcement data.

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[ATTACH SPREADSHEET FOR *Report Section B*: Status update for EACH STRATEGY in the community emissions reduction program]