

California Air Resources Board
Community Air Protection Program

Imperial County North End Phase I Community Community Emissions Reduction Program Staff Report

Release Date: May 16, 2025



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Staff Recommendation

Staff recommends that the California Air Resources Board (CARB or Board) Executive Officer approve the Imperial County North End Phase I Community Emissions Reduction Program (CERP) developed pursuant to Assembly Bill (AB) 617.¹ Staff also recommends that the Executive Officer direct staff to work with the Imperial County Air Pollution Control District (ICAPCD or District) and the Imperial County North End Phase I Community Steering Committee (CSC) to take additional actions to strengthen implementation.

Background

CARB established the Community Air Protection (CAP) Program² (Program) to implement AB 617, which requires community-focused action to reduce air pollution. CARB implements the Program which establishes criteria for developing and implementing community emissions reduction programs,³ community air monitoring plans, as well as other elements of the Program. The Blueprint 2.0⁴ was adopted by the Board in October 2023, and is the first five-year update to program guidance. Blueprint 2.0 carries over certain elements from the 2018 Blueprint, incorporates clarifications to CERP requirements, and provides new elements to identify ways to support more communities.

On February 23, 2023, CARB selected the Imperial County North End Phase I (North End) Community, which includes the cities of Brawley, Westmorland and Calipatria, to develop both a CERP and a community air monitoring plan (CAMP). The District worked with the CSC from July 2023 through December 2024 to develop the Imperial County North End Phase I Community Emissions Reduction Program⁵ to reduce emissions and exposure to air pollution in the community. CSC meetings addressed topics ranging from an introduction to the Program, community air pollution concerns, and air pollution impacts on the community. This included specific discussions of health impacts, monitoring, rules and enforcement, and the role of CAP incentives. The CSC identified priority air quality issues facing the community, which include mobile source emissions (both passenger vehicles and heavy-duty vehicles), fugitive dust emissions, agricultural activities, and exposure to dust from the receding shoreline of the Salton Sea.

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

² Community Air Protection Program: <https://ww2.arb.ca.gov/capp>.

³ Contained in *Blueprint 2.0* beginning on page 79.

⁴ The Blueprint 2.0 is available at: <https://ww2.arb.ca.gov/blueprint-20>.

⁵ To view the CERP, visit:

https://www.icab617community.org/_files/ugd/40c59d_2f14ffa1acde45a3a9b6898b7c450071.pdf.

Selected communities must deploy their CAMP within 12 months of selection and must develop a CERP for the air district board to adopt within one year of selection (or up to two years with the support of the CSC and CARB⁶). Over that period, a district must convene a community steering committee, develop a process for governance of the community steering committee, build relationships within the steering committee and with regulatory agencies, establish the technical foundation for understanding the community's air quality status, develop strategies to reduce air pollution emissions and exposure, prepare the CERP document, and seek review and adoption by the district board.

In January 2024, the District, with the support of the CSC, sent a letter to CARB seeking CARB's support to extend the deadline by one year, up to February 2025, to adopt the CERP. The District's letter expressed concerns about the one-year CERP development timeline. The letter described the challenges the CSC faced in understanding the AB 617 Program but also in creating a CERP tailored to the community's specific needs. Allowing the CSC more time would assist in creating a successful CERP. CARB acknowledged, via a letter to the District on March 5, 2024, the challenging circumstances the District and CSC faced and agreed with the request for an additional year.

During the next year the District and the CSC worked to complete the CERP and on December 16, 2024, the CSC unanimously voted to approve the CERP, which contains a set of strategies to provide benefits to the North End Community. CERP strategies include community outreach and engagement, transportation planning, incentives, collaboration and partnerships, District enforcement and CARB enhanced enforcement. On January 28, 2025, the ICAPCD Board of Supervisors adopted the CERP.

This report summarizes the results of CARB staff's review and evaluation of the CERP to determine if it meets the criteria established in State law⁷ and Blueprint 2.0, reflects community priorities, and is likely to reduce emissions and exposure to air pollution in the community.

Community Emissions Reduction Program Overview

The development of the Community Emissions Reduction Program (CERP) was a community-led process. The CSC is diverse with most of its members being community residents and community-based organizations along with representatives from environmental consulting and the lithium and renewable energy industry. The ICAPCD convened a community steering committee consisting of 9 members and held 20 meetings between July 2023 and January 2025. The CSC worked together with the

⁶ Assembly Bill 1749, Garcia, C., Chapter 340, Statutes of 2022.

⁷ Health & Saf. Code, § 44391.2.

District to develop the CERP and will serve as an important partner in CERP implementation. Prior to the Board of Supervisors' approval of the CERP, the District hosted a workshop in November 2024 to allow the public to have an opportunity to learn about the requirements and implementation of AB 617, local and State agency roles, as well as the development of the CERP.

The North End Community is in a primarily desert region just south of the Salton Sea and is surrounded by agricultural land and several major highways. Because of their surroundings, the community experiences emissions from vehicular traffic (passenger vehicles and heavy-duty trucks), agricultural activities and windblown dust. The CERP focuses on reducing emissions and exposure to oxides of nitrogen (NO_x), reactive organic gases (ROG), diesel particulate matter (diesel PM or DPM), and particulate matter (PM_{2.5} and PM₁₀) from these sources.

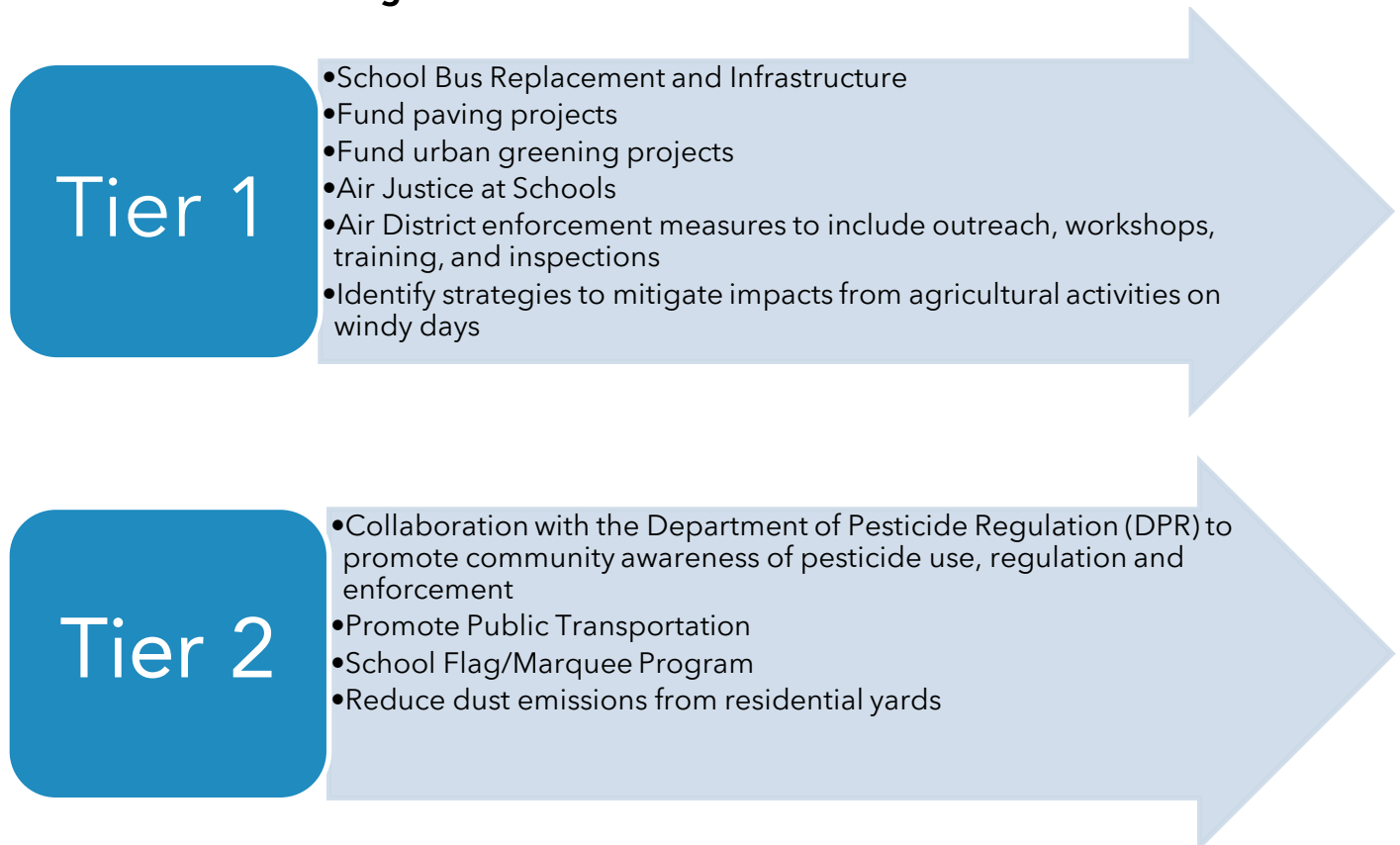
The CSC and the District identified 22 emission and exposure reduction strategies that are separated into two categories, Tier 1 and Tier 2 strategies. Tier 1 strategies consist of well-defined projects where the project partners have been identified, whereas Tier 2 strategies are those which require further study, planning, and stakeholder input prior to implementation.



Picture 1: Love's Truck Stop in Westmorland

Figure 1, below, lists examples of the Tier 1 and Tier 2 actions and strategies to reduce emissions and exposure in the North End Community. For the comprehensive list of strategies along with details, see Chapter 4 in the CERP.⁸

Figure 1. Examples of Actions in the Imperial County North End Phase I Community Emissions Reduction Program



Summary of CARB's Evaluation

CARB staff's review of the CERP follows the framework established in the Blueprint. Throughout the process, CARB staff attended all North End Community CSC meetings to hear the community's ideas and concerns. CARB staff also met regularly with ICAPCD staff to help guide the CERP development process.

⁸ To view the CERP, visit:

https://www.icab617community.org/_files/ugd/40c59d_2f14ffa1acde45a3a9b6898b7c450071.pdf

CARB staff's evaluation of the North End Community CERP found that the CERP follows the framework established in Blueprint 2.0. CARB staff determined that the North End Community CERP reflects community priorities, meets minimum criteria established by State law and Blueprint 2.0, and sets a foundation to deliver air pollution emissions and exposure reductions in the cities of Brawley, Westmorland and Calipatria. However, to ensure successful implementation, the CERP must be strengthened by continuing to refine details around strategies and ensuring continued collaboration between the District, the CSC, and other partner agencies.

CARB staff recommends approval of the CERP with CARB's Executive Officer direction to CARB staff, ICAPCD, and the CSC to begin CERP implementation immediately and begin actions to reduce emissions and exposures. CARB staff provide recommendations for successful implementation based on lessons learned from other CERP implementation efforts. These recommendations draw directly from the core principles of the Board-adopted Blueprint 2.0 which include: using an equity lens, supporting power sharing, and facilitating transparency and accountability.

Staff organized the results of this review into two categories:

- Key strengths of the CERP and the CERP development process, which highlight areas staff found particularly noteworthy; and
- Recommended actions for ICAPCD and CARB to strengthen implementation, including areas where additional discussion, information, clarification, and detail will help ensure the CERP is successful. These actions will also help achieve emissions reductions in the North End Community, as well as CARB commitments.

Key Strengths

Community Steering Committee Participation

The North End Community consists of three cities: Brawley, Westmorland and Calipatria. The District met with the public in July 2023 to initiate the process of creating and nominating community members to the community steering committee. To accomplish the creation of a successful CERP via community guidance, the CSC has equal representation for the three cities in the North End. There are a total of nine primary members (along with alternate members) with three members representing each city. The members were selected to act as leaders and to contribute their knowledge and expertise throughout the development of the CERP.

The CSC members have been committed to participating and engaging during the development of the CERP and work in partnership with ICAPCD and CARB. The additional time to develop the CERP beyond the initial 12 months was well utilized to prioritize community concerns, select locations for a community air monitoring network,

and to identify strategies that would meet the goals of reducing emissions and exposure in their community.

District and CARB Support

The role of the CSC includes such activities as identifying and prioritizing air pollution concerns in the community, understanding and selecting actions to mitigate emissions and exposure, tracking progress of the program, and assisting with community outreach, among other things. To help the CSC with their role, the District and CARB provided education on air quality, health effects, emissions inventory, regulation, air monitoring, incentive programs, and enforcement at the CSC meetings to build the CSC members knowledge and engagement. The District also organized a workshop in November 2024 that included informational tables led by District staff and other local and State agencies. This workshop was open to CSC members and the public with the purpose of allowing community members to meet with other agency representatives and gather information about the AB 617 program in the North End Community.

The District encouraged and supported the community-led process by providing language interpretation services at every CSC meeting, providing access to all meetings via Facebook Live and meeting recordings, holding meetings in the evenings, providing stipends to members for their time, providing CSC materials to members in advance of the meetings to ensure members had time to preview what was going to be discussed at these meetings, and held space at every CSC meeting for both members and the public to voice their concerns and needs. The District also operates a website⁹ dedicated to the AB 617 activity in Imperial County and has established a social media presence to promote community engagement.

Tiered Strategies

In the first AB 617 selected community in the lower half of Imperial County, known as the El Centro-Heber-Calexico Corridor¹⁰ (Corridor), a tiered strategy approach was developed for the CERP. The North End CSC has seen how this tiered system has been applied in the Corridor and has agreed to also develop the same approach of categorizing strategies into two separate tiers. Tier 1 strategies are well defined projects, such as paving and urban greening projects, that can begin implementation soon. Tier 2 strategies are those that require research and planning prior to implementation, such as the promotion of public transportation and the reduction of dust emissions from

⁹ ICAPCD AB 617 Imperial County: <https://www.icab617community.org/>.

¹⁰ More information on the El Centro-Heber-Calexico Corridor can be found here: <https://www.icab617community.org/south-end-community-steering-committee>.

residential yards. The separation into tiers establishes a path to meet reduction targets and goals on schedule and allows the CSC more time to help develop the Tier 2 strategies during the CERP implementation phase.

Recommended Actions to Strengthen Implementation

Staff recognizes that the CERP is the culmination of an extensive amount of work in a short timeframe. CARB staff remain committed to working with the ICAPCD and the community steering committee to refine implementation strategies and support periodic status reports required under AB 617.

CARB staff has developed the following set of recommended actions. Progress in implementing these recommendations should be included in the annual progress reports submitted to CARB as required by Blueprint 2.0.

Agency Partnerships and Collaboration

The District has identified other public agencies to collaborate with in several of the CERP strategies. Open communication and building effective relationships with other agencies to clarify and confirm their roles and responsibilities in the implementation of these strategies is necessary to meet the commitments established in the CERP.

CARB Commitments

CARB actions that specifically relate to the North End Community and identified by the CSC are provided in the CERP. However, it is important to note that some of the State regulations provided within the CERP are in the early phases of development and their adoption and implementation timelines are not yet established. Additionally, the emission inventory used to estimate the potential emission reduction factors for these strategies are derived from draft inventories that will continue to be revised through the regulation development process. As such, the draft statewide emissions reduction estimates presented in the CERP should only be used as a rough estimate that are subject to change in the future. As these emissions inventories are developed, CARB staff will provide estimated benefits in future updates.

CARB enforcement is dedicated to building relationships with communities statewide to address environmental concerns and aims to develop action plans collaboratively, focusing on the community needs and priorities to provide enforcement actions in the North End Community. For example, CARB enforcement will work with the CSC and ICAPCD to review enforcement data and determine how to conduct more heavy-duty activities on mobile sources like vehicles, transport refrigeration units, off-road vehicles, etc. CARB enforcement will also work with the CSC and local agencies to provide community outreach and education.

CARB staff has evaluated the North End CERP and found that the CERP follows the framework established in the 2018 Blueprint and carried over in Blueprint 2.0. The ICAPCD and CARB will continue the collaboration needed to strengthen implementation of the CERP as recommended above.