Placer County
AIR POLLUTION CONTROL DISTRICT

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Erik C. White, Air Pollution Control Officer

May 6, 2026

Steven S. Cliff, Ph.D.
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Placer County APCD Program Review Report for Fiscal Years 2017-18 through 2022-23

Dear Dr. Cliff,

The Placer County Air Pollution Control District (PCAPCD) is pleased to accept the **Program Review Report for Fiscal Years 2017-18 through 2022-23** and offers the attached responses to the recommendations contained therein. The Program Review Report was conducted by a third-party auditor, Crowe, LLP (Crowe) on behalf of the California Air Resources Board and the California Environmental Protection Agency. The Report spanned six years (FY 2017-18 through 2022-23) and three incentive programs, totaling over $38.2 million in grant awards and hundreds of emission reduction projects.

Crowe's Report highlights numerous commendable efforts and makes some recommendations, with no findings. The report confirms that PCAPCD administered all three programs in accordance with program guidelines and statutes. Additionally, the Report states that "PCAPCD achieved the emission reduction objectives…and effectively promoted the adoption of cleaner-than-required vehicles" across all three reviewed programs. The Department of Finance (DOF) conducted a concurrent review of the PCAPCD's fiscal compliance, which spanned the same time period, programs, and scope. The DOF's Fiscal Compliance Audit also had no findings and confirmed that "that the [PCAPCD's] incentive programs' revenues, expenditures, and resulting balances were in compliance with applicable grant agreements, guidelines, and statutes."

With the support of CARB incentive programs, the PCAPCD has funded hundreds of emission reductions projects within Placer County, significantly benefiting the air quality for Placer County residents. These comprehensive reviews highlight the success of the PCAPCD's programs in fulfilling our mission to protect public health, especially in those areas disproportionately burdened by poor air quality.

We look forward to continuing our strong partnership with CARB on the various incentive programs we jointly administer and appreciate the regular support your staff provides to make these programs such a success. If you would like to discuss this letter in greater detail, please feel free to contact me at ecwhite@placer.ca.gov, or at (530) 745-2330.

Sincerely,

Erik White

Erik C. White
Air Pollution Control Officer
Placer County Air Pollution Control District

Cc: Maritess Sicat, Branch Chief
Incentives and Technology Advancement Branch, Mobile Source Division

Tung T. Le, Executive Director
California Air Pollution Control Officers Association

Aaron Coen, Project Manager
Crowe, LLP

Recommendation Responses

Carl Moyer Memorial Air Quality Standards Attainment Program (CMP)

Recommendation 1: Accuracy of Equipment Purchased.

Recommendation:
PCAPCD should require applicants to provide a cost estimate for new equipment at the time the application is submitted and report when there are changes in costs from the time when the equipment was proposed to when it was purchased. In addition, PCAPCD should update all records to include information that reflects the details of the actual equipment purchased. We acknowledge that these discrepancies are common as a result of the time elapsed from the date of application to the application approval date. However, updating all documentation with the final equipment and equipment costs will allow for consistency and completeness of documentation within the project file.

Response:
PCAPCD requires all applicants to provide a cost estimate for new equipment at the time of application. PCAPCD verifies the final equipment cost during the post-inspection and updates all project documentation (except for the original application) to reflect the final equipment and cost. The original application is retained as submitted to preserve the basis for the initial project evaluation.

PCAPCD requested additional detail from Crowe regarding the specific records or projects identified as inconsistent; however, this information was not provided.

Community Air Protection (CAP) Incentives Program

Recommendation 1: Formal Criteria for Project Selection.

Recommendation:
PCAPCD should establish a formal written criteria for project selection in years when CAP funds are insufficient to cover all eligible projects. This will allow for transparency in how PCAPCD selects projects.

Response:
PCAPCD is committed to the successful implementation of all of its programs, with a heightened emphasis on transparency, equity, and public participation for the CAP program. We appreciate that it was noted in the program review that community engagement is at the center of PCAPCD's implementation. In support of transparency, the PCAPCD Carl Moyer Policies and Procedures Manual with Community Air Protection Incentives Program Addendum is reviewed annually and will be updated to address this recommendation.

Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program

Recommendation 1: Formal Criteria for Project Selection.

Recommendation:
PCAPCD should establish formal written criteria in the FARMER Master Agreement for

project selection rather than awarding funding to applications received on a first-come, first-serve basis. This will allow for transparency in how PCAPCD selects projects.

Response:
The PCAPCD includes formal, written criteria for project selection in the FARMER Master Agreement. The Master Agreement identifies two solicitation methods: (1) open solicitation, and (2) first-come, first-served solicitation. Open solicitation is the preferred approach and includes defined evaluation criteria such as project cost-effectiveness, benefits to disadvantaged and low-income communities, and geographic equity among participating districts.

In limited circumstances, such as when funding availability is low, PCAPCD may use a first-come, first-served approach to reduce administrative burden for a small number of awards. However, this is not a frequently-used solicitation approach.

Recommendation 2: Accuracy of Equipment Purchased.

Recommendation:
PCAPCD should update all records to include information that reflects the purchased equipment if the purchased equipment is different than the proposed equipment. We acknowledge that these discrepancies are common as a result of the time elapsed from the date of application to the application approval date. However, updating all documentation with the final equipment and equipment costs will allow for consistency and completeness of documentation within the project file.

Response:
Minor discrepancies between proposed and final equipment are not uncommon due to availability constraints or minor application errors. When changes occur, the PCAPCD coordinates with the applicable Shared Allocation Pool air district to update the FARMER Reporting Tool, confirm the project remains cost-effective, and adjust the award amount as necessary.

Final equipment details are documented in both the FARMER Reporting Tool and Post-Inspection records, while the original application is retained as submitted to document the basis for the initial evaluation.