



AIR POLLUTION CONTROL DISTRICT

IMPERIAL COUNTY COMMUNITY EMISSIONS REDUCTION PROGRAM: PROJECT PLAN PAVING PROGRAM

**EL CENTRO-HEBER-CALEXICO CORRIDOR
AND**

NORTH IMPERIAL PHASE 1 COMMUNITY

Rev. July 2025

Prepared By

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El Centro-Heber-Calexico AB 617 Community Steering Committee

Imperial County Air Pollution Control District

Comite Civico del Valle

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Prepared for

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Abbreviations and Acronyms

AB	assembly bill
CAP	Community Air Protection
CAPP	Community Air Protection Program
CARB	California Air Resources Board
CARL	Carl Moyer Program Clean Air Reporting Log
CCV	Comite Civico del Valle, Inc.
CERP	Community Emissions Reduction Program
CSC	Community Steering Committee
ICAPCD	Imperial County Air Pollution Control District
PM	particulate matter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PM ₁₀	particulate matter less than 10 microns in diameter
RFP	request for proposals
USEPA	United States Environmental Protection Agency
VMT	vehicle miles traveled
WRAP	Western Regional Air Partnership

1 Project Identification

1.1 Background

In 2019, the El Centro-Heber-Calexico Corridor AB 617 Community (“Corridor” or “Community”) developed a Community Emissions Reduction Program (CERP)¹ to address local air quality concerns as part of the state-wide Community Air Protection Program (CAPP). The CERP was a collaborative effort by the Imperial County Air Pollution Control District (ICAPCD), Comité Civico del Valle (CCV) and the Community Steering Committee (CSC). As part of CERP development, the Community was granted funding by the California legislature for the implementation of projects for reducing pollutant emissions or community exposure through mobile source, stationary source, and community-identified projects and strategies. Various strategies were identified during development of the CERP through Community engagement. These strategies were included in the final CERP that was approved by the California Air Resources Board (CARB) Board in January 2020. One of these key strategies was Strategy M-3, *Parking Lot Paving Projects*. In late 2020, it was decided that the eligibility criteria for Strategy M-3 should be expanded to include other paving projects besides parking lots consistent with Strategy L-1, *Paving Project Identification*, and ICAPCD’s Rule 310 funding program. This revision will be included in an update to the CERP.

This document serves as the “Project Plan” for the Paving Project strategy. It was drafted according to the guidelines laid out in the Community Air Protection Incentives 2019 Guidelines.² It describes the nature of the strategy, its history of support by the Community, requirements for entities desiring to participate and receive project funding, how these projects will benefit the community through improved air quality or exposure reduction, as well as other key aspects like project selection criteria and reporting requirements.

1.2 Project Description

As discussed in the CERP, fugitive windblown dust and unpaved road dust are top contributors to particulate matter (PM) emissions in the Corridor. Under this strategy, the District is proposing to provide funding for paving projects in the Corridor, as funding permits. Potentially eligible projects would include well-traveled unpaved roads, parking lots, and other unpaved areas located near sensitive receptors including, but not limited to, homes, schools, and senior centers. Projects implemented by non-public school entities are required to undergo a case-by-case review in order to receive funding due to requirements under the California Constitution. The District is proposing to work with local public works departments, the CSC, and other representatives from the communities of El Centro, Heber, and Calexico to identify locations that could benefit from these types of paving projects.

¹ ICAPCD. 2019. *Imperial County Year 1 Community Emissions Reduction Program Plan for the El Centro-Heber-Calexico Corridor*. October. Available at: https://docs.wixstatic.com/ugd/99eb03_080a305618f5453cb0c69272eb622946.pdf. Accessed: January 2021.

² CARB. 2020. *Community Air Protection Incentives 2019 Guidelines*. October 14. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-10/cap_incentives_2019_guidelines_final_rev_10_14_2020_0.pdf. Accessed: January 2021.

1.3 Benefits

Paving of an unpaved surface reduces PM emissions from fugitive windblown and activity-related dust in the Corridor. Receptors within the vicinity of paving projects will experience a reduction in exposure related to PM emissions.

2 Community Support

2.1 Background – Community Steering Committee

In late 2018, ICAPCD in conjunction with CCV assembled a steering committee for the EI Centro-Heber-Calexico Corridor. Referred to as the AB 617 Community Steering Committee (“CSC”), this body is involved with all aspects of the CERP and is tasked with maintaining communication with other community members throughout the planning process to gather input from concerned citizens and facilitate ongoing discussion. The CSC consists of 15 members made up of two ex-officio co-chairs (representing ICAPCD and CCV) and 13 Community representatives. Each member has an alternate who participates in meetings if a member is unable to.

In February 2019, the CSC’s charter was approved which described the manner in which the CSC would conduct their regular meetings, and the voting process for making decisions related to the CERP and its programs/projects. It describes this process as: “Each member of the Committee, including the two ex officio members, shall be entitled to one (1) vote. A vote of the majority of the members present with at least a quorum in attendance shall be required to take action, and/or make a recommendation, except for adjournment of a meeting which shall require only a majority of those present...”.³ During CERP development, the CSC met on a monthly basis to discuss key issues and progress. Following approval of the CERP by the CARB Board, the CSC has continued meeting every one-to-two months throughout 2020. The meeting schedule will continue as the CERP Project Plans are developed, and the CSC meetings will serve as the chief mechanism for informing the Community on development of the projects and key funding decisions. The CSC will determine the need for additional public outreach mechanisms, as necessary.

2.2 Community Support for Paving Projects

Community engagement was a critical part of the CERP development. This involved regular meetings of the CSC, as described in **Section 2.1**, which sometimes included polls to gauge the opinions of CSC members and the public in attendance on a variety of topics. At one CSC meeting in 2019,⁴ a survey was conducted to gain feedback on various emission/exposure reduction strategies for inclusion in the CERP. The results of that survey indicated that approximately 70% of Steering Committee members were in favor of implementing parking lot paving projects in the Corridor. Additionally, approximately 50% of public attendees at the meeting were also supportive of the strategy. Given this relatively strong support, Strategy M-3, *Parking Lot Paving Projects* was included in the CERP and selected for development of this Project Plan. On September 25, 2020, an additional survey was circulated to CSC members and their alternates to gain feedback on various details of this plan. The results from that survey have informed the development of this draft of the document.

On July 21, 2025, the North-Imperial Community CSC voted to adopt the EI-Centro-Heber-Calexico Corridor's Paving Plan with minor adjustments to the Funding Amounts and Participant Requirements.

³ ICAPCD. 2019. *Imperial County Year 1 Community Emissions Reduction Program Plan for the EI Centro-Heber-Calexico Corridor, Appendix B: AB 617 Community Steering Committee Charter*. October. Available at: https://docs.wixstatic.com/ugd/99eb03_080a305618f5453cb0c69272eb622946.pdf. Accessed: January 2021

⁴ July 24, 2019 meeting of the EI Centro-Heber-Calexico AB617 Community Steering Committee.

3 Participant Requirements and Application Process

3.1 Participant Eligibility

Public and private entities are eligible to apply for and receive funding for paving projects within the Corridor. Applicants must meet the following criteria in order for projects to be considered for funding grants:

- Applicant must be the owner of the area to be paved or have authority to pave the area from a legally binding document such as a long-term lease agreement for the duration of the project life.
- Applicant must maintain the paved area during the entire contract period, 10 years.
- Applicant must make the project available for inspection if requested by ICAPCD and/or CARB staff during the entire contract period, 10 years.
- Paved area must be sufficiently utilized as demonstrated in the application.
- All property taxes must be current at the time of application.
- Recipient is responsible for obtaining any permits required to do the project.
- If Applicant holds an operating permit or other type of permit for the project site, copies of permits shall be provided to ICAPCD as part of application.
- The applicant or their sponsor must have the financial capacity to complete, operate, and maintain the project.
- El Centro-Calexico-Heber: With the exception of schools, cost sharing is required for municipal entities and non-profit organizations at 25% of the total eligible project costs (i.e., AB 617 incentive funds will cover a maximum of up to 75% of eligible project costs) and private and any other entities at 50%. Any funds required from other sources must reasonably be expected to be available on the time frame needed to carry out the project.
- North-Imperial: With the exception of schools, cost sharing is required for municipal entities and non-profit organizations at 15% of the total eligible project costs (i.e., AB 617 incentive funds will cover a maximum of up to 85% of eligible project costs) and private and any other entities at 40%. Any funds required from other sources must reasonably be expected to be available on the time frame needed to carry out the project.

Routine maintenance and rehabilitation projects are not eligible for funding. Applicants may not claim emission reduction credits from the project during the contract period.

3.2 Application Process

Applicants will submit applications that include the required information as described in this Project Plan. Once ICAPCD has collected applications from interested entities, the review process will begin. This may involve ICAPCD requesting additional information from applicants or visiting potential project sites. When the application review process is complete, ICAPCD will inform applicants whether the project has been selected and provide details on the project award amount and next steps.

3.2.1 Application Requirements

The following is a sample of the information that must be included on applications submitted:

- Qualitative description of use, location, and existing condition of the proposed paving project;
- Current and expected vehicle use of the project and supporting documentation;
- Area of paving project in acres or square footage;
- Frequency at which the existing unpaved area is watered, if applicable;
- A commitment to provide photo documentation on an annual basis to demonstrate that project maintenance is occurring throughout the contract period.
- A commitment to provide photo documentation of the completed project (if grant is awarded)
- Commitment to compliance with ICAPCD Rule 801 and Rule 805 during project construction.

Additional information required can be found in **Appendix A: Project Application Form**.

3.2.2 Application Submittal

Applications must be submitted to the ICAPCD during the Request for Proposals (RFP) period. To initiate the RFP period, ICAPCD will issue a public notification to advertise the availability of grant funds for this project type, provide instructions to access and submit the application, and include a due date by which applications must be submitted. Once the RFP period has ended, ICAPCD will review the applications received and contact applicants as necessary to gather additional information. ICAPCD will aim to respond to prospective applicants within 60 days following the end of the RFP period to alert them if their projects have been selected to receive funding. However, this timeline may be extended at the discretion of ICAPCD (e.g., to reach consensus from the CSC).

4 Emissions Reductions and Quantification Methodology

4.1 Regulatory Compliance

Paving projects shall be constructed, installed, placed, and all work performed in conformance with the California Uniform Building Code and all other applicable statutes, rules, and regulations.

Unpaved roads and unpaved traffic areas are subject to Imperial County Rule 805 – Paved and Unpaved Roads (adopted 11/08/2005; Revised 10/16/2012). The purpose of this regulation is to reduce the amount of particulate matter generated from new or existing paved or unpaved roads, road construction projects, or road modification projects. Sources subject to Rule 805 may implement one or more of the listed dust control measures to achieve compliance with the rule.

Construction activities associated with the paving of the project are subject to Imperial County Rule 801 – Construction and Earthmoving Activities (adopted 11/08/2005). The purpose of this rule is to reduce fugitive dust emissions associated with construction and earthmoving activities.

Design, construction, and paving of parking lots, roads, and other unpaved areas are subject to the requirements of the applicable municipal codes and ordinances as listed below:

- Locations within El Centro city limits are subject to the City of El Centro Municipal Ordinance.⁵
- Locations within Calexico city limits are subject to the City of Calexico Municipal Ordinance.⁶
- Locations within unincorporated areas, including Heber, are subject to the County of Imperial California Codified Ordinances.⁷
- Locations within Brawley city limits are subject to the City of Brawley Municipal Ordinance.
- Locations within Calipatria city limits are subject to the City of Calipatria Municipal Ordinance.
- Locations within Westmorland city limits are subject to the City of Westmorland Municipal Ordinance.

In addition, new or modified paved roads are subject to the Imperial County Public Works Department guidelines for width of shoulders and median shoulders.

⁵ City of El Centro Municipal Ordinance. Available at: https://library.municode.com/ca/el_centro/codes/code_of_ordinances?nodeId=COELCE. Accessed: January 2021.

⁶ City of Calexico Municipal Ordinance. Available at: https://library.municode.com/ca/calexico/codes/code_of_ordinances?nodeId=CITY_CALEXICOMUCO1995. Accessed: January 2021.

⁷ County of Imperial, California Codified Ordinances. Available at: https://library.municode.com/ca/imperial_county/codes/code_of_ordinances?nodeId=COUNTY_IMPERIAL_CALIF_ORNIACOR. Accessed: January 2021.

4.2 Emission Reductions

Paving of a dirt surface significantly reduces windblown and activity-related fugitive dust emissions. This methodology utilizes CARB's Miscellaneous Process Methodology 7.10 - Unpaved Road Dust, Non-Farm Roads to estimate the baseline emissions from an unpaved surface.⁸ Emissions reductions from fugitive windblown dust are conservatively not included. The emissions reductions associated with paving are then estimated using a control efficiency from the Western Regional Air Partnership (WRAP) Fugitive Dust Handbook.⁹

Baseline emissions are calculated using CARB's methodology for unpaved road dust, shown in Equation 1. If the unpaved surface is routinely controlled for dust (e.g., through daily watering), a control efficiency (CE) should be applied (see Table 1). Fraction of total PM that is particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) are 0.5943 and 0.0594, respectively.

$$1) \text{ Baseline Emissions} = 2 \frac{\text{lb PM}_{10}}{\text{VMT}} \times \frac{\text{VMT}}{\text{year}} \times (1 - \text{CE}) \times \text{PM fraction}$$

Table 1. Fugitive Dust Control Measures and Control Efficiency	
Control Measure ^[a]	Control Efficiency (CE)
Implement watering twice daily	55%
Implement watering three times daily or greater	61%
Apply dust suppressants or gravel	84%
Notes: ^[a] Contact the District if a dust control measure not listed in this table is being implemented at the project site.	

Paved emissions are calculated by applying the WRAP control efficiency to the baseline emissions, as shown in Equation 2.

$$2) \text{ Paved Emissions} = \text{Baseline Emissions} \times (1 - 0.99)$$

Emissions reductions due to paving are calculated as the difference between the paved and baseline emission estimates as shown in Equation 3.

$$3) \text{ Emission Reductions} = \text{Baseline Emissions} - \text{Paved Emissions}$$

⁸ Calculation methodology and emission factor based on CARB Miscellaneous Process Methodology 7.10 - Unpaved Road Dust, Non-Farm Roads. Available at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-10_2012.pdf. Accessed: January 2021.

⁹ Control efficiency based on Western Regional Air Partnership Fugitive Dust Handbook, Table 6-6. Control Efficiencies for Control Measures for Unpaved Roads. Available at: https://www.wrapair.org/forums/dejff/fdh/content/FDHandbook_Rev_06.pdf. Accessed: January 2021.

5 Relative Exposure Reduction

5.1 Mechanism of Exposure Reduction

Paving of unpaved roads, parking lots, and other unpaved areas will result in a reduction in PM emissions from vehicle travel and fugitive windblown dust as described in **Section 4**. Exposure to PM can result in various health problems related to lungs and heart condition, including¹⁰:

- Premature death in people with heart or lung disease;
- Nonfatal heart attacks;
- Irregular heartbeat;
- Aggravated asthma;
- Decreased lung function; and
- Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing.

Sensitive receptors, such as people with heart or lung diseases, children, and older adults are most susceptible to PM pollution exposure.

5.2 Estimates of Exposure Reduction

Estimates of exposure reduction will be comprised of the following metrics:

- Number of visitors to the location that is served by the project; and
- Number of sensitive receptors within 1,000 feet of the project boundary.

Exposure reduction will be estimated on the estimated number of individuals in these two categories.

¹⁰ USEPA. Health and Environmental Effects of Particulate Matter (PM). Available at: <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>. Accessed: January 2021.

6 Qualitative Benefits

Paving will have qualitative benefits in addition to reducing particulate matter emissions. The reduction in emissions can improve the health and well-being of the Corridor while reducing strain on the local healthcare system. Additionally, if health impacts are avoided or mitigated, this can reduce the number of days of school and work lost to sick time, providing an economic benefit.

Paving will also keep the unpaved areas in good condition. Unpaved parking lots often cannot be used by people with special needs due to the poor condition of the surface. Less maintenance will be required for parking lots and roads as there will be fewer potholes and no need for gravel to be reapplied.

7 Key Project Parameters

7.1 Funding Amount and Eligible Costs

El Centro-Heber-Calexico: For projects sponsored by schools, grants for qualified projects will be provided for up to 100% of eligible project costs. For projects sponsored by municipal entities or non-profits, cost sharing is required at 25% of the total eligible project costs (i.e., AB 617 incentive funds will cover a maximum of up to 75% of eligible project costs). For projects sponsored by other entities, cost sharing is required at 50% of the total eligible project costs.

North-Imperial: For projects sponsored by schools, grants for qualified projects will be provided for up to 100% of eligible project costs. For projects sponsored by municipal entities or non-profits, cost sharing is required at 15% of the total eligible project costs (i.e., AB 617 incentive funds will cover a maximum of up to 85% of eligible project costs). For projects sponsored by other entities, cost sharing is required at 40% of the total eligible project costs.

Applicants who are awarded funding are required to solicit and select project materials and suppliers through a competitive bidding process. A minimum of two competitive bids must be obtained before a supplier is selected, and the selection must be approved by ICAPCD. If a contiguous parking lot, road, other unpaved area, or combination of unpaved areas is shared by more than one owner, only one grant shall be awarded.

The following costs are eligible for funding as part of this CERP strategy:

- Supplies, equipment, and materials
- Labor and construction (including contracted services)
- Signs and interpretive aids communicating information about the project

El Centro-Calexico-Heber: Additionally, up to 15% of the grant request may be budgeted for non-construction costs, including mobilization, traffic control, and administration. Another 5% may be budgeted for contingency costs.

North-Imperial: Additionally, up to 20% of the grant request may be budgeted for non-construction costs, including mobilization, traffic control, and administration. Another 20% may be budgeted for contingency costs.

The following costs are ineligible to receive funding as part of this CERP strategy:

- Cost of permitting and design; and
- Maintenance activities.

7.2 Project Life

Entities that receive grants to fund eligible projects are expected to maintain their project for a minimum of 10 years. During this time, entities must conduct as-needed maintenance such as repairing any potholes and re-painting of lines and comply with other requirements described in **Section 3.1** of this Project Plan. Additionally, entities must make the project available for inspection if requested by ICAPCD and/or CARB staff during this same contract period.

8 Project Selection

8.1 Selection Criteria

Applications received by the ICAPCD will be reviewed by and distributed to ICAPCD staff and the CSC. Projects will be scored by ICAPCD staff according to the criteria described below. These scores are meant to inform the decision making process, but will not be the determining factor for project selection. These criteria were informed by CSC input through a polling process in which CSC members completed surveys to indicate which characteristics of paving projects are most important for consideration.

Table 2. Project Scoring Criteria	
Scoring Criteria	Points Available
❖ Cost-Effectiveness ➤ \$/ton reduced ➤ Other funding available to reduce cost	0-40
❖ Exposure Benefits ➤ Proximity to sensitive populations ➤ How many residents would benefit from the project ➤ Project utilization rate	0-30
❖ Co-Benefits ➤ Handicap accessibility ➤ Vehicle accessibility ➤ Visibility improvements (reduced visible dust emissions) ➤ Improved surface conditions ➤ Sustainable construction (e.g., recycled material, high albedo material)	0-25
❖ Project Readiness ➤ Timeliness of project implementation ➤ Robust project work plan	0-5
TOTAL	0-100

9 Reporting Requirements

All projects that receive funding under this program must comply with the requirements described in Section H of the CAP Incentives 2019 Guidelines.¹¹ This will involve the preparation of Mid-Cycle and Yearly reports, which ICAPCD will prepare based on information collected from project participants. Some of the information to be included in these reports is described below:

- CAP Incentives reporting requirements for Mid-Cycle Reports:
 - Report the required project information in the CARL (Carl Moyer Program Clean Air Reporting Log) Database
 - Report program-level information in the CAP Incentives Supplemental Document for CERP projects funded with CAP incentives
- CAP Incentives reporting requirements for Yearly Reports:
 - Report the required project information in the CARL Database
 - Report program-level information in the CAP Incentives Supplemental Document for CERP projects funded with CAP incentives
 - Output generated by the Required Reports utility of CARL Database
 - Contract execution and liquidation status for each grant year of CAP incentives
 - A list of any projects identified as nonperforming and a brief narrative of any related enforcement actions

Participants must ensure that project-related information is complete, correct, supported by documentation, and supplied to the ICAPCD upon request for the preparation of reports. Meanwhile, the ICAPCD must acknowledge that the most up-to-date reporting requirements have been received and incorporated, and commit to maintaining documents in support of the reports at the ICAPCD office. Finally, this documentation must be made available to CARB staff upon request.

The above is not an exhaustive list of reporting requirements for participants in this program. Participants should refer to the CAP Incentives 2019 Guidelines for a complete list.

¹¹ CARB. 2020. *Community Air Protection Incentives 2019 Guidelines*. October 14. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-10/cap_incentives_2019_guidelines_final_rev_10_14_2020_0.pdf. Accessed: January 2021.