



AIR POLLUTION CONTROL DISTRICT

**IMPERIAL COUNTY
COMMUNITY EMISSIONS REDUCTION
PROGRAM: PROJECT PLAN
EXPANDED/IMPROVED SCHOOL FLAG PROGRAM**

EL CENTRO-HEBER-CALEXICO CORRIDOR

Rev. February 2021

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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Prepared by

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Abbreviations and Acronyms

AB	assembly bill
AQI	air quality index
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 ₁₀	respirable particulate matter
PM ₁₀	fine particulate matter
USEPA	United States Environmental Protection Agency

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), Comite 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-4, *Expanded/Improved School Flag Program*.

This document serves as the “Project Plan” for the Expanded/Improved School Flag Program 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

School flag programs are localized notification systems at schools that provide daily updates on the air quality status (i.e., the air quality index or “AQI”) in the area. They typically involve hoisting color-coded flags that reflect each day’s AQI. They can reduce exposure to criteria air pollutants by informing community members when ambient concentrations reach unhealthy or potentially hazardous levels. Under this strategy, the CERP proposes to fund flag programs at as many schools as possible within the Corridor. Funding will go towards establishing programs at schools which do not currently have them, as well as improving or modernizing programs at schools already utilizing them, as desired (e.g., installing an electronic marquee to provide notifications in lieu of flags).

1.3 Benefits

A well-functioning school flag project reduces exposure to criteria air pollutants like particulate matter and ozone for community members who might not otherwise keep track of local air quality conditions. Siting these notification systems at schools prioritizes exposure reduction for sensitive

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: November 2020.

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: November 2020.

receptors in the community. These projects can also increase a community's general understanding of the region's unique air quality challenges, the potential health impacts that poor air quality can have, and how to protect oneself against these impacts. The visual nature of the flags (or other notification system) provides a regular reminder to the community that air quality is an important factor when considering time spent outdoors, along with temperature and other weather effects.

2 Community Support

2.1 Background – Community Steering Committee

In late 2018, ICAPCD in conjunction with CCV assembled a steering committee for the El 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 Support for Expanded/Improved School Flag Program

2.2.1 Support by Community

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 this survey indicated that 55% of public attendees and 80% of CSC members were in favor of expanding the School Flag Program through funding available as part of the CAPP. Given this relatively strong support, Strategy M-4 – *Expanded/Improved School Flag Program* 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.

³ ICAPCD. 2019. *Imperial County Year 1 Community Emissions Reduction Program Plan for the El Centro-Heber-Calexico Corridor, Appendix B: AB 617 Community Steering Committee Charter*. October. Available at: https://docs.wixstatic.com/ugd/99eb03_080a305618f5453cb0c69272eb622946.pdf. Accessed: November 2020

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

2.2.2 Support by Schools

In July 2020, ICAPCD reached out to a number of schools within the El Centro Elementary School District to gauge the level of interest for participating in an enhanced electronic flag program for air quality notifications, as well as to evaluate the status of existing electronic marquees at participating schools. This outreach consisted of a brief survey completed by the schools' superintendent or principal. 100% of the schools surveyed indicated they were interested in participating in an enhanced flag program and that they would accept funds to improve or install and implement a color marquee for the program. Additionally, schools were asked if they currently have an electronic marquee, if it utilizes a color display, and what software program it runs. The survey responses indicated that seven schools already had functioning electronic marquees, while four did not.

3 Participant Requirements and Application Process

3.1 Participant Eligibility

Public and private elementary, middle, and high schools located within the El Centro-Calexico-Heber Corridor are eligible to apply for and receive funding for new/improved school flag programs. Applicants must commit to the following criteria in order for projects to be considered for funding grants:

- Applicants must work internally with the school's administration or other governing body, as applicable, to receive approval to install or improve upon the school's air quality notification system.
- Equipment (including flag poles or marquees) must be installed on land where the school has authority to do so (i.e., on school property). Should schools have their own requirements/governing bodies for these activities, the locations for equipment installation should be approved internally before an application for funding is submitted.
- Applicants are responsible for ensuring their projects comply with applicable building code and California Department of General Services, Division of the State Architect (DSA) requirements. Specifically,
 - Flag poles to be installed should not exceed 35 feet in height unless applicants first seek review and approval from DSA. Project designs that incorporate flag poles exceeding this threshold are required to submit proof of DSA review and approval along with their application.⁵
 - Apexes of other free-standing elements to be installed (including marquees) should not exceed eight feet above adjacent grades, unless applicants first seek review and approval from DSA. Project designs that incorporate free-standing elements exceeding this threshold are required to submit proof of DSA review and approval along with their application.⁶
- Schools must maintain the funded technology to the manufacturer's specifications during the entire contract period, five years.
- Schools must make the project available for inspection if requested by ICAPCD and/or CARB staff during the contract period, five years.

⁵ Flag poles less than 35 feet in height are exempt from review by DSA, per DSA Interpretation of Regulations A-22: Construction Projects and Items Exempt From DSA Review. Available at: https://www.dgs.ca.gov/-/media/Divisions/DSA/Publications/interpretations_of_regs/IR-A-22_rev_04-02-20.pdf. Accessed: November 2020.

⁶ Free standing elements with apexes less than eight feet above adjacent grades are exempt from review by DSA, per DSA Interpretation of Regulations A-22: Construction Projects and Items Exempt From DSA Review. Available at: https://www.dgs.ca.gov/-/media/Divisions/DSA/Publications/interpretations_of_regs/IR-A-22_rev_04-02-20.pdf. Accessed: November 2020.

- A designated school employee must be responsible for updating the notification system as appropriate on a regular basis (i.e., every day that school is in session), either manually or through automated software.
- During the entire contract period (five years), schools must notify the District if any maintenance or technological issues arise that prevent the equipment from operating as intended.

3.2 Application Process

Following internal approval (e.g., from the administration or other governing body in charge of decisions of this nature, should one exist), schools will submit applications that include the required information as describe in this Project Plan. ICAPCD will notify schools of dates of the application acceptance window. During this window, ICAPCD will be available to assist schools with completing their applications to ensure that the required elements are included and properly documented. Applicants are encouraged to engage with ICAPCD during this time. As described in the CERP, it is the goal of ICAPCD, CCV, and the CSC to award funding to as many schools as possible within the Corridor who meet the participant eligibility requirements described in **Section 3.1** of this Plan.

Once ICAPCD has collected applications from interested schools, 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 if they have 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 intended use and location of current/future notification system;
- School enrollment numbers and numbers of facility and staff;
- A commitment to update the notification system;
- Name of manufacturers and vendors of selected products;
- A commitment to provide photo documentation of the new equipment (if grant is awarded).

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

3.2.2 Application Submittal

Applications must be submitted to ICAPCD during the application acceptance window. To initiate this period, ICACPD will issue a public notification to advertise the availability of grant funds for this project type, provide instructions to access and submit the application, provide contact information for application assistance, and include a due date by which applications must be submitted. Once the application acceptance window 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 application acceptance window 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

This project type does not result in emissions reductions.

5 Relative Exposure Reduction

5.1 Mechanism of Exposure Reduction

For projects funded as part of this CERP strategy, the schools receiving funding will not only organize the purchase and installation of the air quality notification equipment, but actively manage the equipment to provide daily notification of the local AQI through utilization of the system. The notification system should be regularly updated to clearly display the forecasted AQI and designate its level of concern and associated color. If the applicant chooses to install an electronic marquee, it is recommended that they also display a description of the air quality, as described in the table below:⁷

Daily AQI Color	Levels of Concern	Values of Index	Description of Air Quality
Green	Good	0 to 50	Air quality is satisfactory, and air pollution poses little or no risk.
Yellow	Moderate	51 to 100	Air quality is acceptable. However, there may be a risk for some people, particularly those who are unusually sensitive to air pollution.
Orange	Unhealthy for Sensitive Groups	101 to 150	Members of sensitive groups may experience health effects. The general public is less likely to be affected.
Red	Unhealthy	151 to 200	Some members of the general public may experience health effects; members of sensitive groups may experience more serious health effects.
Purple	Very Unhealthy	201 to 300	Health alert: The risk of health effects is increased for everyone.
Maroon	Hazardous	301 and higher	Health warning of emergency conditions: everyone is more likely to be affected.

⁷ AirNow. *AQI Basics*. Available at: <https://www.airnow.gov/aqi/aqi-basics/>. Accessed: November 2020.

Additionally, action-based language is encouraged to be displayed on the marquee as part of the air quality notification. Examples of this language are provided in the table below, which shows recommendations from the USEPA on actions to take when the AQI value is driven by particulate pollution (PM₁₀ or PM_{2.5}):⁸

AQI Value	Actions to Protect Your Health From Particle Pollution
Good (0 - 50)	None
Moderate (51 - 100*)	Unusually sensitive people should consider reducing prolonged or heavy exertion.
Unhealthy for Sensitive Groups (101 - 150)	The following groups should <u>reduce prolonged</u> or <u>heavy</u> outdoor exertion: <ul style="list-style-type: none"> - People with heart or lung disease - Children and older adults
Unhealthy (151 - 200)	The following groups should <u>avoid prolonged</u> or <u>heavy</u> exertion: <ul style="list-style-type: none"> - People with heart or lung disease - Children and older adults Everyone else should reduce prolonged or heavy exertion.
Very Unhealthy (201 - 300)	The following groups should <u>avoid all</u> physical activity outdoors: <ul style="list-style-type: none"> - People with heart or lung disease - Children and older adults Everyone else should avoid prolonged or heavy exertion.

The recommended actions are similar among the different air pollutants, but not identical. If actions are to be recommended as part of the air quality notification, the operator of the electronic marquee who makes the AQI update is encouraged to look up the appropriate language based on the air pollutant driving the AQI that day. Within the Community, the pollutant of concern is most likely to be either particulate matter or ozone.

Displaying the AQI and associated information to the nearby community will serve as a reminder that air quality should be considered when community members are making everyday decisions related to outdoor activities. This will serve to reduce exposure to harmful air contaminants not only for particularly sensitive individuals, but the community at large.

⁸ USEPA. 2017. *Air Quality Index – A Guide to Air Quality and Your Health*. July. Available at: https://cfpub.epa.gov/airnow/index.cfm?action=aqi_brochure.index. Accessed: November 2020.

5.2 Estimates of Exposure Reduction

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

- Number of students enrolled at the school
- Number of faculty and staff employed by the school
- Grades served by the school (as a proxy for average age of students)

Exposure reduction will be estimated only on number of individuals in these broad categories. Each school will be required to include this information on their application for funding. However, as an added benefit to the nature of the program, family members involved in pick-up/drop-off duties and other community members not associated with the school can still be notified of air quality conditions. Community members walking or driving by the school are likely to notice the flags or electronic marquees displaying the air quality information and may tailor their outdoor behavior based on them. Therefore, additional exposure reduction benefits are likely to occur beyond those listed above.

6 Qualitative Benefits

The benefits of expanded and improved air quality notification programs at schools across the Community will be qualitative in nature and result from the community being more informed about daily air quality conditions. Community members knowing the daily AQI and understanding how to make smart choices about outdoor activities when the air quality is unhealthy is important for reducing the negative impacts of poor air quality, such as exacerbation of health problems like asthma. This can improve the health and well-being of the Community 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.

7 Key Project Parameters

7.1 Funding Amount and Eligible Costs

Grants for applicable projects will be funded depending on the degree of new equipment purchases required, up to a limit of \$25,000 per project. 100% of eligible projects costs will be funded up to this limit. 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. It is the role of ICAPCD to ensure that all costs are reasonable and applicable.

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

- Equipment to initiate or improve the air quality notification program, including but not limited to:
 - Supplies and materials
 - Construction costs
 - Installation costs

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

- Ongoing project maintenance
- Utility costs

As described in the CERP, it is the goal of ICAPCD, CCV, and the CSC to award funding to as many schools as possible within the Corridor who meet the participant eligibility requirements described in **Section 3** of this Project Plan. However, due to limited funding, certain projects may be prioritized based on the criteria described in **Section 8** of this Project Plan. Applicants are encouraged to engage with ICAPCD during the application acceptance window, when the ICAPCD will be available to answer questions and assist with application completion.

7.2 Program Cost

To estimate the total amount of AB 617 incentive funds that may be applied towards expanded/improved school flag projects, the number of qualifying schools within the Corridor was estimated. For this program, qualifying schools are defined as eligible schools (as described in Section 3.1 of this Plan) that are interested in participating in the program and that do not already have marquees with color displays under their ownership. To estimate this number of schools, the results of a survey conducted by the ICAPCD in July 2020 were referenced. In that survey, ICAPCD queried 11 schools in the El Centro Elementary School District if they were interested in participating in an enhanced, electronic flag program and if they were already in possession of an electronic marquee with a color display. Nine out of the 11 schools (approximately 82%) responded that they were both interested and did not currently own a color marquee, and thus would be considered as qualifying schools in the context of this Plan's enhanced school flag program. Extrapolating from this sample, if 82% of the 41 public or private elementary, middle,

and high schools within the Community (approx. 34 schools) receive the maximum grant of \$25,000, the total funding awarded for projects under this CERP strategy would be \$850,000.

7.3 Project Life

Schools that receive grants to fund applicable projects are expected to maintain their air quality notification programs for a minimum of five years. During this time, schools must maintain the funded technology to the manufacturer's specifications, while sustaining other aspects of the program, such as updating the daily AQI notification and other requirements described in **Section 3.1** of this Project Plan. Additionally, schools 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, CCV, 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 school air quality notification projects are most important for consideration.

Scoring Criteria	Points Available
❖ Exposure Benefits <ul style="list-style-type: none"> ➤ Number of students enrolled at school ➤ Number of faculty/staff employed by school ➤ Grade level of students 	0-70
❖ Project Readiness <ul style="list-style-type: none"> ➤ Existing marquee at school ➤ Existing school flag program at school ➤ Timeliness of proposed project implementation 	0-30
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.⁹ 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.

⁹ 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: November 2020.

**APPENDIX A
PROJECT APPLICATION FORM**

Application for Proposals: Expanded/Improved School Flag Program

**Imperial County Community Emissions Reduction Program (CERP) for the
El Centro-Heber-Calexico Corridor**



The Imperial Community Emissions Reduction Program (CERP) for the El Centro-Heber-Calexico Corridor and associated emission and exposure reduction projects are part of California Climate Investments, a statewide initiative that puts billions of Cap-and-Trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment — particularly in disadvantaged communities.

Expanded/Improved School Flag Program Proposal Application

For assistance completing your application, please call the Imperial County Air Pollution Control District at (442) 265-1800.

Date	_____
Project	_____ Please give your project a brief title.

Project Site Information

School Name	_____
Address	_____
City, State, Zip	_____
School Enrollment	_____
Faculty/Staff Count	_____
Grade Levels at School	_____

Applicant Contact Information

Applicant Name	_____
Applicant Telephone	_____
Applicant E-mail	_____
Other Information	_____

Project Summary

Please use this section to briefly describe your project, including where on the school's property the air quality notification system will be located.

Scope of Work

Describe the current status (if any) of the school's flag/air quality notification program. List any equipment currently owned by the school that is used for this program and describe where it is located and how it is implemented for air quality notifications.

Describe the additional equipment needed to implement the project as described in the Project Summary on Page 1. For a list of eligible and ineligible project costs, see Section 7 in the *Imperial County Community Emissions Reduction Program: Project Plan – Expanded/Improved School Flag Program*.

Describe how the funded equipment will be used to provide air quality notifications at the school. Refer to Section 5 in the *Imperial County Community Emissions Reduction Program: Project Plan – Expanded/Improved School Flag Program*. If a software is to be used for automatic updates to the AQI displayed, please describe.

Describe any zoning or other legal restrictions that may apply to the project (e.g., limits on the height of electronic marquees). Note: It is the responsibility of the project applicant to ensure the project is legally allowed to proceed as described in this application.

Project Funding and Implementation

Describe the estimated costs of the project:

Supplies and Materials _____

Construction Costs _____

Installation Costs _____

What is the requested funding amount to be used towards eligible project costs? _____
 (Note: a maximum grant amount of \$25,000 is available for this project type)

How much additional funding has been secured for this project? Amount: _____ Source: _____

Provide an estimated timeline for project implementation, assuming the project is notified of grant approval within 60 days of submittal of this application.

Date	Action

Describe the measures that will be utilized to ensure completion of the project within the indicated time

Identify the key individuals responsible for project implementation and their roles.

Name	Title/Position	Project Role

Project Commitment

The applicant commits to the following requirements:

- Applicant has read and understands the *Imperial County Community Emissions Reduction Program: Project Plan – Expanded/Improved School Flag Program* and all program requirements therein.
- Applicant will work internally with the school's administration or other governing body, as applicable, to receive approval to install or improve upon the school's air quality notification system prior to submittal of this application
- Schools will install equipment (including flag poles or electronic marquees) on land where the school has authority to do so (i.e., on school property), and obtain approval from the school's administration or other governing body, as applicable, to receive approval for the location where equipment is to be installed.
- For projects not exempt from review by the California Department of General Services, Division of the State Architect (DSA), applicants will provide proof of DSA review and approval along with their application.
- Schools will maintain the funded technology to the manufacturer's specifications during the contract period, five years.
- Schools will make the project available for inspection if requested by ICAPCD and/or CARB staff during the contract period, five years.
- Schools will notify the District if any maintenance or technological issues arise that prevent the equipment from operating as intended during the contract period, five years.
- Project will be sufficiently utilized as demonstrated in the application in order to provide air quality notifications at the school.
- Applicant will provide proof of purchase (e.g., receipt) of the equipment purchased, as well as photo documentation of the new equipment once it has been installed.
- Applicant will ensure that project-related information is complete, correct, supported by documentation, and supplied to the ICAPCD upon request for the preparation of reports.

Date _____

Signature _____