



AIR POLLUTION CONTROL DISTRICT



**IMPERIAL COUNTY
Annual Progress Report for the AB 617
Community Emissions Reduction Plan
of the El Centro-Heber-Calexico
Corridor**

OCTOBER 2020



**Imperial County Air Pollution Control District
150 South 9th Street
El Centro, CA 92243**

Introduction

On July 26, 2017, California Governor Jerry Brown signed into law Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes 2017), which amended and added sections to the California Health and Safety Code regarding air pollution. This bill directs the California Air Resources Board (CARB) and local air districts throughout the state (including the Imperial County Air Pollution Control District [ICAPCD or “Air District”]) to enact measures to promote public health and welfare by reducing air pollution on a local scale, particularly in communities that are disproportionately burdened by air pollution. AB 617 was designed to accomplish this via the establishment of the Community Air Protection Program (CAPP), which puts the emphasis on community-focused actions that go beyond the regional and statewide air quality programs already in place.

In anticipation of the selection of communities to participate in the CAPP, both local air districts and citizens alike identified communities and submitted nominations to CARB. On August 3, 2018, ICAPCD partnered with a local advocacy and environmental justice group known as Comite Civico del Valle, Inc. (“CCV”) to author a report entitled *Imperial County AB 617 Community Nominations*.¹ This report proposed the nomination of the community of El Centro-Heber-Calexico (Corridor) to CARB, to be selected to participate in the first year of CAPP, given the Corridor’s health, socioeconomic, and air quality conditions of this group of two cities (Calexico and El Centro) and one unincorporated community (Heber).

On September 27, 2018, CARB selected ten Year 1 statewide communities to participate in the CAPP, and the El Centro-Heber-Calexico Corridor was chosen for both community air monitoring and a community emissions reduction program (CERP). Soon thereafter, the ICAPCD in conjunction with CCV assembled a steering committee for the Corridor known as the AB 617 Community Steering Committee (CSC). This group provided input to the ICAPCD in developing the CERP for the Corridor during monthly (and occasionally bi-weekly) CSC meetings that were open to the public. On October 8, 2019, the ICAPCD Board adopted the CERP for the Corridor, which provides the framework to reduce emissions at the local scale by identifying targets and implementing strategies to improve local air quality in the Corridor.

Annual Report Background

The CARB Community Air Protection Blueprint (Blueprint), a guidance document developed for the CAPP and AB 617 communities, requires local air districts to prepare and publish annual progress reports that summarize implementation efforts of their adopted CERPs. This first annual report includes the progress made for implementing the CERP of the El Centro-Heber-Calexico Corridor, from the period of local CERP adoption (October 8, 2019) through September 25, 2020.

The ICAPCD developed this report based on the guidelines of the CAP Blueprint, covering the following subjects for the Corridor’s CERP:

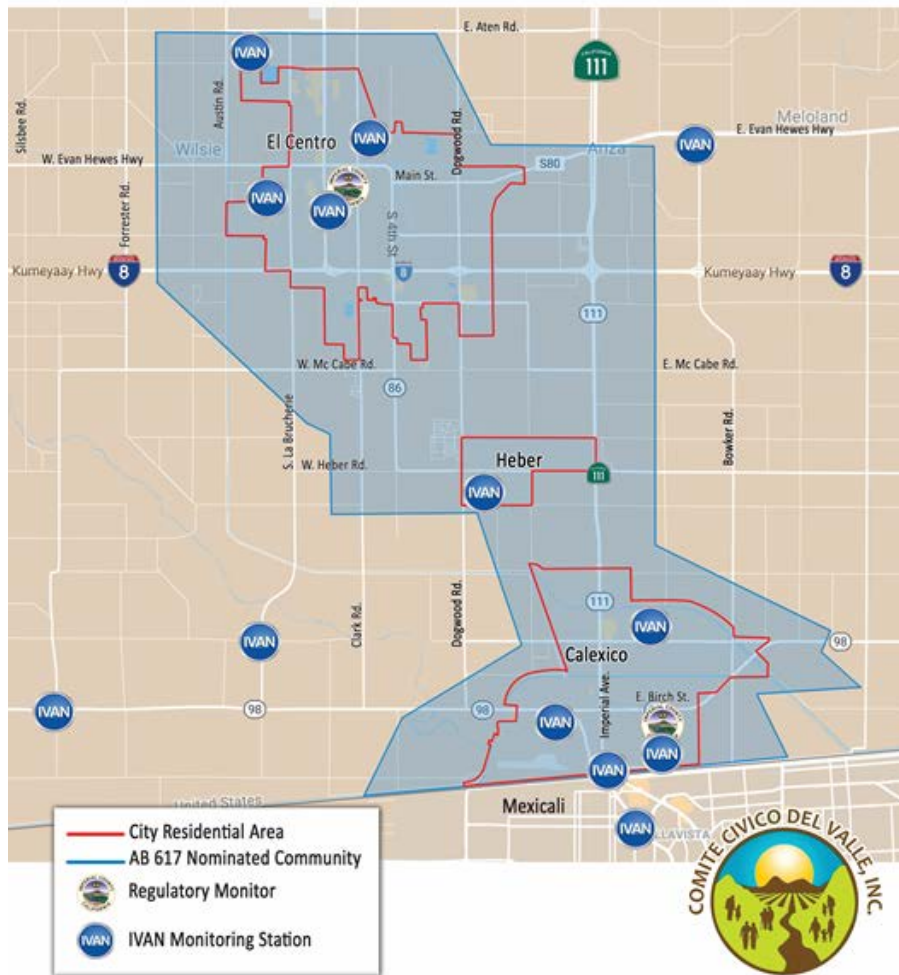
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¹ Available at: <https://ww2.arb.ca.gov/resources/documents/imperial-county-ab617-community-nominations-submitted-partnership-comite-civico> Accessed: September 2020.

Changes to Community Profile

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. The approved and present boundary for the Corridor is shown below:

IMPERIAL COUNTY AB 617 SELECTED CORRIDOR Calexico, Heber, El Centro



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.² According to recent

² Southern California Association of Governments, Potential Economic Impacts of COVID-19 in the SCAG Region. https://www.scag.ca.gov/Documents/scag-COVID-19-White-Paper_FINAL_2020-0514.pdf,

online data published by the Imperial County Public Health Department, a total of 317 deaths have been confirmed since the start of the pandemic through September 23, 2020.³ ICAPCD will continue to evaluate the short-term and long-term ramifications of the pandemic on Imperial County and the Corridor.

CERP Overview

The CERP presents objectives and methodologies for the El Centro-Heber-Calexico Corridor in Imperial County. The CERP addresses the planning elements established in the Blueprint, with each planning element assisting the Air District in meeting two main health-based objectives, which are:

- Maximizing progress on reducing exposure to toxic air contaminants (TACs) that contribute to cumulative exposure burdens within selected communities; and
- Reducing exposure caused by localized particulate matter less than 2.5 microns in aerodynamic diameter (PM_{2.5}) sources to achieve healthful levels of PM_{2.5} within the community.

The CERP demonstrates how the Community intends to satisfy these health-based objectives through the selection of targets and implementation of local emission reduction strategies. The CERP is divided into five main sections, which are summarized as follows:

Technical Assessment

The CERP includes a robust analysis (i.e., “Technical Assessment”) on the existing conditions in the Community, which helps in the identification and selection of targets and strategies. The Technical Assessment analyzes existing air quality policies and programs, identifies locations of emission sources and sensitive receptors, and provides an overview of existing land use policies. It also evaluates the existing air quality exposure burden in the Corridor through a review of historic air quality data. To complement this analysis, CARB developed a community-level emissions inventory for criteria air pollutants and TACs. That analysis showed that the top five contributors to the Community’s PM_{2.5} emissions are: fugitive windblown dust (50.2%), fuel combustion from stationary and area-wide sources (8.8%), unpaved road dust (8.3%), on-road and off-road mobile sources (7.9%), and cooking (6.3%).

Targets and Strategies

The emission reduction targets and strategies in the CERP were developed using information compiled from the Technical Assessment and input from the CSC and public. The strategies chart a path towards continuing long-term emissions reductions of PM_{2.5} and TACs in the Corridor. A total of 28 strategies are included in the CERP, which consist of regulatory, air quality permitting, enforcement, incentives-based, land use, transportation, and mitigation strategies. Five of these strategies, as presently designed, are expected to result in quantifiable reductions in emissions and formulate the emission reduction targets of the CERP. The complete list of these strategies, and the status of implementation, are attached to this report as Appendix A - *Status of CERP Strategies for El Centro-Heber-Calexico Community Corridor*.

Accessed September 2020.

³ Imperial County Public Health Department, Imperial County COVID-19 Dashboard. <https://www.arcgis.com/apps/opsdashboard/index.html#/684c52c01a0c4dbda380d7b905ef0b46>, Accessed September 2020.

Additional strategies are also expected to result in emission reductions; however, these strategies, which are classified as Tier 2, are currently in the planning stages and projections of reductions are not available at this time.

Enforcement Plan

Enforcing air quality rules and regulations is paramount to achieving air quality goals, including the commitments made in the CERP. The CERP includes a three-year retrospective review of enforcement in the Corridor to inform the development of targets, strategies, and the Enforcement Plan. This review includes a summary of complaints received and their resolution, a listing of permitted facilities and their type, the number and type of inspections conducted, data on issuance of Notices of Violation (NOVs) and Notices to Comply (NTCs), an assessment of compliance with CARB and ICAPCD rules and regulations, and a discussion of opportunities for enhanced enforcement activities. Additionally, ICAPCD committed in the CERP to enhance certain enforcement measures to improve compliance rates in the Corridor. CARB's goal under the CERP is to achieve the same or higher compliance rates in the Corridor as observed in its three-year review.

Status of CERP Strategies

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.



Caption: Approval of the CERP by the CSC, October 2, 2019 (Heber, CA)

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 2020.⁴ 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.

As previously stated the Air District put together Appendix A, attached to this annual report, which summarizes the status of the implementation of each of the 28 CERP strategies for the Corridor. The Appendix includes various details on the progress of all strategies, and the work that is to come in 2020-2021 in further advancing the commitments of the CERP.

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* to this annual report.

Qualitative Assessment of CERP Progress

This section contains descriptive evaluations of the progress of various CERP strategy categories for the Corridor, based on implementation activities carried out from October 2019 through September 2020. This section concludes with a subsection discussing the lessons learned by the Air District and the CSC in 2019-2020, in developing and implementing the CERP, and conducting our monthly CSC meetings that are open to the public. For further details on the progress of the CERP strategy categories, please see Appendix A.

Regulatory

Types of regulatory strategies that were included in the CERP consist of the Air District implementing an expedited schedule for Best Available Retrofit Control Technology (BARCT) and updating ICAPCD Policy #34, "Agricultural Burning Procedures for Allocating Acreage, Burn Day Decision, and Tracking." This category also includes Air District coordination with CARB to quantify the impact that proposed CARB regulatory measures/amendment could have on the

⁴ San Francisco Chronicle, In California's hardest-hit county, fear and death mix with anger. <https://www.sfchronicle.com/politics/article/In-California-s-hardest-hit-county-fear-and-15378231.php>, Accessed September 2020.

Corridor. Per the CERP, CARB will update the CSC biannually on the progress and milestones of the regulatory development process for each regulations that could impact the corridor.

The Air District implemented the expedited schedule for BARCT in 2019, evaluating two sources located outside the Corridor – Spreckles Sugar Company, Inc. (Brawley, CA) and U.S. Gypsum Company (Plaster City, CA) – that are subject to this strategy. The Air District evaluated the cost-effectiveness to install additional retrofitting to reduce emissions for Spreckles Sugar from their large industrial boilers and for U.S. Gypsum from their wallboard kilns. Upon reviewing available emissions control options and their cost-effectiveness, the Air District concluded that any additional retrofitting was not cost-effective, and therefore, both sources complied with BARCT requirements. Additionally, Air District Rule 400.2 “Boilers, Process Heaters and Steam Generators,” was amended to incorporate expedited BARCT requirements, and was adopted by the Air District Board on November 26, 2019.

The Air District updated policy #34 in 2019, with several enhancements made to reduce the maximum allowable acres burned per day and improved management of burns and “Special Burns” in the County. Revised Policy #34 reduced the maximum number of acres burned in any single day from 2,000 to 1,600, with a maximum of 400 acres per quadrant of Imperial Valley, and also increased the “Special Burns,” radius from 1.5 miles to 2.0 miles surrounding residential areas, schools, and heavily traveled roads. The updated policy also prioritized burns with smaller acreages (<70 acres) and providing growers the option to divide their fields into smaller sections to request permission to burn these smaller sections on an individual basis. The Air District began implementing Revised Policy #34 on November 14, 2020, and from that date through September 16, 2020, the maximum daily acreage that was burned on a single day in Imperial County was 996 acres. For additional details, please refer to Appendix A.

Air Quality Permitting

Under this category, the Air District committed to utilize CARB’s Technology Clearinghouse, which will result in the substitution over time of older control technologies with newer, better efficient ones to reduce air emissions to a larger degree. ICAPCD Staff began incorporating the preliminary tools in CARB’s Technology Clearinghouse for the evaluation of new or modified permitted sources within and directly surrounding the Corridor in October 2019. With the Technology Clearinghouse still under development (BACT and TBACT components being developed by CARB), the Air District is anticipating to use the Clearinghouse for an increase amount of evaluations in the years to come. In the past year, the Air District analyzed eleven (11) new permit applications with applicable sources for BACT and T-BACT compliance with Air District Rules and Regulations. A list of the source types evaluated are included in Appendix A.

Enforcement

The Air 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 the Air District updated in this annual report in detail in Appendix A. The following are some of the highlights of CERP implementation of enforcement strategies.

The Air 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 ICACPD 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 Air District is planning to host various cross-agency trainings of Air District Rules to improve violation response time and to hold an annual training for the community and specific industry to improve compliance. The Air District will schedule an agricultural burning training session to the farming community, with assistance from the Imperial County Farm Bureau, and training of the Air District's Fugitive Dust Rules (Regulation VIII) to local construction companies between October and December of this year. In the past year, the Air 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 Air District's Fugitive Dust Rules.

On August 31, 2020, the Air District made improvements to the official ICAPCD website to increase public access to filing air quality complaints and more accurately capture complaint information. The Air District added a feature to allow the public file a complaint online, which can be accessed through the home page of the ICACPD'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.

As part of this annual report, the Air 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 Air District and violators. Finally, the non-compliance rate of permitted facilities in the Corridor for 2019 was 26%. For additional details, please refer to Appendix A.

Land Use

Land use strategies assist with addressing issues resulting from the proximity of sensitive receptors to various emission sources. Although local city and county planners generally make land use decisions, the State of California now required planners to consider air quality and environmental justice in land use decisions.

One of the central land use strategies in the CERP is the tracking and reviewing of local general plan updates by the Air District and CSC to assess if a local action has the potential to affect air quality or exposure in the Corridor. The Air District held meetings in September 2020 with the Imperial County Planning & Development Services to determine the agency's schedule for updating Land Use Policies in the Corridor, and with the City of El Centro, as the City is currently developing a new Environmental Justice (EJ) Element to their General Plan. As this is classified as a Tier 2 strategy and an ongoing process through the next five years, the Air District will continue coordinating with local jurisdictions in the Corridor to be a part of the review process for general plan updates.

The Air District is also in the process of coordinating with local agencies and stakeholders to schedule a meeting before the close of 2020 that will examine the feasibility of implementing emission reduction measure in open areas and/or desert areas west of the Corridor. This too is a Tier 2 strategy that will require the input of local experts and stakeholders in order to identify potential barriers in assessing the feasibility of implementing emission reduction measures in these areas, and determine a path forward for additional measures that can be classified as Tier 1 or 2 strategies in 2021 and beyond.

Transportation

The proximity of mobile emission sources to various sensitive receptors (i.e. schools, residences, hospitals, etc.) in the Corridor has the potential to exacerbate the cumulative exposure burden. As such, the Air District included various Tier 2 strategies in the CERP for developing additional measures to reduce the impact of mobile emissions to the populace in the Corridor. Some of these strategies for the Air District include: 1) assessing the feasibility of implementing measures to reduce the impact of activities at the border; 2) soliciting input from local sensitive receptors to determine if installing signage to discourage vehicles idling near these receptors would be beneficial; and 3) to partner with CARB to administer outreach to reduce the amount of truck idling in the Corridor.

The Air District is currently planning to reach out to local transportation agencies, sensitive receptor facilities, and CARB to schedule remote meetings and a public workshop to discuss the feasibility of these measures and to provide education to reduce truck idling. The Air District will schedule these gatherings to take place by December 2020.

Incentives/Mitigation

Incentive-based and mitigation strategies identified in the CERP will lead to direct emission reductions and exposure reductions for the Corridor, which in turn will also improve local air quality conditions for Imperial County. The following is an overview of the assessment of these CERP strategies.

The Air District is participating in the Woodsmoke Reduction Program, administered by CARB, which consists of offering financial incentives for replacing residential wood burning devices with more efficient equipment. The Air District currently has nine (9) signed agreements with residents that will replace their wood burning devices, and two (2) additional agreements are pending for finalization. A remote meeting, held on Zoom, will take place in October 2020 between equipment vendors and ICAPCD Staff, with a second meeting to occur before the close of 2020 with residents to answer questions regarding the program.

The Air District in 2020 has been seeking input from the CSC to develop the required Project Plans for both the implementation of urban greening projects and parking lot paving projects in the Corridor. The CERP commits to initially designating a minimum of \$200,000 in implementing urban greening projects, with the objective to monitor other potential grant programs for additional funding. The CERP also commits for the Air District to implement parking lot paving projects, based on the input from the CSC, and local public works departments and representatives from the communities in the Corridor. The Air District met with the City of Calexico, the City of El Centro throughout 2020 to identify potential locations of projects for these two mitigation strategies, and the processes for implementing these type of projects in their jurisdictions. The Air District is intending to finalize the Project Plans, which set the project application and implementation criteria, to CARB for approval prior to the end of 2020.

As an early emission reduction project, the Air District completed a parking lot paving project at Calexico High School (Calexico, CA) in late 2019. The project consisted of paving the bus and staff parking lots at the Maintenance and Operations building at Calexico High, which results in an annual PM_{10} emission reduction of 2.26 tons/year. For details, please refer to Appendix A.



Caption: Ribbon Cutting Ceremony for Calexico High School Paving Project, October 4, 2019

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 Plant to CARB for approval before the end of the 2020 calendar year.

Another strategy in this category consists of the commitment to fund the replacement of five (5) older school buses with zero emission (electric) school buses over the next five years. The Air 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 Air District will release a Request for Proposal (RFP) in fall 2020 to receive project proposals from school districts in the Corridor.

The final mitigation strategy included in the CERP is the installation of air filtration systems at sensitive receptor locations such as schools in the Corridor. It has been demonstrated that these systems significantly reduce concentrations of particulate matter (diesel and fugitive dust) and other pollutants in the indoor environment. The Air District has moved forward with implementation of installing air filtrations systems at 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 refer to Appendix A.



Caption: HVAC unit with IQAir High Performance Filter (Heber School, Heber, CA)

Lessons Learned

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 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.

Interim Milestones

With the CARB approval of the CERP on January 15, 2020, the CARB Governing Board included a set of interim implementation milestones for the Air District, CCV, and the CSC to achieve as the CERP is implemented for the Corridor. The following is an overview of the progress made toward the four interim implementation milestones directed by the CARB Governing Board.

1. The first interim milestone directs the continued development of Tier 2 strategies, including the identification of additional strategies to further reduce PM_{2.5} and TAC emissions.

As previously stated in this report, and detailed in Appendix A, 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.

2. *The second interim milestone consists of the need to develop specific criteria for project prioritization and selection for funding for various mitigation strategies, with this criteria including clear background information to show how projects and locations are prioritized.*

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.

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. For further information on the progress on this interim milestone, please examine the individual strategy updates in Appendix A.

3. *The third interim milestone directs the continued coordination of CERP activities with California cross-border pollution related activities, and include in these efforts groups such as the United State Environmental Protection Agency (U.S. EPA), California Environmental Protection Agency, Border Relations Council, Commission of the Californias, and CARB.*

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 “Ambientalizate,” was established by ICACPD 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.



Caption: Screenshots of television ad as part of “Ambientalizate,”

4. *The fourth and final interim milestone directs CARB staff, ICACPD, and CCV to continue developing support strategy and design a process that defines a schedule and appropriate lead time to allow the CSC to review documents, ask questions, and provide feedback.*

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.

Summary of CERP Adjustments

The Air District and CCV are in the process of conducting a one-year review of the CERP for the Corridor with the CSC to determine what objectives, strategies, and information needs to be updated or expanded as implementation of the CERP proceeds in 2020 and beyond. The CERP stands as a living document which can be amended as needed through this five-year timeline of the CERP, per CAPP requirements, as new data and information is gathered, lessons are learned by the partnering agencies and CSC, and new strategies are developed and included in the CERP.

Appendix A – Status of CERP Strategies for El Centro-Heber-Calexico Community Corridor

Strategy Category	Strategy Description	Status of Implementation
Regulatory	Identification of potential control options on two industrial sources subject to expedited BARCT (Best Available Retrofit Control Technology) schedule, but are located outside the Corridor.	<ul style="list-style-type: none"> • Draft Amended Rule 400.2 (<i>Boilers, Process Heaters, and Steam Generators</i>) released for public review on October 23, 2019. • Revised Rule 400.2 formally adopted by District Board on November 26, 2019. • District performed the analysis and outreach to satisfy this strategy. Two facilities were subject to expedited implementation of BARCT - Spreckels Sugar Company, Inc. and U.S. Gypsum Company. Upon reviewing available emissions control options and their cost-effectiveness, the District concluded that any additional retrofitting was not cost-effective, and therefore, both sources complied with BARCT.
Regulatory (Air Quality Permitting)	District will utilize CARB's Technology Clearinghouse as a reference in developing BACT and T-BACT for any new or modified source permitting processes within or directly surrounding the Corridor.	<ul style="list-style-type: none"> • October 2019 - District began utilizing preliminary tools offered under CARB's Technology Clearinghouse. • District analyzed 11 new permit applications in the past year for sources within or directly adjacent to the Corridor for BACT and T-BACT compliance with District Rules and Regulations. • 11 applications consisted of following source types: 3 gasoline service stations, 2 emergency generators, 3 paint booths, 1 sandblasting activity, 1 aggregate facility, and 1 crematory.
Regulatory/Mitigation	District has updated their Policy #34 "Agricultural Burning Procedures for Allocating Acreage, Burn Day Decisions and Tracking".	<ul style="list-style-type: none"> • District released Drafts of Updated Policy #34 on 02/13/2019; 03/14/2019; and 06/19/2019 • Updated Policy approved and began implementation on 11/14/2019. • Maximum daily burns recorded on any given day has been 966 acres, which is well below the revised limit of 1,600 acres per day. Total estimated maximum PM_{2.5} emissions is 16.1 tons, which is 10 tons less than estimated maximum daily emissions. The new policy increased the number of agricultural fields defined as "Special", ensuring that field burn smoke impacts are minimized to the greatest extent.

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Strategy Category	Strategy Description	Status of Implementation
Enforcement (Community Measure)	District is in the process of installing cameras in the desert, outside of the Corridor, and will make this video available to the public to monitor for potential exposure concerns of fugitive dust.	<ul style="list-style-type: none"> • District is in process of finalizing agreements to purchase two cameras and associated hardware for two sites. The two identified locations are Superstition Mountain (approx. 16 miles northwest of El Centro) and Toro Peak (approx. 24 miles northwest of Desert Shores). • District is working with University of California, San Diego (UCSD) to host the camera feeds through their online camera video network. • Implementation was delayed due to COVID-19 pandemic and wildfires in Southern California. District is committed to having cameras installed and operating by Aug. 2021.
Enforcement (Community Measure)	District to perform cross agency training of their rules to help with the identification of specific types of violations.	<ul style="list-style-type: none"> • Presentations on Agricultural Burning and Residential Burning are being developed and will be given to County Fire and Sheriff's, and City Fire and Police Departments. • Presentations on Fugitive Dust Rules are in development and will be given to County & City Building Departments. • The proposed cross agency trainings will be scheduled for October 2020, occurring remotely through Zoom.
Enforcement (Community Measure)	District is proposing to provide annual training to industry, with certain focused training available upon request. Along with enforcement related workshops geared for the community.	<ul style="list-style-type: none"> • Agricultural Burning training will be provided to farming community through coordination with I.C. Farm Bureau. • Training for District's Fugitive Dust Rules was provided to Imperial Irrigation District (IID) on 12/12/19 and 01/23/20. This training will also be provided to local construction companies in October 2020.
Enforcement (Community Measure)	District is proposing to increase community outreach through the publication of a quarterly newsletter to include information on enforcement statistics and rule changes.	<ul style="list-style-type: none"> • April 2019 – District published ICAPCD Bulletin, Vol. 1. • June 2019 – District published ICAPCD Bulletin, Vol. 2. • January 2020 - District published press release and news video on the approval of the CERP by the California Air Resources Board on Jan. 15, 2020. • Due to severity of COVID-19 pandemic in Imperial County, some District Staff was reassigned to respond to the crisis. Since conditions have recently improved, District is resuming normal operations, and newsletters will resume publication on a quarterly basis in Fall 2020.

Strategy Category	Strategy Description	Status of Implementation
Enforcement (Community Measure)	District and CARB are proposing to form a dedicated enforcement outreach team made up of staff from the agencies to actively engage with the CSC and respond to community concerns.	<ul style="list-style-type: none"> • District and CARB Staff have regularly engaged with the AB 617 Community Steering Committee (CSC) at their monthly meetings in 2019 and 2020. • District will give a comprehensive update on recent Enforcement Activities at Oct. 14, 2020 CSC meeting. • District and CARB will meet in Fall 2020 to formally establish a dedicated outreach team by end of 2020.
Enforcement (Complaint Response Measure)	District to facilitate the complaint process in order to increase public access to filing complaints and more accurately capture complaint information.	<ul style="list-style-type: none"> • August 2020 – Upgrades finalized to District website, with a new feature to public to file a complaint online, and publishing the complaint phone number. • As of September 16, 2020, there have been no complaints submitted through the online complaint form.
Enforcement (Complaint Response Measure)	District is proposing to revise internal Policy #17 "Guidelines for Staff Processing and Investigation of Complaints".	<ul style="list-style-type: none"> • Revised Policy #17 is currently under internal District review, with changes based on the best methods that can be implemented locally. • An update on this policy will be provided to the AB 617 Community Steering Committee (CSC) in Fall 2020. • District will then have CARB review Revised Policy #17 and finalize the policy by December 2020.
Enforcement (Improvements)	District is proposing to revise internal Policy #18 "Notices of Violation Issuance and Follow Up" and Policy #28 "Notices to Comply - Administrative Guidelines".	<ul style="list-style-type: none"> • Revisions to Policy #18 and #28 are currently in development. District has the goal to finalize revisions to these policies by December 2020. • An update on this policy will be provided to the AB 617 Community Steering Committee (CSC) in Fall 2020.
Enforcement (Improvements)	District is proposing to perform an annual retrospective review of enforcement statistics in order to identify areas of improvements.	<ul style="list-style-type: none"> • Annual review of this data is provided in this Annual Report, published on 10/01/20, based on permitted inspections in the Corridor conducted in 2019. • There was a total of 251 inspections conducted out of a maximum of 253 that could be performed. • Corridor: 26 Notices to Comply (NTCs) were issued in 2019; 49 Notices of Violation (NOVs) were issued in 2019. All NTCs & NOVs issued in 2019 were resolved. • Corridor: 57 complaints were filed in 2019. • Corridor: The non-compliance rate for 2019 was 26%.

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Strategy Category	Strategy Description	Status of Implementation
Land Use	District to track and review local general plan updates on a quarterly basis and issue comment letter when local action has the potential to affect air quality or exposure in the Corridor.	<ul style="list-style-type: none"> • District held a meeting with County Planning & Development Services to determine agency's upcoming schedule of reviewing Land Use Policies in the Corridor. • District held a meeting with the City of El Centro, who are in process of developing a new Environmental Justice (EJ) Element to their General Plan. • District will work with City of El Centro to make available the Draft EJ Element to the CSC for their review, and to present at a CSC meeting in Nov/Dec. 2020.
Land Use	District to assess the feasibility of implementing emission reduction measures in the open areas and/or desert areas west of the Corridor.	<ul style="list-style-type: none"> • Tier 2 Strategy that is currently in development. • District will coordinate with local agencies and stakeholders to schedule a meeting before the close of 2020 to discuss the feasibility of measures for this strategy.
Transportation	District to assess the feasibility of implementing measures that reduce the impact of activities at the border, such as the evaluation of alternative routes for traffic coming through the ports-of-entry.	<ul style="list-style-type: none"> • Tier 2 Strategy that is currently in development. • District will coordinate with local transportation agencies to schedule a meeting before the close of 2020 to discuss the feasibility of measures for this strategy.
Transportation	District to solicit input from local school districts, senior facilities and medical centers to determine if installing signage that encourages vehicles not to idle near these sensitive receptor land uses would be found beneficial.	<ul style="list-style-type: none"> • Tier 2 Strategy that is currently in development. • District will reach out to these affected groups/sensitive receptors to schedule a workshop by December 2020 to gather input and determine feasibility of signage at these locations.
Transportation	District to partner with CARB to conduct education and outreach to reduce the amount of truck idling in the Corridor.	<ul style="list-style-type: none"> • Coordination efforts between District and CARB were delayed due to the COVID-19 pandemic. • Public workshop will be held remotely with CARB by December 2020 for local heavy-duty truck fleets to provide education to reduce idling.

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Strategy Category	Strategy Description	Status of Implementation
Incentives-Based	District to participate in the Woodsmoke Reduction Program administered by CARB. Identification of three projects for replacement of residential wood burning device with more efficient equipment.	<ul style="list-style-type: none"> • October 2019 – District conducted surveys. • June 2020 – District sent letters to participants. • Fall 2020 – District will hold remote meetings with vendors and residents to answer questions. • District currently has 9 signed agreements, with two additional agreements pending, for the replacement of wood burning devices. • Due to COVID-19 pandemic, District was not able to access homes for pre-inspections. All conversations were done over the phone with interested parties.
Incentives-Based	District will monitor for and identify potential grant programs for urban greening projects. Any funding obtained would be put towards projects sought under Urban Greening Projects (Mitigation Strategy).	<ul style="list-style-type: none"> • Tier 2 Strategy that is currently in development. • District is continuing to monitor potential grant programs. • February 2020 - District met with City of Calexico to discuss potential locations for urban greening projects. • March 2020 – District met with City of El Centro to discuss potential locations for urban greening projects.
Mitigation	Urban Greening Projects: District is proposing to initially designate a minimum of \$200,000 in funding towards the implementation of urban greening projects within the Corridor.	<ul style="list-style-type: none"> • District is working with CSC to develop the Project Plan to establish the project criteria for this mitigation strategy. • June 2020 – City of Calexico gave a presentation to the CSC on potential urban greening project locations. • This strategy will be implemented once the Project Plan, is approved by CARB. The Project Plan is being developed with input from the CSC, and will be submitted to CARB for approval prior to the end of 2020.
Land Use	District to identify locations that could benefit from paving projects to mitigate fugitive windblown dust and unpaved road dust. This would inform the projects sought under Parking Lot Paving Projects (Mitigation Strategy).	<ul style="list-style-type: none"> • Strategy is currently in progress. • February 2020 – District met with City of Calexico Public Works to discuss potential locations for this strategy. • March 2020 – District met with City of El Centro Public Works to discuss potential locations for this strategy. • August 2020 – District held Zoom workshop with Corridor School Districts to discuss potential paving projects at their schools. • September 2020 – District met with El Centro City Manager to discuss new potential locations. District also met with Calexico City Manager to discuss proposed Calexico Alleyways Paving Project.

Strategy Category	Strategy Description	Status of Implementation
Mitigation	<p>Air Filtration Systems: District is proposing to install air filtration systems on up to 240,000 square feet of building space at sensitive receptor locations including, but not limited to, schools and senior centers.</p>	<ul style="list-style-type: none"> • July 2020 – Air Filtrations systems were installed at Dogwood Elementary School (Heber, CA) and Heber School (Heber, CA) • September 2020 – Air Filtration system installed at De Anza Magnet School (El Centro, CA). • These systems consist of IQAir North America, Inc. (IQAir) NanoMax™ High Performance Filters, with a MERV Rating of 16, which reduce the exposure of air emissions to sensitive receptors by filtering up to 95% of airborne particles such as PM_{2.5}. • District is working with IQAir to schedule assessments and installation of air filtrations systems at Corridor Schools, based on the input from the CSC.
Mitigation	<p>Parking Lot Paving Projects: District is proposing to fund parking lot paving projects within the Corridor, as funding permits.</p>	<ul style="list-style-type: none"> • July 2019 – CSC approved Calexico High School parking lot paving project as early emissions reduction project; providing funding up to \$203,240 for the project. • District is working with CSC to develop the Project Plan to establish the project criteria for this mitigation strategy. • This strategy will be implemented once the Project Plan, is approved by CARB. The Project Plan is being developed with input from the CSC, and will be submitted to CARB for approval prior to the end of 2020.
Mitigation	<p>Expanded/Improved School Flag Program: District is proposing to assist as many schools as funding permits in the Corridor in implementing the School Flag Program.</p>	<ul style="list-style-type: none"> • District is working with CSC to develop the Project Plan to establish the project criteria for this mitigation strategy. • This strategy will be implemented once the Project Plan, is approved by CARB. The Project Plan is being developed with input from the CSC, and will be submitted to CARB for approval prior to the end of 2020.

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Strategy Category	Strategy Description	Status of Implementation
Mitigation	<p>School Bus Replacement: District is proposing to replace 5 school buses with electric school buses between 2020 and 2025.</p>	<ul style="list-style-type: none"> • August 2020 – District held Zoom workshop with Corridor School Districts to discuss availability of AB 617 funding for school bus replacement projects. • September 2020 - District completed a school bus replacement project, replacing an old diesel bus with an electric bus and installing 1 charging station, at Calexico Unified School District. • Strategy is in progress and will be further implemented once proposals are submitted per the RFP that the District will release in Fall 2020.

Appendix B – Emission Reduction Targets

Table 1. Emission Reduction Targets										
Description	Estimated Emission Reductions 2020 (tons per year)					Estimated Emission Reductions ^[a] 2024 (tons per year)				
	PM_{2.5}	PM₁₀	DPM	NO_x	VOC	PM_{2.5}	PM₁₀	DPM	NO_x	VOC
CARB/State Strategies						0.20		0.20	13.48	8.35
Wood Burning Device Grant Program ^[b]	0.13			0.01	0.13	0.13			0.01	0.13
Parking Lot Paving Projects	[c]	[c]				[c]	[c]			
Strategic Updates to ICAPCD Policy #34	[d]					[d]				
School Bus Replacement Projects ^[e]		0.004	0.004	0.09	0.01		0.02	0.02	0.46	0.04
TOTAL	0.13	0.004	0.004	0.10	0.14	0.33	0.02	0.22	13.95	8.52

Notes:

^[a] Emission reductions for 2025-2029 are identical to the above for strategies I-1, M-3, M-5, and M-6. See Table 4.3 for Strategy R-2 emission reductions in 2025-2029.

^[b] Emission reductions for Strategy I-1 assume three units are replaced in 2020.

^[c] Emission reductions for Strategy M-3 are yet to be determined.

^[d] Maximum emission reductions from Policy #34 updates are estimated at 6.6 tons/day PM_{2.5}, but are not guaranteed to occur in the Corridor. Actual emission reductions will also depend on the number of burn days each year, and the frequency of burning up to the maximum acres allowed under Policy #34.

^[e] Emission reductions for Strategy M-6 assume a 1999 model year diesel bus is replaced with an electric bus at a rate of one per year starting in 2020, for a total of five buses replaced by 2024. DPM emission reductions for this strategy are assumed to be equal to the PM10 emission reductions.