

BOARD MEETING DATE: June 4, 2021

AGENDA NO. 35

**PROPOSAL:** Determine That the Proposed Amendments to the Eastern Coachella Valley Community Emissions Reduction Plan are Exempt from CEQA, and Amend the Eastern Coachella Valley Community Emissions Reduction Plan

**SYNOPSIS:** Assembly Bill (AB) 617 requires CARB to select communities for the preparation of Community Emissions Reduction Plans (CERPs) and air districts with a selected community to adopt the CERP within one year of selection. CARB selected the Eastern Coachella Valley (ECV) community in December 2019, and the South Coast AQMD Board adopted the AB 617 ECV CERP in December 2020. The Board directed staff to provide additional details on the AB 617 ECV CERP monitoring objectives, collaborations with other entities, incentive strategies, and other emission reduction strategies developed by the Community Steering Committee (CSC) by June 30, 2021. Since December 2020, staff has held more than 30 meetings with CSC members to develop additional details that further address the CSC's air quality priorities for the AB 617 ECV CERP.

**COMMITTEE:** Stationary Source Committee, May 21, 2021, Reviewed

**RECOMMENDED ACTIONS:**

1. Determine that the proposed amendments to the AB 617 ECV CERP are exempt from the requirements of the California Environmental Quality Act; and
2. Amend the AB 617 ECV CERP.

Wayne Natri  
Executive Officer

SR:JG:DG:DT:PP

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**Background**

Assembly Bill (AB) 617 established new requirements for improving air quality in disadvantaged communities in California. AB 617 requires a statewide strategy with

focused actions for communities heavily impacted by air pollution. These actions include developing community air monitoring plans (CAMPs) and/or community emissions reduction plans (CERPs) to reduce emissions of toxic air contaminants (TACs) and criteria pollutants.

In 2018, CARB adopted the Community Air Protection Blueprint (Blueprint) as the statewide strategy to guide the development (e.g., public process), content, and implementation of CAMPs and CERPs. An overview of the process to develop these documents as described in the CARB Blueprint is provided in Figure 1 – Overview of Community Emissions Reduction Program Process.

Figure1: *Overview of Community Emissions Reduction Program Process*

On December 5, 2019, CARB designated two communities in the South Coast AQMD to prepare a CAMP and CERP. The two communities selected by CARB are: 1) Southeast Los Angeles (SELA); and 2) Eastern Coachella Valley (ECV). The AB 617



statute directs air districts to adopt CERPs within one year of CARB’s selection. Four additional communities have been added for South Coast AQMD. This Board letter focuses on additional work done for the ECV CERP.

From January 2020 to December 2020, staff held 16 community meetings to develop the AB 617 ECV CERP. These meetings included CSC meetings, charter working group meetings, a workshop, and Technical Advisory Group (TAG) meetings. Through participation at the community meetings, the ECV CSC identified their air quality priorities as 1) the Salton Sea, 2) Pesticides, 3) Fugitive Road Dust and Off-Road, 4) Open Burning and Illegal Dumping, 5) Diesel Mobile Sources and 6) the Greenleaf Desert View Power Plant. Staff also worked with the CSC to develop more than 50 actions to address these air quality priorities, which will be implemented by South Coast AQMD, in collaboration with organizations, businesses, and other government agencies. These actions are in the AB 617 ECV CERP adopted on December 4, 2020 by the Board.

Following the CERP development process, some CSC members requested more time to develop and incorporate additional details in the CERP. In response to this request, the Board directed staff to provide additional details on the AB 617 ECV CERP monitoring

objectives, collaborations with other entities, incentive strategies, and other emission reduction strategies developed by the CSC no later than June 30, 2021. The Board further directed staff to hold two CSC meetings between January 2021 and February 2021 to receive additional feedback, and two additional meetings between March 2021 and April 2021 to review the draft amendments. Since December 2020, staff has met with the CSC on over 30 occasions, including 10 CSC meetings to develop the proposed amendments for the CERP. Details about the public process to develop the proposed amendments are below.

### **Public Process**

*Community Steering Committees, Budget Working Team, Monitoring Working Team, Agenda Setting, and Public Outreach*

The CSC led the amendment process for the AB 617 ECV CERP. The CSC is made up of active residents, community leaders, local business owners or workers, labor unions, community organizations, local agencies, schools, universities, hospitals, and elected officials. The CSC provides input and guidance based on community knowledge and expertise, and this feedback has been instrumental in developing the proposed CERP amendments. CSC members also assist staff with community-level outreach to share information about AB 617 and CERP development. Since the adoption of the AB 617 ECV CERP, the 10 CSC meetings focused on developing the proposed CERP amendments and incentive budgeting. Approximately 30 to 75 people attended each meeting.

Beginning in January 2021, the CSC focused on specific areas of the adopted CERP where they felt amendments were needed. These areas included coordination with local and community plans, pesticides, alternatives to agricultural burning, and Community Air Protection Program incentives budgeting.

In addition to the CSC meetings, staff held over 10 small group meetings and one-on-one meetings with residents, community leaders, and other stakeholders to provide detailed information about the proposed amendments to the AB 617 ECV CERP and facilitate input. Staff held Agenda Setting meetings with the CSC to discuss meeting logistics and topics. Also, CSC members organized 15 CSC-led meetings that included Budget Working Team and Monitoring Working Team meetings to discuss proposed amendment options. In these meetings, CSC members and staff engaged in discussions on monitoring locations, incentives for community-identified projects, and other topics (e.g., diesel mobile sources). In addition, CSC members that participated in these meetings provided regular updates to the entire CSC on the topics discussed and identified opportunities to incorporate them in the proposed amendments to the AB 617 ECV CERP.

## **Proposal**

Through the public process described above, staff worked closely with the CSC and collaborated with other government agencies to develop proposed amendments to the AB 617 ECV CERP. These amendments include new goals and actions that further address the ECV community's air quality priorities and provide additional emissions and exposure reductions in the ECV community. Each goal is supported by actions assigned to responsible or implementing entities (e.g., government agencies), metrics for gauging progress of the actions, and timelines.

### *Proposed AB 617 ECV CERP amendments*

Staff recommends amending the AB 617 ECV CERP. The CSC suggested amendments that include additional actions for pesticides, local and regional plans, alternatives to agricultural burning, diesel mobile sources, and the incentives budget in the proposed amendments to the AB 617 ECV CERP. Where feasible, staff incorporated the actions in Chapter 5a – Introduction, Chapter 5b – Salton Sea, Chapter 5c – Pesticides, Chapter 5f – Diesel Mobile Sources, and Chapter 5g – Greenleaf Desert View Power Plant. The remaining CERP chapters are unchanged. Notable proposed CERP amendments include additional:

- Actions and metrics to address land use concerns and coordinate with planning agencies during the implementation of local and regional plans, for example, outreach to local and regional planning agencies and developing recommendations with the CSC on best practices to reduce light-duty vehicle emissions from the Thermal Racing Club Track;
- Actions to address pesticides emissions and exposure in collaboration with the Riverside County Agricultural Commissioner, Department of Pesticide Regulation (DPR), CARB, Office of Environmental Health Hazard Assessment (OEHHA), and U.S. EPA;
- Actions for CARB to work with the CSC to identify locations for “No Idling” sign installation and coordinate with appropriate agencies to install and enforce “No Idling” signs and provide outreach materials in the ECV community on idling rules;
- Information on the distribution of Year 3 Community Air Protection Program (CAPP) incentives in ECV for community-identified projects; and
- Community Air Monitoring Plan (CAMP) details, including preliminary locations identified for monitor or sensor deployment.

## Key Issues

The ECV CSC requested amendments to the AB 617 ECV CERP that are outside of South Coast AQMD's jurisdiction, including the following:

- Additional pesticide regulations and limits, and a pesticide notification system;
- Pursue a ban on agricultural burning;
- Require funding from other agencies for AB 617 community-identified projects;
- Monitor geothermal and lithium extraction in the Salton Sea region; and
- Develop a new rule to address odors from the Salton Sea.

South Coast AQMD lacks the authority to regulate pesticides as Health and Safety Code Section 39655(a) provides that regulation of the use of pesticides is reserved for the DPR. Similarly, we are unable to ban agricultural burning as air districts and CARB are expressly prohibited from doing so under State law (California Health and Safety Code §41850). Further, while legislation (Senate Bill (SB) 705) has been enacted for the San Joaquin Valley to phase out open burning, recent reports from CARB show that the San Joaquin Valley Air Basin still accounts for 36.5 percent of PM2.5 emissions from agricultural burning statewide.<sup>1</sup> In contrast, the Salton Sea<sup>2</sup> and South Coast Air Basins together account for 8 percent of PM2.5 emissions from agricultural burning statewide. This recent data demonstrates the effectiveness of South Coast AQMD Rule 444 – Open Burning for open burning. Additionally, although staff enforces Rule 444 – Open Burning, many of the illegal burns that the CSC is concerned with are on tribal lands, which do not fall within South Coast AQMD's authority.

South Coast AQMD also does not have the authority to require other entities or agencies to fund projects or initiatives. However, as written in the CERP, staff will continue to seek funding sources to support projects identified in the CERP and will collaborate with other agencies for implementation.

Staff is aware of the geothermal and lithium extraction projects in the Salton Sea region, however these projects are located in Imperial County APCD and fall outside of the South Coast AQMD. Therefore, these projects are outside of South Coast AQMD's jurisdiction.

South Coast AQMD Rule 402 addresses odors from various anthropogenic pollution sources. Our understanding is that anaerobic biological processes cause odors from the Salton Sea. A rule applying to these odors would require the responsible parties to implement measures that reduce them. Unfortunately, South Coast AQMD staff is unaware of any specific measures to reduce odors from anaerobic biological processes in the Salton Sea.

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<sup>1</sup> San Joaquin Valley Agricultural Burning Assessment: [https://ww2.arb.ca.gov/sites/default/files/2021-02/Staff\\_Recommendations\\_SJV\\_Ag\\_Burn.pdf](https://ww2.arb.ca.gov/sites/default/files/2021-02/Staff_Recommendations_SJV_Ag_Burn.pdf)

<sup>2</sup> The Salton Sea Air Basin includes Imperial County and portions of Riverside County.

### *Metrics and Outreach Plan*

CSC members requested staff amend the AB 617 ECV CERP to address implementation milestones. As a result, the proposed amendment includes actions and information on how progress toward each goal is assessed with specific metrics and timelines. Timelines were written to retain flexibility and based on the availability of resources. For example, broad timelines specified in the proposed amendments ensure that staff may apply for grants when opportunities arise without limitations. Additionally, CSC members also requested that the proposed amendments include a more extensive and comprehensive outreach plan. In Chapter 2 of the AB 617 ECV CERP, staff committed to developing an outreach plan with the CSC. The outreach plan will be developed during implementation of the AB 617 ECV CERP.

### *Emission Reduction Targets*

The AB 617 ECV CERP combined with the proposed amendments outline actions to address the air quality concerns prioritized by CSC and are estimated achieve emission reductions of 54 tons per year (tpy) nitrogen oxides (NO<sub>x</sub>), 0.8 tpy diesel particulate matter (DPM), and 2.4 tpy particulate matter of 10 microns or less (PM<sub>10</sub>) by 2025 and 115 tpy NO<sub>x</sub>, 2.5 tpy DPM, and 2.4 tpy PM<sub>10</sub> by 2030. Additional emission reductions from the AB 617 ECV CERP and proposed amendments may be achieved through rule development and enhanced enforcement efforts.

### **California Environmental Quality Act (CEQA)**

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15002(k) and 15061, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Sections 15061(b)(3), 15262, 15301, 15306, 15308, 15309, and 15321. Further, there is no substantial evidence indicating that any of the exceptions to the categorical exemptions set forth in CEQA Guidelines Section 15300.2 apply to the proposed project. A Notice of Exemption has been prepared pursuant to CEQA Guidelines Section 15062 and is included as Attachment D to this Board Letter. If the proposed project is approved, the Notice of Exemption will be electronically filed with the State Clearinghouse of the Governor's Office of Planning and Research, which may be accessed via the following weblink: <https://ceqanet.opr.ca.gov/search/recent>. In addition, the Notice of Exemption will be electronically posted on their CEQA net Web Portal which may be accessed by via the following weblink: <http://www.aqmd.gov/nav/about/public-notices/ceqa-notices/notices-of-exemption/noe--year-2021>. The electronic filing and posting of the Notice of Exemption is being implemented in accordance with Governor Newsom's Executive Orders N-54-20 and N-80-20 issued on April 22, 2020 and September 23, 2020, respectively, for the State of Emergency in California as a result of the threat of COVID-19.

### **Implementation Plan/Schedule**

Implementation of the AB 617 ECV CERP began in January 2021. If proposed amendments to the AB 617 ECV CERP are approved by the Board, CARB staff is expected to begin reviewing and evaluating the amended AB 617 ECV CERP and will hold a public hearing to approve the ECV CERP and amendments in 2021. The implementation of this CERP is to take place over approximately five years.

### **Benefits to South Coast AQMD**

The AB 617 ECV CERP and amendments to the AB 617 CERP will help advance South Coast AQMD's mission to clean the air, especially in the most impacted and disadvantaged communities within South Coast AQMD's jurisdiction. Additionally, emission reductions achieved through implementation of the AB 617 ECV CERP and its amendments will provide emission reduction benefits toward achieving state and national air quality standards.

### **Resource Impacts**

South Coast AQMD received \$21.8 million to support implementation of AB 617 for the upcoming year of this program for all South Coast AQMD AB 617 communities. In addition, CAPP incentive funds will be used toward implementing incentive projects that are located in environmental justice communities. In 2020, South Coast AQMD received \$79,431,607 in total grant funding through the CAPP funds for all AB 617 communities in South Coast, which includes up to 6.25 percent for administrative costs. Staff continues to work with the California state legislature to secure increased and sustained funding for AB 617 statewide.

Implementation costs for future years are dependent on the number of communities that are selected, and the amount of funding allocated by the legislature to support AB 617 implementation by the local air districts.

### **Attachments**

- A. Amendments to the AB 617 Eastern Coachella Valley Community Emissions Reduction Plan
- B. Response to Comments
- C. Resolution
- D. Notice of Exemption from CEQA
- E. Board Meeting Presentation

# Eastern Coachella Valley (ECV) Community Emissions Reduction Plan (CERP) Amendment – Response to Comments

Comment Letter A1



May 11, 2021

Wayne Nastri  
Executive Officer  
South Coast Air Quality Management District  
21865 Copley Dr.  
Diamond Bar, CA 91765



**RE: Eastern Coachella Valley AB 617 CERP Amendment**

Dear Mr. Nastri,

We greatly appreciate South Coast AQMD’s effort to update the Eastern Coachella Valley (ECV) Community Emission Reduction Plan (CERP) over the past four months. On behalf of the undersigned organizations and members of the CSC, we respectfully submit the following recommendations for the draft CERP amendment.

**General Recommendations**

In this section, we include general recommendations that should be embedded across multiple sections in the CERP, including sections that have not been amended.

1. Present a thorough progress update of all CERP measures and funding to the CSC at least twice a year. A progress report shall be provided in Spanish and English that details AQMD’s progress over the past six months of implementation, as well as their goals, timelines, and objectives for the next six months. As part of their outreach and engagement efforts, AQMD shall also present at community councils or other community spaces on CERP implementation at least twice a year.
2. Provide additional detail and direction for actions regarding funding:
  - a. Explicitly identify the Unincorporated Communities Initiative as a target and potential funder of community-identified projects in the unincorporated communities of the ECV AB 617 boundary. AQMD shall work with the CSC and other agencies as necessary to apply for this program during every cycle of

A1-1

A1-2

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<p>funding availability. AQMD shall also support the CSC in ensuring that this Initiative continues being funded by Riverside County.</p>	<p>A1-2 Cont.</p>
<p>b. Provide more specific information and milestones to actions throughout the CERP that direct South Coast AQMD to identify funding sources. This includes identifying such funding on an annual basis and adding follow up steps on what will happen after funding is identified. These actions shall also include milestones that can be met within the implementation period that show progress and effectiveness. In this process, South Coast AQMD should consider the following questions:</p>	
<ul style="list-style-type: none"> <li>i. Who will be the lead applicant(s)?</li> <li>ii. How will AQMD conduct community engagement to inform the funding applications?</li> <li>iii. How will residents/communities in need of this funding be identified?</li> <li>iv. How many applications will be submitted each year?</li> </ul>	<p>A1-3</p>
<p>c. Work with Riverside County and Supervisor Perez’s office to ensure that funding from the American Rescue Plan and any additional federal funding is used in a conscious and healthy way to advance community projects that improve air quality and health in the ECV.</p>	
<p>3. Work with the CSC to develop a community outreach, engagement, and communications plan that will help communicate the CSC’s work to the general public. This plan shall also highlight opportunities for the public to engage as well as strategies for seeking public input on CSC-related projects and CERP/CAMP implementation. This action shall be completed by the end of 2021.</p>	<p>A1-4</p>
<p>4. Identify more concrete actions to reduce emissions and amend the CERP to include quantifiable emission reduction goals once additional monitoring data (e.g. monitoring for H2s and pesticides) become available. South Coast AQMD must go above and beyond to reduce emissions in the ECV. This includes doing more than only providing incentives. The AB 617 Blueprint specifically calls for a wide range of strategies, including regulatory action.</p>	
<p>5. Amend the enforcement plan to conduct a thorough review and analysis of all rules and regulations that address pollution sources in the ECV, identify gaps and opportunities, and initiate a new rule-making process to address such gaps, strengthen rules, and identify new actions to enforce better air quality practices throughout the region, including citations and other enforcement mechanisms. This should also include clear, specific, and enforceable strategies within the authority of South Coast AQMD. Many strategies call for other agencies to implement them, but South Coast AQMD must find additional and innovative actions to be included for each air quality priority.</p>	<p>A1-5</p>
<p>In addition to addressing our recommendations for the CERP, South Coast AQMD must also rethink and revamp its practices for community outreach and engagement. Ensuring a true community-led process through this program at the local level has been an ongoing challenge.</p>	

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South Coast AQMD must be able to work with the CSC to develop a vision, plan, and timeline for all aspects of the program, including allowing ample time and translation for the CSC and the public to review draft plans and other material. Without this, we lose one of the most important components for achieving transformative change in our systems and environment.

A1-6  
Cont.**Chapter 5A: Introduction**

We'd first like to thank South Coast AQMD staff for following the CSC's request to form the Budget and Air Monitoring Working Teams. We believe both of these Teams provided a critical space for further developing our priorities for incentive funding and air monitoring. All of these efforts were essential in the development of this program, in order to ensure these efforts are fully appreciated and implemented in a timely manner we propose a few updates below that we would like included in Chapter 5A:

1. Update Table 1D's timeline for tree planting site identification to be completed by Q1 of 2022. Updates to this sit list shall be done annually based on how the implementation of tree planting projects progresses.
2. Update Table 1G to include the implementation of multi-benefit and climate-resilient infrastructure into the dust suppression projects planned for the Salton Sea through SCAQMD's coordination and collaboration with CNRA
3. Update Table 1H to state that all recommendations for best practices should be completed by the end of 2023 with the opportunity for the public to review and provide input. This action should help increase collaboration with local planning departments, agencies, and others to better understand the land use practices in Riverside County and the ECV. AQMD shall work to ensure that the CERP includes recommendations for better, healthier, and more equitable land use practices that help protect the environment, public health, and the culture of the ECV. AQMD shall engage in planning processes in the ECV and support the prevention of harmful land uses.

A1-7

**Chapter 5B: Salton Sea**

The Salton Sea poses numerous air quality concerns that require urgent attention as a consequence of the receding shoreline and polluting agricultural runoff. We provide additional suggestions to Chapter 5B that address the urgency of these actions as well as promote infrastructure that will address multiple community concerns and needs.

A1-8

1. Update Table 1D's timeline to be completed by 2023.
2. Update Table 3F's timeline to change the start date to Q2 of 2021. This action shall also require an annual update to the site list for tree planting based on ongoing project implementation, as well as steps for applying to funding programs on an annual basis. In

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addition, a milestone of implementing 1-2 tree planting projects by the end of 2022 shall be incorporated into action 3F.

3. Add an additional action to Table 1 to collaborate with Comité Cívico del Valle on their 15 air monitoring system and to ensure a participatory process with the CSC.
4. Add an additional action to Table 1 to regularly provide air quality data and expertise to agencies on the northern shore of the Salton Sea, including CNRA, DFW, IID, and Riverside County/Salton Sea Authority
5. South Coast AQMD must also closely monitor geothermal and lithium extraction in the Salton Sea region to identify current and potential future impacts to air quality and public health. The CERP must include actions on this issue and engage when necessary to prevent further damage to the environment and public health.
6. Develop a new rule to address the bad odors coming from different pollution sources, including the Salton Sea, illegal dumping, and others as identified by the community.

A1-8  
Cont.**Chapter 5C: Pesticides**

As a top air quality priority in the ECV, we urge and expect South Coast AQMD to truly commit to finding strategies and actions within the CERP that will help reduce emissions and pesticides. While we understand the complexities of jurisdictional boundaries, we cannot expect the community to continue suffering disproportionate health impacts because of such issues. In looking at other AB 617 communities, jurisdictional issues have already been addressed by CARB. CARB leadership, as well as CalEPA, dictated that the San Joaquin Valley Air Pollution Control District should reflect all desired measures from the CSC in their CERP. Such issues have come up and been resolved in other AB 617 communities and we should be actively learning and following the leadership of other communities in this process.

As a collective, we have the responsibility to better respond to the concerns of the community on pesticides and all other air quality issues in the ECV. Below are a few additional recommendations we have for Chapter 5C.

A1-9

1. Table 1A: This action, while important, should have already been completed in the 1.5 years that South Coast AQMD has worked with the ECV under AB 617. It is also important for South Coast AQMD to be identified as a lead agency for this action. Community members are asking to see informed strategies on how to reduce exposure from pesticides and the CERP amendment needs to identify stronger actions that address those concerns. South Coast AQMD must thus add an additional action item for the District to compile a pesticide report in partnership with Riverside's County Agricultural Commission and DPR. This report shall be updated annually by South Coast AQMD. This report will help identify what pesticides are mostly used in the area with the aim to reduce usage and adequately monitor. This action should at least be completed by the end

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- of 2021. The CERP should also include actions for all toxic air contaminants of concern identified in the source attribution inventory, including benzene, arsenic and cadmium.
2. Table 1A: there are no commitments made to develop an ECV pesticide application notification system or reduce emissions directly. An ECV pesticide application notification system should begin to be developed immediately. The Shafter pilot and the ECV notification system can both be developed simultaneously in collaboration with DPR, test and share learnings across projects, and both support the development of the statewide pesticide notification system. In fact, DPR, CARB, and the San Joaquin Air Pollution Control District all supported and urged the Kern County CAC to implement the Shafter Pilot Notification System and required them to submit regular reports of approved Notices of Intent (NOIs) for the use of pesticide products. This same action should be applied in the ECV, and if such a collaboration, including Supervisor Perez's office, was established in the South Coast region, more agricultural communities could benefit. We will continue asking for South Coast AQMD to work with the appropriate agencies, including agricultural growers and companies, to implement a pesticide notification system. The ECV community is an agricultural town, thus we have the right agencies and tools to implement a notification system, and help guide the state as they develop their process.
  3. Update Table 2C to also include more detail and follow up steps once funding programs and opportunities are identified. All actions in the CERP amendments that direct South Coast AQMD to "identify funding" shall also include specific follow up steps on what will happen next. They should also include specific mid to long-term milestones to ensure that these actions are moving forward and that we are making progress on implementation.
  4. Table 2D: What are the specific goals for pursuing a partnership with Growing Coachella Valley? What does this action look like and how will this partnership help reduce emissions from and exposure to pesticides?
  5. Add an additional action to work with the appropriate agencies to limit the use of certain pesticides, ban aerial application, mandate tarping for certain pesticides, and create buffer zones and vegetative barriers outside and around agricultural fields.

A1-9  
Cont.**Chapter 5D: Fugitive Road Dust and Off-Road**

The actions in these chapters are a great step forward in addressing the issues and pollution that come from off-roading and unpaved roads in the region. However, they are quite limiting and do not encompass the massive issue of fugitive dust in the region. Our suggestions acknowledge the need for actions to serve more than one purpose and therefore address multiple concerns, but we continue to ask South Coast AQMD to further develop and identify new strategies to reduce fugitive dust and exposure.

A1-10

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1. Update Table 2A to incorporate cool pavement technology into all proposed paving projects as a tool for emission reduction and climate benefits.
  - a. Include the need to pursue partnerships with local non-profit organizations for assistance identifying locations in need of paving to ensure adequate technical assistance is provided to the community.
  - b. Work with the CSC to identify leads for project implementation.
2. Update Table 2E to include a more extensive and comprehensive outreach plan. Provide potential mobile home park owners with information about the application and implementation process. Post informational sessions should also be included to provide information on best practices for maintenance.
3. Update Table 3C to say that funding should be identified every year and add follow up steps on what will happen after funding is identified. AQMD should consider the following questions:
  - a. Who will be the lead applicants?
  - b. What community engagement will be done to inform the application?
  - c. How will residents in need of this funding be identified?
4. Add an action to Table 3 to identify urban greening projects and locations for ongoing pilot projects. These can be implemented through incentive funding or by AQMD applying to the Urban Greening program or others that can provide additional funding support. The CERP shall aim to implement a small greening project at least once a year

A1-10  
Cont.**Chapter 5E: Open Burning and Illegal Dumping**

Our recommendations below reflect the need for research, stronger stringency, and collaboration between relevant organizations regarding open burning and illegal dumping.

1. Affirmatively state in section titled "Potential Alternatives to Burning" that biomass and other combustion alternatives do not qualify as sustainable alternatives to open agricultural burning
2. Add a sub-action to Table 1A to monitor all open burning that takes place in the ECV, identify the cause and work with the CSC to identify and implement preventative measures for illegal dumping and open burning
3. Add sub-action to Table 1A to establish a community notification system for all permitted agricultural burns happening within the ECV.
  - a. This system should also direct residents how to report burnings in the case that they may not be permitted.
4. Add sub-action to Table 2A to educate growers and agricultural businesses on identifying sustainable alternatives to agricultural burning.

A1-11

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5. Add action to Table 2A to set more stringent requirements for open agricultural burning in the Eastern Coachella Valley, and consider requirements based on crop type, frequency of burns, amount burned by farm, and location of burns.
6. Add action to Table 2A to enhance AQMD's enforcement measures to regulate and control agricultural burning, including prescribed burning
7. Add action to Table 2 to collaborate with the CSC to pursue a statewide bill or ordinance to ban agricultural burning (or ease phasing out) and work with local legislators to introduce it in the 2021-2022 session
8. Add action to conduct a thorough review and update of South Coast AQMD's agricultural burning rules and regulations.
9. Add sub-action in Table 2A to enhanced regulations and restrictions on permitted agricultural burning during extreme weather events (e.g., heat, wind, other), citations for identified illegal open and agricultural burning, monitoring and reporting system for unpermitted burning, and develop a phase-out approach where alternatives are prioritized over burning.
10. The sub-action in Table 2A on "accessing the feasibility of new requirements for open burning (e.g., identifying alternatives to open burning of agricultural waste by identifying opportunities used in other air districts) based on the developed list" should be completed by the 2nd quarter of 2022 (within one year of CERP approval in June). Following the feasibility assessment, AQMD must update the stringency of their agricultural burning rule

A1-11  
Cont.**Chapter 5F: Diesel and Mobile Sources**

We are excited to see South Coast AQMD implement the newly adopted Indirect Source Rule. Chapter 5F should be updated to include how the ISR will be implemented and benefit the ECV communities. We would also like to acknowledge the importance of the "no idling" actions added to this section. In addition, we think it is extremely important to continue identifying creative ways to mitigate and reduce emissions from facilities like the Thermal Racetrack, the Thermal Airport, and the Union Pacific Freight Train.

Our recommendations below encourage collaboration with transit agencies and relevant organizations in the region to work towards the use of more environmentally friendly technology.

A1-12

1. Add action to Table 1A to work with Sunline Transit Agency to electrify public transit and establish a zero-emission micro-transit and rideshare program in the ECV.
2. Add action to Table 1A to identify pathways for AQMD to implement greening along the train corridor
3. Add action to Table 1A to install zero-emission charging infrastructure in the ECV.

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- 4. Add sub-action to Table 1C to notify the community on the progress done in replacing school buses with zero or near-zero emission school buses in the ECV, and inform the community of the number of buses that will be replaced every year.

A1-12  
Cont.

**Chapter 5G: Greenleaf Desert View Power Plant**

As one of the CSC’s top air quality priorities, Chapter 5G needs to include more actions that will demonstrate how emissions from the Greenleaf Desert View Power Plant will be reduced. The actions identified so far will only reduce exposure, but it is crucial for South Coast AQMD to include actions that will help achieve both exposure and emission reductions.

A1-13

- 1. Add an action to Table 1 that calls for South Coast AQMD to work with the appropriate agencies or organizations to apply to the Colmac Air Quality Enhancement Fund on an annual basis or each time funding becomes available for community-identified projects.
- 2. As this relates to the CAMP, include community hosted AQY1 monitors and South Coast AQMD sponsored monitoring at locations around this facility. The wind, NO2, PM2.5 and Ozone metrics are important parameters to continuously monitor around this facility. Integrate the Aeroqual AQY1 monitor readings with a dashboard of air quality information that can be accessed by anyone without a password. Ensure that historical data can be downloaded by anyone from these low-cost or community hosted monitors.

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The AB 617 implementation process in the ECV has been challenging, but we are grateful to continue learning and working together through this program. We strongly urge South Coast AQMD to address all of our recommendations and develop a plan that is truly reflective and representative of community input and priorities. We must continue working together to ensure that residents see their advocacy result in tangible change in their communities. If you have questions or wish to discuss this letter further, please contact Mariela Loera at [mloera@leadershipcounsel.org](mailto:mloera@leadershipcounsel.org).

Sincerely,

Mariela Loera  
Policy Advocate, Leadership Counsel for Justice and Accountability

Rebecca Zaragoza  
Regional Policy Manager, Leadership Counsel for Justice and Accountability

Mariana Román

Comment Letter A1

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**Responses to Comment Letter A1 from Mariela Loera, et. al.****Response to Comment A1-1:**

Staff will hold quarterly CSC meetings to provide updates on progress on Community Emissions Reduction Plan (CERP) implementation. Additionally, as outlined in the Community Air Protection Blueprint (Blueprint), air districts are required to provide an annual progress report on CERP implementation. Annual progress reports include status updates on all strategies and metrics for tracking progress, qualitative progress assessment, and planned changes based on progress (if any), and completion of required elements. Staff will provide the annual progress report to the Community Steering Committee (CSC) and submit to the California Air Resources Board (CARB) for review. Additional information about the Blueprint can be accessed here: [https://ww2.arb.ca.gov/sites/default/files/2018-10/final\\_community\\_air\\_protection\\_blueprint\\_october\\_2018\\_appendix\\_c.pdf](https://ww2.arb.ca.gov/sites/default/files/2018-10/final_community_air_protection_blueprint_october_2018_appendix_c.pdf).

Chapter 2 of the adopted Eastern Coachella Valley (ECV) CERP includes a commitment to develop an outreach plan with CSC input. Therefore, upon adopting the CERP amendments, staff will develop the outreach plan with the CSC during CERP implementation. Based on CSC input, the outreach plan may include engagement details, including types of locations (e.g., community councils, community spaces) and frequency (e.g., twice a year).

**Response to Comment A1-2 (part a):**

South Coast AQMD staff added action “I” to the proposed CERP amendments to work with the CSC to apply for available funding opportunities from the Unincorporated Communities Initiative for CERP actions. The metric for this action is to submit one to two applications during each program cycle if funding opportunities are identified.

**Response to Comment A1-2 (part b):**

For comment subpart iv, South Coast AQMD staff added the requested details to the proposed CERP amendments that seek funding opportunities. For example, in Chapter 5a, Action D South Coast AQMD staff added text that specifying the one to two applications shall be submitting for funding opportunities identified.

**Response to Comment A1-2 (part c):**

South Coast AQMD staff will continue to seek out opportunities to work with AB 617 CSCs and community leaders for funding air quality improvement projects through federal, state and local plans.

**Response to Comment A1-3:**

Chapter 2 of the adopted ECV CERP includes a commitment to develop an outreach plan with the CSC. Therefore, upon adopting the CERP amendments, staff will develop the outreach plan with the CSC during CERP implementation. The outreach plan can include details such as engagement opportunities and strategies to seek public input and communicate the CSC’s work to the public.

**Response to Comment A1-4:**

Specific emission reduction targets are in Chapter 5a of the adopted ECV CERP and proposed amendments to the CERP. The CERP is expected to reduce 2.4 tons per year (tpy) of particulate matter 10 microns or smaller (PM10) by 2030. Additionally, the CERP is expected to result in emission reductions that have yet to be quantified (e.g., actions focused on enforcement and outreach). During CERP implementation and as additional monitoring data becomes available, staff will provide annual updates to the CSC on emission reductions. In addition to incentives, the adopted ECV CERP and CERP amendments include a wide range of emission and/or exposure reduction strategies, including collaboration, outreach and education, monitoring, enhanced enforcement, and assessing the feasibility of new requirements to address the air quality priorities. Specific actions to reduce emissions from specific sources are described in the CERP and CERP amendments (Chapter 5).

**Response to Comment A1-5:**

Chapter 5d - Fugitive Road Dust and Off-Road, Table 2, Action D and Chapter 5e – Open Burning and Illegal Dumping, Table 2, Action A of the adopted ECV CERP commits South Coast AQMD staff to conducting a thorough review and evaluating additional requirements for rules (e.g., Rules 403 – Fugitive Dust/403.1 - Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources and 444 - Open Burning) that address the air quality priorities identified by the CSC. The ECV enforcement incorporates flexibility for modifications based on CSC recommendations, monitoring results, and follow-up investigations from actions during CERP implementation. Enforcement actions resulting from CERP implementation may include citations and other enforcement mechanisms to reduce emissions. As noted in this comment, many actions require collaboration with other entities due to South Coast AQMD’s limited jurisdiction to address some of the CSC concerns. Staff will continue working with appropriate entities and modify the enforcement plan as appropriate.

**Response to Comment A1-6:**

South Coast AQMD staff has made extensive efforts to ensure that the CSC leads the development of the proposed amendments to the ECV CERP. For example, when CSC members requested to increase the frequency and number of meetings to develop the proposed amendments, staff accommodated this request. As a result, since December 2020, staff met with the CSC on over 30 occasions, including 10 CSC meetings, to develop the proposed amendments for the CERP. Staff organized Agenda Setting meetings with the CSC to develop the agendas together. Staff implemented the CSC requests on meeting formats, including the CSC’s preference for additional transparency and small group discussions by implementing the use of virtual breakout rooms, enabling the Zoom chat feature, conducting Zoom polls, limiting outside agency presentations until completion of the CERP amendments, and communicating the time allotted for each agenda item before the start of each item.

The CSC had also asked to have Working Team meetings in addition to the CSC meetings. Staff helped the CSC start these Working Team meetings, which were led by CSC members, including

developing the agendas and running the meetings. Staff attended the Working Team meetings and provided information where requested.

Additionally, staff provided initial draft language for the CERP amendments in early April to maximize the opportunity for staff coordination and collaboration with the CSC to develop the details of the proposed CERP amendments.

To further improve community outreach and engagement, South Coast AQMD staff is committed to continuing these types of efforts with the CSC.

**Response to Comment A1-7 (part 1):**

The timeline for identifying tree planting locations and implementing tree planting projects is in Chapter 5a, Table 1, Action D. This action has also been updated to specify that the identification of tree planting locations will be updated annually. South Coast AQMD staff will work with the CSC to identify potential locations for tree planting upon adoption of the CERP amendments and seek opportunities to apply for funding for tree planting projects during CERP implementation. South Coast AQMD staff will provide updates on tree planting projects in the ECV CERP annual progress report.

**Response to Comment A1-7 (part 2):**

The California Natural Resources Agency (CNRA) has authority over the dust suppression projects planned for the Salton Sea (e.g., surface roughening, surface stabilizers, and vegetation establishment). The operation and maintenance of these projects is detailed in chapter six of the Dust Suppression Action Plan. This chapter describes the services, processes, and tools required to ensure the built environment will perform the functions for which the projects are designed and constructed. The Dust Suppression Action Plan is available at <https://saltonseaca.gov/wp-content/uploads/2020/10/DSAP-7-31-2020.pdf>. The South Coast AQMD staff will continue to collaborate with the CNRA and Imperial Irrigation District (IID) to implement dust suppression projects and provide air quality expertise and support, as applicable.

**Response to Comment A1-7 (part 3):**

Chapter 5e, Table 1, Action H is updated to include the recommended timeline.

**Response to Comment A1-8 (part 1):**

The timeline for Chapter 5b, Table 1, Action D begins in the 1<sup>st</sup> quarter of 2021 and will be completed in the 4<sup>th</sup> quarter of 2025 to ensure that any opportunity to supplement the existing monitoring network is supported by the CERP throughout implementation. The CERP implementation process is dynamic and certain action items have been written with built-in flexibility to allow adjustments as new information becomes available. Staff is working with the Monitoring Working Team to identify potential locations for sensors and/or monitors and deployment of these monitors will begin prior to the end of 2023.

**Response to Comment A1-8 (part 2):**

Given that the CERP amendments will not be considered for adoption until the end of 2<sup>nd</sup> quarter 2021, it would not be feasible to begin this effort by the requested timeline. However, staff will begin to work with the CSC to identify potential locations for tree planting upon adoption of the CERP amendments. An annual update to the tree planting projects locations list and a milestone target of submitting one to two applications has been added.

**Response to Comment A1-8 (part 3):**

South Coast AQMD staff will work with the CSC to identify potential locations for tree planting upon adoption of the CERP amendments and seek opportunities to apply for funding for tree planting projects throughout CERP implementation.

**Response to Comment A1-8 (part 3):**

Chapter 5b, Table 1, Action D commits staff to work with the CSC to create an air quality sensor network in the ECV community. This includes collaborating with Comité Cívico del Valle and supplementing their existing monitoring network. Details related to monitoring can be further discussed in the Monitoring Working Team meetings as part of the CAMP.

**Response to Comment A1-8 (part 4):**

Chapter 5b, Table 2, Action A requires staff to provide air quality expertise to the State for the implementation of the Salton Sea Management Program and land use agencies for new development projects near the Salton Sea, including the northern shore. The State includes agencies such as the CNRA, Department of Fish and Wildlife (DFW), Imperial Irrigation District (IID), and Salton Sea Authority.

**Response to Comment A1-8 (part 5):**

South Coast AQMD staff is aware of the geothermal and lithium extraction projects in the Salton Sea region, however these projects are located in Imperial County APCD, not South Coast AQMD. Therefore, these projects are outside of South Coast AQMD's jurisdiction.

**Response to Comment A1-8 (part 6):**

South Coast AQMD Rule 402 - Nuisance addresses odors from various anthropogenic pollution sources. Our understanding is that anaerobic biological processes cause odors from the Salton Sea. A rule applying to these odors would require the responsible parties to implement measures that reduce them. Unfortunately, South Coast AQMD staff is unaware of any specific measures to reduce odors from anaerobic biological processes in the Salton Sea.

**Response to Comment A1-9:**

The Department of Pesticide Regulation (DPR) has authority to regulate pesticide sales and use in California pursuant to the Food and Agricultural Codes (e.g., FAC sections 11501 and 11454). Health and Safety Code Section 39650 (g) and 39655 (a), and FAC 14021 further define DPR's jurisdiction for pesticide Toxic Air Contaminants (TACs). As such, South Coast AQMD has limited jurisdiction on pesticides, and cannot regulate pesticide sale or use. Staff has nevertheless collaborated with DPR, the Riverside County Agricultural Commissioner (CAC), United States

Environmental Protection Agency (U.S. EPA), Office of Environmental Health Hazard Assessment (OEHHA), and CARB to address pesticide concerns.

**Response to Comment A1-9 (part 1):**

As mentioned above, DPR has regulatory authority to address pesticides. In addition, DPR covers activities such as pesticide product evaluation and registration and field enforcement (with county agricultural commissioners) of laws and regulations on pesticide use. Therefore, DPR and the Riverside County Agricultural Commissioner are responsible for leading efforts to complete Chapter 5c, Table 1, Action A, and not South Coast AQMD. Also, DPR compiles reports on pesticide use annually. The public can access the reports at <https://www.cdpr.ca.gov/docs/pur/purmain.htm>.

Chapter 3b – Source Attribution of the adopted ECV CERP shows that diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) in this community and comes from on-road and off-road mobile sources. In ECV, DPM emissions are significantly greater than any other TACs. As a result, the CSC prioritized addressing diesel mobile sources as an air quality priority and Chapter 5f includes actions that will reduce emissions and exposure from diesel mobile sources to address DPM. Diesel exhaust is a complex mixture of many different toxic air contaminants, including benzene, arsenic, and formaldehyde.<sup>1</sup> Therefore, the CERP actions that reduce diesel emissions will reduce not only diesel PM but also benzene, arsenic, and other air toxics contained in diesel exhaust.

**Response to Comment A1-9 (part 2):**

Chapter 5c, Table 2, Actions B, C, and D aim to reduce exposure by supporting the CSC exploration of pesticide notification systems, providing outreach materials and information on pesticide enforcement, worker protection, and pesticide incident reporting, pursuing exposure reduction projects (e.g., air filtration systems, weatherization projects), and collaborating with Growing Coachella Valley Local Farmers and Growers.

As discussed in the overview paragraph above, South Coast AQMD has limited authority over pesticides, and cannot require DPR to create a pesticide application notification system. However, DPR committed to sharing information on statewide efforts for a pesticide notification system with the ECV CSC. This commitment is in Chapter 5c, Table 1, Action A.

**Response to Comment A1-9 (part 3):**

Chapter 5c, Table 2, Action C requires staff to identify funding for exposure reduction projects. Funding sources often have specific criteria and eligibility requirements to apply and receive funding; therefore, the Action has been written to maintain flexibility. For example, if staff identify a funding opportunity where only non-profit organizations are eligible applicants, staff would share that funding opportunity with the CSC so that eligible organizations may apply. Staff will continue to work with the CSC through the Budget Working Group to address items related

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<sup>1</sup> <https://oehha.ca.gov/air/health-effects-diesel-exhaust>

to funding. During CERP implementation, staff will provide updates as part of the annual progress reports and/or quarterly update meetings and continue to work with the CSC to identify funding sources.

**Response to Comment A1-9 (part 4):**

Chapter 5c, Table 2, Action D will seek opportunities to reduce exposure to pesticides by collaborating with Growing Coachella Valley, a non-profit organization, to protect the Coachella Valley's resources. An example of an opportunity includes distributing informational materials on reporting pesticide drift and reducing pesticide exposure. Staff will pursue a collaborative partnership with Growing Coachella Valley and evaluate opportunities to reduce pesticide exposure during CERP implementation.

**Response to Comment A1-9 (part 5):**

Chapter 5c, Table 2, Action B calls upon DPR and the Riverside CAC to identify opportunities to limit pesticide use. DPR and the Riverside CAC will identify opportunities to develop or amend pesticides regulations. These regulations may include limiting the use of certain pesticides, banning aerial applications, mandating tarping, and/or creating buffer zones or vegetative barriers outside agricultural fields.

**Response to Comment A1-10:**

Chapter 5d includes a number of actions to address emissions and exposure from fugitive dust. Staff through discussions with the CSC have incorporated additional actions throughout the CERP to address fugitive dust. For example, the CSC expressed concerns from fugitive dust from the Salton Sea. To address this, staff included an action in Chapter 5b to support dust suppression projects that will mitigate fugitive dust from the Salton Sea.

**Response to Comment A1-10 (part 1):**

The CSC prioritized \$4.57 million for road paving projects from the Year 3 CAPP incentive funds. As noted in Chapter 5a, South Coast AQMD will continue to work with the CSC on their budget priorities for incentive projects and hold incentives workshops for interested members to develop project plans for community-identified projects. The workshops will facilitate CSC input on project plan criteria and other considerations (e.g., integrating cool pavement technology). Additionally, Chapter 5d, Table 2, Action A commits staff to work with the CSC to specify a plan to implement paving projects. This action also requires collaboration with appropriate entities (e.g., local non-profit organizations) to identify locations in need of paving. Finally, staff will work with the CSC to identify leads for project implementation during CERP implementation for paving projects.

**Response to Comment A1-10 (part 2):**

See Response to Comment A1-3.

Additionally, the outreach plan can include extensive and comprehensive approaches to communicating with the public and appropriate entities and conducting outreach to eligible

mobile home parks and Polanco Parks owners with information about the application process for road paving projects and paving maintenance information.

**Response to Comment A1-10 (part 3):**

Chapter 5e, Table 3, Action C requires staff to identify funding for home weatherization projects in CERP implementation. During this process, staff will work with the CSC to identify potential lead applicants, community engagement opportunities and funding recipients.

**Response to Comment A1-10 (part 4):**

The CERP amendments include urban greening actions in three chapters (i.e., 5a, 5b, and 5g). These actions require staff to identify locations annually for tree planting projects and a milestone target of submitting one to two applications has been included.

**Response to Comment A1-11 (part 1):**

The section “Potential Alternatives to Burning” does not list biomass as a sustainable alternative to open agricultural burning. Instead, the section lists potential alternatives as composting or using heavy-duty equipment to break down materials into smaller pieces that can be made into compost or recycled. In the adopted ECV Final CERP, Chapter 5e, Table 2, Action A requires staff to explore the feasibility of other alternatives. Under this action, staff will explore alternatives to burning with the CSC during CERP implementation.

**Response to Comment A1-11 (part 2):**

Chapter 5e, Tables 1 and 4 identify actions to monitor illegal burning and address illegal dumping and burning, including preventative measures (e.g., fencing or berms) that occur in ECV. For example, in Table 1, Action A requires South Coast AQMD staff to work with the CSC to establish an air quality sensor network to improve our understanding of the PM2.5 levels in various community areas impacted by legal and illegal burning in the community. This action also requires the staff to identify areas within ECV where burning is occurring and to gather information to help identify illegal burning emissions and conduct follow-up investigations, as needed. Additionally, Table 4, Action C, requires South Coast AQMD staff to pursue funding for preventative measures.

**Response to Comment A1-11 (part 3):**

In the adopted ECV Final CERP, Chapter 5e, Table 3, Action B requires staff to pursue opportunities to develop an online system (e.g., notification system, database) that informs the community when South Coast AQMD permitted burning is expected to occur.

Chapter 5e, Table 2, Action E includes outreach to inform community members and farm owners, operators and workers about rules and regulations on open burning and ways to report it.

**Response to Comment A1-11 (part 4):**

Chapter 5e, Table 2, Action D commits staff to conduct outreach to farm owners and operators (growers) to best burn practices and methods, which will include sustainable alternatives to agricultural burning.

**Response to Comment A1-11 (part 5):**

Chapter 5e, Table 2, Action A commits staff to assessing the feasibility of new requirements for open burning. During the assessment of new requirements, crop type, frequency of burns, amount burned by farm, and location of burns may be considered. Staff will work with the CSC on developing a list of available technologies, best practices and alternatives and assessing the feasibility of new requirements during CERP implementation.

**Response to Comment A1-11 (part 6):**

Chapter 5e, Table 2, Action A includes enhanced enforcement efforts by conducting additional inspections beyond pre-burn inspections (e.g., unannounced inspections on burn days) and Chapter 5e, Table 2, Action E includes community outreach on complaint-reporting. South Coast AQMD does not have the jurisdictional authority to issue citations for open burning activities on tribal lands.

**Response to Comment A1-11 (part 7):**

State law prohibits air districts and CARB from banning agricultural burning (California Code of Regulations §41850). Additionally, although staff enforces Rule 444 - Open Burning<sup>2</sup> to address open burning, many of the illegal burns that concern the CSC are on tribal lands, which South Coast AQMD do not fall within South Coast AQMD's authority.

Regarding potential legislation, staff does not believe that such legislation would improve air quality. For example, while legislation (SB 705) has been enacted for the San Joaquin Valley to phase out open burning, recent reports from CARB show that the San Joaquin Valley Air Basin still accounts for 36.5% of PM<sub>2.5</sub> emissions from agricultural burning statewide.<sup>3</sup> In contrast, the Salton Sea<sup>4</sup> and South Coast Air Basins together account for 8% of PM<sub>2.5</sub> emissions from agricultural burning statewide. This recent data demonstrate that the provisions of South Coast AQMD's Rule 444 - Open Burning combined with South Coast AQMD's enforcement efforts are more effective than SB 705. Rule 444 - Open Burning places strict daily burn limits on growers that are not required by SB 705. Also, SB 705 allows for exceptions based on economic feasibility and the availability of funding for biomass facilities and has resulted in over \$12 million of incentives for open burn alternatives. During recent participatory budgeting efforts, the ECV CSC opted not to prioritize Community Air Protection Program incentives for alternatives to open burning.

**Response to Comment A1-11 (part 8):**

See Response to Comments A1-11 (part 5) and (part 7) on new requirements and Rule 444 - Open Burning.

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<sup>2</sup> Rule 444 – Open Burning: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-444.pdf>.

<sup>3</sup> San Joaquin Valley Agricultural Burning Assessment: [https://ww2.arb.ca.gov/sites/default/files/2021-02/Staff\\_Recommendations\\_SJV\\_Ag\\_Burn.pdf](https://ww2.arb.ca.gov/sites/default/files/2021-02/Staff_Recommendations_SJV_Ag_Burn.pdf)

<sup>4</sup> The Salton Sea Air Basin includes Imperial County and portions of Riverside County.

**Response to Comment A1-11 (part 9):**

See Response to Comments A1-11 (part 5) for information on Action A for new requirements and best practices and alternatives. In addition, during the assessment, on the feasibility of new requirements restrictions during extreme weather events may be considered.

See Response to Comment A1-11 (part 6) for enforcement measures.

See Response to Comment A1-11 (part 2) for monitoring.

See Response to Comment A1-11 (part 3) for reporting illegal burning.

**Response to Comment A1-11 (part 10):**

See Response to Comment A1-11 (part 5) for Action A.

If feasible, new requirements may be incorporated into South Coast AQMD’s Rule 444 - Open Burning. Staff acknowledges the commenters’ desire to complete a feasibility assessment by the 2<sup>nd</sup> quarter of 2022 (with one year of the CERP approval in June); however, new requirements will be better determined after conducting monitoring efforts (Table 1) and enhanced enforcement, follow-up investigations, and/or referrals to appropriate agencies. Also, a number of other actions have been prioritized and written in the CERP to begin after CERP amendment adoption.

**Response to Comment A1-12:**

Staff acknowledges the adoption of the Warehouse Indirect Source Rule (ISR) - Rule 2305. Details for ISR implementation can be found in the staff report and accessed here: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>. South Coast AQMD staff will continue to work with the CSC and the appropriate entities to continue identifying creative ways to mitigate and reduce emissions from these facilities.

**Response to Comment A1-12 (part 1):**

Pursuant to California’s Innovative Clean Transit rule<sup>5</sup>, Sunline will be required to electrify their fleet. Starting in 2023, a quarter of their new buses must be zero-emission, and by 2026 that requirement will rise to half of all new buses. Sunline will be required to update 100% of their fleet by 2029. Additionally, Action D has been added to Chapter 5f, Table 1 to “Identify funding opportunities to install zero-emission charging infrastructure in ECV”. Staff will inquire with Sunline Transit about establishing a rideshare program in ECV.

**Response to Comment A1-12 (part 2):**

Chapter 5f, Table a, Action A includes an action to pursue collaborations to implement vegetative barriers along the railroad.

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<sup>5</sup> <https://ww2.arb.ca.gov/resources/fact-sheets/innovative-clean-transit-ict-regulation-fact-sheet>

**Response to Comment A1-12 (part 3):**

Action D has been added to Chapter 5f, Table 1 to “Identify funding opportunities to install zero-emission charging infrastructure in ECV”.

**Response to Comment A1-12 (part 4):**

Staff has added “Updates to the CSC” as a metric to Chapter 5, Table 1, Action C to inform the CSC and track progress for school bus replacements.

**Response to Comment A1-13:**

The Greenleaf Desert View Power Plant is on tribal land and therefore subject to rules and regulations of the U.S. EPA, Tribal EPA and Bureau of Indian Affairs (BIA). Chapter 5g, Table 1, outlines the process staff will use to reduce emissions from the Greenleaf Desert Power View Plant. Staff is in consultation with U.S. EPA to identify permits in place, emissions associated with the facility, and opportunities to reduce those emissions.

**Response to Comment A1-13 (part 1):**

Chapter 5g, Action B commits staff to pursue a collaborative partnership with the Coachella Valley Association of Governments (CVAG) to consider requiring all future allocations of funds from the Greenleaf Desert View Power Plant in the ECV community to reduce air pollution emissions or exposures.

**Response to Comment A1-13 (part 2):**

The Budget Monitoring Working team has made progress towards identifying locations for community hosted Aeroqual AQY1 sensors near the facility to supplement the existing monitoring network. Currently, the South Coast AQMD regulatory monitor located in Mecca serves as an appropriate monitoring station to such data. Additionally, staff is currently working to develop a community-friendly dashboard/data display tool to make air monitoring data publicly accessible.

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**EXECUTIVE OFFICER:**

WAYNE NASTRI

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# CHAPTER 5:

## DRAFT CERP AMENDMENTS

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The following chapters contain portions of the Assembly Bill (AB) 617 Eastern Coachella Valley (ECV) Community Emissions Reduction Plan (CERP), adopted by the Board in December 2020, that have been amended to include additional details based on Community Steering Committee (CSC) input. AB 617 ECV CERP amendments are addressed in Chapters 5a, 5b, 5c, 5f, and 5g. All other chapters of the AB 617 ECV CERP will remain unchanged.

## Chapter 5a: Introduction

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### Introduction

The Community Emissions Reduction Plan (CERP) and the Community Air Monitoring Plan (CAMP) provide an overall path to reducing air pollution in the Eastern Coachella Valley (ECV) community. Through the development of the CERP and CAMP, the Community Steering Committee (CSC) identified air quality priorities based on sources of air pollution that are of concern to the community (e.g., Salton Sea, potentially toxic dust, open burning). To reduce air pollution from these sources, the CSC identified a set of actions for inclusion in the CERP to be implemented by government agencies, organizations, businesses and other entities.

The CSC identified the Salton Sea, pesticides, open burning and illegal dumping, fugitive road dust, diesel mobile sources, and the Greenleaf Desert View Power Plant (formerly Colmac Energy, Inc.) as air quality priorities to address in the CERP and CAMP. These air pollution sources are often near homes, schools, and other community areas where the public can be exposed to harmful pollutants. Therefore, additional air monitoring in the community to inform emissions and exposure reduction measures is also important to the CSC.

### Ongoing Efforts

The South Coast AQMD, the California Air Resources Board (CARB), United States Environmental Protection Agency (U.S. EPA), and Tribal EPA have air quality regulations to reduce air pollution from sources such as trucks, diesel farm equipment, open burning, fugitive road dust and electricity-generating facilities such as the Greenleaf Desert View Power Plant. As part of ongoing efforts, staff continues to explore and identify additional funding opportunities to reduce emissions in AB 617 communities. The relevant agencies also enforce these regulations. More information on air pollution related enforcement efforts is available in Chapter 4.

### Opportunities for Action

In addition to the ongoing efforts described above, the CSC, in collaboration with South Coast AQMD staff, identified 15 goals to reduce air pollution in the ECV community. The CERP defines how progress toward each goal is assessed by including specified metrics and timelines for each action. Additionally, the CERP identifies the entities responsible for implementing the actions. Responsible entities include collaborating agencies that have jurisdictional authority and/or supporting entities to implement the actions. The actions define a path to reduce emissions and exposures in the ECV community. In some instances, the actions reaffirm ongoing rule development efforts and provide new commitments for localized reductions, sharing emissions data, new or accelerated timelines, and other related information.

### Emission Reduction Targets

The actions in the CERP prioritize emissions reductions in the ECV community. The CERP includes emission reduction targets, where quantifiable, for oxides of nitrogen (NOx), diesel particulate matter (DPM), and particulate matter 2.5 microns or smaller (PM2.5). Table 1 below, provides a list of the overall emission reduction targets for the CERP, which is ~~Additionally, the CERP is expected to reduce 2.4 tons per year (tpy) of particulate matter 10 microns or smaller (PM10) by 2030. Baseline emissions refer to expected future emissions without any new action or regulation beyond those already adopted. Additionally, the~~

CERP is expected to result in ~~additional~~ emission reductions that have yet to be quantified (e.g., actions focused on enforcement and outreach).

Emissions	NOx	DPM
2018 Emissions in tons per year (tpy))	1,376	24
Projected 2025 Baseline Emissions <sup>†</sup> (tpy)	982	11
Emission Reductions from CERP, by 2025 (tpy)	54	1
Overall Emission Reductions from 2025 (%)	33	58
Projected 2030 Baseline Emissions <sup>±†</sup> (tpy)	878	8
Emission Reductions from CERP, by 2030 (tpy)*	115	2
Overall Emission Reductions from 2030 (%)	45	77

\*Estimated emission reduction targets from CERP, by 2030 include 15.6 tpy NOx, 1.4 tpy DPM from projected incentive projects.

<sup>†</sup>Baseline emissions refer to expected future emissions without any new action or regulation beyond those already adopted.

Statewide Measure	Action Date	Implementing Entity	Emission Reductions Targets 2025/2030 (tpy)			
			NOx	VOC	DPM	PM2.5
Advanced Clean Car 2	2020-2021	CARB	-/1.0	-/0.5	-/<0.1	-/<0.1
Heavy-Duty Inspection and Maintenance	2020	CARB	38.4/47.8	-/-	0.7/0.7	0.6/0.7
Low NOx Engine Standard	2019	CARB	2.7/22.3	-/-	-/-	-/-
Small Off-Road Engine Amendment	2020	CARB	13.2/28.0	12.3/56.5	0.1/0.4	0.2/1.4

\*Emission reduction targets based on estimates from CARB. Emission reductions are subject to future assessment and regulatory analysis that may result in emission reduction adjustments.

## CERP Amendment

During CERP Development, the ECV CSC expressed that more time was needed to fully develop a CERP that was effective, enforceable, and that would result in measurable reductions. On December 4, 2020, the South Coast AQMD Governing Board adopted the ECV CERP, including a resolution that committed staff to continue working with the CSC to develop a CERP Amendment that includes additional details requested by the CSC. Since the adoption of the ECV CERP, staff has met with the CSC on over 30 occasions. This includes 9 CSC meetings focused on the CERP Amendment and incentives budget, 12 Budget and Monitoring Working Teams and agenda setting meetings, and over 10 meetings with small groups or individual CSC members. The CSC meetings focused on developing CERP details for actions to address pesticides, land use, local and regional plans, and alternatives to agricultural burning. These topic areas for developing CERP amendments were specified by the CSC. The budgeting meetings and workshops gathered CSC input on allocation of the Year 3 Community Air Protection Program (CAPP) incentives funds (\$5.57 million) for community-identified projects in the ECV. The Budget and Monitoring Working Teams meetings were organized and led by CSC members and staff participated and provided presentations. CSC members provided regular updates to the entire CSC on topics discussed during the Working Team meetings, which included identifying monitoring locations and discussing the incentives budget.

## Incentives Budget Workshop

The ECV CSC asked to provide input on the allocation of available Year 3 CAPP incentive funds (\$5.57 million). Staff held 3 incentives budget workshops and provided the CSC information on eligible projects (e.g., estimated costs, emissions reductions, amount invested in previous CAPP funding cycle). Staff also conducted two polls to gather CSC input. The first poll identified the CSC's top 3 priorities by project type which are road paving, air filtration and purifier systems, and alternatives to agricultural burning. The second poll identified how the CSC would like to distribute the available funds to the top 3 priorities with \$4.57 million to road paving projects and \$1 million to home air filtration/purifier systems. Additionally, the ECV CSC established a Budget Working Team that met once every other week during development of the CERP Amendment to discuss the incentives budget, leveraging other available funds, eligible and desirable projects to potentially fund, and how to distribute the funds to each project.

South Coast AQMD will continue to work with the CSC on their budget priorities for incentive projects and hold incentives-specific workshops for interested members to develop project plans for community identified projects. The workshops will facilitate additional CSC input on project plan criteria and other considerations for the disbursement of Year 3 CAPP incentive funds, including integrating the additional considerations that were raised during the public process thus far (e.g., focusing on funding home filtration and purifier systems at homes near the Salton Sea and occupied by children with asthma). These project plans are required by CARB, as outlined in their CAPP Incentive Guidelines<sup>1</sup>.

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<sup>1</sup> CAPP Incentives Guidelines: [https://ww2.arb.ca.gov/sites/default/files/2020-10/cap\\_incentives\\_2019\\_guidelines\\_final\\_rev\\_10\\_14\\_2020\\_0.pdf](https://ww2.arb.ca.gov/sites/default/files/2020-10/cap_incentives_2019_guidelines_final_rev_10_14_2020_0.pdf)

## Monitoring Working Team Workshops

During the development of the CERP Amendment, CSC members organized a Monitoring Working Team and held a total of 4 workshops. CSC members led the discussion and staff participated in each of these workshops to answer questions that arose regarding the current monitoring efforts in the ECV, available monitoring technologies, and the overall CAMP implementation. The Monitoring Working Team conducted a survey with the entire CSC to gather input on potential locations to install monitors and/or air quality sensors. Staff will continue working with the Monitoring Working Team to implement the actions in the CAMP, including supplementing the existing air monitoring network and establishing a new air quality sensor network, as well as providing regular updates to the CSC.

## Land Use

Land use planning is the process of regulating or managing the use of land to consider factors (e.g., social, economic) to guide the development of a community and preserve its resources and quality of life. These decisions are generally made by city or county planning agencies. Zoning is used to help governments regulate the physical development of land and type of uses on these lands (e.g., residential, commercial, industrial). State law expressly prohibits South Coast AQMD from making land use decisions. Although South Coast AQMD does not have land use jurisdiction, staff works with land use agencies through California Environmental Quality Act (CEQA). CEQA requires state and local agencies to identify and reduce the environmental impacts of land-use decisions. Through the CEQA process, staff has the opportunity to provide technical expertise and recommendations to mitigate air quality impacts. South Coast AQMD has a robust Intergovernmental Review (IGR) program, in which staff reviews and comments on hundreds of CEQA documents per year, focusing on adequacy of air quality analyses. South Coast AQMD CEQA comments are meant as guidance for lead agencies, including local land use agencies or entities, to ensure a reasonable air quality analysis is conducted to estimate air quality impacts, and significant air quality impacts are mitigated to the extent feasible. Local land use agencies often consult with South Coast AQMD staff during preparation of an environmental analysis and staff provides mitigation measures to ensure they are incorporated into projects early in the development process. Existing projects that are already developed, such as the Thermal Racing Club Track<sup>2</sup> and Thermal Airport, are difficult to change. However, South Coast AQMD recognizes it can take actions to reduce emissions for future development projects (e.g., race tracks, airports, warehouses) in the ECV through the CEQA process and provide the CSC updates on these types of projects. Additionally, the ECV CSC identified concerns around tailpipe emissions from vehicles at the Thermal Racing Club Track. Recognizing the cumulative impacts that the ECV community faces, additional actions were written into the CERP specific to certain air quality priorities. These include:

- working with CARB and land use agencies to develop recommendations on best practices to address light duty mobile sources from local land use (e.g., Thermal Racing Club Track) (see Table 3 below)
- providing additional air quality expertise for new development projects near the Salton Sea and pursuing collaboration with Riverside County, the City of Indio and the City of Coachella to

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<sup>2</sup> California law exempts “racing vehicles” from emissions controls to protect and preserve legitimate racing - Health and Safety Code (HSC) § 43001. “Racing vehicle” is defined as “a competition vehicle not used on public highways - HSC § 39048.

identify, secure and implement greenspace projects near sensitive receptors near the Salton Sea (see Chapter 5b),

- identifying opportunities to collaborate with local land use and transportation agencies to restrict heavy-duty trucks from transiting near sensitive land uses (e.g., residences) and ~~pursuing collaboration with land use agencies to implement vegetative barriers around the railroad that passes through the ECV community (Chapter 5f).~~

Table 3 below provides a goal, action, responsible entity, applicable metrics and an implementation timeline to develop strategies to address land use, and local and regional plans.

**Table 3—Goal: ~~Develop strategies with land use agencies to lessen cumulative impacts and reduce emissions and exposure~~**

	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
<b>A</b>	<del>Present an overview of the South Coast AQMD CEQA – IGR program to the CSC and present recommended mitigation measures staff generally provides for new and redevelopment projects and provide the CSC with updates on CEQA IGR projects South Coast AQMD has provided comments on</del>	South Coast AQMD	Presentation—on overview provided • <del>Updates provided to CSC</del>	First two quarters, 2021	1 <sup>st</sup> quarter, 2026
<b>B</b>	<del>Review the community plans (e.g., Coachella Valley Extreme Ozone State Implementation Plan) and identify appropriate areas for coordination and collaboration with the lead agencies to help reduce emissions and/or exposures to the air pollution within the air quality priorities addressed in the CERP</del>	South Coast AQMD	• Number of plans reviewed Areas identified for coordination	First two quarters, 2021	1 <sup>st</sup> quarter, 2026

**Table 3 – Goal: Coordinate with Local and Regional Agencies to facilitate the implementation of community plans and develop strategies with land use agencies to lessen cumulative impacts and reduce emissions and exposures**

	<u>Action</u>	<u>Responsible Entity</u>	<u>Metric</u>	<u>Timeline</u>	
				<u>Start</u>	<u>Complete</u>
<b>A</b>	<u>Present an overview of the South Coast AQMD CEQA – IGR program to the CSC and present recommended mitigation measures staff generally provides for new and redevelopment projects and provide the CSC with updates on CEQA-IGR projects where South Coast AQMD has provided comments</u>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Overview presentation provided</u></li> <li><u>Updates provided to CSC</u></li> </ul>	<u>3<sup>rd</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2026</u>
<b>B</b>	<u>Provide local and regional planning agencies an opportunity to conduct community outreach for plans that affect air quality in the community (e.g., announcements, presentations) through public comments in CSC meetings</u>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Number of outreach opportunities other agencies participated in</u></li> </ul>	<u>1st quarter, 2021</u>	<u>1st quarter, 2026</u>
<b>C</b>	<u>Provide air quality information to inform the implementation of local and regional plans that affect air quality</u>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Number of air quality related comments provided to other agencies</u></li> </ul>	<u>1<sup>st</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2026</u>
<b>D</b>	<u>Identify appropriate tree planting locations near areas of concern (e.g., mobile home parks and schools), to be updated annually, and seek opportunities to implement tree planting projects that support climate resilience and adaptation policies</u> <ul style="list-style-type: none"> <li><u>Submit one to two applications if funding</u></li> </ul>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Locations identified</u></li> <li><u>Number of trees planted per year</u></li> <li><u>Updates to the CSC</u></li> </ul>	<u>1<sup>st</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2026</u>

	<u>opportunities are identified</u>				
<b>E</b>	<u>Incentivize mobile source projects (e.g., electric and hybrid vehicles) in ECV to reduce air toxics, criteria pollutants, and greenhouse gas emissions</u>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Number of mobile source projects funded</u></li> </ul>	<u>1<sup>st</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2026</u>
<b>F</b>	<u>Identify funds for home weatherization projects in ECV to support climate resilience and adaptation policies</u>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Number of home weatherization projects funded</u></li> </ul>	<u>1<sup>st</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2026</u>
<b>G</b>	<u>Collaborate with the California Natural Resource Agency (CNRA), the Imperial Irrigation District (IID), and other partnering agencies to implement dust suppression projects identified in the Dust Suppression Action Plan (additional details available in Chapter 5b, Table 2, Action C)</u>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Number of comment letters provided to partnering agencies</u></li> <li><u>Number of dust suppression projects implemented</u></li> </ul>	<u>4<sup>th</sup> quarter, 2020</u>	<u>1<sup>st</sup> quarter, 2026</u>
<b>H</b>	<u>South Coast AQMD and CARB to work with the CSC to develop recommendations for land use agencies on best practices to reduce light duty vehicle emissions from the Thermal Racing Club Track</u>	<u>CARB and South Coast AQMD</u>	<u>TBD</u>	<u>4<sup>th</sup> quarter, 2021</u>	<u>4<sup>th</sup> quarter, 2023</u>
<b>I</b>	<u>Work with the CSC to apply for available funding opportunities from the Unincorporated Communities Initiative and American Rescue for CERP actions</u>	<u>South Coast AQMD and ECV CSC</u>	<ul style="list-style-type: none"> <li><u>Submit one to two applications during each program cycle if funding opportunities are identified</u></li> </ul>	<u>3<sup>rd</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2026</u>

## Chapter 5b: Salton Sea

### Background

The Salton Sea is California's largest lake at approximately 25 miles long and up to 15 miles wide. The largest portion of the Salton Sea is in Imperial County while the northern portion is in the Eastern Coachella Valley (ECV) in Riverside County. It is located in a natural trough which is below sea level. ~~Historically, this lakes was formed—were formed on numerous occasions~~ due to flooding of the Colorado River that filled this natural trough or sink, which is below sea level. The modern-day Salton Sea was formed in 1905 when the Colorado River breached an irrigation inlet and flowed unchecked into the area for 18 months. In the years after the breach, the Salton Sea has been fed largely by small rivers, creeks and drains that include agricultural runoff. The relatively shallow lake has no outlet and inflow does not keep pace with evaporation, causing the Salton Sea to gradually shrink. Salts are left behind when the water evaporates, leading to increasing salinity. The Salton Sea is currently over 50 percent saltier than the Pacific Ocean.



In 2003, multiple parties, including the State and three water districts in the region, entered into a series of agreements to address longstanding issues regarding usage of Colorado River water. These agreements are known collectively as the Quantification Settlement Agreement (QSA). The QSA includes an agreement to transfer water that was historically used to irrigate farm fields near the Sea to other Southern California water districts for residential use. To accommodate the QSA transfer, the Imperial Irrigation District (IID) has reduced its water use by increasing efficiencies and fallowing some fields. By reducing the amount of water available for agricultural uses in the Imperial Valley, these transfers have the effect of decreasing the amount of fresh water that runs off fields into the Sea. The State had required some mitigation inflow water to continue to be provided to the Salton Sea, but that requirement expired in December 2017. This has expedited the rate at which the Sea shrinks and becomes more saline.

The Salton Sea is one of the most important links on the Pacific Flyway, supporting over 400 species of birds and a myriad of invertebrates, although deteriorating conditions may be detrimental to this habitat. As the Salton Sea continues to recede, an average of 4,800 acres of shoreline playa is estimated to be newly exposed each year. The increasing area of exposed playa is expected to increase windblown particulate matter and related health impacts.

Created in 1993, the Salton Sea Authority is a Joint Powers Authority (JPA) responsible for working in consultation and cooperation with the State of California to oversee the comprehensive restoration of the

Salton Sea. Although the Salton Sea Authority and its partner agencies recognize the state and federal roles and responsibilities at the Salton Sea, the Salton Sea Authority is directed by board-adopted policy to assert a leadership role to ensure local priorities are recognized. The State has committed to mitigating the effects of the water transfers through a cooperative effort between State and federal agencies and IID to implement habitat and dust suppression projects. The California Natural Resources Agency (CNRA) Salton Sea Management Program (SSMP) was created to address the urgent public and ecological health issues resulting from the drying and shrinking of the Salton Sea. While the SSMP is a long-range program, its immediate focus is on the development and implementation of the 2018 SSMP Phase I: 10-Year Plan<sup>1</sup>, by providing planning, engineering, and environmental expertise for design and implementation of dust-suppression and habitat projects. The Phase I Plan includes projects that will be completed as early as the end of 2022.

### Community Concerns

CSC members expressed that dust emissions resulting from the receding Salton Sea is a major concern in the ECV community. As the Salton Sea evaporates, its receding shoreline exposes sediments deposited at the bottom of the Sea, also referred to as “playa.” The loose soil is blown off by strong gusty winds, contributing to PM10 (inhalable particulate matter) emissions that could impact air quality. Windblown PM10 exposure from the playa is expected to increase over time in an area already impacted by high PM10 events from strong winds through the San Gorgonio Pass that blow along the Coachella Valley or from summertime thunderstorm outflows that transport dust from the desert areas to the south and east into the Coachella Valley. While the composition of the playa is variable, current data suggests that the soils are high in salt content and may contain constituents that could be toxic. CSC members further expressed concerns that the playa may also contain components from agricultural runoff, possibly including remnants of fertilizers and pesticides. Previous studies have detected selenium, cadmium and nickel, which could pose a risk to human health if present in sufficient amounts. CSC members have mentioned that they would like IID and the State of California to move more quickly to develop and implement dust suppression projects for the exposed Salton Sea playa, as well as increase air monitoring around the Salton Sea, particularly in the northern region.

Elevated levels of hydrogen sulfide (H<sub>2</sub>S) occur from natural processes in the Salton Sea. While H<sub>2</sub>S, a gas that smells like rotten eggs, does not have a federal standard, there is a California State standard (30 parts-per-billion). The state standard is exceeded numerous times each year near the shores of the Salton Sea. A few times each year, H<sub>2</sub>S odors are transported toward the northwest to inland areas of the Coachella Valley farther from the Salton Sea and, more rarely, through the San Gorgonio Pass into metropolitan Riverside and San Bernardino Counties. H<sub>2</sub>S odor events occur most frequently in the hot summer months but can occur whenever local breezes bring H<sub>2</sub>S from the Salton Sea into ECV communities.

At levels above the State standard, most individuals can smell the odor and some may experience temporary symptoms such as headaches and nausea. Some individuals can smell H<sub>2</sub>S at very low concentrations, down to a few parts-per-billion. The long-term levels of H<sub>2</sub>S are unlikely to be above

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<sup>1</sup> <https://resources.ca.gov/CNRALegacyFiles/wp-content/uploads/2018/10/SSMP-Phase-1-10-Year-Plan.pdf>

chronic Reference Exposure Levels, and therefore below thresholds where toxic impacts would be a concern. However, because odors can cause temporary health effects, and since H<sub>2</sub>S odors occur frequently in some areas of the ECV, the presence of H<sub>2</sub>S can lead to negative quality of life impacts. The symptoms associated with this low level of exposure are temporary and are not expected to cause any long-term health effects. CSC members have expressed that they experience acute health effects (e.g., headaches and nosebleeds) during both windblown dust and Salton Sea H<sub>2</sub>S odor events. Because there continue to be concerns around the unknown or unquantified health impacts of the Salton Sea emissions, this is an ongoing topic of research at several academic research institutions, including UC Riverside, Loma Linda University and others. The community members requested additional monitoring and improvements to notification systems to better understand emissions from the Salton Sea and reduce exposure in the community. Please see Appendix 5b for more details.

### Actions to Address the Salton Sea

To address community concerns and reduce exposure from the Salton Sea in ECV, South Coast AQMD staff developed actions for the Community Emissions Reduction Plan (CERP). Tables 1, 2 and 3 below provide goals, actions, responsible entities, metrics, and a timeline to achieve the exposure reductions from the Salton Sea.

Table 1 - Goal: Expand monitoring networks and improve notification systems

	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
<b>A</b>	<p>Expand the existing South Coast AQMD's hydrogen sulfide (H2S) monitoring network in ECV to:</p> <ul style="list-style-type: none"> <li>• Provide near real-time H2S data and inform community members about potential odors, including a notification system for when ambient levels exceed the State standard; continue H2S odor advisories for multi-day odor events when H2S levels are forecasted to exceed the state standard</li> <li>• Use the monitoring data to help assess the odor's origin, community impact and extent to which the odors may transport in the community and beyond</li> </ul>	South Coast AQMD	<ul style="list-style-type: none"> <li>• Monitors installed</li> <li>• Data collected through air monitoring</li> <li>• Updates provided to the CSC</li> </ul>	2 <sup>nd</sup> quarter, 2021	4 <sup>th</sup> quarter, 2025
<b>B</b>	<p>Identify opportunities to <del>expand</del> <u>supplement</u> the South Coast AQMD's PM10 monitoring network in the ECV to:</p> <ul style="list-style-type: none"> <li>• Provide real-time PM10 and wind data and inform community members of PM10 levels in ECV, and if they exceed federal and/or State standards</li> <li>• Gain a better understanding of dust emissions and assess methods to distinguish between windblown dust from desert areas and playa dust emissions from the Salton Sea</li> <li>• Track the concentration trends of PM10 over time to help determine the effectiveness of emissions reduction measures as highlighted in the CERP</li> </ul>	South Coast AQMD	<ul style="list-style-type: none"> <li>• Monitors installed</li> <li>• Data collected through air monitoring</li> <li>• Updates provided to the CSC</li> </ul>	4th quarter, 2021	4 <sup>th</sup> quarter, 2025

<b>C</b>	<p>Establish baseline air monitoring to:</p> <ul style="list-style-type: none"> <li>• Characterize the chemical composition of fugitive dust emissions from different sources to help distinguish between windblown dust from desert areas and playa dust emissions from the Salton Sea</li> <li>• Analyze existing chemical speciation data and work with the CSC and CARB to determine which chemical species should be sampled. For example, this may include certain metals (such as selenium) and sea spray indicators</li> <li>• Track the concentration trends of key indicator pollutants of Salton Sea emissions</li> </ul>	South Coast AQMD	<ul style="list-style-type: none"> <li>• Data collected through air monitoring</li> <li>• Updates provided to the CSC</li> </ul>	1 <sup>st</sup> quarter, 2021	4 <sup>th</sup> quarter, 2025
<b>D</b>	<p>Seek new opportunities to work with the CSC to create an air quality sensor network in the ECV community to:</p> <ul style="list-style-type: none"> <li>• Provide real-time PM10 data</li> <li>• Supplement the PM10 monitoring network in the ECV and cover a larger area in the community</li> <li>• Co-locate air quality sensors with a reference PM10 monitor at one <u>or more</u> of South Coast AQMD’s air monitoring station(s) to verify the sensors’ performance prior to deployment and implement a data calibration and correction protocol to enhance sensor PM10 data quality after deployment</li> </ul>	South Coast AQMD	<ul style="list-style-type: none"> <li>• Air quality sensors deployed</li> <li>• Data collected through air monitoring</li> <li>• Updates provided to the CSC</li> </ul>	4th quarter, 2021	4 <sup>th</sup> quarter, 2025
<b>E</b>	<p>Pursue a collaborative partnership with UCR School of Medicine, provide support to the ongoing study on soil chemical and microbiome composition of the Salton Sea playa dust samples, and work with the project team to expand this study to include adult populations in the ECV.</p>	South Coast AQMD, UCR School of Medicine	<ul style="list-style-type: none"> <li>• Updates provided to the CSC</li> <li>• Develop strategies list, if appropriate</li> </ul>	1 <sup>st</sup> quarter, 2021	4 <sup>th</sup> quarter, 2025

Table 2 - Goal: Reduce emissions from the Salton Sea

	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
<b>A</b>	<p>Provide additional air quality expertise to:</p> <ul style="list-style-type: none"> <li>The State for the implementation of the Salton Sea Management Program</li> <li>Land use agencies for new development projects near the Salton Sea</li> </ul>	South Coast AQMD	<ul style="list-style-type: none"> <li>Updates provided to the CSC</li> </ul>	1 <sup>st</sup> quarter, 2021	1 <sup>st</sup> quarter, 2026
<b>B</b>	<p>Work with other agencies (e.g., IID and the State of California) to collect emissivity and dust emissions data to improve South Coast AQMD's emissions inventory</p>	South Coast AQMD, IID, the State of California	<ul style="list-style-type: none"> <li>Data collected and incorporated in South Coast AQMD's emissions inventory</li> <li>Updates provided to the CSC</li> </ul>	4 <sup>th</sup> quarter, 2021	4 <sup>th</sup> quarter, 2026
<b>C</b>	<p>Pursue a collaborative partnership and support IID, the Salton Sea Authority, Riverside County, Torres Martinez Desert Cahuilla Indians and the State of California with implementing dust suppression projects (e.g., Dust Suppression Action Plan (DSAP) and Salton Sea Management Plan) around the Salton Sea by:</p> <ul style="list-style-type: none"> <li>Helping to identify locations in partnership with residents for future dust suppression projects (includes vegetation to reduce emissivity through the DSAP) in the ECV community; and</li> <li>Providing letters of support for additional funding to help expedite dust suppression projects near population centers (e.g., North Shore) in the Riverside County portion of the Salton Sea</li> </ul>	South Coast AQMD, IID, the State of California	<ul style="list-style-type: none"> <li>Number of projects worked on or supported</li> <li>Updates provided to the CSC</li> </ul>	1 <sup>st</sup> quarter, 2021	1 <sup>st</sup> quarter, 2026

	<ul style="list-style-type: none"> <li>Provide updates to the CSC on ongoing Salton Sea efforts (e.g., Coachella Valley Environmental Justice Task Force Meetings) in coordination with AB 617 implementation</li> </ul>				
<b>D</b>	Pursue a collaborative partnership with IID, Regional Water Quality Control Board (RWQCB) Region 7 and State Water Regional Control Board (SWRCB) to identify opportunities to mitigate pesticide runoff into the Sea (e.g., developing alternative disposal options of agricultural runoff or water treatment facilities and filtration systems at all Salton Sea tributary entryways)	South Coast AQMD, IID	<ul style="list-style-type: none"> <li>Number of projects worked on or supported</li> <li>Updates provided to the CSC</li> </ul>	1 <sup>st</sup> quarter, 2021	1 <sup>st</sup> quarter, 2026
<b>E</b>	Pursue a collaborative partnership with Imperial County Air Pollution Control District (ICAPCD) to address cross-jurisdictional air pollution emissions from the Sea and dust suppression projects around the Salton Sea and gather air monitoring network data	South Coast AQMD, ICAPCD	<ul style="list-style-type: none"> <li>Number of projects worked on or supported</li> <li>Updates provided to the CSC</li> </ul>	1 <sup>st</sup> quarter, 2022	1 <sup>st</sup> quarter, 2026
<b>F</b>	Conduct outreach to facility operators/workers/owners on South Coast AQMD Rules 403 – Fugitive Dust and 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources and best practices to reduce dust during the implementation of projects	South Coast AQMD	<ul style="list-style-type: none"> <li>Development of materials for distribution</li> <li>Number of outreach events staff participates in the ECV</li> <li>Number of entities the information is shared with (i.e., newsletter distribution list)</li> </ul>	4 <sup>th</sup> quarter, 2021	4 <sup>th</sup> quarter, 2022

<b>G</b>	<p>Pursue a collaborative partnership with community organizations to conduct outreach in the community (e.g., door hangers, handouts) to inform community members on how to file dust complaints</p> <ul style="list-style-type: none"> <li>Develop a list of potential responses and solutions that South Coast AQMD staff can pursue in response to dust complaints</li> </ul>	<p>South Coast AQMD, community organizations</p>	<ul style="list-style-type: none"> <li>Development of materials for distribution</li> <li>Number of outreach events staff participates in the ECV</li> <li>Number of entities the information is shared with (i.e., newsletter distribution list)</li> </ul>	<p>4<sup>th</sup> quarter, 2021</p>	<p>4<sup>th</sup> quarter, 2022</p>
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**Table 3 - Goal: Reduce exposure from the Salton Sea**

	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
<b>A</b>	<p>Identify, secure and utilize funding to install and maintain air filtration systems at schools and homes located near the Salton Sea to reduce exposure to dust emissions; assess the benefits and feasibility of filtered “clean rooms” in public buildings accessible to the community for relief from dust events</p>	<p>South Coast AQMD</p>	<ul style="list-style-type: none"> <li>Number of air filtration systems installed</li> </ul>	<p>3<sup>rd</sup> quarter, 2021</p>	<p>3<sup>rd</sup> quarter, 2023</p>
<b>B</b>	<p>Identify, secure and utilize funding and pursue collaboration with appropriate entities (e.g., United States Green Building Council, Southern California Gas Company) to implement home weatherization projects near the Salton Sea</p>	<p>South Coast AQMD</p>	<ul style="list-style-type: none"> <li>Number of weatherization projects implemented</li> </ul>	<p>4<sup>th</sup> quarter, 2021</p>	<p>4<sup>th</sup> quarter, 2024</p>

C	Pursue a collaborative partnership with community organizations to conduct outreach in the community (e.g., door hangers, handouts, and community events) to inform community members, schools and other youth groups (e.g., Sierra Club Youth Group), on how to access real-time air quality data, subscribe to air quality alerts, report dust complaints, and use the South Coast AQMD app to obtain air quality information	South Coast AQMD, community organizations	<ul style="list-style-type: none"> <li>• Development of materials for distribution</li> <li>• Number of outreach events staff participates in the ECV</li> <li>• Number of entities the information is shared with (i.e., newsletter distribution list)</li> </ul>	4th quarter, 2021	4th quarter, 2022
D	Pursue a collaborative partnership with community organizations to conduct outreach in the community, including schools and other youth groups (e.g., Sierra Club Youth Group), to inform community members what to do when H2S levels are above the California Ambient Air Quality Standard (0.03 ppm)	South Coast AQMD	<ul style="list-style-type: none"> <li>• Development of materials for distribution</li> <li>• Number of outreach events staff participates in the ECV</li> <li>• Number of entities the information is shared with (i.e., newsletter distribution list)</li> </ul>	1st quarter, 2022	4th quarter, 2022
E	Work with local health care providers to provide requested air quality data (if available)	South Coast AQMD	<ul style="list-style-type: none"> <li>• Data shared with healthcare providers</li> </ul>	3rd quarter, 2021	1st quarter, 2026
F	<u>Identify appropriate tree planting locations near areas of concern (e.g., mobile home parks and schools), to be updated annually, and seek opportunities to implement tree planting projects near sensitive receptors near the Salton Sea.</u>	South Coast AQMD,	<ul style="list-style-type: none"> <li>• <u>Locations identified</u></li> <li>• <u>Number of trees planted per year</u></li> <li>• <u>Updates to the CSC</u>Number of</li> </ul>	4th quarter, 2021	1st quarter, 2026

<ul style="list-style-type: none"><li>• <u>If appropriate funding is identified, submit one to two applications.</u></li></ul> <p><del>Pursue a collaborative partnership with Riverside County, the City of Indio and the City of Coachella to identify, secure and implement urban greening projects near sensitive receptors near the Salton Sea</del></p>		<p><del>implemented urban greening projects</del></p>		
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## Chapter 5c: Pesticides

### Community Concerns



The ECV community is home to a large amount of agricultural activities, including the production of dates, grapes, citrus, and other crops. The ECV CSC expressed concerns about the use and application of pesticides and the resulting agricultural run-off that may collect in the Salton Sea sediment. Concerns raised by the CSC include the unknown adverse health effects of pesticides, odors and potential toxicity resulting from possible exposure. CSC members expressed concerns regarding regulatory enforcement. The members reported that pesticides are being applied during restricted hours and drift into

homes and schools near application sites, despite current regulations that are in place. The CSC also raised concerns about farmworker exposure to pesticides, often in excessive amounts and without proper personal protective equipment (PPE) and training. They further CSC members expressed a need for buffer zones between agricultural operations and sensitive receptors and for employers to provide PPE for agricultural workers. Finally, CSC members requested a pesticide application notification system that informs the community before pesticides are applied, allowing residents to make informed decisions about avoiding outdoor activities that could increase their exposure (e.g., outdoor exercise). ~~Please see Appendix 5c for more details.~~

### Actions to Address Pesticides

South Coast AQMD staff developed additional actions and details that support~~for~~ the Community Emissions Reduction Plan (CERP) to address community concerns about pesticide emissions and exposures. ~~Additionally, the Department of Pesticide Regulation (DPR) is initiating efforts to develop a statewide pesticide application notification system.~~ Tables 1 and 2 below provide a goal, action, responsible entity, applicable metrics, and an implementation timeline to achieve the emission and exposure reductions due to pesticide use and applications. These details were developed in collaboration with the United States Environmental Protection Agency (U.S. EPA) Region 9, the California Air Resources Board (CARB), the California Office of Environmental Health Hazard Assessment (OEHHA), the Department of Pesticide Regulation (DPR), the Riverside County Agricultural Commissioner (CAC), and the ECV CSC.

#### Pesticide control and agency responsibilities in ECV

The Food and Agricultural Codes (e.g., FAC sections 11501 and 11454) provide jurisdiction to DPR over the regulation of pesticide sales and use in California. Health and Safety Code Section 39650 (g)<sup>1</sup> and 39655 (a)<sup>2</sup>, and FAC 14021 further define DPR's jurisdiction for pesticide Toxic Air Contaminants (TACs). Generally, DPR's regulatory authority covers activities, such as:

<sup>1</sup> [https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=39650.&lawCode=HSC](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=39650.&lawCode=HSC)

<sup>2</sup> [https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=39655.&lawCode=HSC](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=39655.&lawCode=HSC)

- Pesticide product evaluation and registration, as well as statewide licensing of commercial applicators, dealers, advisors, and other pesticide professionals;
- Evaluation of health impacts of pesticides through illness surveillance and risk assessment; environmental monitoring of air, water and soil;
- Field enforcement (with CACs) of laws and regulations on pesticide use;
- Residue testing of fresh produce; and
- Encouraging development and adoption of least-toxic pest management practices through incentives and grants.

U.S. EPA-approved pesticide product labels establish use directions and restrictions that must be followed by pesticide users. Additional use restrictions may be established by regulations. For example, DPR regulations set forth distance restrictions for the application of pesticides near school sites and child day care facilities (3CCR 6691(a) to 6691(c)). Local permit conditions may also be established by CACs for pesticides designated as restricted materials by DPR and in limited cases for pesticides that are non-restricted materials. In ECV, the enforcement of pesticide use in the field is carried out by the Riverside CAC.

DPR coordinates with CARB to monitor pesticide use in communities across the state. South Coast AQMD will work with DPR and CARB to conduct pesticide monitoring in ECV based on CSC concerns about pesticide exposure in the community. The Office of Environmental Health Hazard Assessment (OEHHA) is the lead state agency for the assessment of health risks posed by environmental contaminants and provides scientific peer review of pesticide risk assessments. OEHHA works with DPR to develop regulations to protect pesticide worker health and safety and trains physicians to recognize and report pesticide-related illnesses. OEHHA also works with the California Department of Food and Agriculture to provide health information on pesticide applications aimed at combating invasive species.

U.S. EPA regulates pesticides under broad authority granted in two major statutes, the Federal Insecticide, Fungicide, and Rodenticide Act and the Federal Food, Drug, and Cosmetic Act. These laws have been amended by the Food Quality Protection Act and the Pesticide Registration Improvement Act. Under this authority the U.S. EPA administers a registration process for pesticides. Through this process, the U.S. EPA assesses potential human health and environmental effects associated with use of pesticides that are submitted for registration. Pesticide products must be registered federally by the U.S. EPA before they can be registered by DPR for sale and use in California. Additional details about the U.S. EPA's pesticide registration program are available at <https://www.epa.gov/pesticide-registration/about-pesticide-registration#laws>.

**Table 1—Goal: Air Monitoring for Pesticides**

	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
A	<p>Pursue a collaborative partnership with CARB and consult with California Department of Pesticide Regulation (DPR) and Riverside County Agricultural Commissioner to consider developing an air monitoring strategy to study the use of pesticides in ECV, and work with scientists at public health agencies with expertise in pesticide toxicity to identify key pesticides of concern for air monitoring:</p> <ul style="list-style-type: none"> <li>• Conduct a screening evaluation of the pesticides used in this community, and work with the CSC to identify the key pesticides of concern for monitoring efforts</li> <li>• Work with DPR to define the purpose of air monitoring, and develop a plan that identifies the sampling locations, extent of sampling, and equipment that will be used</li> <li>• Determine if specific pesticides are present and at what levels to help determine community impact</li> <li>• Assess the monitoring data and if monitoring results show unacceptable pesticide levels in ambient air, work with DPR and Riverside County Agricultural Commissioner to take steps towards identifying potential exposure reduction measures (e.g., development of new use restrictions by the Riverside County Agricultural Commissioner, or pesticide regulations by DPR, if needed)</li> </ul>	South Coast AQMD, CARB	<ul style="list-style-type: none"> <li>• Type of equipment to be deployed and extent of the deployment</li> <li>• Updates provided to the CSC</li> </ul>	3 <sup>rd</sup> quarter, 2021	1 <sup>st</sup> quarter, 2026

**Table 2—Goal: Reduce Pesticide Emissions and Exposures**

	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
<b>A</b>	<p>Pursue a collaborative partnership with CARB and consult with the California DPR and the Riverside County Agricultural Commissioner to:</p> <ul style="list-style-type: none"> <li>• Gather data about the use of pesticides in the community (e.g., the frequency, volume, composition, potential for community exposures and toxicity of pesticides applied to agricultural crops)</li> <li>• Evaluate potential community impacts from agricultural pesticide use in ECV</li> <li>• Identify and evaluate opportunities to reduce pesticide emissions and exposures based on the evaluation of community impacts</li> </ul>	South Coast AQMD, CARB	<ul style="list-style-type: none"> <li>• Number of opportunities identified and pursued to reduce pesticide emissions and exposure</li> <li>• If quantifiable, amount of emissions and/or exposure reductions achieved</li> <li>• Updates (e.g., pesticide data, community impacts, monitoring results) provided to the CSC</li> </ul>	1 <sup>st</sup> quarter, 2021	1 <sup>st</sup> quarter 2026
<b>B</b>	<p>Consult with DPR and the Riverside County Agricultural Commissioner to:</p> <ul style="list-style-type: none"> <li>• Provide the CSC an annual update on the Shafter Pilot Notification System project</li> <li>• Evaluate the feasibility of a pilot notification system in ECV based on the results of the Shafter Pilot Notification System project</li> <li>• Provide community members with information on the types of pesticides applied in ECV, how to report pesticide drift and ways to reduce pesticide exposure</li> </ul>	South Coast AQMD	<ul style="list-style-type: none"> <li>• Development of a notification system</li> <li>• Number of informational handouts or educational materials provided</li> </ul>	3 <sup>rd</sup> quarter, 2021	TBD

			<ul style="list-style-type: none"> <li>• Updates provided to the CSC</li> </ul>		
<b>C</b>	Consult with the Riverside County Agricultural Commissioner and scientists at public health agencies with expertise in pesticide toxicity to make pesticide data for the ECV community more easily accessible for community members, including farm workers	South Coast AQMD	<ul style="list-style-type: none"> <li>• Updates provided to the CSC</li> </ul>	3 <sup>rd</sup> quarter, 2022	TBD
<b>D</b>	Consult with DPR and USEPA Region 9 to provide outreach materials, training, information on personal protective equipment and ways to reduce worker exposure during pesticide application	South Coast AQMD	<ul style="list-style-type: none"> <li>• Number of trainings or information provided (e.g., handouts)</li> </ul>	4 <sup>th</sup> quarter, 2021	TBD

**Table 1 – Goal: Gather Information and Conduct Air Monitoring for Pesticides**

	<u>Action</u>	<u>Responsible Entity</u>	<u>Metric</u>	<u>Timeline</u>	
				<u>Start</u>	<u>Complete</u>
<b>A</b>	<ul style="list-style-type: none"> <li>• <u>Identify pesticides used in ECV (e.g., frequency, amount, and ingredients)</u></li> <li>• <u>Share information on statewide efforts for a pesticide notification system</u></li> <li>• <u>Provide consultation on field activities</u></li> <li>• <u>Support data analysis and interpretation</u></li> </ul>	<u>DPR and Ag. Commissioner</u>	<ul style="list-style-type: none"> <li>• <u>Data collected on pesticide use in ECV</u></li> <li>• <u>Updates provided to the CSC</u></li> </ul>	<u>4<sup>th</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2022</u>
<b>B</b>	<ul style="list-style-type: none"> <li>• <u>Develop a screening approach for agricultural pesticides commonly used in ECV</u></li> <li>• <u>Support prioritization of pesticides for potential air monitoring based on screening criteria and other relevant information</u></li> </ul>	<u>OEHHA</u>	<ul style="list-style-type: none"> <li>• <u>Updates provided to the CSC</u></li> </ul>	<u>2<sup>nd</sup> quarter, 2022</u>	<u>1<sup>st</sup> quarter, 2023</u>
<b>C</b>	<ul style="list-style-type: none"> <li>• <u>Support protocol development for pesticide sampling and analysis</u></li> <li>• <u>Coordinate sampling and analysis of pesticides</u></li> </ul>	<u>CARB and South Coast AQMD</u>	<ul style="list-style-type: none"> <li>• <u>Development of protocols for pesticide sampling and analysis</u></li> </ul>	<u>1<sup>st</sup> quarter, 2022</u>	<u>1<sup>st</sup> quarter, 2023</u>
<b>D</b>	<ul style="list-style-type: none"> <li>• <u>Participate in field activities</u></li> <li>• <u>Analyze pesticide samples</u></li> <li>• <u>Support data analysis and interpretation</u></li> </ul>	<u>CARB, South Coast AQMD, and DPR</u>	<ul style="list-style-type: none"> <li>• <u>Data collected through air sampling</u></li> <li>• <u>Samples analyzed</u></li> <li>• <u>Updates provided to the CSC</u></li> </ul>	<u>2<sup>nd</sup> quarter, 2023</u>	<u>TBD</u>

**Table 2 – Goal: Pursue Pesticides Emissions and Exposure Reductions**

	<u>Action</u>	<u>Responsible Entity</u>	<u>Metric</u>	<u>Timeline</u>	
				<u>Start</u>	<u>Complete</u>
<b>A</b>	<u>Evaluate potential community health risks/impacts based on air monitoring results and other relevant information</u>	<u>OEHHA and DPR</u>	<ul style="list-style-type: none"> <li><u>Presentation of results to CSC</u></li> <li><u>Written report on findings</u></li> <li><u>Updates to the CSC</u></li> </ul>	<u>2<sup>nd</sup> quarter, 2024</u>	<u>TBD</u>
<b>B</b>	<ul style="list-style-type: none"> <li><u>Assist the ECV CSC in determining pesticide exposures and risks</u></li> <li><u>Identify opportunities to develop or amend pesticide regulations. (DPR works through an established pesticide Toxic Air Contaminant (TAC) process with its partner agencies (i.e., OEHHA, CARB, Air Districts, and CACs) to develop TAC-related regulations.)</u></li> <li><u>Support the ECV CSC’s exploration of a pesticide notification system</u></li> <li><u>In collaboration with U.S. EPA, hold a Pesticides Workshop with the ECV Community and provide outreach materials, and information that include pesticide use enforcement, worker protection (including PPE and exposure reduction), and pesticide incident reporting</u></li> <li><u>In consultation with South Coast AQMD, CARB and the CSC, develop community emission reduction plan (CERP) strategies for pesticides, if warranted</u></li> </ul>	<u>DPR and Ag. Commissioner</u>	<ul style="list-style-type: none"> <li><u>Workshop held for the community</u></li> <li><u>Regulations developed or amended</u></li> <li><u>Updates to the CSC</u></li> </ul>	<u>4<sup>th</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2026</u>
<b>C</b>	<u>Identify funding for exposure reduction projects (e.g., air filtration systems and weatherization projects)</u>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Number of projects implemented</u></li> </ul>	<u>4<sup>th</sup> quarter, 2021</u>	<u>4<sup>th</sup> quarter, 2024</u>

<b><u>D</u></b>	<u>Pursue a collaborative partnership with Growing Coachella Valley Local Farmers and Growers to reduce emissions and exposure in ECV</u>	<u>South Coast AQMD</u>	<ul style="list-style-type: none"> <li><u>Number of opportunities identified and pursued to reduce pesticide emissions and exposure</u></li> </ul>	<u>4<sup>th</sup> quarter, 2021</u>	<u>4<sup>th</sup> quarter, 2024</u>

## Chapter 5f: Diesel Mobile Sources

### Community Concerns



The Eastern Coachella Valley (ECV) Community Steering Committee (CSC) expressed concerns about diesel emissions from mobile sources in the ECV community. Specifically, concerns included~~CSC members raised concerns about~~ heavy-duty trucks traveling along the State highways 111 and 86, school buses, freight trains that transit the community and heavy-duty agricultural equipment (e.g., tractors and harvesting equipment). CSC members mentioned that trucks and school buses often transit in residential areas and near sensitive receptors. Further, they CSC members also cited concerns about trucks idling around the Mecca area within ECV. Additional actions to address light-duty mobile sources from local land use are incorporated in Chapter 5a.

### Actions to Address Diesel Mobile Sources

To address community concerns and reduce emissions from diesel mobile sources, South Coast AQMD developed actions for the Community Emissions Reduction Plan (CERP). Table 1 below provides goals, actions, responsible entities, metrics, and a timeline to achieve emission reductions from diesel mobile sources.

Table 1 - Goal: Reduce Emissions and Exposure from Diesel Mobile Sources

	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
A	<p>Work with the CSC to:</p> <ul style="list-style-type: none"> <li>• Identify air quality concerns related to diesel mobile sources (e.g., trucks, trains), quantify emissions (e.g., baseline, projected) from- diesel mobile sources (trucks , train) , and provide an informational workshop (e.g., summary of regulations and compliance information) on diesel mobile sources</li> <li>• Prioritize actions to address the community’s main concerns around diesel mobile source pollution. For example, actions may include: <ul style="list-style-type: none"> <li>○ Create an air quality sensor network for measurements of PM2.5 and NO2 supported by black carbon measurements (where possible and for limited duration) to better understand the impact of diesel emissions in the community</li> <li>○ Collaborating with CARB to identify opportunities for focused enforcement and additional regulatory measures (e.g., Air Toxic Control Measure, Freight Handbook), if needed</li> <li>○ Identifying opportunities to collaborate with local land use and transportation agencies to restrict heavy-duty trucks from transiting near sensitive land uses (e.g., schools and residences)</li> <li>○ Collaborating with CARB to conduct outreach on how to report idling trucks</li> <li>○ <u>CARB working with the CSC to identify and prioritize locations for “No Idling” sign installation and providing outreach materials to the ECV community on idling rules. CARB coordinating with appropriate agencies to install and enforce “No Idling” signs.</u></li> </ul> </li> </ul>	South Coast AQMD, CARB	TBD	4 <sup>th</sup> quarter, 2021	1 <sup>st</sup> quarter, 2026

	<ul style="list-style-type: none"> <li>○ Pursuing collaboration with land use agencies (e.g., City of Indio, City of Coachella, and Riverside County) to implement vegetative barriers around the railroad that passes through the ECV community</li> <li>○ Identifying funding to implement weatherization projects and to install and maintain air filtration systems at schools, community centers and homes to reduce exposure to diesel mobile sources</li> </ul>				
<b>B</b>	Identify opportunities to incentivize the replacement of older, higher polluting on-road (e.g., trucks) and off-road (e.g., tractors, freight trains, agricultural equipment) equipment with cleaner technology	South Coast AQMD, CARB	TBD (e.g., number of projects incentivized)	1 <sup>st</sup> quarter, 2021	1 <sup>st</sup> quarter, 2026
<b>C</b>	Identify funding opportunities to replace older diesel school buses with zero or near-zero emission school buses in ECV in all school districts within ECV	South Coast AQMD, CARB	TBD (e.g., <u>updates to the CSC</u> , number of projects incentivized)	1 <sup>st</sup> quarter, 2021	1 <sup>st</sup> quarter, 2026
<b>D</b>	<u>Identify funding to install zero emission charging infrastructure in the ECV</u>	<u>South Coast AQMD</u>	TBD (e.g., number of <u>projects incentivized</u> )	<u>3<sup>rd</sup> quarter, 2021</u>	<u>1<sup>st</sup> quarter, 2026</u>

## Chapter 5g: Greenleaf Desert View Power Plant

### Community Concerns

Greenleaf Desert View Power Plant is a biomass electrical generation facility located on the Cabazon Band of Mission Indians Reservation at 62300 Gene Welmas Dr, Mecca, CA 92254. It has been in operation since 1992, first as Colmac Energy, Inc. and then in 2011, the power plant was purchased by Greenleaf Power. Biomass (e.g., urban wood waste, orchard removal trees) is used at this facility as a fuel to help generate electricity. This facility operates as a steam-electric power plant<sup>1</sup>. Typically, these power plants operate by burning fuel in a furnace to generate heat that is used in a boiler to produce steam. The steam flows into the turbine and spins the blades inside a turbine, which is connected to a generator to create electricity.



Since this facility is located on tribal land, it is regulated by Region 9 of the United States Environmental Protection Agency (U.S. EPA).<sup>2</sup> The ECV CSC expressed concern about visible emissions and smoke from the facility and the limited information about the facility that is available to the community.

### Actions to Address the Greenleaf Desert View Power Plant

To address community concerns and reduce emissions from the Greenleaf Desert View Power Plant, South Coast AQMD developed actions for the Community Emissions Reduction Plan (CERP). Table 1 below provides goals, actions, responsible entities, metrics, and a timeline to achieve emission reductions from the Greenleaf Desert View Power Plant.

<sup>1</sup> Greenleaf Power, LLC, Desert View, <http://www.greenleaf-power.com/facilities/desert-view-power.html>, Accessed October 25, 2020.

<sup>2</sup> U.S. EPA, Title V Permit to Operate, <https://www.regulations.gov/contentStreamer?documentId=EPA-R09-OAR-2020-0266-0001&contentType=pdf>, Accessed October 25, 2020.

Table 1 – Goal: Reduce Emissions from Greenleaf Desert Power View Plant

	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
<b>A</b>	<p>Work with the CSC, tribal government and U.S. EPA to:</p> <ul style="list-style-type: none"> <li>Identify air quality concerns related to Greenleaf Desert View Power Plant (e.g., CSC survey)</li> <li>Compile air quality information about the facility (e.g., emissions, compliance history, applicable air quality regulations, existing air pollution control technologies)</li> <li>Conduct PM monitoring near the facility, identify strategic locations for air quality sensor deployment to capture potential PM2.5 emissions from the facility, and assess the potential impact on the community</li> <li>Identify appropriate tree planting locations near areas of concern (e.g., mobile home parks and schools), to be updated annually, and seek opportunities to implement tree planting projects around the perimeter of the facility <ul style="list-style-type: none"> <li>If appropriate funding is identified, submit one to two applications.</li> </ul> </li> <li><del>Develop strategies to reduce emissions and exposure (e.g. planting shrubs, trees and native plants around the perimeter of the facility) from the facility</del></li> <li>Identify funding to implement weatherization projects and to install and maintain air filtration systems at schools, community centers and homes to reduce exposure to industrial, commercial and other sources.</li> </ul>	South Coast AQMD	TBD	1 <sup>st</sup> quarter, 2022	3 <sup>rd</sup> quarter, 2022
<b>B</b>	Pursue a collaborative partnership with the Coachella Valley Association of Governments (CVAG) to consider requiring all future allocations of funds from the Greenleaf Desert View Power Plant in the ECV community to reduce air pollution emissions or exposures	South Coast AQMD, CVAG	TBD	4 <sup>th</sup> quarter 2022	TBD

**ATTACHMENT C  
RESOLUTION NO. 21-**

**A Resolution of the Governing Board of the South Coast Air Quality Management District (South Coast AQMD) determining that the Amendments to the Community Emissions Reduction Plan (CERP) for the Eastern Coachella Valley (ECV) community per Assembly Bill 617 (AB 617 ECV CERP Amendments) are exempt from the requirements of the California Environmental Quality Act (CEQA).**

**A Resolution of the South Coast AQMD Governing Board Amending the AB 617 ECV CERP.**

**WHEREAS**, the South Coast AQMD Governing Board finds and determines that the AB 617 ECV CERP Amendments are considered a “project” as defined by CEQA; and

**WHEREAS**, the South Coast AQMD Governing Board finds and determines after conducting a review of the proposed project in accordance with CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA, and CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA, that the proposed project is exempt from CEQA; and

**WHEREAS**, the South Coast AQMD Governing Board finds and determines that it can be seen with certainty that there is no possibility that the proposed project may have any significant effects on the environment, and is therefore exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption; and

**WHEREAS**, the South Coast AQMD Governing Board finds and determines that the proposed project is also categorically exempt from CEQA pursuant to CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment, because the proposed project is designed to further protect or enhance the environment; and

**WHEREAS**, the South Coast AQMD Governing Board finds and determines that the proposed project contains action items which qualify as feasibility or planning studies which are statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15262 – Feasibility and Planning Studies; and

**WHEREAS**, the South Coast AQMD Governing Board finds and determines that the proposed project may result in some minor physical modifications to existing structures or buildings, such as installing air filters or monitoring equipment, which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15301 – Existing Facilities; and

**WHEREAS**, the South Coast AQMD Governing Board finds and determines that the proposed project involves the collection or exchange of information or data obtained from inspections and air monitoring, which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15306 – Information Collection; and

**WHEREAS**, the South Coast AQMD Governing Board finds and determines that the proposed project also involves inspections that require performance or compliance checks which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15309 – Inspections; and

**WHEREAS**, the South Coast AQMD Governing Board finds and determines that the proposed project relies on enforcement activities which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15321 – Enforcement Actions by Regulatory Agencies; and

**WHEREAS**, the South Coast AQMD Governing Board has determined that there is no substantial evidence indicating that any of the exceptions to the categorical exemptions apply to the proposed project pursuant to CEQA Guidelines Section 15300.2 – Exceptions; and

**WHEREAS**, the South Coast AQMD staff has prepared a Notice of Exemption for the proposed project that is completed in compliance with CEQA Guidelines Section 15062 – Notice of Exemption; and

**WHEREAS**, the AB 617 ECV CERP Amendments and other supporting documentation, including but not limited to the Notice of Exemption, were presented to the South Coast AQMD Governing Board and the South Coast AQMD Governing Board has reviewed and considered this information, as well as has taken and considered staff testimony and public comment prior to approving the project; and

**WHEREAS**, AB 617 directs the California Air Resources Board (CARB) to select locations around the state for preparation of community emissions reduction programs; and

**WHEREAS**, in 2019, the South Coast AQMD Governing Board recommended communities to CARB for the AB 617 program; and

**WHEREAS**, in 2019, CARB selected the community of ECV as one of the communities for which a CERP shall be prepared; and

**WHEREAS**, the AB 617 statute specifies that the air district must adopt the CERP within one year of the state board's selection of the community; and

**WHEREAS**, in 2020, the South Coast AQMD Governing Board has adopted the ECV CERP and directed staff to provide additional details on the ECV CERP monitoring objectives, collaborations with other entities, incentive strategies and other emission reduction strategies developed by the Community Steering Committee (CSC) no later than June 30, 2021, including holding two CSC meetings between January 2021 and February 2021 to receive additional feedback on these topics, and two additional CSC meetings between March 2021 and April 2021 to review draft amendments to the AB 617 ECV CERP; and

**WHEREAS**, staff has held over 30 additional meetings between January 2021 and May 2021 and added details which are contained in the AB 617 ECV CERP Amendments; and

**WHEREAS**, the AB 617 ECV CERP and the AB 617 ECV CERP Amendments are planning documents designed to assist future regulatory programs and rule development efforts, and to reduce emissions of and exposure to air toxics and other pollutants; and

**WHEREAS**, the AB 617 ECV CERP is required by AB 617 and it builds upon existing criteria pollutant and air toxic programs, with greater emphasis on cumulative and localized impacts, and

**WHEREAS**, although the results of the Multiple Air Toxics Exposure Study IV (MATES IV) show regional reductions in health risk from exposure to toxic air contaminants, some communities such as ECV are disproportionately impacted by environmental pollution, as well as social and economic burdens; and

**WHEREAS**, the ECV CSC has worked with staff to develop the AB 617 ECV CERP and AB 617 CERP Amendments to reflect the community's air quality priorities and strategies to address these priorities; and

**WHEREAS**, the AB 617 ECV CERP and AB 617 CERP Amendments aim to reduce local sources of air pollutants and other pollutants in the ECV community.

**NOW, THEREFORE BE IT RESOLVED**, that the South Coast AQMD

Governing Board does hereby determine, pursuant to the authority granted by law, that the AB 617 ECV CERP Amendments are exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption. Further, the AB 617 ECV CERP Amendments contain action items which are statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15262 – Feasibility and Planning Studies. The proposed project contains action items that are also categorically exempt from CEQA pursuant to, CEQA Guidelines Section 15301 – Existing Facilities, CEQA Guidelines Section 15306 – Information Collection, CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment, CEQA Guidelines Section 15309 – Inspections, and CEQA Guidelines Section 15321 – Enforcement Actions by Regulatory Agencies. No exceptions to the application of the categorical exemptions set forth in CEQA Guidelines Section 15300.2 – Exceptions, apply to the proposed project. This information was presented to the South Coast AQMD Governing Board, whose members exercised their independent judgment and reviewed, considered and approved the information therein prior to acting on the proposed AB 617 ECV CERP Amendments; and

**BE IT FURTHER RESOLVED**, that the South Coast AQMD Governing Board finds that the ECV CERP and CERP Amendments meet the requirements of AB 617 and will advance the mission of cleaning the air at a community scale in the ECV community and will provide emission reduction benefits toward achieving state and national air quality standards; and

**BE IT FURTHER RESOLVED**, that the South Coast AQMD Governing Board does hereby adopt the AB 617 ECV CERP Amendments; and

**BE IT FURTHER RESOLVED**, that the South Coast AQMD Governing Board hereby directs the Executive Officer to forward a copy of this Resolution, the AB 617 ECV CERP, and AB 617 CERP Amendments to the California Air Resources Board for approval; and

**BE IT FURTHER RESOLVED**, that the South Coast AQMD Governing Board directs staff to periodically report to the Stationary Source Committee on the implementation of the AB 617 ECV CERP and AB 617 CERP Amendments, including updates on the actions within the plan and the emissions reductions achieved.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Clerk of the Boards

ATTACHMENT D



**South Coast  
Air Quality Management District**

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

**SUBJECT: NOTICE OF EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL  
QUALITY ACT**

**PROJECT TITLE: AMENDMENTS TO THE COMMUNITY EMISSIONS REDUCTION PLAN  
FOR THE EASTERN COACHELLA VALLEY COMMUNITY PER  
ASSEMBLY BILL 617**

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, the South Coast Air Quality Management District (South Coast AQMD), as Lead Agency, has prepared a Notice of Exemption pursuant to CEQA Guidelines Section 15062 – Notice of Exemption for the project identified above.

If the proposed project is approved, the Notice of Exemption will be electronically filed with the State Clearinghouse of the Governor's Office of Planning and Research to be posted on their CEQAnet Web Portal which, upon posting, may be accessed via the following weblink: <https://ceqanet.opr.ca.gov/search/recent>. In addition, the Notice of Exemption will be electronically posted on the South Coast AQMD's webpage which can be accessed via the following weblink: <http://www.aqmd.gov/nav/about/public-notices/ceqa-notices/notices-of-exemption/noe---year-2021>. The electronic filing and posting of the Notice of Exemption is being implemented in accordance with Governor Newsom's Executive Orders N-54-20 and N-80-20 issued on April 22, 2020 and September 23, 2020, respectively, for the State of Emergency in California as a result of the threat of COVID-19.

**NOTICE OF EXEMPTION FROM THE  
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

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<b>To:</b> Governor's Office of Planning and Research - State Clearinghouse 1400 Tenth St, Suite 222 Sacramento, CA 95814-5502	<b>From:</b> South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765
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**Project Title:** Amendments to the Community Emissions Reduction Plan for the Eastern Coachella Valley Community per Assembly Bill 617

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**Project Location:** The proposed project will occur within a portion of the South Coast Air Quality Management District (AQMD) jurisdiction located in the Eastern Coachella Valley (ECV) community in Riverside County. The boundaries of the ECV community extend from the City of Indio south to the Riverside County boundary along the Salton Sea, including the City of Indio, the City of Coachella, a small portion of the City of La Quinta (southern part of the city), and the unincorporated areas of Thermal, Mecca, Oasis and North Shore.

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**Description of Nature, Purpose, and Beneficiaries of Project:** Assembly Bill (AB) 617, signed into state law in 2017 (see Health and Safety Code Section 44391.2), requires air districts to prepare a Community Emissions Reduction Plan (CERP) for environmental justice communities selected by the California Air Resources Board (CARB). CERPs provide a blueprint for achieving reductions of air pollution emission and exposure within selected communities and are tailored to address each community's air quality priorities. The ECV community was selected by CARB to prepare a CERP in December 2019 and the South Coast AQMD Governing Board adopted the AB 617 ECV CERP in December 2020. The purpose of the proposed amendments to the AB 617 ECV CERP is to include additional details to further address the community's concerns as identified by the Community Steering Committee (CSC). The proposed amendments to the AB 617 ECV CERP will benefit the identified ECV community and nearby areas, as well as the entire region within South Coast AQMD's jurisdiction.

The topics that were discussed during the ECV CERP Amendments process included actions to address the use and application of pesticides, actions to address land use concerns and coordination with local and regional planning agencies on plans that affect air quality, alternatives to agricultural burning, actions to address light-duty mobile sources and idling from trucks, and budget priorities and distribution for incentive projects. Specifically, the following amendments to the AB 617 ECV CERP are proposed:

- Chapter 5a – Introduction to Community Emissions Reduction Plan Actions: Additional actions and detailed metrics to address land use concerns and coordinate with planning agencies during the implementation of local and regional plans are proposed which include the following commitments to: 1) provide outreach opportunities and air quality information to local and regional planning agencies; 2) support climate resilience and adaptation policies such as tree planting and home weatherization projects; 3) incentivize mobile source incentive projects; 4) collaborate implementation of dust suppression projects near the Salton Sea; and 5) develop recommendations with the CSC on best practices to reduce light-duty vehicle emissions from the Thermal Racing Club Track. Additional discussion was also included on the Community Air Protection Program (CAPP) Year 3 incentives funds and budget distribution determined by the CSC and selected community-identified projects (such as funding the pavement of unpaved roads and mobile home parks, home air filtration and purifier systems, and alternatives to agricultural burning with alternative equipment or services such as chippers and grinders). Lastly, additional discussion was included on the Community Air Monitoring Plan (CAMP) implementation, which included the Monitoring Working Team (MWT) efforts, and the identification of preliminary locations for air quality monitors and sensor deployment.
  - Chapter 5b – Salton Sea: An amendment is proposed to identify appropriate locations to plant trees on an annual basis near sensitive receptors in proximity to the Salton Sea area.
  - Chapter 5c – Pesticides: Amendments are proposed that include information on the multi-agency process, jurisdictional limitations and collaborating agency responsibilities (i.e., CARB, Department of Pesticide Regulation (DPR), the Office of Environmental Health Hazard Assessment (OEHHA), the United States Environmental Protection Agency (USEPA), and Riverside County Agricultural Commissioner) to address pesticide emissions and exposure.
  - Chapter 5f – Diesel Mobile Sources: An additional action is proposed for CARB to work with the CSC to identify locations for “No Idling” sign installation and coordinate with appropriate agencies to install and enforce “No Idling” signs and provide outreach materials in the ECV community on idling rules. Another additional action is for South Coast AQMD to identify funding for the installation of zero emission charging infrastructure in the ECV community.
  - Chapter 5g – Greenleaf Desert View Power Plant: An amendment is proposed to identify appropriate locations to plant trees around the perimeter of the facility.
-

**Public Agency Approving Project:**

South Coast Air Quality Management District

**Agency Carrying Out Project:**

South Coast Air Quality Management District

**Exempt Status:**

CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption

CEQA Guidelines Section 15262 – Feasibility and Planning Studies

CEQA Guidelines Section 15301 – Existing Facilities

CEQA Guidelines Section 15306 – Information Collection

CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment CEQA

Guidelines Section 15309 – Inspections

CEQA Guidelines Section 15321 – Enforcement Actions by Regulatory Agencies

**Reasons why project is exempt:**

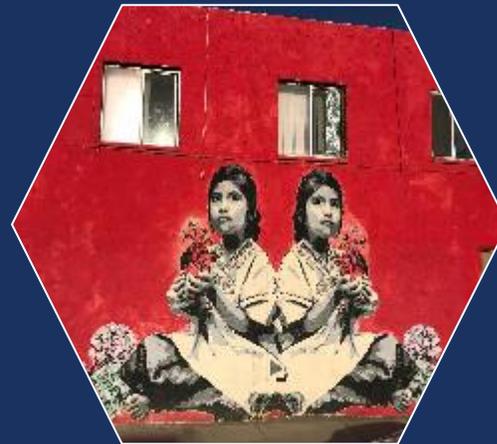
Pursuant to the California Environmental Quality Act (CEQA), South Coast AQMD, as Lead Agency, has reviewed the proposed project pursuant to: 1) CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and 2) CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. Because the physical changes that may occur as a result of implementing portions of the proposed project would only require minimal construction activities and cause negligible physical impacts, it can be seen with certainty that there is no possibility that any physical actions that may be associated with the proposed project may have a significant adverse effect on the environment. Therefore, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3). Further, the overall purpose of this project is to improve the environment of the ECV community and nearby areas, and all of the action items within the ECV CERP Amendments support this goal, the action items are also categorically exempt from CEQA pursuant to CEQA Guidelines Section 15308.

The ECV CERP Amendments contain the following action items, which are speculative at this time as they require collaboration with other entities, might have some secondary air quality impacts: 1) funding paving of unpaved roads and mobile home parks and installing home air filtration and purifier systems and 2) replacing agricultural open burning with alternative equipment or services such as chippers and grinders. However, activities associated with those action items are subject to existing South Coast AQMD rule requirements. For instance, South Coast AQMD Rules 403, 1120 and 1186 cover paving-related activities and South Coast AQMD Rule 1133.1 covers chipping and grinding activities. These existing South Coast AQMD rules not only require reducing any potential air quality impact to the minimum, but also have gone through CEQA review during the rulemaking process. If a discretionary action triggering CEQA is needed to implement those action items, a CEQA review will be conducted at that time.

The proposed amendments to the AB 617 ECV CERP contain action items involving feasibility and planning studies, because information needs to be collected to make an informed decision about further actions such as rule development. However, these action items neither prescribe or commit to specific rule requirements, nor require advance approval or adoption of future actions because they require an open public process. Thus, the proposed amendments contain action items involving feasibility or planning studies which are statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15262. The proposed amendments also contain action items requiring minor physical modifications to existing structures or buildings, such as installing home air filters or monitoring equipment, which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15301. The proposed amendments contain action items involving the collection or exchange of information or data obtained from inspections and air monitoring, which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15306. The proposed amendments contain action items involving inspections requiring performance or compliance checks, which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15309. The proposed amendments also contain action items relying on enforcement activities which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15321. Finally, there is no substantial evidence indicating that any of the exceptions to the categorical exemptions apply to the proposed project pursuant to CEQA Guidelines Section 15300.2 – Exceptions. Therefore, the proposed project is exempt from CEQA.



# PROPOSED AMENDMENTS TO THE AB 617 EASTERN COACHELLA VALLEY (ECV) COMMUNITY EMISSIONS REDUCTION PLAN (CERP)



BOARD MEETING  
JUNE 4, 2021





# EASTERN COACHELLA VALLEY AB 617 COMMUNITY

# ECV AIR QUALITY (AQ) PRIORITIES\*

**Reduce emissions/exposures and address concerns about:**



**Salton Sea**



**Pesticides**



**Fugitive Road  
Dust and Off-  
Roding**



**Open Burning  
and Illegal  
Dumping**



**Diesel Mobile  
Sources**



**Greenleaf  
Desert View  
Power Plant  
(former Colmac  
Power Plant)**

\* In addition to these priorities, the Community Steering Committee (CSC) identified other areas of concern, such as land use and increasing tree population in the community

# CERP AMENDMENTS TIMELINE

## CERP Development and Adoption (January – December 2020)

- Established CSC, developed and finalized Charter, and identified AQ Priorities
- Developed goals, strategies, and actions for AQ Priorities
- Board adopted CERP and directed staff to work with CSC to develop additional details

## Draft CERP Amendments (January – April 2021)

- CSC focused on:
  - Pesticides
  - Local and regional plans
  - Alternatives to agricultural burning
  - Diesel mobile sources
  - Incentives budget
- Staff developed Draft CERP amendments based on CSC input (e.g., discussions, breakout rooms)

## CSC and Stationary Source Committee Review (May 2021)

- CSC review of Draft CERP amendments
- Stationary Source Committee Meeting

# PUBLIC PROCESS AND COLLABORATION FOR CERP AMENDMENTS

## Community-Led Process

- **Over 30 meetings** with CSC since December 2020
- Staff implemented the CSC's requests to **amplify community voices** in the CERP development process by:
  - Hosting pre-meetings to set CSC meeting agenda
  - Asking CSC for their priority topics for CERP amendments
  - Implementing virtual breakout rooms
  - Using virtual chat box and live polls
  - Participating in CSC-led Working Team meetings



## Inter-agency Collaboration

- **Developed new actions** in the CERP to address AQ priorities



# SUMMARY OF PROPOSED AMENDMENTS TO AB 617 ECV CERP

## Chapters 5a, 5b and 5g



### Land Use and Coordination with Local and Regional Plans

- **Outreach** to the community on plans that affect air quality
- Collaborate with agencies to provide **air quality information** and implement local/regional plans, including Salton Sea **dust suppression projects**
- Develop best practices to reduce **light-duty vehicle emissions** from the Thermal Racing Club Track

## Chapter 5c Pesticides



- Conduct **air monitoring for high priority pesticides**, based on pesticide use data and screening criteria (e.g., toxicity)
- Present information about pesticide exposures and **health risks** (OEHHA)
- Identify opportunities (w/DPR and other agencies) to develop or amend **pesticide regulations**
- Provide information on statewide efforts for a **pesticide notification system** (DPR)

# SUMMARY OF PROPOSED AMENDMENTS TO AB 617 ECV CERP (CONTINUED)

## Chapter 5f Diesel Mobile Sources



- CARB to provide **outreach materials** in the ECV community on idling rules
- CARB to work with the CSC to identify locations and install and enforce **“No Idling” signs**
- Identify funding for **zero-emission charging infrastructure**

## Chapter 5a Community Air Protection Program (CAPP) Incentive Funds – Community Identified Projects



- Incentives budget distribution of \$4.57 million allocated to eligible **road paving projects** (e.g., Polanco Parks and access roads), and
- \$1 million for installing **home air filtration and purifier systems** (e.g., homes near sources of air pollution and with children with asthma)

## Chapter 5a Community Air Monitoring Plan (CAMP) Details



- Details about **Monitoring Working Team** efforts
- Prioritized **locations** for monitor or sensor deployment

# SUMMARY OF KEY ISSUES

Key Issue	Staff response
<b>Proposed CERP amendments do not include a pesticide notification system</b>	<ul style="list-style-type: none"><li>● DPR has jurisdiction over the regulation of pesticides and their use (Health and Safety Code Section 39655(a))</li><li>● Proposed amendments commit DPR to:<ul style="list-style-type: none"><li>○ Share information on statewide efforts for a pesticide notification system</li><li>○ Support the CSC’s exploration of a pesticide notification system</li></ul></li></ul>
<b>Proposed CERP amendments do not pursue a ban on agricultural burning</b>	<ul style="list-style-type: none"><li>● South Coast AQMD is prohibited from banning agricultural burning (California Code of Regulations §41850)</li><li>● South Coast AQMD Rule 444 is more effective than the state law (Health and Safety Code 41855.5 and 41855.6) that “bans” open burning in the San Joaquin Valley, for example, the law:<ul style="list-style-type: none"><li>○ Allows for exceptions based on economic feasibility, and</li><li>○ Excludes daily burn limits</li></ul></li></ul>

# NEXT STEPS & STAFF RECOMMENDATIONS

**June 2021**

Board consideration of amendments to the AB 617 ECV CERP

**July 2021**

If adopted, submit amended AB 617 ECV CERP for CARB Board approval and continue CERP implementation

**Fall/Winter 2021**

CARB Board consideration of amended AB 617 ECV CERP

## **STAFF RECOMMENDATIONS:**

1. Determine that the proposed amendments to the AB 617 ECV CERP are exempt from the requirements of the California Environmental Quality Act; and
2. Amend the AB 617 ECV CERP