



# **FINAL** **PAVING PROJECT PLAN**

**Reducing Particulate Matter Emissions  
from Unpaved Roads and/or Mobile Home Parks**

*Amended - April 2025*

# Table of Contents

<b>Project Identification</b>	<b>1</b>
<i>Background Information</i>	<i>1</i>
<i>Project Description</i>	<i>1</i>
<i>Rules and Regulations</i>	<i>2</i>
<b>Community Support</b>	<b>3</b>
<i>Eastern Coachella Valley (ECV) Community Steering Committee (CSC)</i>	<i>3</i>
<i>Development of Paving Project Plan</i>	<i>3</i>
<i>Development of Amendments to Paving Project Plan</i>	<i>4</i>
<b>Project Funding Parameters</b>	<b>5</b>
<i>Eligible and Ineligible Costs</i>	<i>5</i>
<i>Project Completion and Project Life</i>	<i>5</i>
<b>Requirements for Properties to be Paved and Prioritization Process</b>	<b>7</b>
<i>Prioritized List of Properties to be Paved</i>	<i>7</i>
<i>Scoring Criteria for the Prioritized List of Properties to be Paved</i>	<i>7</i>
<b>Requirements for Applicant(s) and Paving Project Application Process</b>	<b>9</b>
<i>Applicant Eligibility and Paving Project Application Requirements</i>	<i>9</i>
<i>Paving Project Application Process</i>	<i>10</i>
<i>Scoring Criteria for Paving Project Applications and Selection Process</i>	<i>11</i>
<b>Emission Reductions Quantification Methodology</b>	<b>13</b>
<i>Emission Reduction Quantification Methodology</i>	<i>13</i>
<b>Relative Exposure Reduction and Other Qualitative Benefits</b>	<b>16</b>
<i>Relative Exposure Reduction and Other Benefits</i>	<i>16</i>
<i>Estimating Relative Exposure Reduction</i>	<i>16</i>
<b>Reporting Requirements</b>	<b>17</b>



## Project Identification

### Background Information

Signed into law in 2017, Assembly Bill 617 (AB 617) is a California law that addresses the disproportionate impacts of air pollution in environmental justice (EJ) communities. Since 2018, the California Air Resources Board (CARB) has designated six (6) AB 617 communities for the South Coast Air Quality Management District (South Coast AQMD) to develop Community Emissions Reductions Plans (CERPs). Each CERP is developed under the guidance of a Community Steering Committee (CSC) of stakeholders including active residents, representatives of community-based organizations, schools, government agencies, businesses, and other relevant community stakeholders. Each CSC identifies actions in the CERP to address the top air quality concerns in their respective communities.

In 2019, the Eastern Coachella Valley (ECV) was designated as an AB 617 community. The ECV community established an approximately 38 member CSC and collaborated with the South Coast AQMD to develop the ECV CERP. The South Coast AQMD Governing Board adopted the ECV CERP on December 4, 2020, which included a resolution that committed South Coast AQMD to continue working with the ECV CSC to amend the CERP with additional details. The South Coast AQMD Governing Board adopted these details into the CERP on June 4, 2021. The ECV Final CERP<sup>1</sup> was approved by the CARB Board in September 2021.

During CERP development, the ECV CSC expressed concern with inhalable particulate matter of 10 microns or less (PM<sub>10</sub>) emitted from unpaved roadways. One of the actions identified in the CERP to address these emissions is through paving projects (e.g., mobile home and Polanco parks, public county roads). The action specific to paving projects is listed below and may be found in Chapter 5d, Table 2, Action A of the ECV CERP:

*“Pursue a collaborative partnership with appropriate entities (e.g., homeowners’ associations, mobile home park owners) and the County of Riverside to implement paving projects (e.g., unpaved roads and mobile home parks such as Polanco Parks) by:*

- *Working with the CSC to specify a plan, including locations and timelines, for paving projects to reduce fugitive dust*
- *Evaluating the addition of a landscaping component to paving projects, where feasible*
- *Identifying funding opportunities to implement paving projects”*

### Project Description

As part of the AB 617 Program, South Coast AQMD has been granted Community Air Protection Program (CAPP) Incentive funding to implement projects to reduce pollutant emissions and/or community exposure through mobile source, stationary source, and community-identified projects. Through participatory budgeting, the ECV CSC allocated \$4,570,000 in Year 3 CAPP Incentive funds (Fiscal Year 2019-2020) to paving projects in their community. This community-identified project requires the development of a Paving Project Plan per CARB’s CAPP Incentive 2019 Guidelines<sup>2</sup>.

This Paving Project Plan, herein referred to as the “Plan”, is part of California Climate Investments, a

<sup>1</sup> South Coast AQMD, Eastern Coachella Valley Community Emissions Reduction Plan. Available at: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/final-cerp/final-cerp-july-2021.pdf?sfvrsn=9>.

<sup>2</sup> California Air Resources Board, Community Air Protection Program (CAPP) Incentive 2019 Guidelines. Available at: [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).



statewide initiative that puts billions of Cap-and-Trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment — particularly in disproportionately burdened communities. The Plan will serve as the mechanism to distribute CAPP Incentive funds to eligible applicant(s). It is consistent with the guidelines established in the CAPP Incentives 2019 Guidelines, which sets minimum requirements for the Plan.

Potentially eligible projects may include unpaved roads, mobile home and Polanco parks, and other unpaved areas located near sensitive receptors.<sup>3</sup> South Coast AQMD will work with applicant(s), local public works departments, community-based organizations, the CSC, and other ECV representatives to identify locations that could benefit from these types of paving projects. South Coast AQMD will also provide technical assistance to applicant(s), if needed.

### **Rules and Regulations**

Paving projects shall be constructed and all work performed in conformance with the California Uniform Building Code and all other applicable statutes, rules, regulations, and ordinances. Construction activities associated with paving projects are subject to South Coast AQMD Rules 402, 403, and 403.1; these rules are meant to reduce particulate matter emissions and protect public health.

Public nuisance violations (Rule 402) can occur when a person discharges from any source such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This may occur during construction or demolition activities. Fugitive dust violations (Rules 403 and 403.1) occur when significant dust emissions (> 20% opacity) are generated from activities such as excavation, grading, and other construction activities. Additionally, a violation can occur when dust is visible past the property line of the emission source or when dirt or mud is tracked out onto the public roads for more than 25 feet. Rule 403.1 is a supplemental rule to Rule 403 and is applicable to man-made sources of fugitive dust in Coachella Valley, including construction activities related to paving. Rule 403.1 requires a Fugitive Dust Control Plan approved by South Coast AQMD or an authorized local government agency prior to initiating any construction or earth-moving activity, for any project with 5,000 or more square feet of surface area disturbance.

Design, construction, and paving of parking lots, roads, and other unpaved areas are subject to the requirements of any applicable municipal codes and the Riverside County Public Works Department guidelines for dimensions of lanes, shoulders, and medians. In addition, construction and/or demolition equipment (e.g., off-road mobile source) may be subject to CARB rules or regulations.

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<sup>3</sup> Sensitive Receptors are children, elderly, asthmatics and others whose are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. Sensitive Receptor locations may include hospitals, schools, and day care centers, and such other locations as the air district board or California Air Resources Board may determine (California Health and Safety Code § 42705.5(a)(5)).

## Community Support

### Eastern Coachella Valley (ECV) Community Steering Committee (CSC)

Development of the ECV CERP occurred between January 2020 and June 2021, and South Coast AQMD held more than 50 meetings with CSC members, including CSC, technical advisory group (TAG), small group and one-on-one, and working team meetings. Through this extensive collaboration, the Final ECV CERP was developed, then adopted by the South Coast AQMD Governing Board, and subsequently approved by the CARB Board.

CERP implementation began January 2021 and South Coast AQMD continues to meet with the ECV CSC to discuss CERP action implementation and tracking. As part of CERP implementation, South Coast AQMD conducted participatory budgeting workshops to allow a CSC-led process for the distribution of the Year 3 CAPP incentive funds; the ECV community was allocated \$5.57 million. Between December 2020 and April 2021, multiple workshops<sup>4</sup> were conducted to prioritize community-identified projects and the funding levels for each project type. South Coast AQMD presented information on eligible project types from actions in the CERP, including the average cost based on past projects, expected emission reductions, and the difficulty of implementing those projects. To gather CSC input for community-identified projects, South Coast AQMD conducted two surveys, one to identify the top priorities for community-identified projects and the second to determine the distribution of CAPP incentive funds (\$5.57 million for ECV) to each project type. The initial survey resulted in the CSC prioritizing paving projects, air filtration systems, and alternatives to open burning. The second survey regarding distribution of the available \$5.57 million resulted in the CSC allocating \$4.57 million to paving projects, \$1 million to residential air filtration and purification systems, and no incentive funds for alternatives to open burning. On April 29, 2021, South Coast AQMD submitted a disbursement request for Year 3 CAPP incentive funds to CARB.

### Development of Paving Project Plan

The ECV CSC established working teams, consisting of a subset of ECV CSC members, to further guide the implementation of CERP actions. This included a Budget Working Team (BWT)<sup>5</sup>, which met on a biweekly or monthly basis, as determined by the BWT. South Coast AQMD met with the BWT on February 22, 2022, March 15, 2022, May 3, 2022, and June 3, 2022 to develop the details of the Plan. Additionally, South Coast AQMD attended a BWT Meeting with Imperial County Air Pollution Control District (ICAPCD) to discuss ICAPCD's approach to paving projects in Imperial County. Resulting from these meetings, the BWT's input guided development of the Plan's framework and has been incorporated into the Plan, where feasible, and includes Project Funding Parameters, Requirements for Properties to be Paved and Prioritization Process, and Requirements for Applicant(s) and Paving Project Application Process. The BWT also suggested that applicant(s) submit a "Community Narrative and Support" describing the community and population,

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<sup>4</sup> South Coast AQMD, ECV CSC Meeting presentations that include Community-Led Incentives Budgeting Workshops: January 21, 2021: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/incentives-jan21-2021.pdf?sfvrsn=8>  
March 5, 2021: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/presentation-feb26-2021.pdf?sfvrsn=15>  
March 19, 2021: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/presentation-mar19-2021.pdf?sfvrsn=8>  
April 14, 2021: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/presentation-apr14-2021.pdf?sfvrsn=14>

<sup>5</sup> The BWT is a subset of CSC Members who meet more frequently for focused discussion, including the following CSC Members: Yaneth Andrade-Magana, Mariela Loera, Rebecca Zaragoza, Lillian Garcia, Miguel Romero, Pati Leal-Gutierrez, Manuel Arredondo, Beatriz Gonzalez, and Deborah McGarrey.

challenges and impacts with living near unpaved roads, and how the project will protect the community. Further, the Scoring Criteria for the Prioritized List of Properties to be Paved and Scoring Criteria for Paving Project Applications and Selection Process sections describe the collaborative nature in which CSC members will work with South Coast AQMD to review, score, and approve the applicant(s) and property(ies) to be paved. This Plan incorporates suggestions from the BWT and CSC so that it is tailored for the ECV community. The Plan was approved by CARB in October 2022.

### **Development of Amendments to Paving Project Plan**

After receiving CARB approval, South Coast AQMD began developing a Request for Proposals (RFP) to solicit paving project applications for paving proposals. An implementation status update was provided at the January 2023 ECV CSC Meetings<sup>6</sup>. In February 2023, South Coast AQMD met with County of Riverside Housing and Workforce Solutions (HWS) to provide an implementation status update; the community asked questions regarding permit requirements for mobile home and Polanco parks. In February 2023, in order to streamline implementation of the Plan, South Coast AQMD proposed to adjust the Plan, and release a Program Announcement (PA) instead of an RFP. South Coast AQMD met with the BWT on April 13, 2023, April 20, 2023, May 4, 2023, and May 26, 2023, to discuss these proposed amendments. South Coast AQMD also attended an in-person meeting organized by Leadership Council for Justice and Accountability (LCJA) to discuss the proposed changes to the Plan and visited approximately ten (10) mobile home and Polanco parks with Riverside County HWS to assess potential properties to be paved. Resulting from these meetings, the BWT's input guided development of amendments to the Plan, where feasible. A primary change resulting from this process is that the PA will incorporate a Prioritized List of Properties to be Paved that identifies property(ies) that applicant(s) will be applying to pave. Input from the BWT, where feasible, was incorporated into the following sections of the Plan: Project Funding Parameters, Requirements for Properties to be Paved and Prioritization Process, and Requirements for Applicant(s) and Paving Project Application Process. For example, the BWT suggested broadening the description in the "Community Narrative and Support" to include the applicant's knowledge and familiarity with the ECV community, cultural competency, and bilingual fluency in English and Spanish. The amendments to the Plan and modifications to the public solicitation approach incorporates additional suggestions from the BWT which will improve efficiency and reflect community input.

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<sup>6</sup> January 26, 2023 ECV CSC Meeting: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/presentation-jan26-2023.pdf?sfvrsn=20>.

## Project Funding Parameters

The funding amount available for the implementation of paving project(s) is \$4,570,000 in Year 3 CAPP incentive funding, however if additional funds become available, they may be allocated at a later time. Multiple paving project applications may be awarded as agreed upon by South Coast AQMD and the BWT, depending on the paving project application(s) received, estimated paving project(s) cost(s), and other factors in the selection process.

The following projects are not eligible for funding:

- Routine maintenance and rehabilitation projects;
- paving activities as part of new development projects; and
- private schools.<sup>7</sup>

## Eligible and Ineligible Costs

The following costs are eligible for funding under this Plan:

- Labor and construction (including contracted services);
- Materials, including materials required to comply with South Coast AQMD rules and regulations related to paving projects (e.g., water, shaker/wheel spreading device, cover, etc.); and
- Signs and interpretive aids communicating information about the paving project.

Additionally, up to twenty-five (25) percent of the awarded grant amount may be budgeted for non-construction costs, including but not limited to mobilization, traffic control, and administration. Another ten (10) percent of the grant request may be budgeted for contingency costs (i.e., unforeseen costs such as permitting delays, material acquisition, inflation).

The following costs are ineligible to receive funding under this Plan:

- All other permits not related solely to paving projects;
- Paving design; and
- Maintenance activities (e.g., pothole repair, lane re-striping, street sweeping).

## Project Completion and Project Life

The Contract Period will be based on two phases: Project Completion and Project Life.

- ***Project Completion*** is the period between contract execution and South Coast AQMD receipt of photo documentation of completed grant-funded paved area. Project Completion must follow the

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<sup>7</sup> Private schools are not eligible for funding. No public money shall ever be appropriated for the support of any sectarian or denominational school, or any school not under the exclusive control of the officers of the public schools; nor shall any sectarian or denominational doctrine be taught, or instruction thereon be permitted, directly or indirectly, in any of the common schools of this State (California Constitution Article 9 § 8). Further, Neither the Legislature, nor any county, city and county, township, school district, or other municipal corporation, shall ever make an appropriation, or pay from any public fund whatever, or grant anything to or in aid of any religious sect, church, creed, or sectarian purpose, or help to support or sustain any school, college, university, hospital, or other institution controlled by any religious creed, church, or sectarian denomination whatever; nor shall any grant or donation of personal property or real estate ever be made by the State, or any city, city and county, town, or other municipal corporation for any religious creed, church, or sectarian purpose whatever; provided, that nothing in this section shall prevent the Legislature granting aid pursuant to Section 3 of Article XVI (California Constitution Article 16 § 5).

schedule included in the executed contract.

- **Project Life** is the time the applicant(s) is required to maintain the completed grant-funded paved area. The Project Life for this grant is five years from the date of Project Completion, which is consistent with the standard duration of CERP implementation. During this time, entities must conduct regular and as-needed maintenance (e.g., fixing potholes, lane re-striping, street cleaning). Regular and as-needed maintenance may be conducted through professional services or completed by the property owner(s). Additionally, applicant(s) must provide annual photo documentation of maintained project site and make the project site available for inspection upon request by South Coast AQMD and/or CARB. Entity shall conduct maintenance as required by South Coast AQMD and/or CARB from inspections.



## Requirements for Properties to be Paved and Prioritization Process

### Prioritized List of Properties to be Paved

As mentioned above, the amendments to this Plan include developing a Prioritized List of Properties to be Paved, that will be released with the PA. Applicant(s) that apply for the PA are expected to pave the property(ies) identified, in the order they are listed. To develop this list, BWT members will submit property(ies) within the ECV community to be considered for paving. South Coast AQMD and the BWT will prioritize submissions from the BWT and develop the Prioritized List of Properties to be Paved based on the Scoring Criteria for the Prioritized List of Properties to be Paved.

While developing the Prioritized List of Properties to be Paved, South Coast AQMD will work with the BWT and other applicable entities to gather information needed for the prioritization process. Property owners may be contacted with a request for information on the property, including the following:

- description of the area to be paved, including current use, existing conditions, and photos of its current condition;
- number of dwelling units and residents living at the property;
- square footage and dimensions of the area to be paved;
- current and expected vehicle use of the area to be paved; and
- existing dust control measures of the area to be paved, if any (e.g., frequency the unpaved area is watered), if applicable.

Additionally, property owners on the Prioritized List of Properties to be Paved will be expected before any paving activities begin, and throughout the Project Completion and Project Life of the grant-funded paved area, to work with selected applicant(s) to provide the following:

- documentation demonstrating that all property taxes are current before paving and that the property(ies) is(are) in compliance with all federal, state, and local requirements;
- copies of all permits required to complete the paving project and copies of existing permits for the project site, or proof of exemption from permitting requirements. Property(ies) may be considered if the property(ies) are in the process of obtaining permits, in which a proof of permit application must be submitted;<sup>8</sup>
- documentation that demonstrates compliance with the California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA), or proof of exemption;
- facilitation of access to paved area for South Coast AQMD and/or CARB inspections;
- photo documentation of the completed grant-funded paved area; and
- annual photo documentation of maintained grant-funded paved area.

### Scoring Criteria for the Prioritized List of Properties to be Paved

In coordination with the BWT, South Coast AQMD will develop the Prioritized List of Properties to be Paved based on the scoring criteria in Table 1 – Scoring Criteria for Prioritizing Properties to be Paved. Properties to be Paved which have been recommended by the BWT will be reviewed and scored by a prioritization panel of two (2) to three (3) South Coast AQMD staff members as appointed by the Executive Officer or their designee, and two (2) to three (3) CSC and/or BWT members. Additionally, a subject matter expert from an

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<sup>8</sup> Property(ies) that are in the process of becoming permitted will only be eligible for funding if all non-paving related permits are in place at the time of contract execution.

external agency may be included on the prioritization panel. Once the Prioritized List of Properties to be Paved is developed, it will then be presented to the ECV CSC for their approval to be included in the PA.

**Table 1 – Scoring Criteria for Prioritizing Properties to be Paved**

Scoring Criteria	Points Available
<b>Exposure Reduction</b> <ul style="list-style-type: none"> <li>• Number of affected residents within the paving project property</li> <li>• Distance between the paving project area to the nearest resident within the paving project property</li> <li>• Number of sensitive receptor locations within 1000 feet surrounding the paving property boundary</li> <li>• Closest distance between the paving property boundary to the sensitive receptor location boundary</li> </ul>	<b>0 – 40</b>
<b>Emission Reduction</b> <ul style="list-style-type: none"> <li>• Emissions reduced</li> </ul>	<b>0 – 40</b>
<b>Property Readiness</b> <ul style="list-style-type: none"> <li>• Satisfy permit requirements</li> </ul>	<b>0 – 20</b>
<b>Total Points Available:</b>	<b>100</b>

The scoring criteria detailed in Table 1 – Scoring Criteria for Prioritizing Properties to be Paved provide a framework to prioritize properties to be paved. For example, during the prioritization process, the property that reduces most emissions per area will receive the highest points available (i.e., 40 points for Emission Reduction) and all other projects will receive a point value to scale (i.e., less than 40 points). The scoring criteria in Table 1 – Scoring Criteria for Prioritizing Properties to be Paved were informed by input and approval from the BWT and will result in the Prioritized List of Properties to be Paved. Paving of the properties identified on this list through the scoring criteria in Table 1 – Scoring Criteria for Prioritizing Properties to be Paved will be subject to the requirements laid out in the Prioritized List of Properties to be Paved section and properties that cannot fulfill these requirements will be removed from consideration.

## Requirements for Applicant(s) and Paving Project Application Process

### Applicant Eligibility and Paving Project Application Requirements

Public and private entities<sup>9</sup>, except private schools, are eligible to apply for and receive funding for paving projects within the ECV community<sup>10</sup>. It is the responsibility of the applicant(s) to ensure that all information submitted is accurate and complete. If the applicant(s) hire(s) a subcontractor(s) to implement the paving project, it is the responsibility of the applicant(s) to submit all required information on behalf of the subcontractor(s) and ensure that all information submitted is accurate and complete. Applicant(s) will submit paving project application(s) based on the requirements laid out in this Plan. The following information is required as part of the paving project application submission:

- list of properties to be paved, paving cost for each property, and total cost of the project, including a breakdown of all eligible costs and anticipated expenses. Paving project applications that follow the order of the Prioritized List of Properties to be Paved will be given preference, however applicant(s) may submit recommendations for additional paving property(ies) that are not included on the Prioritized List of Properties to be Paved, or not in order of the Prioritized List of Properties to be Paved, which may be considered at the BWT's discretion;
- a commitment to provide documentation from the property owner that authorizes applicant to pave the project area;
- a Community Narrative and Support describing the community and population demographics, challenges and impacts living near unpaved roads, how the project will benefit the community, applicant's cultural competency, understanding of the ECV community, and bilingual fluency in English and Spanish;
- a commitment to comply with the most current versions of any applicable South Coast AQMD rules, including but not limited to, Rule 402 – Public Nuisance, Rule 403 – Fugitive Dust, and Rule 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources;
- a commitment detailing that all paving activities conducted and all work performed will be in conformance with the California Uniform Building Code and all other applicable federal, state, and local statutes, rules, regulations, and ordinances;
- a commitment to provide documentation demonstrating that all property taxes are current before paving and that the property(ies) is(are) in compliance with all federal, state, and local requirements;
- a commitment to provide copies of all permits required to complete the paving project and copies of existing permits for the project site, permit application for property(ies) in the process

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<sup>9</sup> Private schools are not eligible for funding. No public money shall ever be appropriated for the support of any sectarian or denominational school, or any school not under the exclusive control of the officers of the public schools; nor shall any sectarian or denominational doctrine be taught, or instruction thereon be permitted, directly or indirectly, in any of the common schools of this State (California Constitution Article 9 § 8). Further, Neither the Legislature, nor any county, city and county, township, school district, or other municipal corporation, shall ever make an appropriation, or pay from any public fund whatever, or grant anything to or in aid of any religious sect, church, creed, or sectarian purpose, or help to support or sustain any school, college, university, hospital, or other institution controlled by any religious creed, church, or sectarian denomination whatever; nor shall any grant or donation of persona property or real estate ever be made by the State, or any city, city and county, town, or other municipal corporation for any religious creed, church, or sectarian purpose whatever; provided, that nothing in this section shall prevent the Legislature granting aid pursuant to Section 3 of Article XVI (California Constitution Article 16 § 5).

<sup>10</sup> South Coast AQMD, ECV Community Boundary. Available at: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/community-map-feb-20-2020.pdf?sfvrsn=14>. Accessed March 2022.

- of obtaining permits, or proof of exemption from permitting requirements;
- a commitment to provide documentation that demonstrates compliance with the California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA), or proof of exemption;
- a commitment to ensure regular and as-needed maintenance of the paved project area is conducted throughout the Project Life, and to submit and adhere to a maintenance plan;
- a commitment to making all paving project(s) available for inspection, if requested by South Coast AQMD and/or CARB during the Project Life;
- a Payment Schedule outlining the payment terms in accordance with the Schedule of Deliverables in the PA, which may include obtaining information from property owners on the Prioritized List of Properties to be Paved that are required for property eligibility (e.g., documentation of current property tax, compliance with federal, state, and local requirements);
- narrative describing applicant's paving experience, including a minimum of two examples for each applicant and/or subcontractor(s) demonstrating successfully implemented paving projects by (e.g., photos and past completion reports); examples of paving projects in mobile home and Polanco parks are preferred;
- a list of personnel (e.g., project manager) who will be implementing the paving project(s) and their contact details;
- physical address of the applicant's(s') and/or subcontractor's(s') office location;
- document(s) demonstrating conflicts of interest, if any; and
- additional documents, if needed.

### **Paving Project Application Process**

South Coast AQMD will release a PA to solicit interested applicant(s). The PA will include information on the funding amount for paving projects, instructions to submit paving project applications, and a deadline for paving project application submission. Once the PA has been released and the solicitation period is open, South Coast AQMD will work with community-based organizations, the BWT, and/or the CSC to identify target areas to conduct outreach. During the PA solicitation period, South Coast AQMD will be available to provide assistance and support to applicant(s), including reporting requirements and general support to ensure application completeness. South Coast AQMD does not have expertise on the development and/or implementation of proposed paving activities and will not be able to provide such technical assistance.

The Prioritized List of Properties to be Paved will be included in the PA and these properties should be paved in the order provided. In the paving project application(s), the applicant(s) must specify, with a detailed cost breakdown, how many of these properties can be paved with the \$4.57 million available funding amount. In addition, the applicant(s) must submit proof of authorization of paving from the owner(s) of the property(ies), and other documentation described in the PA and Prioritized List of Properties to be Paved as an attachment to their project application. The applicant(s) may submit recommendations for additional paving property(ies) that are not included on the list, which may be considered at the BWT's discretion, however applicant(s) that propose property(ies) on the list will be prioritized.

Once the PA solicitation period ends, South Coast AQMD will respond to applicant(s) as soon as feasible considering the volume of paving project applications received, not to exceed 90 days. Based upon this initial evaluation, possible next steps include:

- A request for more detailed information, which would be used to further evaluate the paving project application(s);
- An offer from South Coast AQMD to enter into contract development based on information

- submitted; or
- Notification that the paving project application has been declined from further consideration.

Upon selection of an applicant(s), applicant(s) will also be required to work with the property owners of the Prioritized List of Properties to be Paved to obtain information relating to the requirements laid out in the Prioritized List of Properties to be Paved section. Additional details on this deliverable will be provided in the PA.

If the PA does not receive any applications, or applications received do not result in an executed contract, South Coast AQMD may pursue reissuance of the PA and/or other mechanisms to fund paving projects, including, but not limited to, a request for quotes, program announcement, sole-source contract, or memorandum of understanding.<sup>11</sup>

### Scoring Criteria for Paving Project Applications and Selection Process

Once the PA solicitation period has ended, South Coast AQMD will review the paving project applications in coordination with CSC and/or BWT members, utilizing the scoring criteria described in Table 2 – Scoring Criteria for Paving . The scoring criteria in Table 2 – Scoring Criteria for Paving provide a framework to score paving project application(s) received for projects during the PA solicitation period. The scoring criteria in Table 2 – Scoring Criteria for Paving were informed by input and approval from the BWT.

**Table 2 – Scoring Criteria for Paving Project Applications**

Scoring Criteria	Points Available
<b>Cost-Effectiveness</b> <ul style="list-style-type: none"> <li>Cost of paving per square feet of area</li> <li>Cost sharing and other available funding</li> </ul>	<b>0 – 40</b>
<b>Applicant’s Qualifications</b> <ul style="list-style-type: none"> <li>Applicant’s previous experience in paving projects (experience paving mobile home or Polanco parks in ECV is preferred)</li> </ul>	<b>0 – 25</b>
<b>Project Readiness</b> <ul style="list-style-type: none"> <li>Timeliness and robustness of paving project application<sup>12</sup></li> <li>Community Narrative and Support</li> </ul>	<b>0 – 20</b>
<b>Other Benefits</b> <ul style="list-style-type: none"> <li>Pre-paving property preparation design (e.g., land compaction)</li> </ul>	

<sup>11</sup> South Coast AQMD released a Paving Project PA from September 29, 2023 – December 29, 2023 and February 23, 2024 – March 15, 2024, received multiple applications, but did not execute a contract. South Coast AQMD may consider other mechanisms to fund paving projects upon CARB’s approval of this project plan modification.

<sup>12</sup> Timeliness and robustness of the paving project application refers to the extent the paving project application is developed and ready for implementation. Applications that are complete and include all necessary permissions, documentation, details of paving activities (e.g., timelines, contracting entity), etc. will likely receive full points. South Coast AQMD will work with BWT and/or CSC members during the paving project application review period to further define how these criteria will be scored.



<ul style="list-style-type: none"><li>• Flood prevention elements (e.g., retention basin)</li><li>• Accessibility improvements (e.g., wheelchair ramps, roundabout/hammerhead turnarounds, speed bumps)<sup>13</sup></li><li>• Addition of a landscaping component, “cool pavement,” or other climate resistance measure</li><li>• Conformance to Prioritized List of Properties to be Paved</li></ul>	<b>0 – 15</b>
<b>Total Points Available:</b>	<b>100</b>

For any PA or other public solicitation in which South Coast AQMD receives two or more applications, paving project applications will be reviewed and scored by a selection panel of two (2) to three (3) South Coast AQMD staff members as appointed by the Executive Officer or their designee, and two (2) to three (3) CSC and/or BWT members. Additionally, a subject matter expert from an external agency may be included on the selection panel. After all paving project applications received have been reviewed, scored, and ranked by the selection panel, the resulting list of paving project applications will be provided to the CSC and/or BWT for their consideration and final approval. The selection panel will provide their recommendation informed by CSC and/or BWT input to the South Coast AQMD Governing Board for final selection of the paving project application(s) and execution of contract(s).

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<sup>13</sup> Accessibility may refer to several features that increase the project’s accessibility to community members with disabilities (e.g., wheelchair ramps, designated parking spots, clear signage, detectable warning for visually impaired), school buses (e.g., roundabouts, hammerhead turnarounds), and other benefits that provide improved accessibility to community members. South Coast AQMD will work with BWT and/or CSC members during the paving project application review period to further define how these criteria will be scored.

## Emission Reductions Quantification Methodology

### Emission Reduction Quantification Methodology

Paving of unpaved roads, parking lots, and mobile home and Polanco parks will significantly reduce fugitive dust emissions from vehicle use and windblown dust. Emissions associated with vehicle use of the project area to be paved will be attributable to the project's emission reductions. Emission reductions associated with windblown dust are conservatively not included in this methodology and should not be calculated in the project's emission reductions, unless clearly indicated in the paving project application.

The methodology below is meant to provide guidance for applicant(s) to calculate estimated baseline PM<sub>10</sub> emissions, paved PM<sub>10</sub> emissions, and PM<sub>10</sub> emission reductions from paving an unpaved area. The methodology is based on three sources: CARB Miscellaneous Process Methodology 7.10 - Unpaved Road Dust, Non-Farm Roads<sup>14</sup> for the emission factor of PM<sub>10</sub> (EF<sub>PM10</sub>) and the Average Daily Trip (ADT) rate for public roads; San Joaquin Valley Air Pollution Control District Annual Average Daily Vehicle Trips (AADT) of Selected Land Uses<sup>15</sup> for the ADT rate of mobile home and Polanco parks; and the Western Regional Air Partnership (WRAP) Fugitive Dust Control Handbook<sup>16</sup> for control efficiencies (CE) such as paving, watering, and dust suppressants. The variables used from each source are summarized in Table 3 – Variables Used in Emission Reduction Quantification Methodology and Table 4 – Fugitive Dust Control Measure Efficiency below.

**Table 3 – Variables Used in Emission Reduction Quantification Methodology**

Public Road		Mobile Home Park
<b>Emission Factor of PM<sub>10</sub> (EF<sub>PM10</sub>)</b>	2lbs PM <sub>10</sub> per VMT	
<b>Vehicle Miles Traveled (VMT)</b>	10 ADT × miles of road	4.99 ADT × number of housing units × miles of road

\*ADT – Average Daily Trips

**Table 4 – Fugitive Dust Control Measure Efficiency**

Control Measure	Control Efficiency (CE)
Implement watering twice daily	55%
Implement watering three times daily or greater	61%

<sup>14</sup> California Air Resources Board, Miscellaneous Process Methodology 7.10 - Unpaved Road Dust, Non-Farm Road. Available at: [https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-10\\_2012.pdf](https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-10_2012.pdf).

<sup>15</sup> San Joaquin Valley Air Pollution Control District, Annual Average Daily Vehicle Trips (AADT) of Selected Land Uses. Available at: [https://www.valleyair.org/busind/comply/PM10/forms/AADT\\_Determination.pdf](https://www.valleyair.org/busind/comply/PM10/forms/AADT_Determination.pdf).

<sup>16</sup> Western Regional Air Partnership (WRAP), Fugitive Dust Handbook. Available at: [https://www.wrapair.org//forums/dejf/fdh/content/FDHandbook\\_Rev\\_06.pdf](https://www.wrapair.org//forums/dejf/fdh/content/FDHandbook_Rev_06.pdf).

Apply dust suppressants or gravel	84%
Paving	99%

**Baseline PM10 Emissions** are calculated by multiplying the **EF<sub>PM10</sub>** by the **VMT**, then by the **CE**. **Paved PM10 Emissions** are calculated by applying the **CE** for paving (99%) to the **Baseline Emissions**. **PM10 Emissions Reductions** due to paving are calculated as the difference between the **Baseline PM10 Emissions** and **Paved PM10 Emissions**. Each of these equations are in pounds per day (lbs/day) and provided below.

***Baseline PM10 Emissions = EF<sub>PM10</sub> × VMT × (1 – CE),***

**Where:**

**EF<sub>PM10</sub>** and **VMT** are based on **Table 3**

**CE** is based on **Table 4**

***Paved PM10 Emissions = Baseline PM10 Emissions × (1 – CE)***

***PM10 Emission Reductions = Baseline PM10 Emissions – Paved PM10 Emissions***

Example 1:

Public road that is two miles long and watered two times per day

$$\begin{aligned}
 \text{Baseline PM}_{10} \text{ Emissions} &= EF_{PM_{10}} \times VMT \times (1 - CE), \\
 \text{Where: } EF_{PM_{10}} &= 2 \text{ lbs per VMT/day} \\
 VMT &= 10 \text{ ADT} \times 2 \text{ miles} = 20 \text{ VMT} \\
 CE &= 0.55 \\
 &= 2 \text{ lbs/VMT/day} \times 20 \text{ VMT} \times (1 - 0.55) \\
 &= 40 \text{ lbs/day} \times 0.45 \\
 &= \mathbf{18 \text{ lbs/day}}
 \end{aligned}$$

$$\begin{aligned}
 \text{Paved PM}_{10} \text{ Emissions} &= \text{Baseline PM}_{10} \text{ Emissions} \times (1 - CE) \\
 &= 18 \text{ lbs/day} \times (1 - 0.99) \\
 &= \mathbf{0.18 \text{ lbs/day}}
 \end{aligned}$$

$$\begin{aligned}
 \text{PM}_{10} \text{ Emissions Reductions} &= \text{Baseline PM}_{10} \text{ Emissions} - \text{Paved PM}_{10} \text{ Emissions} \\
 &= 18 \text{ lbs/day} - 0.18 \text{ lbs/day} \\
 &= \mathbf{17.82 \text{ lbs/day}}
 \end{aligned}$$

Example 2:

Mobile Home Park with 10 housing units and 0.5 miles of paving with no dust control measures

$$\begin{aligned}
 \text{Baseline PM}_{10} \text{ Emissions} &= EF_{PM_{10}} \times VMT \times (1 - CE), \\
 \text{Where: } EF_{PM_{10}} &= 2 \text{ lbs per VMT/day} \\
 VMT &= 4.99 \text{ ADT} \times 10 \text{ housing units} \times 0.5 \text{ miles} = 24.95 \text{ VMT} \\
 CE &= 0 \\
 &= 2 \text{ lbs/VMT/day} \times 24.95 \text{ VMT} \times (1 - 0) \\
 &= 49.9 \text{ lbs/day} \times 1 \\
 &= \mathbf{49.9 \text{ lbs/day}}
 \end{aligned}$$

$$\begin{aligned}
 \text{Paved PM}_{10} \text{ Emissions} &= \text{Baseline PM}_{10} \text{ Emissions} \times (1 - CE) \\
 &= 49.9 \text{ lbs/day} \times (1 - 0.99) \\
 &= \mathbf{0.49 \text{ lbs/day}}
 \end{aligned}$$

$$\begin{aligned}
 \text{PM}_{10} \text{ Emissions Reductions} &= \text{Baseline PM}_{10} \text{ Emissions} - \text{Paved PM}_{10} \text{ Emissions} \\
 &= 49.9 \text{ lbs/day} - 0.49 \text{ lbs/day} \\
 &= \mathbf{49.41 \text{ lbs/day}}
 \end{aligned}$$

## Relative Exposure Reduction and Other Qualitative Benefits

### Relative Exposure Reduction and Other Benefits

Paving of unpaved roads, parking lots, and mobile home and Polanco parks will result in PM10 emissions reduction from vehicle travel and fugitive windblown dust as described above; thus, respectively reducing community members exposure to PM10 emissions. Exposure to PM10 can result in various health problems related to the lungs and heart, including<sup>17</sup>:

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

Sensitive receptors, such as people with heart or lung diseases, children, and older adults are the most susceptible to PM10 exposure. A reduction in PM10 exposure can improve the health and well-being of community members while reducing strain on the local healthcare system. Additionally, any health impacts that are avoided or mitigated may reduce the number of sick days of school and/or work that community members lose due to health issues or complications, reaping additional co-benefits.

Additionally, these infrastructure improvements may have co-benefits, including reducing road erosion, improving water run-off, and improved accessibility for persons with disabilities. Paving will also keep the formerly unpaved areas in better overall condition, including susceptibility to weather damage and erosion (e.g., rain, wind), accessibility accommodations, walkability, safety, and aesthetic improvements. Unpaved parking lots may often be inaccessible to community members with special needs due to the poor condition of the surface. Additionally, there will be less maintenance required for parking lots and roads as there will be fewer potholes, less erosion to the surfaces, and no need for gravel and other dust control measures to be applied.

### Estimating Relative Exposure Reduction

Estimates of exposure reduction will be used in the scoring criteria under the category of Exposure Reduction in Table 1 (see Scoring Criteria for the Prioritized List of Properties to be Paved) and comprised of the following metrics:

- Number of affected residents or community members within the paving project property
- Number of sensitive receptor locations within 1000 feet surrounding the paving property boundary

Exposure reduction will be estimated based on these two categories.

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<sup>17</sup> United States Environmental Protection Agency (U.S. EPA), Health and Environmental Effects of Particulate Matter (PM).

Available at: <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>. Accessed March 2022.



## Reporting Requirements

All paving project applications that receive funding under this program must comply with the reporting requirements described in Chapter 3, Section H of the CAPP Incentive 2019 Guidelines<sup>18</sup>. Participants must ensure that paving project application-related information is complete, correct, and supported by documentation and provided to South Coast AQMD upon request. South Coast AQMD will compile this information and prepare mid-cycle and annual reports and provide information to CARB.

At the conclusion of the project, South Coast AQMD will utilize paving project information to report the overall emission and exposure reduction benefits of this program. Information such as paving project application(s) selected, dollars spent, and associated community benefits will be compiled and provided as CSC meeting updates and will also be included in the AB 617 Annual Progress Report.

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<sup>18</sup> CARB. Community Air Protection Program Incentives 2019 Guidelines. Available at: [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). Accessed March 2022.