AB 617: Eastern Coachella Valley **December 2, 2020**

Community Recommendations for the Draft CERP

The recommended actions provided below are not exhaustive. The ECV community reserves the right to continue adding to this list after December 4, 2020.

Recommended Strategies and Actions:

- Salton Sea:
  - Establish ongoing public stakeholder meetings between South Coast AQMD, CNRA, the Salton Sea Authority, community organizations, and other agencies to discuss progress and ongoing efforts and identify points for coordination and mutual support.
  - Include an enforceable plan for air monitoring that will be conducted around the Salton Sea, including HS, PM, and other toxics. This action's timeline should be streamlined and completed far in advance of 2026. This, in conjunction with the broader air monitoring network, should be fully funded and in place by the end of 2021.
- Pesticides:
  - Implement a risk based system where pesticide reporting is done in near-real time using data that the DPR and Agricultural Commissioner have. Data that is 2 months old is not useful for preventing exposure to pesticides.
  - Develop, fund, and implement a pesticide application notification system for the ECV starting in the 2nd quarter of 2021. A community notification system in place and fully operational by the end of 2021.
  - Under the multi-agency coordination that AQMD plans on doing, incorporate a list of initiatives that AQMD will help advance in collaboration with the responsible agencies, including: PPE provision, advocating for healthy soil practices, outreach and notification systems for pesticide application like signage, and vegetative buffer zones.
- Open Burning and Illegal Dumping:
  - Adopt a new rule to reduce emissions from open burning, agricultural burning, and illegal dumping by January 2022.
- Diesel/Other Vehicle Emissions:
  - Develop a stronger plan to reduce diesel emissions. This is identified as one of the most toxic issues in the ECV, but there are limited strategies to support limiting these emissions. There needs to be further review and update of rules and regulations, more enforcement, and real-time monitoring programs.
  - Increase collaboration efforts with the Thermal Racetrack Club and the Thermal Airport to provide mitigation strategies and projects around nearby communities. for the Thermal Race Track
- Greenleaf Power Plan:
  - Collaborate with Tribal governments to explore and incorporate mitigation measures (greenery, plants etc). Work with the County to reassess how mitigation fees are being used, and prioritize all fees to be used in the ECV.
  - Develop the specifics of air monitoring with the CSC and co-identify the location, type, and number of air monitors. It should not only capture PM, but additional pollutants and toxins that may be emitted by the facility. Conduct baseline measurements, including additional pollutants and air toxic pollutants at this site.

- Fugitive Dust:
    - Include an air filtration program that's specific for mobile homes and mobile home parks (Polanco Parks).
    - Provide real time data for PM10 (the CERP does not expand on other pollutants eg. PM2.5).
    - Advance legislation to bring more support to pave Polanco Parks in the ECV.
    - Collaborate with the County to identify and pave unpaved County roads.
    - Allocate funding and conduct stronger outreach to support primarily local and small landscaping businesses to transition to zero-emission equipment.
    - Identify funding opportunities within the Greenhouse Gas Reduction Fund and parter with the relevant entities to apply and implement greening/vegetation projects near pollution sources, including agriculture, that respond to and provide mitigation for all six air quality priorities.
- Land Use:
    - Enact and enforce rules and regulations for permitting sources and ensure the enforcement of mitigation measures and/or permit conditions.
    - By February 2021, conduct a thorough review of its rules and regulations that impact and apply to the ECV and share it's findings with the CSC. By the end of 2021, update and create new rules and regulations that better address air quality and emissions in the ECV.
- Air Monitoring:
    - The deployment of air monitors *and* analysis of initial air quality data must be set to a required timeline (suggest deployment by May 1 2021, and an initial report of first several months of air quality data by August 2021)
    - Create and maintain a web tool for the public to view data from all air quality monitors in real time.
    - Detail the additional monitoring instruments that will be used to document contaminants and parameters that could originate from a natural system.
    - Include a stronger commitment and timeline for data to be released so that the public is notified of the information and enforcement actions by the South Coast AQMD.
- Enforcement:
    - Enforcement, fines, compliance, response, and violations should be updated in a publically available website that is updated monthly. A 1x per year schedule is not sufficient.
    - Include specific emission reduction targets for all four parameters.
    - Include plans for working with legacy school bus fleets from school districts.
- Emission Reduction Targets
    - Strengthen reduction targets for PM2.5 and NOx.
    - Include targets for VOCs, since VOCs are a primary source of pollution, as identified in the CERP, and are expected to increase in the future.
    - Include goals for all toxic air contaminants of concern identified in the source attribution inventory (Ch. 3b), including benzene, arsenic and cadmium.
    - Commit to amending the CERP to include quantifiable emission reduction goals once additional monitoring data (e.g. monitoring for H2s and pesticides) become available by October 2021.
    - Include strategies for all significant sources. For example, the draft CERP says construction and demolition are the most important sources of PM 2.5 but does not include any strategies for reducing such fugitive emissions.
    - Include additional strategies that direct CARB to further reduce emissions in the ECV.
    - Provide language that guarantees South Coast AQMD will further all strategies in the CERP in an impactful way, regardless of budget constraints in a given year.

Recommended Timeline for 2021 CERP Update:

- **January - February:** 2 Monthly CSC Meetings
    - South Coast AQMD will work on incorporating the remaining suggestions from November/December, and additional comments made by CSC in January/February.
- **March:** 1 CSC meeting for review and consideration of updated CERP with requested changes made by CSC members.
- **March:** Stationary Source Committee Meeting
- **April:** South Coast AQMD Governing Board Meeting to consider approval of the updated CERP.

Recommended Action for South Coast AQMD Board:

We do not recommend approval of the ECV Draft CERP until all of the CSC's comments and recommendations are incorporated into the plan and until the timeline for the 2021 CERP update is amended to reflect a period of four months instead of six.