WHEREAS, sections 39600 and 39601 of the Health and Safety Code authorize the California Air Resources Board (CARB or Board) to adopt standards, rules and regulations and to do such acts as may be necessary for the proper execution of the powers and duties granted to and imposed upon the Board by law;

WHEREAS, California's air quality programs have led to significant public health improvements; however, certain communities continue to experience environmental and health inequities from air pollution;

WHEREAS, many of these communities are affected by multiple stationary, area, and mobile sources of air pollution and suffer disproportionate health impacts;

WHEREAS, the high cumulative exposure burdens in these communities are a public health concern, contributing to health conditions such as cardiorespiratory disease, increased cancer risk, and an increased risk of premature death;

WHEREAS, expedited emission reductions of toxic air contaminants and criteria air pollutants in communities with high cumulative exposure burdens are critical to reduce these disproportionate health impacts;

WHEREAS, Assembly Bill (AB) 617 (C. Garcia, Statutes of 2017, chapter 136) added sections 39607.1, 40920.8, 42411, 42705.5, 44391.2 and amended sections 40920.6, 42400, 42402 in the Health and Safety Code, requiring a new community-focused program to address criteria air pollutants and toxic air contaminants;

WHEREAS, AB 617 is a significant step in transforming California's air quality programs to address air pollution disparities at the neighborhood level;

WHEREAS, the Legislature has demonstrated an ongoing commitment to improving air quality in California's most burdened communities through the allocation of nearly $750 million to CARB, with subsequent distribution to local air districts, as "Community Air Protection" funds to reduce exposure in highly impacted communities;

WHEREAS, AB 617 required CARB by October 1, 2018, to engage stakeholders through a robust public process to set overall Program requirements to reduce toxic air
contaminant and criteria air pollutant emissions in communities with high cumulative exposure, and select initial communities with high cumulative exposure burdens for the deployment of community air monitoring systems and/or the development of community emissions reduction programs;

WHEREAS, on September 27, 2018, CARB approved the Community Air Protection Blueprint: For Selecting Communities, Preparing Community Emissions Reduction Programs, Identifying Statewide Strategies, and Conducting Community Air Monitoring (Blueprint), which described criteria for the development of community emissions reduction programs by air districts, in conformance with the requirements of AB 617, and determined that the Blueprint and online Resource Center met statutory requirements for CARB to develop a monitoring plan and state strategy;

WHEREAS, AB 617 requires that community emissions reduction programs be consistent with the state strategy;

WHEREAS on September 27, 2018, CARB selected the community corridor of El Centro-Heber-Calexico to develop a community emissions reduction program as one of ten initial communities;

WHEREAS, the Imperial County Air Pollution Control District (District) partnered with Comite Civil del Valle, Inc. (CCV) to convene a steering committee comprised of El Centro-Heber-Calexico community residents, non-profit organizations, business, and local government representatives and develop a community emissions reduction program to improve air quality in El Centro-Heber-Calexico, titled “Imperial County Year 1 Community Emissions Reduction Program Plan for the El Centro-Heber-Calexico Corridor” (Plan);

WHEREAS, the District and CCV conducted a public process to develop the Plan over the course of a year including a series of 16 public meetings, including community steering committee meetings and workshops;

WHEREAS, the District Governing Board approved the Plan on October 8, 2019, and submitted it to CARB on October 16, 2019;

WHEREAS, CARB staff hosted a community meeting, coinciding with a community steering committee meeting, on November 13, 2019, to hear directly from the community steering committee and the public on the Plan;

WHEREAS, local decisions that determine land use and traffic patterns impact exposure to air pollution, and in many impacted communities throughout the State, including El Centro-Heber-Calexico, the proximity of emissions sources to nearby sensitive receptors like schools, homes, and day care centers exacerbates the cumulative exposure burden;

WHEREAS, historic land use decisions have created disproportionate impacts in many communities throughout the State;
WHEREAS, the State has emphasized the importance of incorporating environmental justice into city and county planning to address existing and new environmental injustice through the passage of Senate Bill 1000 (Levy, Chapter 587, Statutes of 2016), requiring general plans to include environmental justice elements and policies, and the Governor's Office of Planning and Research's General Plan Guidelines;

WHEREAS, CARB staff reviewed the Plan to determine whether it meets the criteria established in the Blueprint and considered the perspectives of the community steering committee members in developing recommendations to the Board;

WHEREAS, CARB staff have identified key strengths of the Plan to highlight for future communities as well as specific aspects of the Plan that will need further definition to support successful implementation in the areas of reduction strategies and process;

WHEREAS, aspects of the Plan may change over implementation, including implementation timeframes, technical information, and strategy prioritization;

WHEREAS, staff has proposed that CARB approve the El Centro-Heber-Calexico community emissions reduction program and direct the District to take additional actions to strengthen implementation as set forth in Attachment A: the El Centro-Heber-Calexico Corridor Community Emissions Reduction Program Staff Report (Staff Report), released to the public on December 18, 2019;

WHEREAS, the District should continue to work with CCV, the community steering committee, and CARB staff to expeditiously implement the Plan, including to achieve measurable progress on the additional actions set forth in Attachment A prior to the first annual reporting due to CARB by October 1, 2020;

WHEREAS, the District submitted the Plan to CARB on October 16, 2019 (Proposed Project), which included CARB implementation measures identified in Table 1 in Attachment B to the resolution (CARB Measures). As part of its approval process, the District is the lead agency under the California Environmental Quality Act (CEQA) and Title 14, California Code of Regulations, Sections 15000 et seq. (CEQA Guidelines) and prepared and filed a Notice of Exemption (NOE) for the Plan. The District’s NOE, however, did not include environmental review of the CARB Measures;

WHEREAS, under CEQA Guidelines sections 15381, CARB is a responsible agency in approving the Proposed Project because it has discretionary authority to approve or deny the project based on its consistency with AB 617. CARB, as the responsible agency under CEQA for approval of the Proposed Project, has prepared findings under its certified regulatory program (California Code of Regulations, title 17, sections 60000 through 60007) to comply with the requirements of CEQA (Public Resources Code section 21080.5). CEQA Guidelines, section 15096 dictates the responsible agency’s role when reviewing a project that has been approved by a lead agency. Specifically, CARB, in approving a project, has responsibility for mitigating or avoiding only the direct or indirect environmental effects of those parts of the project which it decides to carry out, finance or approve. As such, since CARB is considering carrying out the Proposed Project’s CARB Measures, CARB must independently review the CARB Measures for consistency with CEQA;
WHEREAS, CARB staff has considered the Final Programmatic Environmental Analysis for the State Strategy for the State Implementation Plan (SIP Strategy EA), State Clearinghouse Number 2015102011, and the Final Environmental Analysis for the Community Air Protection Blueprint (Blueprint EA), State Clearinghouse Number 2018022025, which it certified in March 2017 and September 2018, respectively, to determine whether the CARB Measures are within the scope of the SIP Strategy and Blueprint EAs and require no further environmental review pursuant to CEQA Guidelines section 15168. CARB staff is proposing that the Board find that the CARB Measures are within the scope of the Community Air Protection Blueprint and State Strategy for the State Implementation Plan planning documents and the associated programmatic EAs adequately describe the CARB measures for the purposes of CEQA. (14 Cal. Code of Regulations §15168(e)(1)-(2).) The full findings to support this "within the scope" analysis is in Attachment B to the Board's resolution; and

WHEREAS, in consideration of the applicable statutory and Blueprint requirements, written and oral testimony provided by community members, the District, and other stakeholders, the Board finds that:

- The Plan is a community emissions reduction program pursuant to AB 617;
- The Plan was developed with the community steering committee in an open public process, in consultation with affected parties, through numerous public workshops, individual meetings, and other outreach efforts, and these efforts are expected to continue; and
- The Plan addresses key elements required in statute and the Blueprint and will benefit from additional actions to support successful implementation in the areas of reduction strategies and process.

NOW, THEREFORE, BE IT RESOLVED that the Board hereby approves the Plan with additional direction to the District and CARB staff as set out in this Resolution.

BE IT FURTHER RESOLVED that the Board hereby directs the District to work with CARB staff, CCV, and the community steering committee to complete the additional actions as defined in the Staff Report in Attachment A on page 8.

BE IT FURTHER RESOLVED that the Board directs the District to submit annual reports to CARB by October 1 of each year beginning in 2020, developed in accordance with the Blueprint requirements, and including updates on the implementation of the Plan and measurable progress made regarding the additional actions required in this Resolution.

BE IT FURTHER RESOLVED that the Board affirms the existing authority of CARB staff to review and interpret aspects of the community emissions reduction programs and delegates to the Executive Officer, or his or her designee, the authority to approve District changes to the Plan, in a manner compliant with CEQA, that he or she deems necessary to enable effective implementation of the Plan, provided that such changes are consistent with statute and the goals established by the Board. Staff shall identify those changes when the Board receives an update on the annual report on the Plan.
BE IT FURTHER RESOLVED that based on the CEQA findings in Attachment B, attached to this Resolution, CARB finds that pursuant to Section 15162 of the CEQA Guidelines, no subsequent EA is required for the CARB Measures because they are considered proposed "later activities" that are within the scope of the SIP Strategy and Blueprint EAs. Thus, pursuant to CEQA Guidelines section 15168, no new environmental document is required for the CARB Measures before CARB approves the Proposed Project.

BE IT FURTHER RESOLVED that the Board incorporates by reference the SIP Strategy EA Findings and the Blueprint EA Findings in their entirety as the Board’s findings to support the environmental review of the CARB Measures including: (1) the potential environmental impacts of the CARB Measures; (2) the measures adopted to mitigate significant environmental impacts of the CARB Measures; (3) the feasibility of mitigation measures and alternatives; (4) the potentially significant impacts of the CARB Measures that will be mitigated to a less than significant level by the adopted mitigation measures; (5) the identification of the significant environmental impacts associated with the CARB Measures that will not be avoided or reduced to a less than significant level by the adopted mitigation measures; and (6) the findings related to the statements of overriding considerations.

BE IT FURTHER RESOLVED that the Board finds all significant effects on the environment due to the implementation of the Proposed Project’s CARB Measures have been eliminated or substantially lessened where feasible through mitigation measures adopted in connection with CARB’s approval of the SIP Strategy EA and Blueprint EA and incorporated as part of the Proposed Project.

BE IT FURTHER RESOLVED that the Board finds all remaining significant effects on the environment caused by implementation of the Proposed Project’s CARB Measures, found to be unavoidable, remain acceptable due to the reasons set forth in the Statements of Overriding Considerations in the SIP Strategy EA and Blueprint EA Findings adopted by CARB in connection with its approval of the 2016 SIP Strategy and AB 617 Blueprint documents, as incorporated by reference and reaffirmed herein.

BE IT FURTHER RESOLVED that the Board adopts the findings in Attachment B to this resolution and finds that there are new feasible alternatives or feasible mitigation measures within its power that would mitigate for the impacts from the CARB Measures, which are already identified in the SIP Strategy and Blueprint EAs and incorporated in their entirety, herein. (CEQA Guidelines section 15096(g)).

I hereby certify that the above is a true and correct copy of Resolution 20-1 as adopted by the California Air Resources Board.

Patricia Carlos, Board Clerk
Resolution 20-01
January 15, 2020

Identification of Attachments to the Board Resolution

Attachment A:  
El Centro-Heber-Calexico Corridor Community Emissions Reduction Program Staff Report

Attachment B:  
CEQA Findings in Connection with the Approval of the El Centro-Heber-Calexico Corridor Community Emissions Reduction Program
Community Air Protection Program

El Centro-Heber-Calexico Corridor

Community Emissions Reduction Program

Staff Report

Release Date: December 18, 2019

CARB Governing Board Hearing Date: January 15, 2020
For more information

Comments: Please submit written comments on this Staff Report by January 7, 2020 to: https://www.arb.ca.gov/lispub/comm/bclist.php

Community Air Protection Program: https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program

To receive email updates from “Community Air”, please subscribe at: https://public.govdelivery.com/accounts/CARB/subscriber/new?topic_id=CAPP

This Staff Report is available at: https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program
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Staff Recommendation

Staff recommend that the California Air Resources Board (CARB or Board) approve the El Centro-Heber-Calexico Corridor community emissions reduction program developed pursuant to Assembly Bill (AB) 617\(^1\) and direct the Imperial County Air Pollution Control District (ICAPCD or District) to take additional recommended actions, as described in this report, to strengthen implementation.

Background

CARB established the Community Air Protection Program (Program) to implement AB 617, which requires new community-focused action to reduce air pollution. On September 27, 2018, the Board selected the El Centro-Heber-Calexico Corridor in Imperial County to develop a community emissions reduction program as one of ten initial communities. The Board also approved the *Community Air Protection Blueprint\(^2\)* (Blueprint), which, among other things, establishes criteria for developing and implementing community emissions reduction programs, contained in the Blueprint Appendix C and summarized in the *Checklist for Community Emissions Reduction Program Evaluation\(^3\)* (Checklist).

CARB staff reviewed the *Imperial County Year 1 Community Emissions Reduction Program Plan for the El Centro-Heber-Calexico Corridor\(^4\)* (Plan), adopted by the ICAPCD Board of Supervisors on October 8, 2019. This staff report summarizes the results of CARB staff’s review and evaluation of the Plan to determine if it meets the criteria established in AB 617\(^5\) and the Blueprint, reflects community priorities, and is likely to reduce exposure to air pollution in the community.

Plan Overview

ICAPCD partnered with Comite Civico del Valle, Inc. (CCV) as co-leads to convene a community steering committee and develop the Plan. The community steering committee consists of 15 members\(^6\) (with one current vacancy) and held 16 meetings between November 2018 and October 2019. Prior to the Board of Supervisors’ approval of the Plan, ICAPCD and CCV also hosted two workshops in June 2019 to allow the public to have an opportunity to learn about the requirements and implementation of AB 617, local and State agency roles, as well as the development of the Plan. During these meetings, the community steering committee helped identify key community concerns\(^7\) for the Plan to address, including:

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\(^1\) Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017.
\(^2\) The Blueprint is available at: https://www2.arb.ca.gov/resources/documents/final-community-air-protection-blueprint
\(^3\) Begins on page C-41.
\(^4\) To review the Plan and associated documents, visit https://www.icab617community.org/
\(^5\) California Health and Safety Code §44391.2.
\(^6\) See page 2-2 in the Plan for the community steering committee roster, available at https://www.icab617community.org/
\(^7\) For additional information on the El Centro-Heber-Calexico Corridor community, see Chapter 3 of the Plan, available at https://www.icab617community.org/.
• Truck idling and traffic (specifically, border related);
• Windblown dust;
• Agricultural activities; and
• Vulnerable population’s exposure to pollution.

The Plan focuses on reducing exposure to fine particulate matter (PM$_{2.5}$) and toxic air contaminants (TACs) from these sources. The community steering committee, ICAPCD and CCV identified 28 emission reduction strategies that are separated into two categories, Tier 1 and Tier 2 strategies. Tier 1 strategies consist of specifically identified projects which can begin implementation immediately, whereas Tier 2 strategies are commitments that require further development and discussion prior to beginning implementation. The following are examples of emissions and exposure reduction strategies included in the Plan:

### Tier 1
- Parking Lot Paving Projects to Reduce Dust
- School Bus Replacement
- Updates to Agricultural Burning Procedures
- Expanded/Improved School Flag Program (Air Quality Notification System)
- Installation of Air Filtration Systems at Sensitive Receptor Locations
- Urban Greening Projects

### Tier 2
- General Plan Comment and Review
- Strategies to Reduce Dust from Open Areas
- Alternative Routes for Traffic Coming Through Ports of Entry
- Installation of Signage to Reduce Idling Near Sensitive Receptors
- Work with CARB to Identify State Regulatory Measures that Could Benefit the Corridor

### Summary of CARB’s Evaluation
CARB staff’s review of the Plan follows the framework established in the Blueprint. In addition to the Plan itself, staff also reviewed meeting materials including a record of public comments and responses to those comments by ICAPCD and CCV posted to the Imperial County AB 617 dedicated website. During the Plan development process, CARB staff attended every El Centro-Heber-Calexico Corridor community steering committee meeting and met regularly with ICAPCD and CCV staff. Finally, CARB staff also hosted a community meeting in Imperial on November 13, 2019, in coordination with ICAPCD and CCV, to solicit additional community input to the CARB staff recommendations.

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8 Visit [https://www.icab617community.org/](https://www.icab617community.org/).
State law gives communities and air districts 12 months to develop a community emissions reduction program following CARB community selection. One year is a very short amount of time to organize a community steering committee, develop a process for operation of the community steering committee, establish the technical foundation for understanding the community’s air quality status, and develop the strategies to reduce air pollution emissions and exposure.

To ensure that the Plan successfully delivers on the identified strategies, there are elements of the Plan that need additional clarification and detail as the Plan moves from the short time frame provided for development into the implementation phase. While each of the initial communities and their community emissions reduction programs have now been approved by the air districts, the need to focus on strengthening the plans during implementation is a theme that applies to all first-year communities, not just the El Centro-Heber-Calexico Corridor.

Therefore, CARB staff is recommending approval of the Plan with additional Board direction to CARB staff, ICAPCD, and the community steering committee to begin Plan implementation immediately, while taking steps to strengthen implementation of the Plan. These recommendations draw directly from the core principles of the Board adopted Blueprint.

Staff have organized the results of this review into two categories:

- Key strengths of the Plan, which highlights areas staff found particularly noteworthy; and
- Recommended actions to strengthen implementation, including areas where additional discussion, information, clarification and detail will help ensure the Plan is successful and achieves emissions reductions in the El Centro-Heber-Calexico Corridor.

**Key Strengths**

ICAPCD and CCV developed a strong co-lead partnership based on a joint effort to encourage and establish relationships with environmental justice groups. The representation of the local agency along with community advocates provided an opportunity to discuss, promote and increase community capacity to find solutions to community concerns. The co-leads worked together to select the community steering committee members and met frequently to discuss the process, prepare meeting agendas and review and comment on draft documents. CARB acknowledges and continues to encourage the leadership and commitment established by both ICAPCD and CCV and its importance in helping to expand community involvement, prevent barriers to engagement, and strengthen the partnership between the co-leads.

The community steering committee was very energetic from the start and began work immediately. Members absorbed the presentations and materials and fully participated during discussions of emission reduction strategies. The community steering committee agreed on a variety of strategies to achieve emissions reductions in their community and expressed support for the Plan, approving the Plan by unanimous vote. The identified
strategies to meet emission reduction targets and associated goals are separated into two categories; Tier 1 and Tier 2.\textsuperscript{9} CARB staff appreciates the identification and distinction between the two tiers of strategies and the recognition that there are additional steps that need to be taken as the Plan moves into implementation to further discuss and integrate the two tiers. This will result in implementation of a suite of strategies to achieve long-term emissions reductions. CARB staff also commends the clear identification of specific metrics to track progress for each of the District led strategies in the Plan.

Lastly, the collaboration between the District, CCV and the community steering committee resulted in the development of a Community Air Monitoring Plan, the first such plan developed under the Program to be approved by a community steering committee and submitted to CARB. This new monitoring will build on the existing community-led monitoring network developed by CCV.

**Recommended Actions to Strengthen Implementation**

On October 2, 2019, the community steering committee unanimously voted to support the Plan. CARB staff recognize the Plan is a living document that will continue to require work in order to meet the implementation goals and targets specified in the Plan. In support of this, staff have developed a set of recommended actions to support implementation in the following key areas: reduction strategies and process. Progress in implementing these recommendations should be included in the annual progress report required by the AB 617 statute.

**Reduction Strategies**

Throughout the past year of community steering committee meetings, committee members provided comments regarding the development and implementation of strategies and associated community involvement. The Plan documented and responded to these public comments and the emissions and exposure reduction strategies outlined in the Plan are generally responsive to community concerns and recommendations. However, the community steering committee has voiced requests for continued discussion to determine additional strategies that would provide further emissions reductions in the community.

In addition, additional information and clear parameters to help inform the prioritization of the strategies and the individual projects within each strategy should be provided in the Plan’s annual progress report. The community steering committee requested their input be solicited during the project selection process and development of criteria for how projects are prioritized for funding.

Finally, border-related emissions have been recognized by the community steering committee as a key contributor to pollution in the corridor. Efforts to reduce emissions from these sources will complement local actions undertaken as part of the Plan. As noted in the Plan, there is currently a collaborative effort between agencies and governments on both

\textsuperscript{9} See Chapter 4 of the Plan for additional information on targets and strategies identified. The Plan is available at: https://ww2.arb.ca.gov/capp_2018_ad_cerps.
sides of the United States and Mexico border to develop a plan for prioritizing actions that should be taken to improve air quality in the border region.¹⁰

To help clarify and enhance strategy development, staff recommend that CARB staff, ICAPCD, CCV and the community steering committee work together to undertake the following actions:

1. Continue to develop the Tier 2 strategies. This process will also identify additional strategies and projects to further reduce PM 2.5 and TAC emissions.
2. Develop specific criteria for project prioritization and selection for funding, which should include clear background information to help inform how projects and locations are prioritized. The identification of available funding per project type, via a clear and detailed budget, will also support prioritization of project types.
3. Continue to coordinate the activities of the plan with California cross-border pollution related activities, and include in these efforts groups such as the United States Environmental Protection Agency, California Environmental Protection Agency, Border Relations Council, Commission of the Californias, and CARB. This inter-agency coordination will support the development and implementation of emissions reduction strategies. As a result, the plan may need to be adjusted in the future in order to meet the objectives of reducing cross-border pollution.

Process
The community steering committee also requested additional time in the future to review the information they are provided in order to enhance their ability to make informed decisions. To benefit the implementation process, staff recommend that CARB staff, ICAPCD, CCV and the community steering committee work together to undertake the following action:

1. Continue to support strategy development and design a process that defines a schedule and appropriate lead time to allow the community steering committee to review documents, ask questions, engage in discussion and provide feedback; consider updating the charter to reflect the agreed upon process.

¹⁰ See Imperial County-Mexicali Air Quality Work Plan to Improve Air Quality in the Border Region. Available at: https://ww3.arb.ca.gov/planning:border/workplan.pdf.
Attachment B

CEQA FINDINGS IN CONNECTION WITH THE APPROVAL OF THE
EL CENTR0-HEBER-CALEXICO CORRIDOR COMMUNITY EMISSIONS REDUCTION
PROGRAM

CONSIDERATION OF THE EL CENTR0-HEBER-CALEXICO CORRIDOR
COMMUNITY EMISSIONS REDUCTION PROGRAM’S CARB IMPLEMENTATION
MEASURES AS BEING WITHIN THE SCOPE OF THE 2016 STATE STRATEGY FOR
THE STATE IMPLEMENTATION PLAN AND THE 2018 COMMUNITY AIR
PROTECTION BLUEPRINT ENVIRONMENTAL ANALYSES

Pursuant to the California Environmental Quality Act, Public Resources Code Sections 21000 et seq. (CEQA) and the CEQA Guidelines, Title 14, California Code of Regulations, Sections 15000 et seq. (CEQA Guidelines), the California Air Resources Board (CARB) has considered the Final Programmatic Environmental Analysis for the State Strategy for the State Implementation Plan (SIP Strategy EA), State Clearinghouse Number 2015102011, and the Final Programmatic Environmental Analysis for the Community Air Protection Blueprint (Blueprint EA), State Clearinghouse Number 2018022025, which it certified in March 2017 and September 2018, respectively, for purposes of determining whether the El Centro-Heber-Calexico Corridor Community Emissions Reduction Program’s (Proposed Project) CARB implementation measures identified in Table 1 (CARB Measures) are within the scope of the SIP Strategy and Blueprint EAs. As set forth below, CARB finds that pursuant to Section 15162 of the CEQA Guidelines, no subsequent EA is required for the CARB Measures because they are considered proposed “later activities” that are within the scope of the SIP Strategy and Blueprint EAs. Thus, no new environmental document is required under CEQA to approve the Proposed Project.

1. FINDINGS

The following Findings are hereby adopted by CARB as required by Public Resources Code Sections 21081, 21081.5, and 21081.6, and CEQA Guidelines Sections 15091, 15092, 15096 and 15168, in conjunction with the approval of the Proposed Project, which is set forth below.
A. Environmental Review Process

The Imperial County Air Pollution Control District (District) submitted the Proposed Project to CARB on October 16, 2019. As part of its approval process, the District is the lead agency under CEQA and prepared and filed a Notice of Exemption (NOE) for the Proposed Project, excluding the CARB Measures. Under CEQA Guidelines sections 15381, CARB is a responsible agency in approving the Proposed Project because it has discretionary authority to approve or deny the project based on its consistency with AB 617.

CEQA Guidelines, section 15096 dictates the responsible agency’s role when reviewing a project that has been approved by a lead agency. Specifically, CARB, in approving a project, has responsibility for mitigating or avoiding only the direct or indirect environmental effects of those parts of the project which it decides to carry out, finance or approve. As such, since CARB is considering carrying out the Proposed Project’s CARB Measures, CARB must independently review the CARB Measures for consistency with CEQA. Based on the following findings, however, CARB finds that the Proposed Project’s CARB Measures are within the scope of the SIP Strategy EA and the Blueprint EA.

TABLE 1: PROPOSED PROJECT’S CARB MEASURES

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<td><strong>MOBILE SOURCE MEASURES</strong></td>
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<td>1</td>
<td>Advanced Clean Car 2 – CARB would consider expanded California-specific standards for new light-duty vehicles, impacting 2026 and later model year vehicles, to increase the number of new zero emission and plug-in hybrid electric vehicles sold in California and increase the stringency of fleet-wide emission standards for greenhouse gases and criteria pollutants.</td>
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<td>2</td>
<td>Advanced Clean Truck – CARB is working through a public process to develop and consider proposals for new approaches and strategies that may transition to zero emission technology those truck fleets that operate in urban centers, have stop and go driving cycles, and are centrally maintained and fueled.</td>
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<td>3</td>
<td>Heavy-Duty Inspection and Maintenance – When emissions control systems are not operating correctly, in-use emissions can increase. CARB’s current inspection programs include the roadside Heavy-Duty Vehicle Inspection Program and the fleet Periodic Smoke Inspection Program. These regulations require heavy-duty vehicles operating in California to be inspected for excessive smoke and tampering. In July 2018, CARB approved amendments to the Heavy-Duty Vehicle Inspection Program and the Periodic Smoke Inspection Program to reduce the smoke opacity limits to levels more appropriate for today’s modern engine technology. CARB is now exploring the development of a more comprehensive heavy-</td>
<td>CARB</td>
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Duty inspection and maintenance program which would help ensure all vehicle emissions control systems are adequately maintained throughout the vehicles’ operating lives.

**4 Low NOx Engine Standard** – This measure would establish lower NOX standards and associated test procedures for model year 2022 and subsequent model year medium-duty and heavy-duty engines. CARB is in the process of evaluating the technical feasibility of this measure.

**5 Small Off-Road Engine Amendment** – In 2020, CARB will consider new standards for small off-road engines (SORE), which are spark-ignition engines rated at or below 19 kilowatts and used primarily for lawn, garden, and other outdoor power equipment.

### ENFORCEMENT MEASURES

**6 Increase frequency of CARB compliance inspections with guidance from the Steering Committee:**
CARB will collaborate with the Steering Committee co-chairs to work with the Steering Committee members to actively enhance CARB enforcement activities through a combination of improved complaint reporting, more focused inspections, and report-back meetings to update the Steering Committee on the status of CARB inspections and to obtain additional areas of mobile source concern. CARB will work with the co-chairs to meet annually with the Steering Committee in order to prioritize CARB enforcement strategies and identify possible locations where non-compliant vehicles are present. CARB will report back to the Community with the number of CARB inspections performed, mapped locations of the enforcement, and the number of citations and/or Notices of Violations issued.

**7 Coordinate and conduct inspections of stationary sources with ICAPCD staff when assistance is requested by the District:**
Based on Steering Committee input and upon evaluation of concerns, the District can request assistance from CARB and coordinate joint inspections of stationary sources, as needed.

**8 Provide Annual Report of Enforcement Activities:**
The Community Outreach and Enforcement Section of CARB’s Enforcement Division will provide an annual report to the Steering Committee to update and summarize CARB’s enforcement activities within the community. Reporting enforcement activities results is expected to help create an enforcement presence and incentive compliance.

**9 Coordination with other agencies:**
CARB will seek opportunities to coordinate with other agencies with enforcement authority in Imperial County. Such an opportunity could consist of CARB staff working with cities to provide truck idling signage.

**10 Enhancing CARB’s Data Management Practices:**
CARB is committed to enhancing the quality of enforcement data for the El Centro-Heber-Calexico Corridor. Moving forward, CARB will maintain the location of enforcement activity and received complaints to provide the Steering Committee with the most accurate data available. CARB has recently completed a visualization tool that makes CARB enforcement data more transparent and available. The tool can be accessed online by visiting https://webmaps.arb.ca.gov/edvs/.

**11 Providing in-person community specific training (CARB may have future online trainings available).** CARB commits to deliver one training session.
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<td>12</td>
<td><strong>Commitment to Update Enforcement Strategies as Applicable:</strong> CARB staff are committed to updating enforcement strategies as requested by the Steering Committee, if said strategies are enforceable by CARB staff or if CARB can reasonably accommodate the request (e.g., additional enforcement training for idling vehicles).</td>
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| 13 | **Compliance Communication:** This strategy intends to promote voluntary compliance with applicable regulations and requirements, and to help overcome compliance barriers. Compliance will be promoted through educational programs and technical assistance. The information to communicate may include:  
  - Education and technical assistance to the regulated community to facilitate compliance by providing information about regulatory requirements and how to meet them.  
  - Available compliance training programs, hot lines, and publications.  
  - Publicized success compliance stories in the area to create positive social climate and promote compliance. |
| 14 | **Community outreach:** Communicate specific effects of air pollution to human health and natural resources to build public support. This element of the strategy may include non-government organizations to help promote compliance by publicizing information to increase public awareness of environmental problems. |
| 15 | **Complaint system:** Citizen complaints are an important way of detecting violations that are unlikely to be detected through self-reporting or inspections. These types of complaints could potentially help detect violations and illegal acts that take place in isolated areas. CARB will promote the use of systems for reporting potential violations, referred to as “complaints.” Community will be provided with contacts and instructions to report potential violations. |
| 16 | **Technology based and traditional enforcement inspection-based:** CARB staff will inspect mobile and portable (i.e., PERP) air pollution sources and evaluate compliance against regulatory or permit requirements. Additionally, CARB will incorporate new technologies, where feasible, to assist and enhance enforcement work in communities. |
| 17 | CARB will present the SEP Program to the Steering Committee members to identify potential project opportunities that would benefit their community. If the project meets SEP Policy criteria, it may be listed as eligible for potential funding through the program. |
In March 2017, CARB certified the SIP Strategy EA for the Proposed Revised 2016 State Strategy for the State Implementation Plan in accordance with CEQA, the CEQA Guidelines, and the CARB’s Procedures for Implementation of CEQA, and approved the SIP Strategy plan (Resolution 17-7). The SIP Strategy EA provided a programmatic environmental review of the State SIP Strategy, which CARB designed to reduce emissions of ozone-forming pollutants and fine particulate matter (PM2.5), and describe the programmatic and regulatory mechanisms of the federal Clean Air Act requirements to meet federal air quality standards. The SIP Strategy EA evaluated the potentially significant environmental effects related to implementation of the strategy measures and their associated reasonably foreseeable compliance responses. The strategy measures are in Table 2, below, and constituted the “project description” for the SIP Strategy EA.

The SIP Strategy EA evaluated mitigation measures that would reduce potentially significant impacts associated with the potential indirect significant environmental impacts (projects resulting from compliance responses) from the implementation of the SIP Strategy measures if agencies with authority over the compliance response projects imposed such mitigation measures when approving those projects. The SIP Strategy EA took the conservative approach in its post-mitigation significance conclusions (i.e., tending to overstate the risk that feasible mitigation may not be sufficient or may not be implemented by other parties) and discloses, for CEQA compliance purposes, that potentially significant environmental impacts may be unavoidable. The SIP Strategy EA expected that many of these potentially significant impacts would be feasibly avoided or mitigated to a less-than-significant level as described in each resource area during the project-specific environmental review processes associated with compliance actions and, additionally, through compliance with local and state laws and regulations.

The Board found that implementation of the State SIP Strategy would potentially result in cumulatively considerable contributions to significant cumulative impacts related to certain resource areas. While the Board adopted recommended mitigation for each potential cumulatively considerable contribution to a significant impact, other agencies would be responsible for implementing the mitigation measures. Consequently, the Board found it was uncertain whether other agencies would implement recommended mitigation measures, which precludes assurance that the State SIP Strategy project implementation would avoid its significant environmental impacts. Where impacts could not feasibly be mitigated, the SIP Strategy EA recognized the impact as significant and unavoidable. In response to the unavoidable significant impacts, the Board adopted Findings and a Statement of Overriding Considerations for significant and unavoidable environmental effects of the State SIP Strategy as part of the approval process.
<table>
<thead>
<tr>
<th>Proposed Measures</th>
<th>Agency</th>
<th>Action</th>
<th>Implementation Begins</th>
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<tbody>
<tr>
<td><strong>On-Road Light-Duty</strong></td>
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<tr>
<td>Advanced Clean Cars 2</td>
<td>ARB</td>
<td>2020 – 2021</td>
<td>2026</td>
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<tr>
<td>Lower In-Use Emission Performance Assessment</td>
<td>ARB / BAR</td>
<td>n/a</td>
<td>ongoing</td>
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<tr>
<td>Further Deployment of Cleaner Technologies*</td>
<td>ARB / SCAQMD</td>
<td>ongoing</td>
<td>2016</td>
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<tr>
<td><strong>On-Road Heavy-Duty</strong></td>
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<tr>
<td>Lower In-Use Emission Performance Level</td>
<td>ARB</td>
<td>2017 – 2020</td>
<td>2018 +</td>
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<tr>
<td>Low-NOx Engine Standard – California Action</td>
<td>ARB</td>
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<td>2023</td>
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<td>Low-NOx Engine Standard – Federal Action*</td>
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<td>2019</td>
<td>2024</td>
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<td>ARB / U.S.EPA</td>
<td>2017 – 2019</td>
<td>2018</td>
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<tr>
<td>Innovative Clean Transit</td>
<td>ARB</td>
<td>2017</td>
<td>2018</td>
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<td>Last Mile Delivery</td>
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<td>2020</td>
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<td>Innovative Technology Certification Flexibility</td>
<td>ARB</td>
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<td>Zero-Emission Airport Shuttle Buses</td>
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<td>2018</td>
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<tr>
<td>Incentive Funding to Achieve Further Emission Reductions from Heavy-Duty Vehicles</td>
<td>ARB / SCAQMD</td>
<td>ongoing</td>
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<tr>
<td>Further Deployment of Cleaner Technologies*</td>
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<td><strong>Off-Road Federal and International Sources</strong></td>
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<td>Tier 4 Vessel Standards*</td>
<td>ARB / IMO</td>
<td>2016 – 2018</td>
<td>2025</td>
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<td>Incentivize Low Emission Efficient Ship Visits</td>
<td>ARB</td>
<td>2018 – 2020</td>
<td>2018</td>
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<td>At-Berth Regulation Amendments</td>
<td>ARB</td>
<td>2017 – 2018</td>
<td>2023</td>
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<td>Proposed Measures</td>
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<td><strong>Off-Road Equipment</strong></td>
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<td>Zero-Emission Off-Road Worksite Emission Reduction Assessment</td>
<td>ARB</td>
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<td>Zero-Emission Airport Ground Support Equipment</td>
<td>ARB</td>
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<td>2023</td>
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<td>Small Off-Road Engines</td>
<td>ARB</td>
<td>2018</td>
<td>2022</td>
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<td>Transport Refrigeration Units Used for Cold Storage</td>
<td>ARB</td>
<td>2018 – 2019</td>
<td>2020 +</td>
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<td>Low-Emission Diesel Requirement</td>
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<td>2023</td>
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<td><strong>Consumer Products</strong></td>
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<tr>
<td>Consumer Products Program</td>
<td>ARB</td>
<td>2019 – 2021</td>
<td>2020 +</td>
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</tbody>
</table>

BAR=Bureau of Automotive Repair; IMO=International Maritime Organization; SCAQMD=South Coast Air Quality Management District, U.S. EPA = U.S. Environmental Protection Agency
* Request U.S. EPA approval under the provisions of Section 182(e)(5) of the Clean Air Act, allowing for reliance on anticipated development of new control techniques or improve of existing control technologies. Also includes identification of needed funding, infrastructure development, and actions/resources required from other agencies.

In September 2018, CARB certified the EA for Assembly Bill 617 Community Air Protection Program-Program Requirements (Blueprint EA) in accordance with CEQA, the CEQA Guidelines, and the CARB’s Procedures for Implementation of CEQA, and approved the AB 617 Blueprint document (Resolution 18-33). The Blueprint EA provided a programmatic environmental review of the AB 617 Blueprint document, which CARB designed as a State-level planning document that provides the following: (1) an overarching blueprint for the Community Air Protection Program; (2) a process for identifying communities with a high cumulative pollutant exposure burden; (3) the statewide strategy measures to reduce emissions of criteria air pollutants and toxic air contaminants (TACs) in these communities; and (4) the path for development and implementation of community emission reduction programs and community.
monitoring systems. The Blueprint EA evaluated the potentially significant environmental effects related to implementation of the AB 617 Blueprint measures and their associated reasonably foreseeable compliance responses. The strategy measures are in Table 3, below, and constituted the “project description” for the Blueprint EA.

The Blueprint EA evaluated mitigation measures that would reduce potentially significant impacts associated with the potential indirect significant environmental impacts (projects resulting from compliance responses) from the implementation of the AB 617 Blueprint measures if agencies with authority over the compliance response projects imposed such mitigation measures when approving those projects. The Blueprint EA took the conservative approach in its post-mitigation significance conclusions (i.e., tending to overstate the risk that feasible mitigation may not be sufficient or may not be implemented by other parties) and discloses, for CEQA compliance purposes, that potentially significant environmental impacts may be unavoidable. The Blueprint EA expected that many of these potentially significant impacts would be feasibly avoided or mitigated to a less-than-significant level as described in each resource area during the project-specific environmental review processes associated with compliance actions and, additionally, through compliance with local and state laws and regulations.

The Board found that implementation of the AB 617 Blueprint would potentially result in cumulatively considerable contributions to significant cumulative impacts related to certain resource areas. While the Board provided recommended mitigation for each potential cumulatively considerable contribution to a significant impact, other agencies would be responsible for implementing the mitigation measures. Consequently, the Board found it was uncertain whether other agencies would implement recommended mitigation measures, which precludes assurance that the AB 617 Blueprint project implementation would avoid its significant environmental impacts. Where impacts cannot feasibly be mitigated, the Blueprint EA recognized the impact as significant and unavoidable. In response to the unavoidable significant impacts, the Board adopted Findings and a Statement of Overriding Considerations for significant and unavoidable environmental effects of the AB 617 Blueprint as part of the approval process.
<table>
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<tbody>
<tr>
<td><strong>Emission Reduction Strategies</strong></td>
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<td>Evaluation and Potential Development of Regulation to Reduce Idling for All Railyard Sources</td>
<td>CARB</td>
<td>2020</td>
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<td>Evaluation and Potential Development of Regulation to Reduce Emissions from Locomotives not Preempted Under the Clean Air Act</td>
<td>CARB</td>
<td>2022</td>
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<td>Drayage Trucks at Seaports and Rail Yards Amendment</td>
<td>CARB</td>
<td>2022</td>
<td>2026–2028+</td>
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<td>Commercial Harbor Craft Amendment</td>
<td>CARB</td>
<td>2020</td>
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<td>Cargo Handling Equipment Amendment</td>
<td>CARB</td>
<td>2022</td>
<td>2026</td>
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<td>Catalytic Converter Theft Reduction</td>
<td>CARB</td>
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<td>Chrome Plating Control Measures Amendment</td>
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<td>Composite Wood Products Control Measure Amendments</td>
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<td>Commercial Cooking Suggested Control Measure</td>
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<td><strong>Supporting Tools and Resources</strong></td>
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<td>Develop and Maintain the Online Resource Center</td>
<td>CARB</td>
<td>2018</td>
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<tr>
<td>Expand and Maintain the Technology Clearinghouse</td>
<td>CARB</td>
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<tr>
<td>Develop and Maintain Community Air Monitoring Online Resources</td>
<td>CARB</td>
<td>2018</td>
<td>2018+</td>
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<tr>
<td>Compile and Develop Best Practices Guidance on Outreach, Land Use, and Transportation</td>
<td>CARB</td>
<td>2018</td>
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<td>Provide Community Enforcement Program</td>
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<td>Provide Enforcement Staff Cross-Training for Multi-media Violations</td>
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<td>Conduct Periodic Supplement Environmental Projects Outreach</td>
<td>CARB</td>
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<td>2018+</td>
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<tr>
<td>Assess Current Air Monitoring Technologies and Provide Information</td>
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<td>2018</td>
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<td>Assess Current Air Monitoring Systems and Provide Information</td>
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<td>2018+</td>
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<tr>
<td>Develop and Maintain an Annual Emissions Reporting System</td>
<td>CARB</td>
<td>2018</td>
<td>2018+</td>
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<tr>
<td>Funding for Community Assistance Grants</td>
<td>CARB</td>
<td>2018</td>
<td>2018+</td>
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<tr>
<td>Develop and Maintain Community Air Monitoring Data Portal</td>
<td>CARB</td>
<td>2018</td>
<td>2019+</td>
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<tr>
<td>Explore Community Health Indicators</td>
<td>CARB</td>
<td>2018</td>
<td>2018+</td>
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</tbody>
</table>

**Identification and Recommendation of Communities**

| Identification and Recommendation of Communities | CARB       | 2018   | 2018                 |

**Criteria for Community Air Monitoring**

| Criteria for Community Air Monitoring | CARB / Air Districts | 2018   | 2018                 |

**Criteria for Community Emissions Reduction Programs**

| Criteria for Community Emissions Reduction Programs | CARB / Air Districts | 2018   | 2018                 |

In addition to serving as the environmental documents for the approval of the 2016 SIP Strategy and AB 617 Blueprint, CARB intended that later activities could be found within the scope of the SIP Strategy EA and Blueprint EA, which would preclude the need to conduct further environmental review under CEQA for those later activities. Under CEQA Guidelines, if a proposed later activity involves no new or substantially more severe significant effects and no new mitigation measures would be required, a program EIR has adequately analyzed the later activity for CEQA purposes; i.e., the later activities are within the scope of the program EIR, and no further review under CEQA is required.

According to CEQA Guidelines section 15168, later activities within the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. Use of program EIRs to cover later activities is addressed in CEQA Guidelines Section 15168(c):

(c) Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
(1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152.

(2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

(4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

(5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

Section 15168(c)(2) states that if the lead agency finds that pursuant to CEQA Guidelines Section 15162, no subsequent EIR would be required, then the lead agency can approve the activity as being within the scope of the project covered by the program EIR and no new environmental document is required. According to CEQA Guidelines Section 15162, no additional environmental review shall be prepared for a project unless the public agency with the next discretionary approval determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CARB has completed an evaluation of the CARB Measures pursuant to Section 15168(c)(2) of the CEQA Guidelines to determine whether the CARB Measures are within the scope of the SIP Strategy EA and Blueprint EA. Section 15168(c)(4) states that a lead agency should use a written checklist or similar device “[w]here the later activities involve site specific operations” (emphasis added) to document the later activity and determine whether the environmental impacts of the later activity were within the scope in the Program EAs. Since the CARB Measures identified in the Proposed Project consist of very similar or identical program-level measures that CARB evaluated in the SIP Strategy EA and the Blueprint EA, there are no site specific operations that would require a written checklist or similar device to document whether the environmental effects of the CARB Measures are within the scope of the SIP Strategy and Blueprint programmatic EAs. In other words, the same programmatic-level analysis would occur if CARB undertook environmental review of the CARB Measures since the District is proposing them at the same planning level scope as they occurred under the AB 617 Blueprint and 2016 SIP Strategy documents. As a result, CARB does not need to use a written checklist or similar device since the level of review of the CARB Measures is the same as the programmatic level of review that CARB conducted when it prepared the SIP Strategy EA and Blueprint EA.
CARB has determined that the environmental impacts from the CARB Measures were evaluated in the 2016 SIP Strategy and Blueprint EAs, and that under CEQA Guidelines Section 15162 there would be no new impacts and no new mitigation measures are required. Therefore, further evaluation and documentation under CEQA is not required. (CEQA Guidelines Section 15168(c)(2)) The legal criteria for approving the Proposed Project on the basis of the SIP Strategy EA and Blueprint EA are met here. The Proposed Project’s CARB Measures is a later activity within the scope of the programs evaluated in the SIP Strategy EA and Blueprint EA. None of the conditions or circumstances that would require preparation of subsequent or supplemental environmental review pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162 exists in connection with the Proposed Project’s CARB Measures.

B. Adequacy of Prior Environmental Reviews

The CARB Measures consist of a later activity under the SIP Strategy EA and Blueprint EA in that they are planning level measures adopted in a similar planning document, such as the Proposed Project, as the very similar or same measures that CARB adopted in the 2016 SIP Strategy and AB 617 Blueprint documents. The District is proposing 17 CARB Measures in the Proposed Project. The following lays out the specific relationship between the Proposed Project’s CARB measures and the measures that went through environmental review in the SIP Strategy EA and Blueprint EA.

There are five mobile source CARB Measures and 13 enforcement-related CARB measures in the Proposed Project (numbering accords with Table 1, above), all of which have been through environmental review in either the SIP Strategy EA or the Blueprint EA.

1. CARB Measure 1 addressing CARB’s goal of adopting Advanced Clean Car 2 regulations is a substantively similar measure as the SIP Strategy EA’s measure 1.a) found on pages 13 and 14.
2. CARB Measure 2 that encourages CARB to develop Advanced Clean Truck is the same measure as the SIP Strategy EA’s measure 2.e) on page 21 (entitled “Last Mile Delivery” at the time of adoption of the SIP Strategy EA).
3. CARB Measure 3 that requests CARB to adopt regulations addressing improvements to CARB’s current Heavy-Duty Inspection and Maintenance program is a substantively similar measure as the SIP Strategy EA’s measure 2.a) on pages 16 and 17.
4. CARB Measure 4 that requests CARB to develop a Low NOx Engine Standard regulation is the same measure as the SIP Strategy EA’s measure 2.b) on pages 17 and 18.
5. CARB Measure 5 requesting CARB to develop new standards for small off-road engines is the same measure that CARB evaluated in the SIP Strategy EA’s measure 4.d) on pages 35 and 36.

6. CARB Measures 6-17 requesting CARB engage in various enforcement measures are substantively similar to measures that CARB evaluated in the Blueprint EA’s measures 2.a) through 2.n) on pages 18 through 25.

Given the foregoing, the Proposed Project’s CARB Measures fall within the scope of the project description for the programs analyzed in the SIP Strategy EA and Blueprint EA. The CARB Measures are not substantively different from the very similar measures examined in the SIP Strategy EA and Blueprint EA. The compliance responses that CARB identified in the SIP Strategy and Blueprint EA associated with complying with the very similar measures that the District identified as CARB Measures in the Proposed Project are applicable to the CARB Measures because the CARB Measures present no substantive changes to the measures examined in the EAs.

Similarly, since the SIP Strategy EA and Blueprint EA reviewed the impacts associated with the identified compliance responses, the CARB Measures would not change the impact analysis and mitigation measures found in the SIP Strategy EA and Blueprint EA. As a result, the Proposed Project presents no substantial changes to the projects identified in the SIP Strategy EA and Blueprint EA, presents no substantial changes with respect to the circumstances under which those projects are undertaken nor does it present new information of substantial importance such that they require changes to the significant impact analysis, the mitigation measures or alternatives in the SIP Strategy EA and Blueprint EA. (CEQA Guidelines section 15162) Therefore, based on the foregoing, CARB finds that pursuant to section 15162, the Proposed Project’s CARB Measures do not require a subsequent EA and it approves the Proposed Project’s CARB Measures as a later activity within the scope of the projects covered by the program SIP Strategy and Blueprint EAs, and no new environmental document is required under CEQA for the environmental review of the CARB Measures.

2. Findings on Environmental Impacts of the CARB Measures

These Findings rely upon and incorporate by reference the SIP Strategy EA Findings and the Blueprint EA Findings as CARB’s findings for the CARB Measures with respect to (1) the potential environmental impacts of the CARB Measures; (2) the measures adopted to mitigate significant environmental impacts of the CARB Measures; (3) the feasibility of mitigation measures and alternatives; (4) the potentially significant impacts that will be mitigated to a less than significant level by the adopted mitigation measures; (5) the identification of the significant environmental impacts that will not be avoided or reduced to a less than significant level by the adopted mitigation measures; and (6) the findings related to the statements of overriding considerations.
3. **Incorporation by Reference**

These Findings incorporate by reference in their entirety the text of the SIP Strategy EA and Blueprint EA and their Findings previously certified and/or adopted by CARB. Without limitation, this incorporation is intended to elaborate on the scope and nature of the Proposed Project’s CARB Measures, potential environmental impacts that could result from the Proposed Project’s CARB Measures, and the basis for determining the significance of the CARB Measures’ impacts.

4. **Feasible Alternative or Mitigation Measures**

CEQA Guidelines section 15096 requires that the Responsible Agency, like CARB in this instance, shall not approve the Proposed Project if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment. CARB finds that there are new feasible alternatives or feasible mitigation measures within its power that would mitigate for the impacts from the CARB Measures, which are already identified in the SIP Strategy and Blueprint EAs and incorporated in their entirety, herein. (CEQA Guidelines section 15096(g)(2))

5. **Record of Proceedings**

Various documents and other materials constitute the record of proceedings upon which CARB bases its findings and decision contained herein. The custodian for these documents and materials is the California Air Resources Board, 1001 I Street, Sacramento, California, 95814.

6. **Summary**

Based on the foregoing Findings and the information contained in the record, CARB has made one or more of the following Findings with respect to the Project:

1. The SIP Strategy EA and Blueprint EA adequately examined the Proposed Project’s CARB Measures’ environmental impacts. No subsequent EA is required because the Proposed Project’s CARB Measures will not contribute to the significant environmental impacts previously identified in the SIP Strategy EA and Blueprint EA or otherwise alter those EAs findings. Therefore, pursuant to CEQA Guidelines section 15168(c)(2), the Proposed Project’s CARB Measures are a later activity within the scope of the SIP Strategy EA and Blueprint EA and no new environmental document is required under CEQA.

2. All significant effects on the environment due to the implementation of the Proposed Project’s CARB Measures have been eliminated or substantially lessened where feasible through mitigation measures adopted in connection with CARB’s approval of the SIP Strategy EA and Blueprint EA and incorporated as part of the Proposed Project.
3. All remaining significant effects on the environment caused by implementation of the Proposed Project’s CARB Measures, found to be unavoidable, remain acceptable due to the reasons set forth in the Statements of Overriding Considerations in the SIP Strategy EA and Blueprint EA Findings adopted by CARB in connection with its approval of the 2016 SIP Strategy and AB 617 Blueprint documents, as incorporated by reference and reaffirmed herein.

7. APPROVALS

CARB hereby takes the following actions:

A. CARB has reviewed and considered the SIP Strategy EA and the Blueprint EA as described above for the Proposed Project.

B. CARB reaffirms the Findings and Statement of Overriding Considerations adopted for the SIP Strategy EA in March 2017 and the Findings and Statement of Overriding Considerations adopted for the Blueprint EA in September 2018 relative to the environmental impacts associated with the Proposed Project’s CARB Measures.

C. CARB hereby adopts the Findings in their entirety as set forth in full, above.