



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

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

*September 2022*

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## 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 (PM10) emitted from unpaved roadways. The ECV CSC identified actions in the CERP to address these emissions through paving projects (e.g., Polanco and mobile home 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>.

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<sup>1</sup> South Coast AQMD, Eastern Coachella Valley Community Emission 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>. Accessed March 2022.

<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). Accessed March 2022.

This Paving Project Plan, herein referred to as the “Plan”, is part of California Climate Investments, a 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 disadvantaged communities. The Plan will serve as the mechanism to distribute CAPP Incentive funds to eligible applicants. It is consistent with the guidelines established in the CAPP Incentives 2019 Guidelines, which sets minimum requirements for the Plan, including the following:

- Project Identification
- Community Support
- Participant Requirements and Application Process (including Participant Eligibility)
- Project Funding Parameters
- Emission Reductions Quantification Methodology
- Relative Exposure Reduction and Other Qualitative Benefits
- Project Scoring and Selection
- Reporting Requirements

Potentially eligible projects may include unpaved roads, Polanco or mobile home parks, and other unpaved areas located near sensitive receptors. South Coast AQMD will work with project applicants, 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 applicants, if needed.

## 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 meetings, 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>3</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) 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.

Additionally, the ECV CSC established working teams, with a subset of ECV CSC members, to further guide the implementation of CERP actions. This included a Budget Working Team (BWT), which met on a biweekly or monthly basis, as requested 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 **Participant Eligibility**, **Project Funding Parameters**, and **Project Scoring and Selection**. The BWT also suggested applicants submit a "Community Narrative and Support" describing the community and population, challenges and impacts with living near unpaved roads, and how the project will protect the community. Further, the **Project Scoring and Selection** section describes the collaborative nature of project selection, in which CSC members will work with South Coast AQMD to review, score, and approve the projects selected. This Plan incorporates suggestions from the BWT and CSC so that it is effective for the ECV community.

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<sup>3</sup> South Coast AQMD, ECV CSC Meetings:

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>

## Participant Requirements and Application Process

### Participant Eligibility

Public and private entities<sup>4</sup> are eligible to apply for and receive funding for paving projects within the ECV community<sup>5</sup>. Applicants must meet the criteria below for projects to be considered for funding.

- The following projects are not eligible for funding:
  - Routine maintenance and rehabilitation projects
  - Paving activities as part of new development projects
- Applicant must:
  - be in compliance with all federal, state, and local requirements, if applicable
  - be the owner of or have authority for the project area to be paved
  - obtain all permits required to complete the project and provide copies of existing permits for the project site, if applicable<sup>6</sup>
  - demonstrate compliance with the California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA), if applicable<sup>7</sup>
  - commit to perform routine maintenance of the paved area during the Project Life
  - commit to making the project available for inspection, if requested by South Coast AQMD and/or CARB during the Project Life
  - ensure the project will be sufficiently utilized once paving has been completed
  - demonstrate that all property taxes are current at the time of application
  - submit a Community Narrative and Support with application submittal, describing the community and population, challenges and impacts with living near unpaved roads, and how the project will benefit the community

### Application Process and Requirements

South Coast AQMD will release a Program Announcement and a Request for Proposals (RFP) to solicit interested parties. The Program Announcement and RFP will include information on the funding amount for paving projects, instructions to submit applications, and a deadline for application submission. Once the RFP has been released and the solicitation period is open, South Coast AQMD will work with community-based organizations, the BWT, and the CSC to identify target areas to conduct outreach. During the RFP

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<sup>4</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, 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>5</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.

<sup>6</sup> Some projects, including Polanco parks, may be exempt from permitting requirements pursuant to Assembly Bill 1783 (AB 1783). Available at: [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=201920200AB1783](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1783). Accessed June 2022.

<sup>7</sup> Some projects, including Polanco parks, may be exempt from CEQA requirements pursuant to CEQA Guidelines 15061 – Review for Exemption, and/or Article 12.5 Exemptions for Agricultural Housing, Affordable Housing, and Residential Infill Projects, CEQA Guidelines 15091 - 15096. Applicants are advised to consult with the applicable lead agency (i.e., city or county planning department, tribal entity) for specific requirements to comply with CEQA and/or NEPA (e.g., Notice of Exemption, other lead agency documentation).

solicitation period, South Coast AQMD will be available to provide technical assistance and support to applicants, including emission and/or exposure reductions quantification, reporting requirements, and dust control strategies for rule compliance. South Coast AQMD will also provide 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.

Once the RFP solicitation period has ended, South Coast AQMD will review the applications in coordination with CSC members and/or the BWT, utilizing the scoring system described in this Plan (see **Project Scoring and Selection**). When the application review process is complete, South Coast AQMD will provide the information to CSC members and/or the BWT for additional input and final approval. South Coast AQMD will respond to applicants as soon as feasible considering the volume of 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 application
- An offer from South Coast AQMD to enter into contract development based on information submitted
- Notification that the response has been declined from further consideration

Applicants will submit applications based on the requirements laid out in this Plan. The following is a sample of the information that must be included on an application submitted:

- Community Narrative and Support
- Description of the project site, including the following: location, current use, size of area to be paved, existing conditions, and pictures of project site in its current condition
- Identification of nearby sensitive receptors, if applicable
- Current and expected vehicle use at the project site
- Existing dust control measures (e.g., frequency the unpaved area is watered), if applicable
- Baseline emissions (methodology provided in this Plan)
- Applicable permits and/or permissions to pave
- A commitment to provide photo documentation of the completed project
- A commitment to provide photo documentation on an annual basis to demonstrate that project maintenance is occurring throughout the Project Life
- A commitment to comply with the most current versions of any applicable South Coast AQMD rules, including but not limited to, Rules 402 – Public Nuisance<sup>8</sup>, 403 – Fugitive Dust<sup>9</sup>, and 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources<sup>10</sup> during project construction
- Include any supporting documentation, as needed

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<sup>8</sup> South Coast AQMD, Rule 402 – Public Nuisance. Available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf?sfvrsn=4>. Accessed March 2022.

<sup>9</sup> South Coast AQMD, Rule 403 – Fugitive Dust. Available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>. Accessed March 2022.

<sup>10</sup> South Coast AQMD, Rule 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403-1.pdf>. Accessed March 2022.

## Project Funding Parameters

### Maximum Funding Amount Per Project

Through collaboration with the CSC, a maximum funding amount has been established at \$375,000 per project, with discretion left to the CSC on a case-to-case basis to exceed this amount.

### Maximum Funding Percentage of Project Cost Per Project

For purposes of this Plan, Polanco parks, mobile home parks, and roads within 1,000 feet of a sensitive receptor, will be considered sensitive receptor locations to determine funding eligibility. Sensitive Receptor locations may include homes, hospitals, public schools<sup>11</sup>, 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))<sup>12, 13</sup>.

- For projects located at a sensitive receptor, grants for qualified projects will be provided for up to 100% of eligible project costs.
- For projects in a publicly accessible location but not within 1,000 feet of a sensitive receptor, grants for qualified projects will be provided for up to 70% of eligible project costs.
  - For projects that are not located within 1,000 feet of a sensitive receptor, discretion will be left to the CSC to exceed this percentage so long as: the project serves mobile home and/or Polanco park residents; is supported by the CSC as outlined in the ECV CSC Charter<sup>14</sup>; and is supported by the residents and/or park owners it will serve.

The applicant shall identify the total cost of the project, including a breakdown of all eligible costs and anticipated expenses. When a project is selected, the amount of funding to be provided will be determined based on the maximum funding amount listed above.

### Eligible and Ineligible Costs

The following costs are eligible for funding under this Plan:

- Supplies, equipment, and materials
- Labor and construction (including contracted services)
- Signs and interpretive aids communicating information about the project

Additionally, up to 10% of the grant request may be budgeted for non-construction costs, including mobilization, traffic control, and administration. Another 5% may be budgeted for contingency costs.

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

- Permitting and design

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<sup>11</sup> No public monies are allowed for the support of any sectarian or denominational school, or any school not under the exclusive control of the officers of the public schools. (California Constitution Article 16 § 5 and Article 9 § 8).

<sup>12</sup> California Health and Safety Code § 42705.5(a)(5). Available at: [https://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=HSC&sectionNum=42705.5](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=42705.5). Accessed May 2022.

<sup>13</sup> CARB, Sensitive Receptor Assessment. Available at: <https://ww2.arb.ca.gov/capp-resource-center/community-assessment/sensitive-receptor-assessment>. Accessed May 2022.

<sup>14</sup> South Coast AQMD, ECV CSC Final Charter. Available at: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/final-charter.pdf?sfvrsn=14>. Accessed May 2022.



- 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 schedule included in the executed contract.
- **Project Life** is the time the applicant 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 duration of the ECV CERP implementation. During this time, entities must conduct as-needed maintenance (e.g., fixing potholes, lane re-striping, street cleaning). As-needed maintenance may be conducted through professional services or completed by the owner. Additionally, entities 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.

## Emission Reductions Quantification Methodology

### 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.

### Emission Reduction Quantification Methodology

Paving of unpaved roads, parking lots, and Polanco and mobile home 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 application submittal.

The methodology below is meant to provide guidance for applicants to calculate estimated baseline PM10 emissions, paved PM10 emissions, and PM10 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>15</sup> for the emission factor of PM10 ( $EF_{PM10}$ ) 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>16</sup> for the ADT rate of mobile home parks; and the Western Regional Air Partnership (WRAP) Fugitive Dust Control Handbook<sup>17</sup> for control efficiencies (CE) such as paving, watering, and dust suppressants. The variables used from each source are summarized in Tables 1 and 2 below.

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<sup>15</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). Accessed March 2022.

<sup>16</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). Accessed March 2022.

<sup>17</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). Accessed March 2022.

**Table 1 – Variables Used in Emission Reduction Quantification Methodology**

Public Road		Mobile Home Park
<b>Emission Factor of PM10 (EF<sub>PM10</sub>)</b>	2lbs PM10 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 2 – Fugitive Dust Control Measure Efficiency**

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

$$\text{Baseline PM10 Emissions} = \text{EF}_{\text{PM10}} \times \text{VMT} \times (1 - \text{CE}),$$

Where:

**EF<sub>PM10</sub>** and **VMT** are based on **Table 1**

**CE** is based on **Table 2**

$$\text{Paved PM10 Emissions} = \text{Baseline PM10 Emissions} \times (1 - \text{CE})$$

$$\text{PM10 Emission Reductions} = \text{Baseline PM10 Emissions} - \text{Paved PM10 Emissions}$$

Example 1:

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

$$\begin{aligned}
 \text{Baseline PM10 Emissions} &= EF_{PM10} \times VMT \times (1 - CE), \\
 \text{Where: } EF_{PM10} &= 2 \text{ lbs per VMT/day} \\
 VMT &= 10 \text{ ADT} \times 2 \text{ miles} = 20 \text{ VMT} \\
 CE &= 0.55 \\
 &= 2 \text{ lbs/VMT/day} \times 20 \text{ VMT} \times (1 - 0.55) \\
 &= 40 \text{ lbs/day} \times 0.45 \\
 &= \mathbf{18 \text{ lbs/day}}
 \end{aligned}$$

$$\begin{aligned}
 \text{Paved PM10 Emissions} &= \text{Baseline PM10 Emissions} \times (1 - CE) \\
 &= 18 \text{ lbs/day} \times (1 - 0.99) \\
 &= \mathbf{0.18 \text{ lbs/day}}
 \end{aligned}$$

$$\begin{aligned}
 \text{PM10 Emissions Reductions} &= \text{Baseline PM10 Emissions} - \text{Paved PM10 Emissions} \\
 &= 18 \text{ lbs/day} - 0.18 \text{ lbs/day} \\
 &= \mathbf{17.82 \text{ lbs/day}}
 \end{aligned}$$

Example 2:

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

$$\begin{aligned}
 \text{Baseline PM10 Emissions} &= EF_{PM10} \times VMT \times (1 - CE), \\
 \text{Where: } EF_{PM10} &= 2 \text{ lbs per VMT/day} \\
 VMT &= 4.99 \text{ ADT} \times 10 \text{ housing units} \times 0.5 \text{ miles} = 24.95 \text{ VMT} \\
 CE &= 0 \\
 &= 2 \text{ lbs/VMT/day} \times 24.95 \text{ VMT} \times (1 - 0) \\
 &= 49.9 \text{ lbs/day} \times 1 \\
 &= \mathbf{49.9 \text{ lbs/day}}
 \end{aligned}$$

$$\begin{aligned}
 \text{Paved PM10 Emissions} &= \text{Baseline PM10 Emissions} \times (1 - CE) \\
 &= 49.9 \text{ lbs/day} \times (1 - 0.99) \\
 &= \mathbf{0.49 \text{ lbs/day}}
 \end{aligned}$$

$$\begin{aligned}
 \text{PM10 Emissions Reductions} &= \text{Baseline PM10 Emissions} - \text{Paved PM10 Emissions} \\
 &= 49.9 \text{ lbs/day} - 0.49 \text{ lbs/day} \\
 &= \mathbf{49.41 \text{ lbs/day}}
 \end{aligned}$$

## Relative Exposure Reduction and Other Qualitative Benefits

### Relative Exposure Reduction and Other Benefits

Paving of unpaved roads, parking lots, and other unpaved areas 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>18</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 (see Project Scoring and Selection) and comprised of the following metrics:

- Number of users that visit and/or utilize the project area to be paved
- Number of sensitive receptors within 1,000 feet of the project boundary

Exposure reduction will be estimated based on the number of community members and/or affected residents that are in these two categories.

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<sup>18</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.

## Project Scoring and Selection

Project applications received during the solicitation period will be reviewed and scored by South Coast AQMD and CSC and/or BWT members. Projects will be scored according to the criteria described below, which were informed by input from the BWT. The scoring criteria detailed below provides a framework to score applications received for projects during the RFP solicitation period. For example, during an RFP solicitation period, the project that is most cost-effective will receive the highest points available (i.e., 25 points for cost-effectiveness) and all other projects will receive a point value to scale (i.e., less than 25 points). After all project applications have been reviewed, scored, and ranked, the prioritized list of projects will be provided to CSC members for final approval. The prioritized list will be provided to inform the CSC members' decision-making process but will not be considered the final determining factor for project funding.

**Table 3 – Scoring Criteria for Project Prioritization**

Scoring Criteria	Points Available
<b>Exposure Reduction</b> <ul style="list-style-type: none"> <li>Number of affected residents or community members</li> <li>Affected residents' proximity to paving</li> </ul>	<b>0 – 35</b>
<b>Cost-Effectiveness</b> <ul style="list-style-type: none"> <li><i>Emissions reductions in dollar per ton reduced</i></li> <li><i>Cost sharing or other available funding</i></li> </ul>	<b>0 – 25</b>
<b>Project Readiness</b> <ul style="list-style-type: none"> <li><i>Timeliness and robustness of project plan<sup>19</sup></i></li> <li><i>Community Narrative and Support</i></li> </ul>	<b>0 – 25</b>
<b>Other Benefits</b> <ul style="list-style-type: none"> <li><i>Accessibility improvements (e.g., wheelchair ramps, roundabout/hammerhead turnarounds)<sup>20</sup></i></li> <li><i>Addition of a landscaping component, “cool pavement”, or other climate resistance measure</i></li> </ul>	<b>0 – 15</b>
<b>Total Points Available:</b>	<b>100</b>

<sup>19</sup> Timeliness and robustness of the project plan refers to the extent the project plan is developed and ready for implementation. Applications that are complete and include all necessary permissions, documentation, details of paving activities (e.g., costs, materials, timelines, contracting entity), etc. will likely receive full points. South Coast AQMD will work with CSC members during the RFP and application review period to further define how these criteria will be scored.

<sup>20</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 CSC members during the RFP and application review period to further define how these criteria will be scored.

## Reporting Requirements

All projects 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>21</sup>. Participants must ensure that project-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 project information to report the overall emission and exposure reduction benefits of this program. Information such as projects 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>21</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.