

State of the District Report Butte County Air Quality Management District

August 25, 2022

Preface

Under the existing State and federal environmental regulatory structure, the federal government is granted primary authority to establish health-based ambient air quality standards, to establish specific technology and emission requirements for sources of air pollution, to regulate selected sources of air pollution (e.g., aircraft), and to mandate that states comply with these requirements.

Under the State of California regulatory structure, the State maintains primary authority to regulate mobile sources of air pollution (e.g., establish vehicle emission standards), and possess regulatory oversight authority over local and regional air pollution control authorities. Local and regional agencies maintain primary authority to regulate stationary sources of air pollution (e.g., permitting industry activities and regulating open burning).

The Butte County Air Quality Management District (District) is the local county independent air pollution control agency created pursuant to Section 40100.5 et seq. of the California Health and Safety Code (HSC). The District lies within the Sacramento Valley Air Basin and participates as a member of the Sacramento Valley Basinwide Air Pollution Control Council (BCC). As part of its statutory responsibilities, the District implements a broad spectrum of air quality management programs. The purpose of this State of the District Report is to summarize the status of the more salient District programs and provide goals for fiscal year 2022-2023.

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I. ADMINISTRATION

√ District Finances

District administration coordinated a successful fiscal audit for FY 2020-2021 with the firm Smith and Newell, Certified Public Accountants. The audit was presented to the Board at the April 2022 meeting. Norman Newell provided an unmodified opinion, with no findings.

The District program maintained a balanced budget in FY 2021-2022 and in previous fiscal years. A balanced budget for FY 2022-2023 was approved at the June 23, 2022, Board meeting. The District continues to maintain service levels.

The FY 2022-2023 budget includes no additional permanent staffing. District operations are supported by State grant administration funds. Current revenue for most of these grants is secured through 2023 however uncertainty with the State’s future budgets could impact these revenue source thereafter. District Administration will closely monitor the situation. The District will utilize temporary extra help staff as needed to assist with the implementation of ongoing grant programs and assist with other duties as needed. The District has not increased permanent staffing levels since FY 2000-2001, even though multiple new programs have been added which continue to tax staff resources.

District Administration continues to implement program improvements to ensure efficient, cost effective operations. The District utilized e-mailing for invoicing, public notification of workshops, meetings and upcoming rules and regulations. Work continues implementing a digital file system, which offers many advantages in records management. Documents are scanned electronically onto a computer hard drive and are accessible from network workstations. Cost

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savings have been maximized through efficient information retrieval and data storage. The District also utilizes Laserfiche for its electronic file depository. Laserfiche allows workflows to be created and is integrated with the electronic file system software. These workflows increase productivity and streamline processes requiring approval or follow-up. Staff continues to add forms that are available to the public through the District website which can be completed electronically. The District utilizes the ADP timesheet system to better track program costs and indirect expenses. The data generated is used to evaluate the percent cost recovery in areas requiring a regulatory fee. Analysis of this data has highlighted the programs failing to achieve cost recovery targets.

The Board approved a District Fiscal Policy in May of 2022 that requires annual review of program cost recovery and the development of a Pension Liability Management Plan. Enforcement penalty changes and Fee rule adjustments will be proposed later this year in an effort to address cost recovery deficits.

The District has implemented the use of electronic payments to pay reoccurring bills in effort to reduce costs, increase productivity and increase security.

√ **Human Resources**

The current District Memorandum of Understanding with the Employee Association expires in October of 2024. A salary survey will be proposed in next year's budget in preparation of the 2024 MOU negotiations for the 2024-2027 MOU.

District staffing is budgeted at eleven (11) full-time employees. Over the last two (3) years, five (5) new staff have been hired to fill positions vacated by retirements and other staff changes. This period represents the highest turnover in the District's history however we have managed to manage all programs at a high level because of the efficiencies that have been implemented over the last years and the training and dedication of our staff.

The District will take advantage of part-time extra help as needed and consider internships. Staff training is not limited to new staff and continues at all levels. Staff have attended classes offered by the California Air Resources Board (CARB) and the California Emergency Management Agency (Cal EMA), Special District Risk Management Association (SDRMA), California Special District Association (CSDA), Target Solutions, California Chamber of Commerce and the Governmental Finance Officers Association (GFOA). Our field staff are certified in evaluating visible emissions in accordance with U.S. EPA requirements and are certified in hazardous materials response.

√ **Facilities**

The District is currently in the second year of a 5-year lease extension for our office located at 629 Entler Avenue, Chico.

√ **Program Compliance**

District operating procedures are maintained in the Administrative Code, Parts A and B. Part A includes operating protocols for the Board and accounting procedures. The Board has regularly approved amendments to Part A, including operating protocols. Part B includes staff operating procedures, from routine office policies to field staff inspection procedures and permitting

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guidance. Amendments to Part B are approved by the APCO. Maintenance of the District Administrative Code is an ongoing activity as we continuously seek to improve our internal processes.

Fiscal program compliance was evaluated by outside auditor Smith and Newell, CPAs, as mentioned above.

II. AIR QUALITY PLANNING AND GRANTS

√ **The Carl Moyer Program**

The Carl Moyer Program is a grant program that funds the incremental cost of cleaner heavy-duty diesel vehicles and other diesel equipment. The District received \$175,000 in Year 24 funds. \$263,375 in Year 24 State Reserve funds were awarded to Butte County. The District was awarded \$114,940 in Year 24 funds from the Carl Moyer Rural Assistance Program (RAP). District staff updated the District Policies and Procedures Manual for Governing Board approval in September 2021.

√ **The FARMER Program**

The Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program provides state funding for replacing agricultural harvesting equipment, heavy-duty trucks, agricultural pump engines, tractors, and other equipment used in agricultural operations. The District received FY 2021/2022 FARMER funds totaling \$1,736,000. District staff updated the FARMER Policies and Procedures Manual for Governing Board approval in September 2021.

√ **The AB617 Community Air Protection Program**

The State of California signed AB617 into law in July 2017 directing CARB to develop the Community Air Protection (CAP) Program. The Program's focus is to reduce exposure in communities most impacted by air pollution statewide. The District received \$48,987 in FY 2021/2022 implementation funds towards activities that further the goals of AB 617.

CARB developed a CAP Incentives program to provide funding to air districts for projects that would prioritize disadvantaged communities and low-income communities. Through a public process and with Governing Board approval, the District projects totaling \$1,064,315.57 in FY 2021/2022 funding.

√ **CEQA Mitigation Grant Program**

The District maintains an offsite mitigation program where large projects can pay into a fund to reduce air quality impacts when on-site mitigation is not feasible or adequate. There are currently no projects being funded with offsite mitigation funds.

√ **District Web Page**

The District's website (www.bcaqmd.org) provides information to the public and includes: Governing Board agendas, permit information, current air quality information and advisories, agricultural and residential burning information, burn day status, staff contact information, printable forms, and links to other air quality and transportation websites. Staff posts information relevant to special projects of interest to the public, such as wildfire information, **Check Before You Light** program, the Portable Equipment Registration program, the Agricultural Engine

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Registration program, grants and incentive programs, as well as advisories issued by the California Air Resources Board, EPA and other agencies.

√ Check Before You Light Program

The 2021-2022 Check Before You Light (CBYL) Program was effective November 1, 2021 through February 28, 2022. The CBYL Program requests that the public voluntarily refrain from using woodstoves and fireplaces when an area in Butte County is expected to exceed the federal 24-hr PM_{2.5} health standard (35ug/m³). These conditions generally occur on cold winter nights with little air movement and strong inversions. The federal standard is also the threshold for the Air Quality Index (AQI) level of 101 which is considered Unhealthy for Sensitive Groups. Advisories are issued for the following day based on air quality and meteorological data measured in Chico, Gridley, and Paradise. When advisories are issued for the Chico area a mandatory no-burn ordinance adopted by the Chico City Council restricts burning in non-EPA certified wood burning devices within the city limits.

There were no advisories issued for the 2021-2022 CBYL season. There were also no exceedances of the federal 24-hr PM_{2.5} standard at the Chico, Paradise, or South Butte County monitoring locations during the 2021-2022 CBYL Season.

√ Public Education Program

Staff provides air quality information to the media on a daily basis. During periods of poor air quality, the District staff will respond to media requests for additional information. Staff are available to give presentations on topics related to air quality, upon request, and participates in public events for the purpose of outreach and education. Upon request, staff is available to work with local educators, at all levels, to promote clean air programs such as EPA's School Flag Program.

√ Air Quality Data

District staff prepare biannual and annual air quality data summaries including detailed graphics. These summaries are available to interested members of the public and are frequently used for public presentations. Also see the comments above. Staff maintains contact with California Air Resources Board technician, who maintain the various permanent air quality monitors within the District. Additionally, staff monitors exceptional event data in order to support the public in decision-making during unhealthy air episodes.

√ CEQA/NEPA Reviews

The District continues to work closely with Butte County and cities in evaluating potential air quality impacts under the California Environmental Quality Act and National Environmental Protection Act (CEQA/NEPA). The District prepares an air quality review and analysis for developments submitted by Butte County and cities. The District has been working with the cities and county providing comments and resource information for their general plan updates. District staff has also forwarded resource information developed by the CAPCOA on evaluating climate change through the CEQA and general plan process. The District provides a guidance document "CEQA Air Quality Handbook" as a resource for lead agencies in project evaluation for air quality impacts.

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√ **Sacramento Valley Basinwide Air Pollution Control Council (BCC)**

District staff closely coordinate program activities with the air districts in the Sacramento Valley. Staff coordinate review, each year, of the Basin Smoke Management Program and other common activities.

√ **California Air Pollution Control Officers Association (CAPCOA)**

CAPCOA is a professional organization of the California Air Pollution Control Officers. As more State and federal mandates are imposed on local air districts, CAPCOA offers the District opportunities to coordinate program elements Statewide on new requirements. District staff participates at varying levels with the CAPCOA Planning Managers, Engineering Managers, Enforcement Managers, Vapor Recovery, Toxics, Human Resources and Fiscal Managers. The Senior Air Quality Planner is currently Chair of the Planning Managers Committee.

√ **Federal PM 2.5 State Implementation Plan (SIP)**

U.S. EPA took final action effective October 10, 2013 to determine that the Chico nonattainment area in Butte County attained the 2006 24-hour PM_{2.5} National Ambient Air Quality Standards (NAAQS). District staff developed a Redesignation Request and Maintenance Plan which was approved by U.S. EPA effective August 10, 2018. Butte County continues to attain 2006 24-hour PM_{2.5} NAAQS. The District evaluates any violations of the NAAQS due to exceptional events (such as wildfires) annually.

√ **Federal 8-hour Ozone State Implementation Plan (SIP)**

U.S. EPA established a new 8-hour Ozone standard in October 2015 at 0.070 parts per million (ppm). The previous standard was 0.075 ppm, established in 2008. Butte County was designated nonattainment for the 2015 Ozone standard by the U.S. EPA effective April 2018. Ozone concentrations measured in Butte County improved to where U.S. EPA is proposing a determination (July 2022) that Butte County attained the 2015 Ozone NAAQS by the August 2021 deadline. The District evaluates any violations of the NAAQS due to exceptional events (such as wildfires) annually.

√ **Rule and Regulation Development**

The California Health and Safety Code requires the District's Governing Board to adopt Rules and Regulations for the implementation and enforcement of federal and State statutes and regulations. The District Board may also adopt rules based on local needs. Most of the rules proposed are required by the State Air Quality Attainment Plan (Plan). The Plan is updated every three (3) years by the Sacramento Valley Basinwide Air Pollution Control Council and approved by the District's Governing Board. The Board last adopted the Plan in 2021. The Plan includes a listing of "*all feasible measures*" that the District's Governing Board is required to consider.

The District's Governing Board adopted amendments to District Rule 509 – *Subject Research Fees and Hourly Rate* at the June 27, 2019 meeting and Rule 434 *Emission Statements* at the June 25, 2020 meeting.

III. COMPLIANCE & ENGINEERING

√ **Stationary Source Permit Program**

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The District issues permits (Authority to Construct and Permits to Operate) to stationary sources of air pollution in Butte County. The stationary source permit is the primary means to ensure compliance with local, State and federal air quality requirements. Typical sources under permit include dry cleaners, retail service stations, auto body repair shops, lumber mills, cabinet shops, sand and gravel processing plants, asphalt concrete production, diesel-fueled generators, agricultural processing operations (almond hullers and rice dryers), and soil/groundwater remediation projects. In calendar year 2021, the District issued or renewed 788 Permits to Operate and issued 46 Authority to Construct permits.

The Title V Program requires a federal major source to have a permit, which includes all of the federal requirements applicable to the facility. The District has three (3) Title V sources under its jurisdiction: 1) SFPP, L.P., a bulk gasoline distribution terminal, 2) Butte County Department of Public Works for the Neal Road Recycling and Waste Facility, and 3) the Ameresco Butte County LLC Gas to Energy plant co-located at Neal Road. Title V Operating Permits are valid for five (5) years from the date of issuance and are renewable and were all renewed in 2022.

√ **Stationary Agricultural Engine Registration Program**

Rule 1001, *Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines Used in Agricultural Operations* and Rule 441, *Registration Requirements for Stationary Compression Ignition (CI) Engines Used in Agricultural Operations* were adopted in 2007 by the Board. The registration rule required that owners of all existing engines apply for a Certificate of Registration by March 1, 2008 and the owners of any new engines apply for registration no later than ninety (90) days from the date of installation. Owners of “low use” engines are allowed to request that the engines be evaluated for a compliance extension which allows engines to be operated for a cumulative total number of hours of operation, or until 2020 for non-certified engines, or 2025 for certified engines, whichever occurs first.

The District has 259 agricultural engines registered, with 65 engines designated as “low-use”. 55 engines were non-certified or Tier I engines that were phased out in December 31, 2020.

√ **Portable Equipment Registration Program**

In 2005, the local Portable Equipment Registration Program (PERP) was approved by the Board. This program was developed as a local alternative to the existing state-wide program. The program helps implement the Portable Equipment Airborne Toxic Control Measure (ATCM). The District is currently managing 66 active certificates of registration.

√ **Emission Inventory Program**

The District is required to maintain records and report periodically to the California Air Resources Board regarding criteria and toxic pollutant emissions from stationary sources and area sources. Staff utilize the Hot Spots Analysis and Reporting Program (HARP) for this effort. Data is available for access by the public at the CARB website (www.arb.ca.gov).

The emissions inventory is an important planning tool used in attainment demonstrations. Facility emissions data is generated during the annual permit renewal process, so inventory maintenance is assigned to the permitting staff. Staff provided updates for the 2020 inventory for both criteria and toxic pollutants for all sources per ARB’s requirements. Staff continue to work with CARB workgroups related to AB 617 emissions inventory and reporting regulatory development efforts

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which focuses on improved communications for sources subject to the Greenhouse Gas mandatory reporting requirements, sources emitting over 250 tons per year, and certain more significant sources of toxic emissions.

√ **Air Toxics “Hot Spots” Program**

The AB 2588 Air Toxics “Hot Spots” program requires the District to develop and update inventories of stationary sources of air toxics, assesses the potential risks from exposures and provides information to the public regarding exposures. Staff continue to work on implementing new inventory software. Significant efforts are forecast in the future to ensure that stationary and portable diesel-fueled engines comply with the AB 2588 reporting requirements.

District staff have briefed the Governing Board on the impacts of the implementation of the Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines and received approval on the updated Toxics Health Risk Assessment Permitting Guidelines. District staff will propose additional changes to existing guidance, including those for prioritizing facilities and notification procedures for sources with more significant impacts. A revised reporting format incorporating those changes will be presented to the Board for approval later this year.

√ **State Airborne Toxic Control Measure (ATCM) Program**

The Toxic Air Contaminant Identification and Control Act (AB 1807, Tanner 1983) created California's program to reduce public exposure to air toxics. Under AB 1807, the CARB is required to use certain criteria to prioritize the identification and control of air toxics. A two-step process was established for risk identification and risk management, to address the potential adverse health effects from public exposure to toxic air contaminants. The end result of the process is an Airborne Toxic Control Measure (ATCM) which the local air districts are required to implement and enforce. ATCM's have been developed for several toxic air contaminants including diesel particulate matter and Naturally Occurring Asbestos (NOA).

√ **Federal MACT & NESHAPs Programs**

The District is delegated by EPA to implement and enforce the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for area sources. These regulations are codified in 40 Code of Federal Regulations, Part 63. Under court order, EPA has promulgated a host of NESHAPs for area sources, such as auto body shops, small boilers, other coating operations, reciprocating internal combustion engines, and other “common” sources that emit HAPs. District staff continues to work with the affected businesses to ensure compliance with the local, State and federal regulations. District staff evaluated the requirements of NESHAP, Subpart ZZZZ which regulates HAPs (other than diesel particulate matter) from internal combustion engines and continues to update permit conditions for affected sources to include maintenance and testing practices to comply with the NESHAPs, Subpart ZZZZ.

√ **District Enforcement Program**

The District utilizes three (3) main tools to enforce District regulations: the Notice of Noncompliance (NON), the Notice to Comply (NTC) and the Notice to Apply for a Permit (NTA). These notices are a formal record of the District's finding that a violation of a State or federal law or District regulations affecting air quality has occurred. In most cases, a violation can be settled by taking corrective action and paying a penalty. A Notice of Noncompliance can also involve monetary penalties, compliance agreement, civil suits, or criminal prosecution for failure to

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respond, repeated violations, or serious pollution cases. Notices are issued in response to complaint investigations, stationary source inspections and special District investigations.

In calendar year 2021, the District issued seventy (70) Notices of Noncompliance. These violations include open burning (i.e. burning on a no-burn day or burning prohibited materials), failure to obtain a permit or certificate of registration, fugitive dust, vapor recovery and permit condition violations. The District has issued offers to settle through the Board-approved Civil Penalty Program. District Staff developed and optional alternative civil settlement program for residential burning noncompliance that provides for reductions in penalties after successful completion of a training course on open burning. District staff continue to monitor and follow-up on open cases. Staff will be updating the maximum penalties for Board approval later this year to meet AB 617 requirements and to assure cost recovery in the Enforcement Program.

Staff coordinate with other enforcement agencies and the Butte County District Attorney on cases as appropriate.

√ **Hearing Board and Variance Program**

The California Health and Safety Code requires each air district to maintain a Hearing Board which serves as a quasi-judicial body, acting on petitions and appeals for variances from District Rules and Regulations. Membership on the Hearing Board is specified in law and must include: one (1) attorney, one (1) professional engineer, one (1) representative from the medical profession, and two (2) public members. All members of the Hearing Board are appointed by the District Governing Board for terms of three (3) years. The current Hearing Board members are:

Open (attorney representative)

Ms. Tammie Watkins P.E. (professional engineer representative)

Dr. Julian Zener (medical professional representative)

John Scott (public representative)

Josh Sheppard (public representative)

Dr. Melanie Marty (alternate medical professional representative)

Kevin Tokunaga (alternate public representative)

Recruitment for the open position on the Hearing Board is currently under way.

√ **2021-2022 Smoke Management Program**

The Sacramento Valley Smoke Management Program (SMP) governs all agricultural open burning in the Sacramento Valley. The SMP is reviewed on an annual basis by the Sacramento Valley Basinwide Air Pollution Control Council and forwarded to the California Air Resources Board for final approval. Amendments to the SMP were adopted by CARB on September 21, 2016. The SMP is currently undergoing revisions expected to be completed before the Fall Burn season in 2023.

As required by State law, District rules and the SMP, burn permits are issued to growers to burn agricultural wastes. In calendar year 2021, the District issued 845 burn permits. In addition to having a valid burn permit, growers may burn only on permissive agricultural burn days, as determined by the SMP and CARB. During calendar year 2021, there were 345 burn days.

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The biggest element to the SMP is management of the intensive fall burn program, when peak demand occurs to burn rice straw after harvest. The intensive fall burn program focuses burn authorization decisions to reduce smoke impacts in populated areas from field crop burning. During the fall burn season, the Smoke Management Program Coordinator (SMPC), under contract with the BCC, coordinates burn day status and acreage allocations through an internet-based system used by each of the nine (9) air districts in the Basin. The SMPC works closely with CARB personnel and contract meteorologists to implement the Smoke Management Program. District personnel use the acreage allocations from the SMPC and meteorological forecasts to allocate fields to be burned. A conservative approach to allocations is employed by the CARB, SMPC, and District staff. Each year, the SMPC facilitates a fall burn training at a central location prior to the start of the intensive fall burn program. In a collaborative effort to increase knowledge and communication throughout the Basin, staff from districts and CARB provided presentations in two (2) separate training sessions. A similar training program is being implemented for 2022.

Fall of 2021 began the 21st year of District implementation of the Conditional Rice Straw Burning Permit Program (Program), which restricts the burning of rice straw to fields where there is a significant amount of confirmed disease (HSC 41865). The District logged 4,640 acres of rice straw burned for the period September 1, 2021 through May 31, 2022.

√ Residential Open Burning Program

The District publicizes the daily burn day status for residential open burning on the District's website (www.bcaqmd.org), on burn day status line (332-9407) and to the media. Staff also spend considerable time communicating with the public regarding residential open burning requirements. The District continues to closely coordinate the open burning program with local fire agencies. The local fire agencies rely on the District and the residential daily burn day status line to inform the public of the burn ban during fire season.

Staff continue to attend meetings with community groups and fire agency personnel. A complaint hotline was established in conjunction with the implementation of the new open burning regulations in order to provide the opportunity for staff to respond to complaints received after hours. The success of the hotline is being tracked.

√ Vapor Recovery Program

Certified vapor recovery systems are required for all fuel transfers to and from gasoline storage tanks and at retail gasoline facilities. Non-retail gasoline facilities (fleet tanks or private fueling facilities) require a certified system be installed in certain circumstances (exemptions exist). These vapor recovery systems are under permit with the District and subject to testing requirements and regular inspections to verify that they meet certain vapor recovery performance and maintenance standards. District staff observe testing and assist station operators with on-site training of station personnel during inspections or as requested, as part of our compliance assistance program.

√ Emission Reduction Credit Banking Program

Federal and State requirements mandate emission increases at new and modified facilities to be offset under certain circumstances. District Rule 431, *Emission Reduction Credits and Banking*, establishes the procedures for recognizing emission reductions which are then eligible for use as "offsets" (called emission reduction credits or ERCs).

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Key program areas include: 1) policy development, 2) issuance of biomass certificates of emission reduction credit, 3) issuance of stationary source certificates of emission reduction credit, 4) maintenance of the banking register, and 5) processing unclaimed credits for deposit into the District's community bank.

To track ERC transactions, the District maintains a banking register. The tracking of ERC certificates can be quite complex. Certificates can be split, sold or leased, and there must be a clear paper trail that links the disposition of the credits to the initial certificate issued. In addition, portions of the credits deposited are placed in a community bank for air quality purposes, and/or are designated for use to promote essential public services. This information is posted on the District website and is updated as any changes occur.

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**District Goals and Performance Metrics
for Fiscal Year 2022-2023**