COASTAL BEND

Community Air Action Plan

(CB-CAAP) • 2026-2031



PUBLIC COMMENT DRAFT

Comment Period: October 20 - November 19.
Submit comments at https://cbairquality.org/programs/

COASTAL BEND
AIR QUALITY
PARTNERSHIP



PATH STRATEGY

Prepared by Path Strategy LLC

In partnership with the Coastal Bend Air Quality Partnership

2026

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At-a-Glance

5 Guiding Principles | **4** Board Priority Areas | **2** Targets | **41** Stakeholder Objectives | **32** Project Concepts

The Coastal Bend has maintained clean air through voluntary action for more than 30 years. This plan builds on that legacy, bringing together community, industry, and government partners to protect public health, support the regional economy, and keep our air clean for the next generation.

Policy Statement

The Coastal Bend Community Air Action Plan and subsequent updates will provide voluntary, clear, actionable recommendations to keep the air quality in the Corpus Christi Airshed good for our entire community. The plan focuses on strategies to remain in attainment of EPA's NAAQS for ozone and $PM_{2.5}$ by reducing ground-level ozone, its precursors, and particulate matter.

GUIDING PRINCIPLES

Reduce Emissions:

Encourage all emission sources to reduce air emissions and improve air quality to support a healthy community and clean environment.

Support the Economy:

Recognize all vital economic engines supporting hundreds of thousands of local and regional jobs to remain economically competitive.

Build Partnerships:

Develop and foster strong partnerships with all stakeholders in order to achieve and sustain successful outcomes.

Ensure Transparency:

Ensure the plan implementation process is transparent and responsive to stakeholder input.

Stay Voluntary:

Recommendations are voluntary, but inspire all stakeholders to want to participate for many years to come.

BOARD PRIORITIES

Air Quality Measures:

Drive measurable reductions in ozone, $PM_{2.5}$, and precursor emissions through prioritized, feasible initiatives that protect attainment, stay ahead of future standards, and improve air quality beyond minimum compliance.

Community Engagement:

Build broad community, industry, and public-sector participation in voluntary clean air actions that increase awareness, support behavior change, and reduce health and environmental impacts across the Coastal Bend.

Funds:

Secure, diversify, and strategically deploy funding to support high-impact air quality projects, sustain CBAQP's implementation capacity, and maximize measurable emissions reduction benefits.

Projects:

Develop and maintain a prioritized, implementation-ready project portfolio that is measurable, fundable, communicable, and focused on the highest-impact opportunities to reduce emissions and protect public health.

BOARD-DEFINED PRIORITY TARGETS FOR AIR QUALITY MEASURES

Ozone (O_3)

Target Standard:
60-65 ppb

Proposed Reduction:
3 ppb by 2030 (59 ppb by 2029)

$PM_{2.5}$

Target Standard:
Reduce to below 9 µg/m³

Proposed Measure:
Add one additional monitor in San Patricio County by 2030

Introduction & Background

1.1 PURPOSE OF THE PLAN

The 2026–2031 CB-CAAP is intended to:

- Identify key air quality issues for the Corpus Christi Urban Airshed (Nueces and San Patricio Counties);
- Present Board-approved priority areas and strategies;
- Outline prioritized projects concepts and actions that CB-CAAP members can implement; and
- Define roles, responsibilities, and metrics for tracking progress.

The plan is designed to be voluntary, actionable, and updated regularly to reflect new data and emerging opportunities.

1.2 ABOUT THE COASTAL BEND AIR QUALITY PARTNERSHIP

The Corpus Christi Air Quality Group was established in 1995 as an ad-hoc task force to address ozone attainment issues. For more than thirty years, the organization worked collaboratively to maintain NAAQS compliance. In December 2019, the Group was renamed the Coastal Bend Air Quality Partnership (CBAQP) to reflect the inclusion of both Nueces and San Patricio Counties and the partnership model at its core. In 2020, CBAQP transitioned to a formal 501(c)(3) nonprofit with a Board of Directors, bylaws, and dedicated funding. A full-time Executive Director was hired in June 2022.

As outlined in CBAQP's bylaws, the organization's core purposes are to:

Advance regional dialogues about the effects of air quality on health, environment, economy, and quality of life

Communicate to industry, government, small businesses, and the public on air quality issues

Promote voluntary air quality improvement measures and emissions-reducing activities

Propose and promote programs for monitoring and improving air quality

Governing Body

CBAQP is led by a board of local elected and appointed officials from city and county governments, business, industry, the Port of Corpus Christi, academia, and local citizens participating in the airshed's air quality planning efforts.

Click here or scan to see the most up-to-date governance information.

1.3 HOW THIS PLAN WAS DEVELOPED

The CB-CAAP was developed through a phased process beginning with community engagement in 2024. In 2026, the CBAQP built on that foundation by convening a focused Implementation Roadmap Action Team, a series of weekly action planning sessions held over consecutive Tuesdays in April, co-facilitated by Path Strategy LLC alongside CBAQP leadership. Four sessions organized strategy development across the plan's core sectors: Industrial & Stationary Sources, Freight & Goods Movement, Transportation & Mobile Sources, and Community & Area Sources (encompassing Policy & Engagement), ensuring that decisions were informed by cross-disciplinary expertise and grounded in the realities of the communities and industries the plan serves. Through this process the Action Team developed the portfolio of prioritized project concepts. The broader community of approximately 200 stakeholders were solicited for feedback on the resulting list via a survey.

2022-2023

FOUNDATION

Organizational Restructuring

CBAQP formally incorporated as a 501(c)(3) nonprofit. Executive Director hired June 2022. Board seated; bylaws and written policies adopted.

2024

COMMUNITY ENGAGEMENT

Phase 1 • Community Working Groups

Nine workgroup sectors convened throughout 2024. Stakeholders across transportation, industry, port operations, public health, academia, and more developed strategies and objectives.

2026

BOARD DIRECTION

Phase 2 • Board Retreat & Priority Setting • January 2026

The CBAQP Board reviewed community outcomes and aligned around four priority areas with specific measurable targets: Air Quality Measures, Community Engagement, Funds, and Projects.

ROADMAP DEVELOPMENT

Phase 3 • Implementation Roadmap Process • March 31-September 2026

Stakeholder kickoff (march 31). Four weekly Implementation Action Team sessions (April; 8-10 participants each). Review of the results by the original community working groups (May). Draft plan compiled and revised with the Executive Director and Board (June-August). Plan finalized (September). See appendix for the full Implementation Roadmap.

PUBLIC COMMENT

Fall 2026 (30 days)

2026-2031

IMPLEMENTATION

Annual Reporting & Updates

2032

PLAN RENEWAL

Plan Update

Goals, Priorities & Targets

This section presents the full strategic framework: community-developed goals, the Board's four priority areas, and the specific measurable targets the Board has set for each priority area.

2.1 COMMUNITY-DEVELOPED PLAN GOALS

CBAQP Community and Industry stakeholders defined two overarching goals that set the region's ambition: not simply maintaining air quality, but working to measurably improve it and stay ahead of tightening federal standards. The first focuses on driving down ozone, $PM_{2.5}$, and precursor emissions beyond minimum compliance; the second on reducing the health and environmental impacts of air pollution through high-impact, voluntary projects that benefit communities across the Coastal Bend. While these efforts are voluntary, stakeholders across the Coastal Bend are committed to moving the needle on these goals through coordinated, high-impact action.

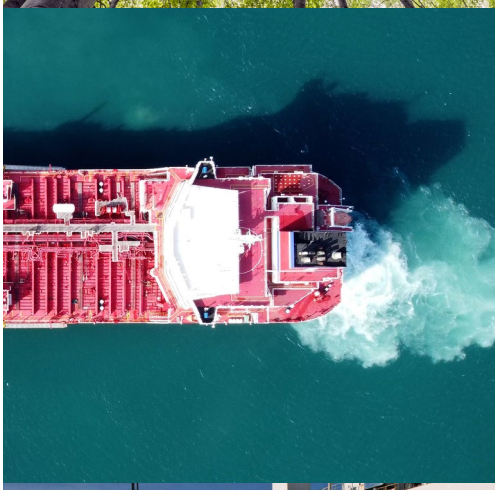
Goal #1

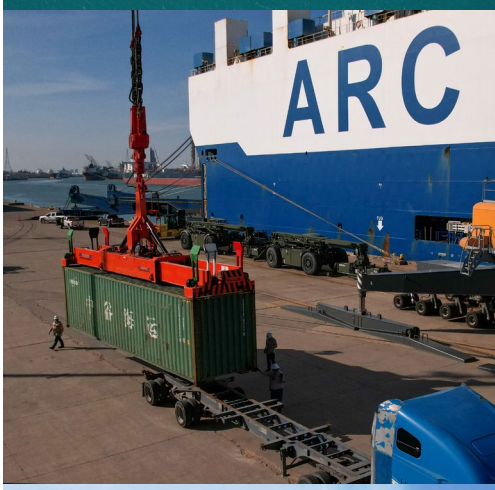
Drive measurable reductions in ozone, $PM_{2.5}$, and precursor emissions to protect attainment status, stay ahead of future standards, and improve regional air quality beyond minimum compliance.

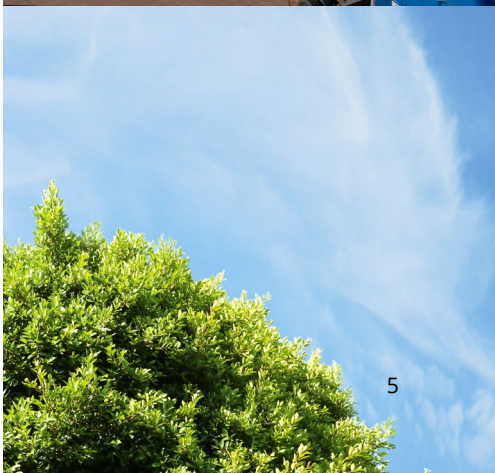
Goal #2

Reduce health and environmental impacts from air pollution by prioritizing high-impact, voluntary projects that reduce emissions, improve monitoring, and benefit communities across the Coastal Bend.









2.2 BOARD PRIORITIES

Following the community process, the CBAQP Board reviewed working group outcomes at a January 2026 strategic retreat and aligned around four priority goals that drive implementation:

AIR QUALITY MEASURES:

Drive measurable reductions in ozone, $PM_{2.5}$, and precursor emissions through prioritized, feasible initiatives that protect attainment, stay ahead of future standards, and improve air quality beyond minimum compliance.

COMMUNITY ENGAGEMENT:

Build broad community, industry, and public-sector participation in voluntary clean air actions that increase awareness, support behavior change, and reduce health and environmental impacts across the Coastal Bend.

FUNDS:

Secure, diversify, and strategically deploy funding to support high-impact air quality projects, sustain CBAQP's implementation capacity, and maximize measurable emissions reduction benefits.

PROJECTS:

Develop and maintain a prioritized, implementation-ready project portfolio that is measurable, fundable, communicable, and focused on the highest-impact opportunities to reduce emissions and protect public health.

TOGETHER, THESE FOUR PRIORITIES ENSURE THAT THE CB-CAAP:

DELIVERS measurable emission reductions

BUILDS community & industry engagement

SUSTAINS financial capacity to act

PRIORITIZES the highest-impact projects the region can support

Landscape Analysis

2.3 BOARD DEFINED PRIORITIES

At the January 2026 retreat, the Board established specific measurable targets under each priority area. These are non-negotiable inputs anchoring the plan.

Category	Board-Defined Priorities	Status
Air Quality Measures	Reduce ozone design value by 3 ppb by 2030 (target: 59 ppb by 2029)	In Progress
	Reduce $PM_{2.5}$ below 9 µg/m³	Not Started
	Add 1 $PM_{2.5}$ monitor in San Patricio County by 2030	Not Started
Community Engagement	Increase CBAQP Ozone and PM2.5 Advance Program participants by 5% YoY	Not Started
	Establish social media presence with defined metrics	Not Started
	Environmental Clubs pilot: 1 school + 1 college by June 2028	In Progress
Funds	Maintain 12 months operating reserves at all times	Not Started
	Deploy ≥20% of excess funds to projects in 2026	Not Started
	Diversify funding; pursue state/federal monitoring funds	In Progress
Projects	Produce prioritized project list from workgroup surveys and Action Team sessions	Completed
	Score all projects on 11-criteria framework 1. Importance 2. Potential effect on air quality measures 3. Alignment with funding and community engagement goals 4. Cost per pound of air quality measure 5. Cost per person affected 6. Funding potential (e.g., grant availability) 7. Feasibility 8. Staff needed 9. Ability to link with or complement existing organizations 10. Whether it is a leading or lagging measure 11. Ability to communicate results	In Progress
	Implement top-scoring projects within available budget	Not Started

Understanding the current air quality landscape — where we are, what is impacting air quality, and who is at the table — is essential to ensuring the plan is data-driven and the right priorities are being addressed.

3.1 AIR QUALITY STATUS

The Coastal Bend airshed encompasses Nueces and San Patricio Counties, defined by the United States Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) as a single urban airshed because emissions from both counties interact to influence ambient air quality in the Corpus Christi area. This plan addresses both Ozone and Particulate Matter ($PM_{2.5}$) pollution within this airshed.

The Coastal Bend is currently in attainment for ozone as of 2026, but $PM_{2.5}$ is now at risk. The region's current EPA-accepted design value of 9.3 / 9.4 µg/m³ exceeds the 2024 NAAQS standard of 9.0 µg/m³. TCEQ has submitted a post-exceptional events adjustment of 8.4 µg/m³, which if accepted by EPA, would return the region to attainment. The tightening of the $PM_{2.5}$ standard in 2024 and recent 4th-high ozone readings mean the region cannot afford to stand still.

The cost of inaction is substantial. A nonattainment designation for ozone alone could cost the region an estimated $0.6-1.7 billion per year. Over the full study period (nonattainment plus two subsequent 10-year maintenance periods), cumulative costs could reach $16-$52 billion17 (Dr. Jim Lee, Potential Costs of Ozone Nonattainment in the Corpus Christi Metropolitan Area, South Texas Economic Development Center at Texas A&M University- Corpus Christi, for the Port of Corpus Christi, 2020; see Appendix B).

58-59 ppb
Current Ozone Design Value
Standard: 70 ppb
Proposed new: 55–60 ppb

9.3 / 9.4 µg/m³
Current $PM_{2.5}$ Design Value
Standard: 9.0 µg/m³

$52B
Up to, Cost of Nonattainment
Over the study period (Lee, 2020 study for the Port)

30+
Years Maintaining Attainment
Through voluntary action since 1995

Ozone (O_3)

✔ In Attainment

Design value: 58-59 ppb — 84% of limit

⚠ **4th-high readings at 63–64 ppb and rising**

🎯 **Board target: 59 ppb by 2029**

$PM_{2.5}$

⚠ At Risk of Non-Attainment

Design value: Huisache 9.3| Dona Park 9.4 µg/m³

Standard: 9.0 µg/m³ (revised Feb 2024, was 12.0 µg/m³)

⚠ **Both monitors exceed the standard**

🎯 **Board target: Reduce below 9.0 µg/m³**

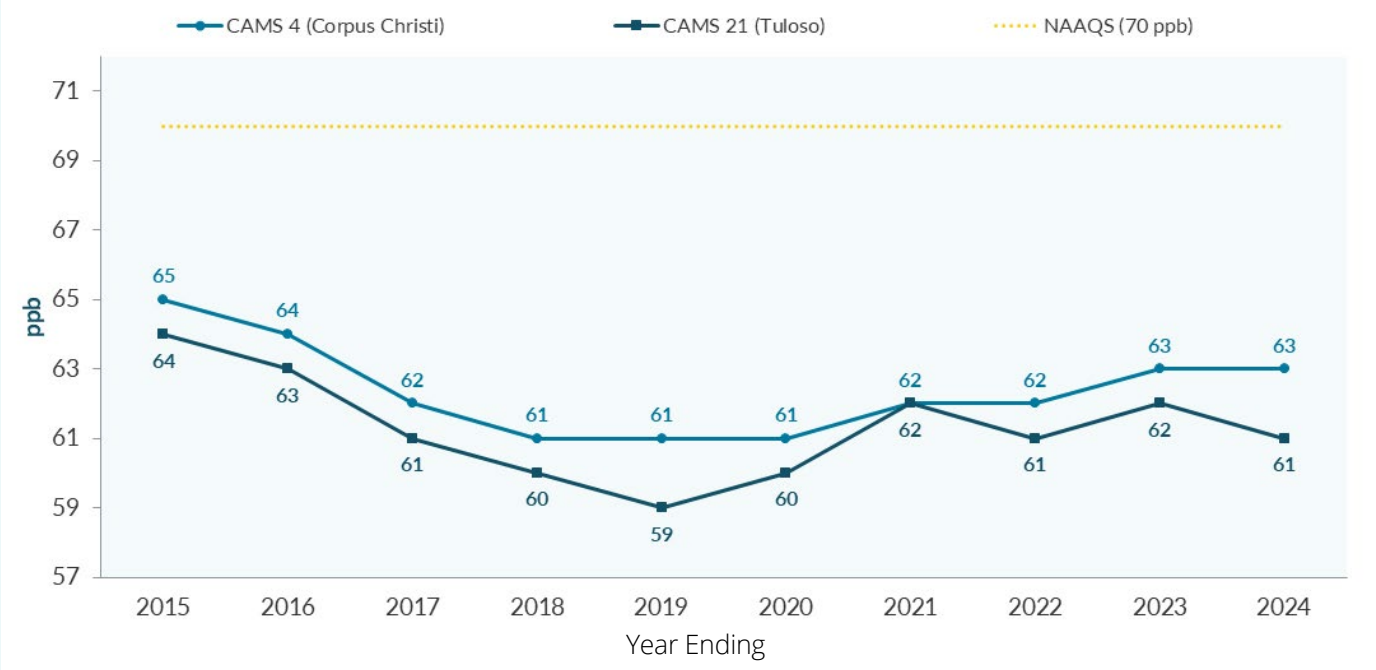
Key Finding

65–75% of ozone health benefits are $PM_{2.5}$ co-benefits. Reducing NOx addresses both pollutants simultaneously .

Landscape Analysis

Ground-level ozone forms from reactions between volatile organic compounds (VOC) and nitrogen oxides (NOx) in heat and sunlight. Ozone season in our airshed runs April 1–October 31. Attainment requires the rolling 3-year average of the 4th-highest 8-hour reading across both monitors (CAMS 4 and CAMS 21) to stay below 70 ppb. Each data point in the chart below represents the design value for the 3-year period ending in that year.

OZONE DESIGN VALUE TREND VS. NAAQS (3-Year Rolling Average of Annual 4th-Highest Reading)



Source: EPA Ozone Design Values Report (2022–2024 final, published 5/28/2025)[12]; TCEQ CAMS 4 (CCWest)[13] & CAMS 21 (Tuloso)[14], Nueces County

In Attainment

Ozone (O_3)

58-59 ppb

Design Value: 2025 3-year average

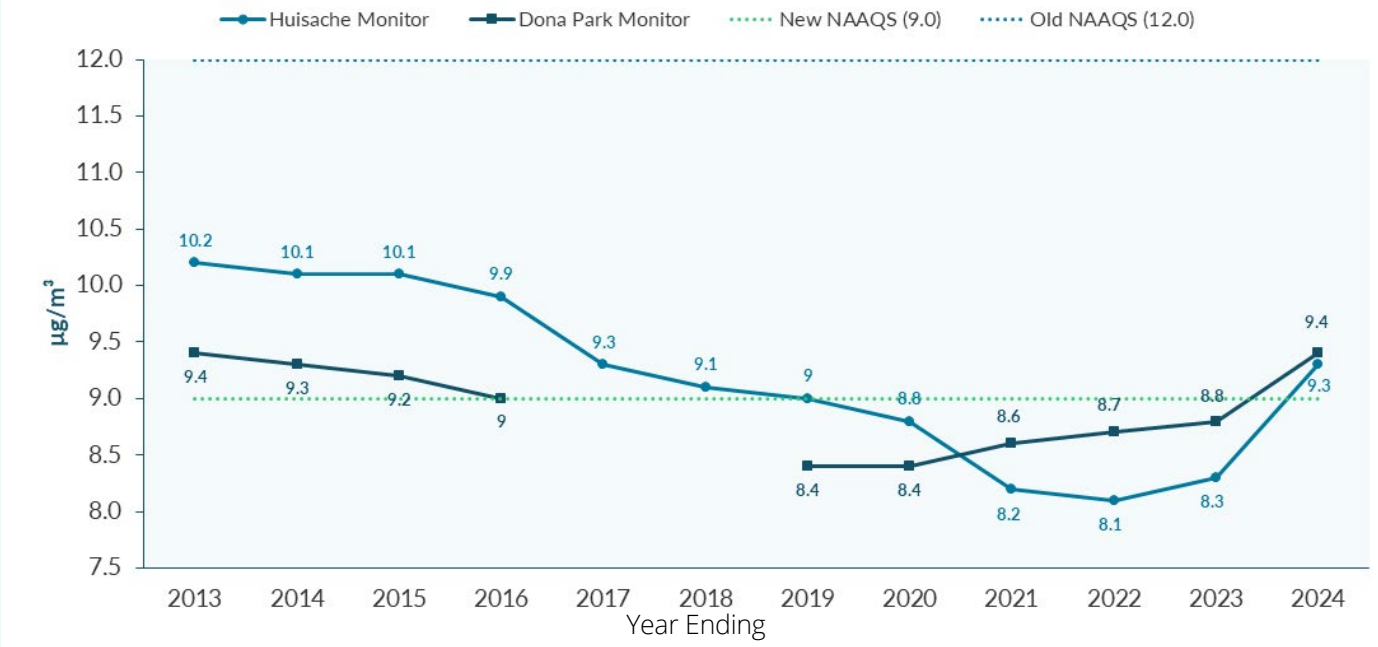
NAAQS Standard: 70 ppb

84% of limit

Board Target: 59 ppb by 2029; Proposed Reduction: 3 ppb by 2030

$PM_{2.5}$ is fine particulate matter from combustion, industrial sources, and secondary formation from gas reactions — as well as seasonal influences including Saharan dust, wildfire smoke from Mexico and surrounding states, and tropical weather events. In February 2024, EPA tightened the annual $PM_{2.5}$ standard from 12.0 to 9.0 µg/m³, placing the Coastal Bend at risk.

$PM_{2.5}$ DESIGN VALUE TREND VS NAAQS



**2017 and 2018 design values for the Dona Park monitor (CAMS 644) are unavailable due to monitor downtime or insufficient data completeness.*
Source: EPA Design Values Report[12]; TCEQ CAMS 98 (Huisache)[15] & CAMS 635 (Dona Park)[16], Nueces County

At Risk of Non-Attainment

$PM_{2.5}$

9.3-9.4 µg/m³

Design Value: 2025 3-year average

NAAQS Standard:. 9.0 µg/m³ (revised Feb 2024, was 12.0 µg/m³)

104% of limit

Board Target: Reduce below 9 µg/m³

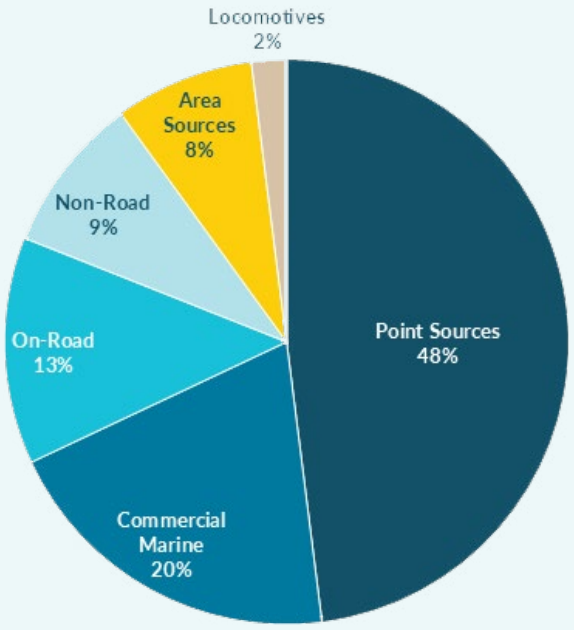
Landscape Analysis

3.2 WHAT'S DRIVING IT — EMISSIONS BY SECTOR

Point sources and commercial marine together account for nearly 70% of regional NOx. These two sectors, which include refineries, petrochemical plants, and Port vessel traffic, are the primary focus of Sectors 4.1 and 4.2 of the Implementation Roadmap.

External contributions, such as Saharan dust (April–September), wildfire smoke, and industrial transport from Mexico, also affect the airshed seasonally but lie outside local control. EPA has accepted TCEQ exceptional event demonstrations for these influences.

NOx SOURCE SHARE (2020)



48% **Point Sources**
Refineries, petrochemical, industrial combustion

20% **Commercial Marine**
Ocean-going vessels + harbor craft at the Port

13% **On-Road Mobile**
Cars, trucks, fleet vehicles

9% **Non-Road Equipment**
Construction, agricultural, off-road equipment

8% **Area Sources**
Small businesses, consumer products, agriculture

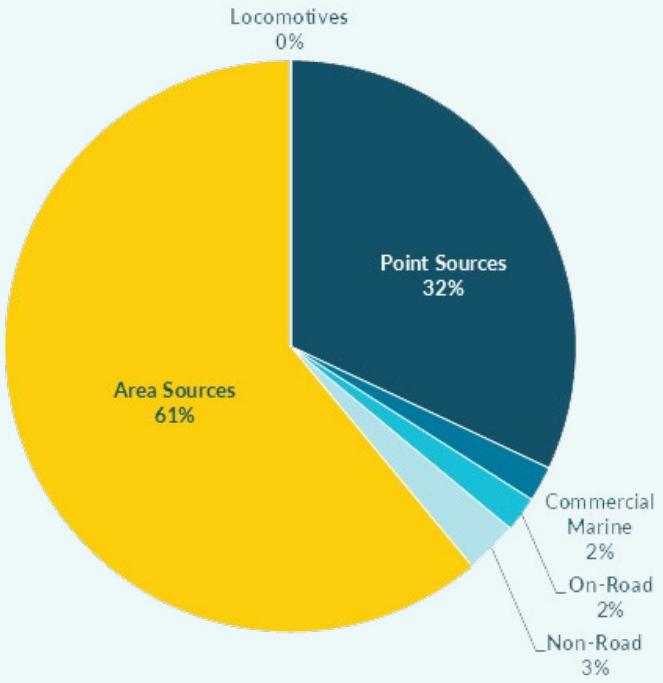
2% **Locomotives**
Rail freight at Port of Corpus Christi

Note: External factors (Saharan dust, wildfire smoke, and industrial transport from Mexico) also affect the airshed seasonally but lie outside local control. EPA has accepted TCEQ exceptional event demonstrations for these influences.

Data Sources: Port of Corpus Christi 2020 Emissions Inventory (NOx)[3]; EPA Design Values Report (ozone & $PM_{2.5}$)[12]; Dr. Jim Lee, South Texas Economic Development Center, Texas A&M University-Corpus Christi, 2020, for the Port of Corpus Christi (nonattainment cost).

The 2020 emissions inventory was selected as the foundational baseline for this plan because it provides the most complete and representative accounting of community, regional, and area-wide emissions, whereas the Port's more recent inventory is scoped specifically to port operational sources.

$PM_{2.5}$ SOURCE SHARE (2020)



32% Point Sources
Refineries, petrochemical, industrial combustion

2% Commercial Marine
Ocean-going vessels + harbor craft at the Port

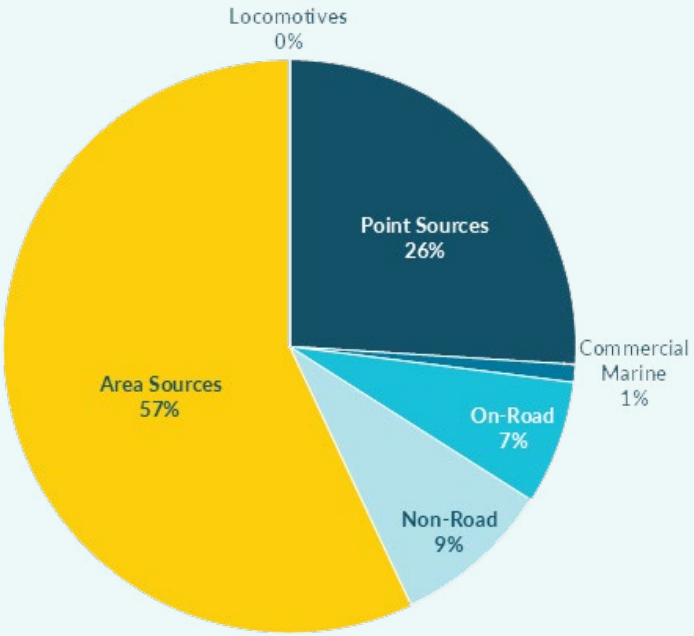
2% On-Road Mobile
Cars, trucks, fleet vehicles

3% Non-Road Equipment
Construction, agricultural, off-road equipment

61% Area Sources
Small businesses, consumer products, agriculture

<1% Locomotives
Rail freight at Port of Corpus Christi

VOC SOURCE SHARE (2020)



26% Point Sources
Refineries, petrochemical, industrial combustion

1% Commercial Marine
Ocean-going vessels + harbor craft at the Port

7% On-Road Mobile
Cars, trucks, fleet vehicles

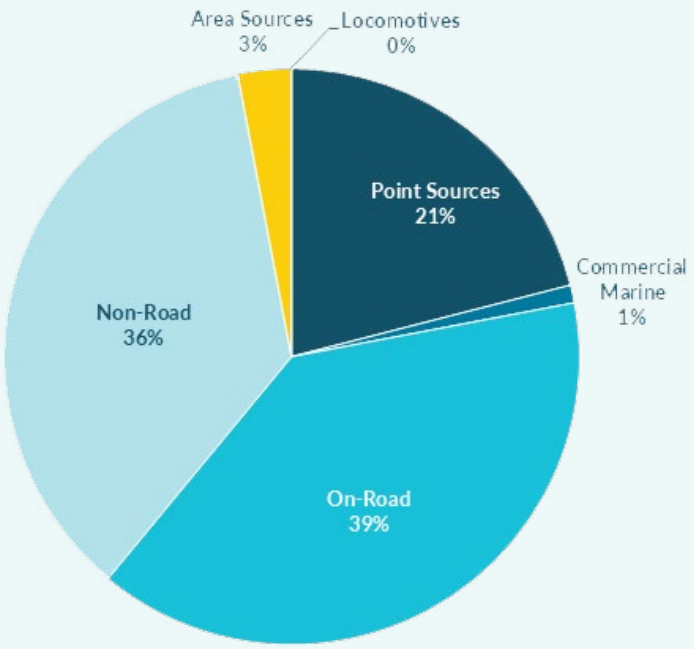
9% Non-Road Equipment
Construction, agricultural, off-road equipment

57% Area Sources
Small businesses, consumer products, agriculture

0% Locomotives
Rail freight at Port of Corpus Christi

Landscape Analysis

CO SOURCE SHARE (2020)



21% — **Point Sources**
Refineries, petrochemical, industrial combustion

1% — **Commercial Marine**
Ocean-going vessels + harbor craft at the Port

39% — **On-Road Mobile**
Cars, trucks, fleet vehicles

36% — **Non-Road Equipment**
Construction, agricultural, off-road equipment

3% — **Area Sources**
Small businesses, consumer products, agriculture

<1% — **Locomotives**
Rail freight at Port of Corpus Christi

"The 2020 emissions inventory is used as the plan's foundational baseline because it provides the most complete regional accounting of community, regional, and area-wide emissions. However, 2020 may not represent a fully typical operating year due to COVID-19-related activity disruptions and contemporaneous fuel/emissions regulatory changes; therefore, trends from 2020 should be interpreted alongside later inventory years and sector-specific context.

3.2 WHAT'S DRIVING IT — EMISSIONS BY SECTOR (CONTINUED)

The NOx source share chart on the preceding page shows the breakdown of nitrogen oxides emissions by source category across the Coastal Bend airshed. NOx is the organizing lens for this analysis because it is a precursor to both of the region's core air quality challenges. Ground-level ozone forms when NOx reacts with volatile organic compounds (VOCs) in heat and sunlight. Fine particulate matter ($PM_{2.5}$) forms when NOx reacts with other compounds in the atmosphere. Understanding where NOx comes from and what else each source category contributes reveals the full picture of what is driving air quality risk in Nueces and San Patricio Counties.



INDUSTRIAL & STATIONARY SOURCES
48% OF REGIONAL NOx

At 9,494 tons and growing 19% from 2020 to 2023, point sources are the largest regional NOx contributor. Refineries, petrochemical plants, and industrial combustion remain priority sources to address.



FREIGHT & GOODS MOVEMENT
22% OF REGIONAL NOx

Cargo throughput grew 27% from 2020 to 2023, yet NOx and PM rose only 6-8%, and emissions per ton of cargo are down 15%. This demonstrates that economic growth and sustainability go hand in hand, even as volumes continue to rise and efficiency improves. The Port of Corpus Christi and the organizations supporting the movement of freight and goods continue to prioritize expanding their clean technology portfolio, including newer equipment, upgraded engines, cleaner fuels, incentives for behavior change, and continued efficiency improvements.

TRANSPORTATION & MOBILE SOURCES
13% OF REGIONAL NOx

Regional on-road NOx dropped 35% from 2020 to 2023 (TCEQ data), likely from fleet turnover to tighter federal standards and updated EPA modeling. On-road vehicles and public fleets remain a key area for sustained reductions.



COMMUNITY & AREA SOURCES, POLICY & ENGAGEMENT
17% OF REGIONAL NOx

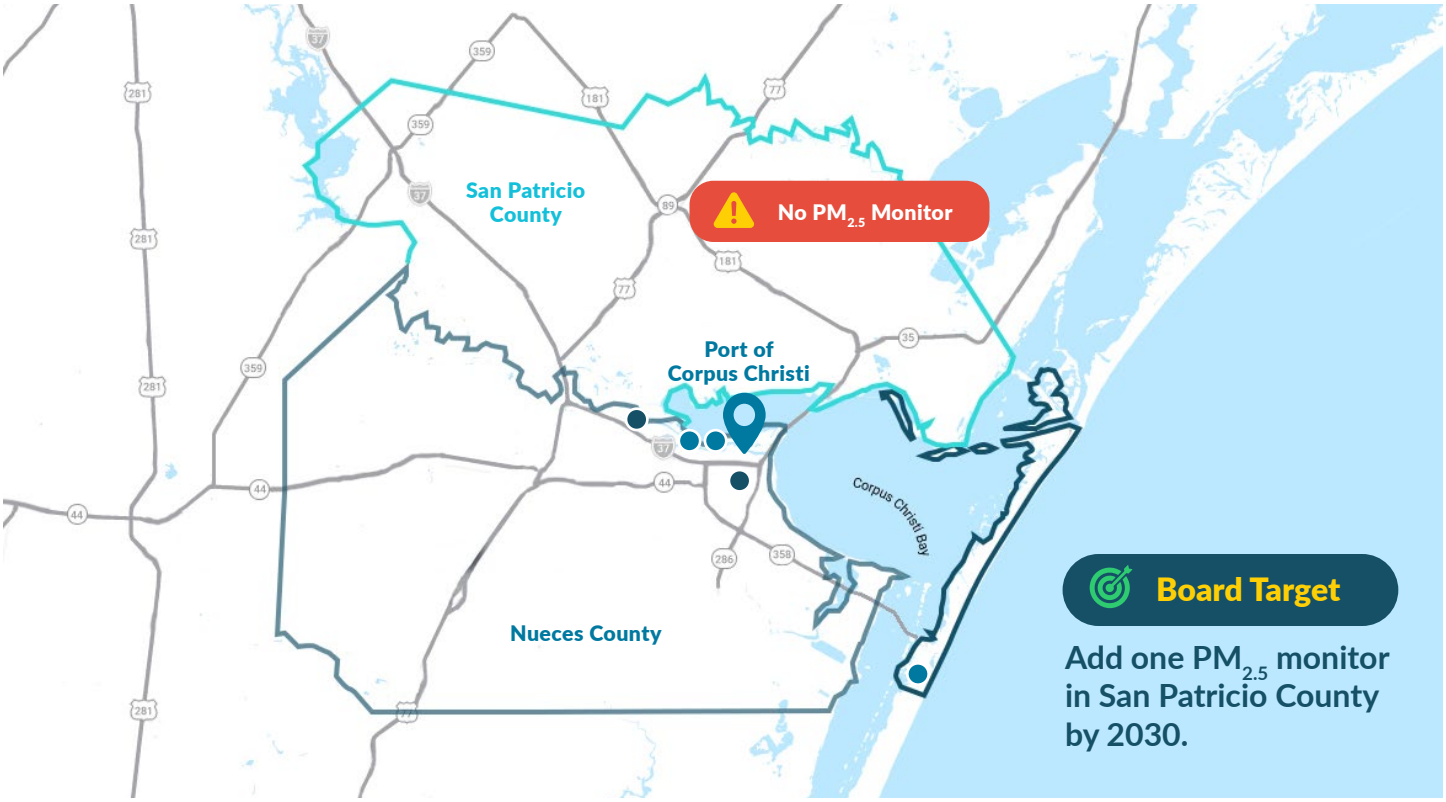
The most distributed and hardest to measure are area sources: construction equipment, agricultural machinery, and small businesses. Area source NOx fell 16% from 2020 to 2023; further reductions depend on equipment turnover, cleaner non-road engine standards, and community-level outreach.

Sources: Port of Corpus Christi 2020 air emissions inventory[3], Port of Corpus Christi 2023 air emissions inventory[4]

Landscape Analysis

3.3 REGIONAL MAP & MONITORING NETWORK

The Corpus Christi Urban Airshed covers Nueces and San Patricio Counties. The two counties form a single airshed because emissions from both counties interact to influence ambient air quality across the entire region. All four active regulatory monitoring stations are located in Nueces County. The monitor with the highest 3-year rolling average for $PM_{2.5}$ becomes the design value for the entire area.



Monitor/CAMS ID	Address	County	Pollutant	Role & Status
CAMS 4 – Corpus Christi	902 Airport Blvd	Nueces	Ozone (O_3)	✓ Active - Design value monitor
CAMS 21 – Tuloso	9860 LaBranch	Nueces	Ozone (O_3)	✓ Active - Design value monitor
CAMS 98 – Huisache	3810 Huisache St	Nueces	$PM_{2.5}$	✓ Active - Primary design value monitor
CAMS 635 – Dona Park	5705 Up River Rd	Nueces	$PM_{2.5}$	✓ Active - Secondary design value monitor

⚠ Monitoring Gap

No $PM_{2.5}$ monitor in San Patricio County. All design value determinations rely solely on Nueces County monitors.

3.4 HEALTH & COMMUNITY IMPACTS

The U.S. Air Quality Index (AQI)[10] is EPA's tool for communicating about outdoor air quality and health. The AQI includes six color-coded categories, each corresponding to a range of index values. The higher the AQI value, the greater the level of air pollution and the greater the health concern. For example, an AQI value of 50 or below represents good air quality, while an AQI value over 300 represents hazardous air quality.

For each pollutant an AQI value of 100 generally corresponds to an ambient air concentration that equals the level of the short-term national ambient air quality standard for protection of public health. AQI values at or below 100 are generally thought of as satisfactory. When AQI values are above 100, air quality is unhealthy: at first for certain sensitive groups of people, then for everyone as AQI values get higher.

The AQI is divided into six categories. Each category corresponds to a different level of health concern. Each category also has a specific color. The color makes it easy for people to quickly determine whether air quality is reaching unhealthy levels in their communities. Air pollution has real, measurable consequences for Coastal Bend residents. The Coastal Bend area has 188 or more days per year recording moderate to unhealthy for sensitive groups' AQI days (ozone and $PM_{2.5}$ combined, Nueces County, 2024).

AQI Basics for Ozone and Particulate Pollution			
Daily AQI Color	**Levels of Concern**	**Values of Index**	**Description of Air Quality**
Green	Good	0 to 50	Air quality is satisfactory, and air pollution poses little or no risk.
Yellow	Moderate	51 to 100	Air quality is acceptable. However, there may be a risk for some people, particularly those who are unusually sensitive to air pollution.
Orange	Unhealthy for Sensitive Groups	101 to 150	Members of sensitive groups may experience health effects. The general public is less likely to be affected.
Red	Unhealthy	151 to 200	Some members of the general public may experience health effects; members of sensitive groups may experience more serious health effects.
Purple	Very Unhealthy	201 to 300	Health alert: The risk of health effects is increased for everyone.
Maroon	Hazardous	301 and higher	Health warning of emergency conditions: everyone is more likely to be affected.

Data Source: AirNow.gov[10]

Landscape Analysis

3.4 HEALTH & COMMUNITY IMPACTS (CONTINUED)

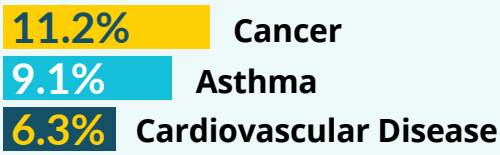
Hazardous air pollutants (HAPs) of regional concern include acetaldehyde, benzene, carbon tetrachloride, and formaldehyde. External seasonal influences — Saharan dust, wildfire smoke, and cross-border industrial transport — periodically push AQI into unhealthy ranges even when local emissions are well-controlled.

Moderate or Higher AQI Days *(Ozone and $PM_{2.5}$ combined, Nueces County)*

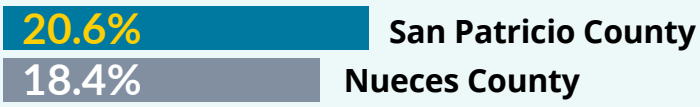


Good (178) Moderate (172) Unhealthy for Sensitive Groups (15) Unhealthy (1)

Chronic Disease Rates



Uninsured Rates (2024)



The two 'Unhealthy' AQI days in Nueces County occurred on June 26–27, 2020, and were driven by $PM_{2.5}$ from Saharan desert dust — described by climate scientists as the most intense Saharan dust event since detailed global records began in 2002. These elevated concentrations were externally caused and not attributable to local emissions.

Data Sources: EPA AQS Daily AQI Data, Nueces County, 2020; Yale Climate Connections, 'Saharan dust cloud was most intense in decades,' June 2020; The Washington Post, 'Record Saharan dust event brings unhealthy air quality to Texas,' June 26, 2020.

Key Finding

Sensitive populations, including children, the elderly, people with asthma, and outdoor workers, face the greatest risk. 18-22% across the two counties, the communities most often affected, have the least ability to absorb the health costs.

The following meet or exceed federal requirements:



Data Sources: EPA AQS Data Mart[11]; AirNow[10]

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Landscape Analysis

3.5 WHO'S AT THE TABLE — PARTNERSHIP STRUCTURE

The CB-CAAP is built on voluntary collaboration, not regulation. Success depends on partners across government, industry, and community choosing to act together. CBAQP serves as the plan coordinator and convener.



9 CB-CAAP Workgroups

18 Partners in the CBAQP Ozone and PM Advance Program

46 Organizations

Industry – 19

Air Liquide • ArcelorMittal
Buckeye Partners • Celanese
Chemours • Cheniere • Citgo
CBIA • Enbridge • Equistar
Flint Hills • GCGV • La Quinta CAP
LyondellBasell • NuStar • OxyChem
Plains Pipeline • Valero • Vopak

Transportation – 4

CCMPO • CCRTA • TxDOT • FHWA

Port Operations – 1

Port of Corpus Christi Authority

Public Policy – 11

Cities • Counties • TCEQ • EPA
TPWD • CC Army Depot

Environmental – 3

P3 • Sierra Club - Lone Star
CEC Environmental

Academia – 2

Texas A&M - Corpus Christi
TPWD

Tourism & Recreation – 3

Coastal Bend Bays Foundation
Bays & Estuary Program
Coastal Watch Assoc.

Public Health – 2

CC/Nueces County Health Department • CC Community Advisory Group

Construction & Ag – 1

AECOM • McKamey Farms

Commercial – TBD

⚠ No organizations assigned yet.

Note: Organizations listed participated in the CB-CAAP workgroups. Program partners are listed in Appendix D.

CBAQP Board & Staff

Port • Business • Community • CBIA • Nueces County • City of Corpus Christi • San Patricio County • Academia

Industry, Public Policy, Tourism & Recreation, Construction & Ag
Transportation, Environmental, Public Health
Port Operations, Academia
CBAQP Board
Commercial
⚠ Representation Gap

3.6 COMMUNITY WORK GROUPS

In 2024–2025, the Coastal Bend Air Quality Partnership formed nine workgroups (CBAQP staff were not counted as a member of the workgroups) that collectively developed 41 strategic objectives to reduce emissions and improve air quality across the Coastal Bend region. These objectives are organized by workgroup category: Academia (6), Construction and Agriculture (3), Environmental (3), Industry (4), Port Operations (4), Public Health (3), Public Policy (5), Tourism and Recreation (5), and Transportation (8). Together they span the full range of regional activity, from research and public education to freight movement, industrial operations, and energy transition infrastructure.

The objectives are as follows:

Academia – 6 Objectives

- Promote Research and Continuous Air Monitoring
- Promote Public Education and Outreach
- Identify Opportunities to Connect with the Public About Air Quality
- Develop Easily Digestible Ways to Explain Air Quality
- Promote Change That Can Be Done at the Individual Level
- Encourage Student Participation in Emission Reduction Activities

Construction & Ag – 3 Objectives

- Develop & Understand Best Practices and Regulations for Agriculture
- Develop & Understand Best Practices and Regulations for the Construction Industry
- Encourage & Support Incentivization of LEED Design and Codes

Environmental – 3 Objectives

- Support the Pollution Prevention Partnership Program
- Promote Regional Pollutant Data Collection and Research
- Promote/Develop Anti-Idling & Public Transportation Campaign

Industry – 4 Objectives

- Expand Industry Participation in CBAQP Ozone and $PM_{2.5}$ Advance Program
- Regularly Update Emissions Checklist
- Identify Educational Opportunities for Public
- Maintain Existing Air Quality as New Industry Comes Online

Public Health – 3 Objectives

- Promote Public Awareness of the Air Quality Index (AQI)
- Promote Anti-Idling Policy
- Promote Public AQI Education

Port Operations – 4 Objectives

- Expand use of Technology and Innovation to Promote Emissions Reduction, Sustainability, and Environmental Protection
- Implement Strategies to Establish a Comprehensive Infrastructure to Support Energy Transition
- Continue and Enhance Education and Outreach
- Explore Opportunities to Expand Incentives Program

Public Policy – 5 Objectives

- Promote Increase Pedestrian Mobility/Decreased Passenger Vehicle Usage
- Promote Localized Air Quality/ Monitoring Data Availability
- Promote Anti-Idling Practices for Non-Emergency Public Vehicles
- Promote Local Government Cooperation in Air Quality Action Initiatives
- Promote Incentivization of Emission Reduction Activities in Commercial Entities

Tourism & Recreation – 5 Objectives

- Develop Dashboard on CBAQP of Related Air Quality on Website/ App to Include Most Recent Area Emissions Inventory Information
- Promote the Use of Electric Power/Minimize Generators Use for Food Trucks
- Promote the Establishment of Parking and Signage for Electric Vehicles Downtown
- Promote the Establishment of an Electric Vehicle Charging Area in Area Downtown Parks
- Promote the Establishment of Ultra-Low Gas Emission Vehicle (ULEV) Parking Signs in Certain Areas (e.g. Local Businesses)

Transportation – 8 Objectives

- Promote and Facilitate Grants and Other Funding Opportunities
- Investigate Requisites and Benefits of Establishing a local Clean Cities Coalition (CCC)
- Promote, Join, and Collaborate with Traffic Optimization Entities and Stakeholders
- Create, Maintain, and Distribute a Digital "Transportation Guide(s)" for Actions and Resources to Reduce Transportation Emissions
- Increase the Adoption Rate of Low Emissions Vehicles Year-to-Year
- Assess, Monitor, Encourage, and Communicate Local Alternate Fuel Infrastructure Availability, Use, and Development
- Produce or Host Workshops, Demonstrations, Classes, and Campaigns Addressing Sustainable Transportation Programs, Tools, and Practices
- Work with Policymakers, Law Enforcement, the Public, Mechanic Businesses, and Vehicle Resellers to Reduce the Number of Diesel Trucks with Illegal Emissions Control Defeat Modifications

Implementation Roadmap: Projects by Sector

The Implementation Roadmap translates the plan's goals, priorities, and objectives into specific, measurable actions.

The project portfolio was developed through the Implementation Action Team process (April 2026) and reviewed by the original community working groups (May 2026). Projects were screened, refined, prioritized, and surveyed using the Board's 11-criteria scoring framework, which considers each project's importance, potential effect on air quality measures, alignment with funding and community engagement goals, cost per pound of air quality measure, cost per person affected, funding potential such as grant availability, feasibility, staff needed, ability to link with or complement organizations already working in the area, whether it is a leading or lagging measure, and ability to communicate results.

SHORT
0-2 years

MID
2-5 years

LONG
5+ years

Projects are organized into four sectors reflecting the major emission sources in the Coastal Bend airshed.

IMPLEMENTATION ROADMAP SECTORS

- **Industrial & Stationary Sources**
- **Freight & Goods Movement**
- **Transportation & Mobile Sources**
- **Community & Area Sources, Policy & Engagement**



CB-CAAP Board Targets • Tracked across the plan period 2026-2031

Active period for the target → Ongoing through the full plan period

	Board Target	Owner	2026	2027	2028	2029	2030	2031
Air Quality Measures	Reduce ozone design value by 3 ppb by 2030 (target: 59 ppb by 2029)	CBAQP				By 2030		
	Reduce $PM_{2.5}$ below 9 µg/m³	CBAQP						Ongoing →
	Add 1 $PM_{2.5}$ monitor in San Patricio County by 2030	CBAQP				By 2030		
Community Engagement	Increase CBAQP Ozone and PM2.5 Advance Program participants by 5% YoY	CBAQP						Ongoing →
	Establish social media presence with defined metrics	CBAQP Comms	2026					
	Environmental Clubs pilot: 1 school + 1 college by June 2028	CBAQP			By June 2028			
Funds	Maintain 12 months operating reserves at all times	CBAQP / Board						Ongoing →
	Deploy ≥20% of excess funds to projects in 2026	CBAQP / Board	2026					
	Diversify funding; pursue state/ federal monitoring funds	CBAQP						Ongoing →
Projects	Produce prioritized project list from workgroup surveys and Action Team sessions	CBAQP / Action Team	2026					
	Score all projects on 11-criteria framework	CBAQP / Action Team	2026					
	Implement top-scoring projects within available budget	CBAQP / Leads						Ongoing →

Implementation Roadmap: Projects by Sector

CB-CAAP Project Concepts • Estimated duration to completion

To support implementation planning, each project concept is assigned a readiness tier that reflects its relative ease of implementation, coordination requirements, funding needs, and likely implementation timeframe.

Tier	Definition
Tier 1 – Near-Term / Low-Barrier Projects	Projects that are ready to implement now or in the very near term. These projects generally require limited coordination, modest funding, and clear ownership, and can be advanced with existing staff capacity, partner commitments, or readily available resources.
Tier 2 – Coordinated / Fundable Projects	Projects that are implementable within the next several years but require additional coordination, partner alignment, technical scoping, or fundraising. These projects are considered feasible but need further development before implementation.
Tier 3 – Long-Term / High-Barrier Projects	Projects that are not currently realistic for near-term implementation due to high cost, substantial coordination needs, technical uncertainty, regulatory complexity, or extended timelines. These projects may remain in the portfolio for future consideration as conditions, funding, or technology readiness improve.

Note: Duration is the estimated time to complete a project once it starts.

	Project Name	Tier #	Recommended Project Lead	Potential Resources**	Duration
4.1 Industrial & Stationary Sources	**4.1.1** — Voluntary tank emissions reduction	3	Industrial facility consortium	Refinery consortium; TCEQ	18 months
	4.1.2 —Produce a BMP case study white paper on solar farm use at industrial facilities	1	Regional air quality organization and industry host facilities	CBAQP; industry hosts	6 months
	4.1.3 —Develop a Coastal Bend Industrial Clean Energy Portfolio Expansion Plan	2	Regional planning organization and industrial sector working group	COG; CBAQP industry team	12 months
	4.1.4 —Coastal Bend Airshed Stewardship & Partnership Annual Report	1	CBAQP	CBAQP; TCEQ	6 months
	4.1.5 —Distributed Renewables & Microgrid Deployment Program	3	Regional planning organization, utilities, and critical facility partners	COG; utilities; critical sites	24 months
	4.1.6 —Industry Energy Efficiency Recognition Program	2	Regional air quality organization and industrial partners	CBAQP; industrial partners	6 months

	Project Name	Tier #	Recommended Project Lead	Potential Resources**	Duration
4.2 Freight & Goods Movement	**4.2.1** —Develop the modernization plan for the Port's owned fleet (vehicles and equipment)	2	Port fleet and facilities lead	PCCA fleet/facilities	9 months
	4.2.2 —ZE technology pilot – battery-electric CHE, ZE tugboats, or vehicles	1	Port authority and terminal operator partners	PCCA; terminal operators	36 months
	4.2.3 —Pilot a ZE truck express lane at PCCA Northside Gate	1	Port authority, regional transportation planners, and trucking partners	PCCA; MPO; truckers	18 months
	4.2.4 —Clean Truck Program: Priority Express Lane Access + Conversion Fund	3	Port authority and regional transportation/funding partners	PCCA; COG; MPO	24 months
4.3 Transportation & Mobile Sources	**4.3.1** —Traffic signal optimization	1	Regional transportation planners and local traffic engineers	MPO; city traffic engineers	9 months
	4.3.2 —Idle-free school zone pilot – at 1–4 schools	1	School districts and regional air quality organization	School districts; CBAQP, TAMUCC	6 months
	4.3.3 —Develop a Clean Delivery Program Approach	3	Local governments, regional transportation planners, and business partners	Cities; MPO; businesses	9 months
	4.3.4 —Conduct a Clean Delivery Fleet Opportunities Study	3	Local governments, regional transportation planners, and business partners	Cities; MPO; businesses	6 months
	4.3.5 —Design an electric municipal fleet pilot project	2	Local government fleet and facilities departments	City fleet/facilities	9 months
	4.3.6 —Develop a mobile-friendly digital guide for Coastal Bend residents and businesses	1	Regional air quality organization and technical vendor	CBAQP; web vendor	6 months
	4.3.7 —Commission a study to quantify the NOx and PM contribution of adjacent transport emissions	3	Academic research partner	University; MPO; CBAQP	12 months
4.4 Community & Area Sources	**4.4.1** —Develop a Coastal Bend Construction Air Quality BMP Manual	1	Regional air quality organization and contractor industry association	CBAQP; contractor association	9 months
	4.4.2 —Vegetative buffer co-benefit demonstration/pilot project	1	Local public agency, school/site host, and transportation partner	City/parks; school; TxDOT	18 months
	4.4.3 —Advocate for a $PM_{2.5}$ monitor in San Patricio County	1	Regional air quality organization	CBAQP; TCEQ	12 months
	4.4.4 —Grow CBAQP Social Media Presence	1	Regional air quality communications lead	CBAQP communications	6 months
	4.4.5 —Pilot On-Farm Anaerobic Co-Digester — Single Cotton Gin or Feedlot Anchor	2	Agricultural host site and extension agriculture partners	Farm host; Extension; USDA	24 months

Implementation Roadmap: Projects by Sector

	Project Name	Tier #	Recommended Project Lead	Potential Resources**	Duration
4.4 Community & Area Sources, Policy & Engagement	**4.4.6** —Regional Anaerobic Co-Digester — Multi-County Centralized Facility	3	Regional planning organization and private project developer	COG; private developer	48 months
	4.4.7 —Commercial energy efficiency & incentives program	1	Utilities, regional planning organization, and air quality organization	Utilities; COG; CBAQP	12 months
	4.4.8 —Pilot quantifying air quality at local events & tourist sites – measure & mitigate	2	Tourism partner and regional air quality organization	Tourism bureau; CBAQP	12 months
	4.4.9 —Expand CBAQP website data-hosting capacity	1	Regional air quality organization and web/data vendor	CBAQP; web/data vendor	6 months
	4.4.10 —Clean Air BMP Stakeholder Fact Sheets	2	Regional air quality organization and sector subject matter experts	CBAQP; sector experts	4 months
	4.4.11 —Seasonal Air Quality Public Awareness Campaign	1	Regional air quality organization and local media partners	CBAQP; local media	6 months
	4.4.12 —Coastal Bend Air Quality Education Series	2	Regional air quality organization and school/ university partners	CBAQP; schools; university	12 months
	4.4.13 —Standardized CBAQP Air Quality Presentation for Schools and Clubs	1	Regional air quality organization and education partners	CBAQP; educators	4 months
	4.4.14 —Public Air Quality Dashboard for Public Education and Transparency	1	Regional air quality organization, and academic partner	CBAQP; university; TCEQ	12 months
	4.4.15 — $PM_{2.5}$ Speciation Project	2	Academic research partner and regional air quality organization	Cheniere; TAMUCC; CBAQP	18 months

**** Agencies, organizations, and partner entities listed in this column are illustrative potential sources of funding, technical assistance, sponsorship, or implementation support. See Appendix C – Available Funding Opportunities for specific funding programs and details currently available at the time of publishing.**

4.1 INDUSTRIAL & STATIONARY SOURCES

Industrial and stationary sources, including refineries, petrochemical plants, and large combustion facilities, are significant contributors to NOx and VOC emissions. This sector focuses on measurable reductions through direct controls, equipment upgrades, voluntary commitments.

PROJECT # 4.1.1 • TIMELINE: SHORT (18 MONTHS)

Not Started | In Progress | Completed

Voluntary Tank Emissions Reduction

Capture the BMP white paper voluntary tank emission reduction actions taking place across 3-5 Coastal Bend terminals and refineries. Leverage the case study or lessons learned to facilitate further adoption of the best practices (beyond compliance) at other locations in the CB region.

Develop a BMP guide that moves beyond compliance, providing recommended schedule for evaluating existing tank seals, controls, and configurations to determine upgrade possibilities. May include: tank seals, vapor recovery lines, and dome roofs to reduce VOC emissions from storage tanks at industrial facilities.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$2.5M pilot | Refinery consortium; TCEQ

RECOMMENDED PROJECT LEAD:

Industrial facility consortium

KEY ACTION STEPS:

- Screen priority tanks for retrofit
- Select feasible control options
- Execute refinery participation MOUs

PROJECT # 4.1.2 • TIMELINE: SHORT (6 MONTHS)

Not Started | In Progress | Completed

Produce a BMP Case Study White Paper on Solar Farm Use at Industrial Facilities

Coordinate with stakeholders to gather lessons learned around a successful solar installation, collecting data, and BMPs for a proxy such as GCGV and FHR to develop a similar initiative. Publish white paper for public access.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$60k | CBAQP; industry hosts

RECOMMENDED PROJECT LEAD:

Regional air quality organization and industry host facilities

KEY ACTION STEPS:

- Identify candidate solar sites
- Interview facility hosts
- Publish lessons learned and BMPs

Implementation Roadmap: Projects by Sector

PROJECT # 4.1.3 • TIMELINE: SHORT (12 MONTHS)

Not Started | In Progress | Completed

Develop a Coastal Bend Industrial Clean Energy Portfolio Expansion Plan

Develop a Coastal Bend Industrial Clean Energy Portfolio Expansion Plan covering grid upgrade needs, renewable integration pathways, and clean energy generation, storage, and procurement planning for major industrial facilities.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$250k | COG; CBAQP industry team

RECOMMENDED PROJECT LEAD:

Regional planning organization and industrial sector working group

KEY ACTION STEPS:

- Inventory industrial energy loads
- Screen priority clean energy projects
- Rank portfolio by readiness and impact

PROJECT # 4.1.4 • TIMELINE: SHORT (6 MONTHS)

Not Started | In Progress | Completed

Coastal Bend Airshed Stewardship & Partnership Annual Report

Expand the CBAQP Ozone and PM Advance Program (formerly the EPA Ozone/PM Advance Program) and report its results each year in the Coastal Bend Airshed Stewardship & Partnership Annual Report. Eighteen organizations, including 17 industrial point sources and the Port of Corpus Christi, are partners in the program, and six of them (Cheniere, Flint Hills Resources, Valero Refining, Citgo Refining, Equistar Chemicals, GCGV) currently participate consistently. This project builds on that foundation with a targeted campaign to broaden consistent annual participation among all partners and to recruit additional organizations emitting over a certain threshold (e.g. 100 tons per year of NOx). The campaign is delivered in a structured way: target list development, executive briefing materials, peer-to- peer Advance Partner advocacy, and value- proposition documentation. Each annual report publishes participants and their voluntary commitments.

Note: EPA discontinued its national Ozone Advance Program in June 2025. CBAQP is continuing the program locally and in-house as the CBAQP Ozone and PM2.5 Advance Program, building on the local and state initiatives established under the program's "Path Forward Plan."

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$50k | CBAQP; TCEQ

RECOMMENDED PROJECT LEAD:

CBAQP

KEY ACTION STEPS:

- Conduct TCEQ and industry outreach
- Secure voluntary participation pledges

PROJECT # 4.1.5 • TIMELINE: MID (24 MONTHS)

Not Started | In Progress | Completed

Distributed Renewables & Microgrid Deployment Program

Deploy distributed renewable energy (e.g. solar PV, battery storage, microgrids) at municipal facilities, school districts, and industrial sites across the Coastal Bend, reducing grid electricity demand at the upstream NOx emissions from fossil fuel based energy generation.

Develop a multi-year distributed energy deployment program targeting (1) municipal facilities (city/county buildings, water treatment plants, libraries), (2) school district sites, (3) industrial facilities behind-the-meter solar and storage, and (4) community-scale microgrids in areas with economically distressed communities, persistent-poverty indicators, or capacity-constrained jurisdictions for resilience and energy bill reduction.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$1M program design; $5M–$50M depending on sites and scale | COG; utilities; critical sites

RECOMMENDED PROJECT LEAD:

Regional planning organization, utilities, and critical facility partners

KEY ACTION STEPS:

- Map critical loads and facilities
- Screen sites for microgrid feasibility
- Prepare priority grant applications

PROJECT # 4.1.6 • TIMELINE: SHORT (6 MONTHS)

Not Started | In Progress | Completed

Industry Energy Efficiency Recognition Program

Launch a CBAQP voluntary energy efficiency checklist and recognition program such as a CBAQP "efficiency award' for industrial and commercial participants, building on existing CBAQP Ozone and PM2.5 Advance program participation. The program rewards measurable efficiency improvement and provides public recognition for isolated projects, or completion of defined criteria by participating organizations including but not limited to industrial facilities, municipalities, and local government facilities.

See Appendix D for details.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$75k | CBAQP; industrial partners

RECOMMENDED PROJECT LEAD:

Regional air quality organization and industrial partners

KEY ACTION STEPS:

- Define recognition criteria
- Recruit industry participants
- Launch annual awards and reporting

Implementation Roadmap: Projects by Sector

4.2 FREIGHT & GOODS MOVEMENT

The Port of Corpus Christi is one of the nation's largest ports by tonnage, and freight and goods movement represent a major emission source. This sector prioritizes projects that reduce emissions from drayage trucks, vessels, and port equipment — where federal and state funding opportunities are strongest and per-pound emission reductions can be substantial.

PROJECT # 4.2.1 • TIMELINE: SHORT (9 MONTHS)

Not Started | **In Progress** | Completed

Develop the Modernization Plan for the Port's Owned Fleet

Develop the modernization plan for the Port's owned fleet (vehicles and equipment. Define precise quantities of fleet vehicles and equipment that could be retrofitted (e.g. tier 4 engines), replaced, or upgraded to be either hybrid, full electric, or zero emission equivalent by 2031. Leverage fleet data that has already been compiled in recent federal grant applications, or emissions inventory data sets to identify specific equipment to modernize (e.g. roughly 40–50 vehicles, transitioning hybrid to full electric and equipment to modernized Tier 4 engines, utilize lower-emissions fuels, retrofitting, replacements, new equipment, and cargo handling equipment (CHE) electrification).

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$250k | PCCA fleet/facilities

RECOMMENDED PROJECT LEAD:

Port fleet and facilities lead

KEY ACTION STEPS:

- Inventory port fleet assets
- Analyze total cost of ownership
- Develop charging and replacement plan

PROJECT # 4.2.2 • TIMELINE: MID (36 MONTHS)

Not Started | In Progress | Completed

ZE Technology Pilot — Battery-Electric CHE, ZE Tugboats, or Vehicles

Execute at least one ZE technology pilot by 2030 — prioritizing batteryelectric cargo handling equipment (likely) or zero-emission harbor vessels, zero-emission railcar movers, locomotive tier upgrades, and marine alternative-fuel transitions. If piloting the technology itself is not available or feasible, consider piloting the safety response protocols (e.g. first responder tabletop exercise) or fuel storage or refueling (e.g. bunkering) process as a means to develop the landscape for future technology deployments.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$10M pilot | PCCA; terminal operators

RECOMMENDED PROJECT LEAD:

Port authority and terminal operator partners

KEY ACTION STEPS:

- Select priority zero-emission equipment
- Secure grant and match funding
- Build charging and support infrastructure

PROJECT # 4.2.3 • TIMELINE: SHORT (18 MONTHS)

Not Started | In Progress | Completed

Pilot a ZE Truck Express Lane at PCCA Northside Gate

Pilot a Green Truck Express Lane, which may entail a dedicated port access lane to prioritize near-zero and zero emission trucks to reduce turn times, lower emissions, and improve freight efficiency at the Port of Corpus Christi.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$1.5M | PCCA; MPO; truckers

RECOMMENDED PROJECT LEAD:

Port authority, regional transportation planners, and trucking partners

KEY ACTION STEPS:

- Define lane eligibility rules
- Design gate technology requirements
- Pilot operations and track throughput

PROJECT # 4.2.4 • TIMELINE: MID (24 MONTHS)

Not Started | In Progress | Completed

Clean Truck Program Priority Express Lane Access + Conversion Fund

Develop a Clean Truck Program at the Port of Corpus Christi. Model the program after BMPs and lessons learned by the Port of Long Beach. Establish mechanisms that reward "green" technologies and collect a fee to develop a pool of funds that can be reallocated in the form of grants to facilitate the upgrade and conversion to near-zero and zero emissions. Establishing an "express lane" would be one aspect of the overall program. Funds collected through the program fee could be leveraged to charging infrastructure, grants, or equipment purchases to accelerate the adoption, deployment, and utilization of zero emission technology.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$10M | PCCA; COG; MPO

RECOMMENDED PROJECT LEAD:

Port authority and regional transportation/ funding partners

KEY ACTION STEPS:

- Define eligible truck classes
- Structure incentives and access benefits
- Enroll fleets and monitor conversions

Implementation Roadmap: Projects by Sector

4.3 TRANSPORTATION & MOBILE SOURCES

On-road vehicles are the largest single source of ground-level ozone precursors in most urban airsheds. Reducing emissions from commuter vehicles, fleet vehicles, and non-road equipment requires behavioral change, infrastructure investment, and policy support. The Board has directed that this sector produce transportation-sector standards and measurable targets.

PROJECT # 4.3.1 • TIMELINE: SHORT (9 MONTHS)

Not Started | **In Progress** | Completed

Traffic Signal Optimization

Fast-track traffic signal optimization through the City of Corpus Christi and TxDOT, targeting the 2-3 highest-congestion corridors in the Coastal Bend Region by end of 2031. Retime a defined quantity of high priority intersections, with documented before/after travel-time and idling-emission reductions (leverage baseline intersection delay).

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$150k | MPO; city traffic engineers

RECOMMENDED PROJECT LEAD:

Regional transportation planners and local traffic engineers

KEY ACTION STEPS:

- Collect corridor traffic counts
- Retain signal timing specialist
- Measure delay and emissions benefits

PROJECT # 4.3.2 • TIMELINE: SHORT (6 MONTHS)

Not Started | **In Progress** | Completed

Idle-Free School Zone Pilot — At 1-4 Schools

Engage Nueces and San Patricio County ISDs to pilot an EPA Idle-Free School Zone Project. Explore a pilot idle-free school zone program at Ingleside Elementary with possible Enbridge partnership, with potential to expand across the Coastal Bend. Install AQI flag system at the school entrance. If successful, expand to 3 additional schools in Nueces and San Patricio Counties.

CBAQP will contribute $25,000 per participating school to cover school costs (up to four schools, $100,000), plus $50,000 for CBAQP supplies and administration of the pilots, for a total CBAQP commitment of $150,000. A related grant collaboration has been submitted by TAMUCC.

Note: must comply with OSHA heat standards above 80°F.
Source: EPA Idle-Free Schools Toolkit

FUNDING ESTIMATES/POTENTIAL RESOURCES:

"$150k total CBAQP commitment ($25k per school for up to 4 schools, plus $50k for supplies and administration) | School districts; CBAQP; TAMUCC

RECOMMENDED PROJECT LEAD:

School districts and regional air quality organization

KEY ACTION STEPS:

- Select pilot school locations
- Install idle-free signage
- Secure driver and parent pledges

PROJECT # 4.3.3 • TIMELINE: SHORT (9 MONTHS)

Not Started | In Progress | Completed

Develop a Clean Delivery Program Approach

Develop the partnership and implementation approach for a future Coastal Bend clean delivery program by engaging major freight receivers, logistics providers, delivery companies, and regional distribution hubs serving the region. Potential participants may include UPS, Amazon, FedEx, H-E-B, Walmart, grocery delivery services, DoorDash, and other regional delivery providers. The project will identify existing zero- or near-zero-emission delivery initiatives, assess partner interest, document operational priorities, define data-sharing needs, and establish the voluntary commitments needed to support a follow-on technical study or pilot.

Resource: EPA SmartWay Partner Program

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$150k | Cities; MPO; businesses

RECOMMENDED PROJECT LEAD:

Local governments, regional transportation planners, and business partners

KEY ACTION STEPS:

- Identify priority freight receivers, carriers, delivery platforms, and distribution hubs
- Develop outreach materials, participation criteria, and data templates
- Conduct targeted outreach and stakeholder workshops
- Document existing clean delivery initiatives, fleet goals, and constraints
- Secure participation commitments or letters of interest for the follow-on study

PROJECT # 4.3.4 • TIMELINE: SHORT (6 MONTHS)

Not Started | In Progress | Completed

Conduct a Clean Delivery Fleet Opportunities Study

Building on the partners and data framework developed under Project 4.3.3, conduct a technical study of clean delivery opportunities in the Coastal Bend. The study will evaluate participating fleet characteristics, delivery routes, trip patterns, vehicle duty cycles, idling and dwell time, baseline fuel use, current vehicle technologies, charging or fueling infrastructure needs, operational barriers, emissions reduction potential, and implementation costs. The study should compare potential clean delivery pathways, including CNG, LNG, renewable natural gas, hybrid-electric, plug-in hybrid, battery-electric, and other near-zero-emission delivery vehicles, and identify priority pilot projects that could be advanced through future funding opportunities.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$350k | Cities; MPO; businesses

RECOMMENDED PROJECT LEAD:

Local governments, regional transportation planners, and business partners

KEY ACTION STEPS:

- Collect fleet, route, vehicle, fuel-use, and delivery operations data
- Evaluate clean vehicle technologies and fuel pathways
- Assess charging, fueling, maintenance, and site infrastructure needs
- Estimate emissions reductions, costs, and cost-effectiveness
- Identify priority pilots and prepare an implementation roadmap

Implementation Roadmap: Projects by Sector

PROJECT # 4.3.5 • TIMELINE: SHORT (9 MONTHS)

Not Started | In Progress | Completed

Design an Electric Municipal Fleet Pilot Project

Design an electric fleet pilot concept. Identify 2-5 high-idling units as first candidates and apply for available EV fleet funding. Place orders and deploy first vehicles, documenting the experience for lessons learned, challenges, opportunities, with annual idling-hour and fuel-use reductions recorded and reported to compare to baseline. Create a findings white paper featuring a fleet electrification case study to encourage EV fleet adoption and leverage the lessons learned to facilitate future adoption across the region and identify new locations to install charging stations.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$200k | City fleet/facilities

RECOMMENDED PROJECT LEAD:

Local government fleet and facilities departments

KEY ACTION STEPS:

- Inventory municipal fleet vehicles
- Site chargers at priority facilities
- Prepare fleet grant package

PROJECT # 4.3.6 • TIMELINE: SHORT (6 MONTHS)

Not Started | In Progress | Completed

Develop a Mobile-Friendly Digital Guide for Coastal Bend Residents and Businesses

Develop a mobile-friendly digital guide (e.g a website dashboard or a mobile friendly fact sheet) for Coastal Bend residents and businesses covering available grant programs, clean vehicle incentives, idle reduction resources, and EV charging locations in Nueces and San Patricio Counties. Host on the CBAQP website. Update quarterly. Produce in English and Spanish.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$75k | CBAQP; web vendor

RECOMMENDED PROJECT LEAD:

Regional air quality organization and technical vendor

KEY ACTION STEPS:

- Define guide content and audiences
- Design mobile-first user experience
- Test guide with residents and businesses

PROJECT # 4.3.7 • TIMELINE: SHORT (12 MONTHS)

Not Started | In Progress | Completed

Commission a Study to Quantify the NOx and PM Contribution of Adjacent Transport Emissions

Commission a study through TAMUCC or Del Mar College to quantify the NOx and PM contribution of vehicles passing through the Corpus Christi urban airshed on IH-37 and US-77 without stopping. Use Corpus Christi MPO travel demand model as a baseline.

Source: Corpus Christi MPO / TAMUCC Research Partnership

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$250k | University; MPO; CBAQP

RECOMMENDED PROJECT LEAD:

Academic research partner

KEY ACTION STEPS:

- Scope study methods and geography
- Collect traffic and activity data
- Model NOx and PM contributions

4.4 COMMUNITY & AREA SOURCES, POLICY & ENGAGEMENT

This sector encompasses three interconnected areas: community and area emission sources (construction, agriculture, small businesses); community engagement and outreach (awareness, education, voluntary compliance); and research, planning, and policy advocacy (enabling work that makes the rest of the plan possible). Each project is evaluated against the Board's filter: measurable emissions reduction, funding potential, or partner network impact.

4.4A COMMUNITY & AREA SOURCES

PROJECT # 4.4.1 • TIMELINE: SHORT (9 MONTHS)

Not Started | In Progress | Completed

Develop a Coastal Bend Construction Air Quality BMP Manual

Produce a standardized Coastal Bend Construction and Area Source Emissions BMP Manual covering NOx and PM2. The manual should include standardized guidelines for construction and area source emissions management in the Coastal Bend region. Develop the BMP Manual in partnership with City of Corpus Christi Development Services, Nueces County, and the local construction industry. Include water trucks, wind fencing, haul road stabilization, vegetative cover or other dust mitigation BMPs that fall beyond SWPPP requirements. Distribute to all permit applicants.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$125k | CBAQP; contractor association

RECOMMENDED PROJECT LEAD:

Regional air quality organization and contractor industry association

KEY ACTION STEPS:

- Adapt construction air quality BMPs
- Vet manual with contractors
- Train inspectors and project managers

PROJECT # 4.4.2 • TIMELINE: SHORT (18 MONTHS)

Not Started | In Progress | Completed

Vegetative Buffer Co-Benefit Demonstration/Pilot Project

Leverage partnerships with existing local initiatives (e.g. AgriLife buffer demo) to establish design criteria for any vegetative buffer or community greening project undertaken, ensuring plantings deliver air quality benefits without creating safety hazards or future replacement burdens. Focus vegetative buffers and greening initiatives that are grounded in lessons learned.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$250k | City/parks; school; TxDOT

RECOMMENDED PROJECT LEAD:

Local public agency, school/site host, and transportation partner

KEY ACTION STEPS:

- Select high-exposure demonstration site
- Design planting and maintenance plan
- Monitor survival and co-benefits

Implementation Roadmap: Projects by Sector

PROJECT # 4.4.3 • TIMELINE: SHORT (12 MONTHS)

Not Started | **In Progress** | Completed

Advocate for a $PM_{2.5}$ Monitor in San Patricio County

Identify a specific location for a new monitor, in close coordination with key stakeholders and agency partners.

Board goal: deploy a $PM_{2.5}$ monitor in San Patricio County by 2030.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$100k | CBAQP; TCEQ

RECOMMENDED PROJECT LEAD:

Regional air quality organization

KEY ACTION STEPS:

- Build technical need and equity case
- Identify feasible monitor site
- Petition TCEQ/EPA for deployment

PROJECT # 4.4.4 • TIMELINE: SHORT (6 MONTHS)

Not Started | In Progress | Completed

Grow a CBAQP Social Media Presence

Launch and maintain CBAQP accounts on social media with regular posts on AQ alerts, success stories, events, and educational content. Determine the social media baseline, develop a social media content strategy, complete with content theme categories, key messages, partnership accounts to tag, defined hashtags, and a content plan. Utilize a free or low-fee software to design and schedule the posts. Create templates to easily recycle key messages and establish brand recognition while producing educational and informative content. Monitor followers and impression growth. Adjust strategy as needed to align with community feedback.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$20k | CBAQP communications

RECOMMENDED PROJECT LEAD:

Regional air quality communications lead

KEY ACTION STEPS:

- Create monthly content calendar
- Assign posting and response owner
- Track reach and engagement metrics

PROJECT # 4.4.5 • TIMELINE: MID (24 MONTHS)

Not Started | In Progress | Completed

Pilot On-Farm Anaerobic Co-Digester — Single Cotton Gin or Feedlot Anchor

Site, permit, and commission a containerized or modular on-farm anaerobic co-digester within at a single anchor site (regional cotton gin or agricultural operation), diverting a specific quantity of agricultural waste from open burning, producing an estimated quantity of biogas, and returning soil amendment to participating producers.

A small-scale (15,000–25,000 tons/yr) anaerobic co-digester at a single regional cotton gin or beef cattle operation, accepting cotton gin biomass, manure, and compatible food-processing organics as a noburn alternative could produce an estimated 30,000–50,000 MMBtu/yr of biogas for on-site electricity or boiler use, and return Class A digestate for a zero waste operation. The Pilot can be designed as the proof-of-concept that builds producer confidence before scaling to the regional flagship project.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$1.5M pilot | Farm host; Extension; USDA

RECOMMENDED PROJECT LEAD:

Agricultural host site and extension agriculture partners

KEY ACTION STEPS:

- Assess feedstock supply and quality
- Complete feasibility and host agreement
- Secure pilot funding and permits

PROJECT # 4.4.6 • TIMELINE: MID (48 MONTHS)

Not Started | In Progress | Completed

Regional Anaerobic Co-Digester — Multi-County Centralized Facility

Divert regional agricultural waste and prevent open burning by deploying a regional anaerobic digester. Site, permit, and commission a centralized regional anaerobic co-digester across two counties — diverting a specific quantity (e.g. 50,000+ tons/yr of agricultural waste from burning.

Centralized regional anaerobic co-digester (50,000–75,000 tons/yr throughput) serving multiple Coastal Bend cotton gins, beef cattle operations, grain producers, and food processors as the regional alternative to open burning and uncontrolled manure storage. The circular economic model could produce biogas with optional biogas upgrade to biomethane for use as transportation fuel, and distributes Class A digestate back to producers. Recommended ag-sector flagship for the CB-CAAP plan; the Tier 1 pilot serves as the de-risking step.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$43M facility | COG; private developer

RECOMMENDED PROJECT LEAD:

Regional planning organization and private project developer

KEY ACTION STEPS:

- Map multi-county feedstock sources
- Complete siting and feasibility study
- Procure private development partner

Implementation Roadmap: Projects by Sector

PROJECT # 4.4.7 • TIMELINE: SHORT (12 MONTHS)

Not Started | In Progress | Completed

Commercial Energy Efficiency & Incentives Program

Encourage businesses to implement smaller efficiency projects through available incentive programs; builds on CBAQP and $PM_{2.5}$ Advance Program and Energy Star frameworks. Develop educational and outreach materials to inform and educate about incentives. Publicly support and announce participating businesses.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$150k–$300k to design; $1M/year to maintain | Utilities; COG; CBAQP

RECOMMENDED PROJECT LEAD:

Utilities, regional planning organization, and air quality organization

KEY ACTION STEPS:

- Define rebates and eligible measures
- Recruit auditors and contractors
- Enroll businesses and verify savings

4.4B COMMUNITY ENGAGEMENT & OUTREACH

PROJECT # 4.4.8 • TIMELINE: SHORT (12 MONTHS)

Not Started | In Progress | Completed

Pilot Quantifying Air Quality at Local Events & Tourist Sites — Measure & Mitigate

Encourage clean air practices and low-emission operations at community events and tourist destinations. Develop an events BMP guide with strategies and estimated air quality benefits for event host organizations to deploy (e.g. utilizing zero emissions generators) at events and high traffic tourist destinations with air quality impacts.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$200k | Tourism bureau; CBAQP

RECOMMENDED PROJECT LEAD:

Tourism partner and regional air quality organization

KEY ACTION STEPS:

- Select event and tourism venues
- Deploy portable monitoring sensors
- Test mitigation measures on-site

PROJECT # 4.4.9 • TIMELINE: SHORT (6 MONTHS)

Not Started | In Progress | Completed

Expand CBAQP Website Data-Hosting Capacity

Expand the CBAQP website's ability to host and display emissions, monitoring, and program data into a more digestible format. Develop a website update plan and design a wireframe to extend the current site so it can serve as the regional public-facing data for the CB-CAAP and other relevant air quality information.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$75k | CBAQP; web/data vendor

RECOMMENDED PROJECT LEAD:

Regional air quality organization and web/data vendor

KEY ACTION STEPS:

- Scope data needs and users
- Select web/data platform
- Migrate datasets and publish updates

Implementation Roadmap: Projects by Sector

PROJECT # 4.4.10 • TIMELINE: SHORT (4 MONTHS)

Not Started | In Progress | Completed

Clean Air BMP Stakeholder Fact Sheets

Develop a series of approximately 20 different one-two page fact sheets, one per topic (e.g. BMPs by sector, BMPS for each CB-CAAP BMP Stakeholder agency).

Create a series of plain-language fact sheets, designed for digital distribution to public agencies, port tenants, private businesses, and community organizations across the Coastal Bend region. Each sheet condenses information and resources into a concise, ready-to-share artifact that lowers the barrier to voluntary adoption of BMPs and efforts that improve air quality.

FUNDING ESTIMATES/POTENTIAL RESOURCES::

$5k–$25k each | CBAQP; sector experts

RECOMMENDED PROJECT LEAD:

Regional air quality organization and sector subject matter experts

KEY ACTION STEPS:

- Prioritize sector-specific BMP topics
- Draft concise stakeholder briefs
- Translate and distribute materials

PROJECT # 4.4.11 • TIMELINE: SHORT (6 MONTHS)

Not Started | In Progress | Completed

Seasonal Air Quality Public Awareness Campaign

Curate a pre-built seasonal campaign architecture that delivers public messaging at predictable seasonal triggers: pre-ozone-season kickoff (March-April), Saharan dust season (May-June), peak ozone months (August-September), hurricane and tropical storm season (June-November), winter inversion season (December-February). Includes developing creative assets, paid media buy plans, member copromotion playbooks. Develop an Anti-idling campaign for fleet trucks to turn off engine when not in vehicle and educate the public about Ozone Action Days.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$100k | CBAQP; local media

RECOMMENDED PROJECT LEAD:

Regional air quality organization and local media partners

KEY ACTION STEPS:

- Build seasonal message calendar
- Place local media and social content
- Track impressions and public engagement

PROJECT # 4.4.12 • TIMELINE: SHORT (12 MONTHS)

Not Started | In Progress | Completed

Coastal Bend Air Quality Education Series

Package the plan's existing technical content — NAAQS framework, $52B economic impact study, seasonal patterns, AQI tier explanations — into a modular, multi-audience curriculum that CBAQP and partners can deploy across community channels A structured education curriculum derived from the plan's underlying technical content.

Create a structured education curriculum derived from the plan's underlying technical content. Modules include: K-5 AQ basics, 6-12 deeper science, civic group briefings, industry orientations, public health partner training, and emerging-leader fellowships. Each module should include a complete instructional package: slides, facilitator guide, handouts, demonstration materials, evaluation. Distributed via TAMU-CC, Del Mar College, K-12 districts, civic organizations, and CBCAAP member networks.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$150k | CBAQP; schools; university

RECOMMENDED PROJECT LEAD:

Regional air quality organization and school/ university partners

KEY ACTION STEPS:

- Build curriculum and session topics
- Recruit speakers and school partners
- Host recurring education sessions

PROJECT # 4.4.13 • TIMELINE: SHORT (4 MONTHS)

Not Started | In Progress | Completed

Standardized CBAQP Air Quality Presentation for Schools and Clubs

Create a standardized, replicable air quality education presentation module that can be delivered by CBAQP representatives to be delivered at schools and community clubs throughout the Coastal Bend region. The presentation materials should be designed to raise awareness about local air quality issues, health impacts, and community actions.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$30k | CBAQP; educators

RECOMMENDED PROJECT LEAD:

Regional air quality organization and education partners

KEY ACTION STEPS:

- Create standard presentation deck
- Train volunteer presenters
- Schedule school and club visits

Implementation Roadmap: Projects by Sector

4.4C RESEARCH, PLANNING & POLICY ADVOCACY

PROJECT # 4.4.14 • TIMELINE: SHORT (12 MONTHS)

Not Started | In Progress | Completed

Public Air Quality Dashboard for Public Education and Transparency

Develop a public-facing air quality data dashboard hosted by CBAQP that consolidates and visualizes regional emissions data from the Published Port of Corpus Christi Emissions Inventory Report. The report is lengthy and highly technical so efforts should be made to digitize and explain the data trends in plain English. Detailed emissions data should be displayed by source type, in an accessible public dashboard format, and provide information and data visualizations tracking emissions reductions and progress towards defined targets.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$300k | CBAQP; university; TCEQ

RECOMMENDED PROJECT LEAD:

Regional air quality organization, and academic partner

KEY ACTION STEPS:

- Define public dashboard metrics
- Connect monitoring and agency datasets
- Launch dashboard and feedback loop

PROJECT # 4.4.15 • TIMELINE: SHORT (18 MONTHS)

Not Started | In Progress | Completed

$PM_{2.5}$ Speciation Project

Conduct a $PM_{2.5}$ speciation study to identify the chemical composition and source contributions of fine particulate matter in the Coastal Bend airshed. Speciated data will distinguish local emissions sources from regional and transported particulates, strengthening the region's emissions inventory, informing targeted mitigation strategies, and supporting future monitoring investments. The project is a collaboration with TAMUCC, with a revised budget forthcoming from the new project lead.

FUNDING ESTIMATES/POTENTIAL RESOURCES:

$50k secured from Cheniere restricted funding; total budget pending revised estimate | Cheniere; TAMUCC; CBAQP

RECOMMENDED PROJECT LEAD:

Academic research partner and regional air quality organization

KEY ACTION STEPS:

- Finalize revised budget and study design with new project lead
- Deploy speciation sampling and laboratory analysis
- Publish source apportionment findings to inform CB-CAAP strategies

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Cross-Sector Strategies & Best Practices

These strategies and best practices apply across all sector focus areas - Industrial & Stationary Sources, Freight & Goods Movement, Transportation & Mobile Sources, and Community Area, Policy & Engagement. Each sector can adopt them to establish accountability, build a credible baseline, and demonstrate measurable progress over time.

1 GOAL-SETTING AND COMMITMENTS

Formal, time-bound targets signal intent and create accountability. They work best when they are sector-specific, publicly stated, and assigned to a named accountable owner.

Net Zero or GHG Reduction Goal

Set a long-range target with interim milestones, such as a 40% reduction from baseline by 2035 and net zero by 2050.

Electrification Goal

Commit to converting a defined percentage of fleet or facility assets to electric power by a target date.

Zero-Emission Equipment Transition

Establish a timeline for moving to zero-emission equipment aligned to commercial availability, infrastructure, and grid readiness.

2 PROCUREMENT AND POLICY

Embedding emissions criteria into purchasing and contracting decisions ensures cleaner choices become the default rather than the exception.

Environmentally Preferred Procurement (EPP) Policy

Require or prioritize the lowest-emission option available when acquiring or replacing equipment, vehicles, and services.

Contract and Bid Specifications

Mandate cleaner technology through bid language, such as zero-emission requirements, Tier 4 minimums, and idle-reduction clauses for contractors and tenants. Expand clean fuel and clean technology portfolio.

3 EQUIPMENT MODERNIZATION

A modernization plan turns an aging, high-emitting asset base into a phased, prioritized replacement schedule. Expand the use of clean technology and clean fuel portfolio.

Equipment Modernization Plan

Set a phased replacement or retrofit schedule prioritized by emissions impact and duty cycle.

Repower and Retrofit

Repower or retrofit assets where full replacement is not yet feasible, and right-size equipment to actual operational need.

End-of-Life Timing

Schedule turnover to coincide with natural end-of-life to control cost while maximizing emissions benefit.

4 INVENTORY AND BASELINE

A complete inventory of equipment and fuel use is the foundation for every other strategy. It defines what exists today and sets the reference point for measuring progress.

Equipment and Fuel Inventory

Catalog each asset by type, date purchased, engine, age, horsepower, and hours of operation, and track fuel and energy consumption by source.

Emissions Baseline Year

Establish a documented baseline year against which all future progress is measured.

5 EMISSIONS INVENTORY

A documented, repeatable methodology ensures emissions results are credible, consistent, and comparable over time.

Recognized Protocol

Follow an established protocol such as the GHG Protocol and apply EPA or TCEQ emission factors, defining scope, boundaries, and the activity data used.

Quantifying Reductions

Use the same methodology to isolate the effect of specific interventions—fuel switching, retrofitting, electrification—against the baseline or a business-as-usual case.

6 OPERATIONS AND BEHAVIOR

Lower-cost, near-term reductions often come from how assets are operated rather than from capital investment.

Operational Measures

Implement anti-idling policies, route and load optimization, shore power and equipment plug-in use, and appointment systems to reduce queuing and congestion.

Maintenance and Training

Sustain efficiency through preventative maintenance, and drive adoption through staff training and incentive programs.

7 REPORTING AND MONITORING

Ongoing monitoring tracks progress against goals and verifies that reductions are real and sustained.

Reporting Cadence

Report on a regular schedule, typically annual, with transparent public disclosure.

Dashboards and Feedback

Maintain trackers for internal management and use results to adjust strategies in a continuous feedback loop.

Third-Party Verification

Add credibility to externally reported figures through independent verification.

Governance & Plan Management

Successful implementation of the CB-CAAP depends on clear roles, consistent accountability, and a commitment to measuring and reporting progress.

5.1 ORGANIZATIONAL ROLES

The following organizations are key to implementing and overseeing the CB-CAAP:

CBAQP BOARD OF DIRECTORS

Sets strategic direction, approves targets, makes funding decisions, reviews annual progress.

CBAQP EXECUTIVE DIRECTOR & STAFF

Coordinates implementation, supports workgroups, manages monitoring and reporting.

SECTOR WORKGROUPS

Provide sector expertise, support project implementation, submit annual commitment updates.

PARTNER MEMBERS & STAKEHOLDERS

Implement voluntary commitments and report actions annually.

5.2 ANNUAL REPORTING & TRACKING

Progress against the plan will be measured and reported annually:

- **Annual Air Quality Report published — primary public accountability document.**
- **Progress reported against all four Board-defined priority area targets.**
- **Project-level tracking using the 11-criteria scoring metrics.**
- **Updated list of participants and voluntary commitments with each annual report.**

5.3 PLAN UPDATES

The CB-CAAP is a living document, updated regularly to reflect progress, changing conditions, and evolving community priorities.

ANNUAL REVIEW

The Board reviews progress and updates the project portfolio each year, relying on annual air quality reports developed by workgroup participants to account for changes in participation, measures being implemented, and developments in the region or nearby areas.

⚠ TRIGGERS FOR SIGNIFICANT UPDATES

Participants are expected to keep staff informed of developments that may warrant a more significant plan update, including:

- Change to the geographic area covered by the plan
- Change to the time frame covered by the plan
- Change to the plan objectives

Changes to these aspects of the plan require approval by the CBAQP Board of Directors.

FIVE-YEAR PLAN UPDATE

At the end of the five-year cycle, the plan will be fully updated to reflect cumulative progress and evolving community priorities. Toward the end of 2031, the Board will prompt staff to consider whether to: a) approve an extension of the current plan beyond December 31, 2031, b) initiate a process to develop a new plan, or c) allow the plan to expire at the end of 2031 without replacing it. At any time, the Board may also request that staff initiate a revision or update to the plan for other reasons.



CB-CAAP • 2026-2031

Appendix

COASTAL BEND
AIR QUALITY
PARTNERSHIP

APPENDIX A

CB-CAAP Baseline Data Map

COASTAL BEND AIR QUALITY PARTNERSHIP

All data drawn from client-provided sources and verified public databases. See source table for details:

Tab	Sheet Name	Description	Primary Sources
1	1_AirQualityConditions	Ozone & $PM_{2.5}$ design values, NAAQS standards, near-nonattainment status, board targets	S1, S5, S6, S7, S8, S9
2	2_EmissionsInventory	Regional emissions by sector for 2017, 2020, 2023 (trend table) — NOx, $PM_{2.5}$, VOC, CO, SOx	S2, S3, S4
3	3_EmissionsSources	Port terminal list, vessel call data, OGV breakdown by type, CBAQP Ozone and PM2.5 Advance partners	S1, S2, S3, S4
4	4_MonitoringInfrastructure	All CAMS monitor details, pollutants covered, geographic gaps, planned additions	S1, S5, S6
5	5_HealthOutcomes	Health rates, HAPs of concern, AQI days, uninsured rates, sensitive populations	S1

#	Reference
S1	Coastal Bend Air Quality Partnership. (2025). *Coastal Bend Community Air Action Plan (CB-CAAP).*
S2	Starcrest Consulting Group. (2019). *Port of Corpus Christi 2017 air emissions inventory.* Port of Corpus Christi Authority.
S3	Starcrest Consulting Group. (2021). *Port of Corpus Christi 2020 air emissions inventory.* Port of Corpus Christi Authority.
S4	Starcrest Consulting Group. (2025). *Port of Corpus Christi 2023 air emissions inventory.* Port of Corpus Christi Authority.
S5	Murphy, S. (2026, March 11). *Ozone update (CAMS 4 & CAMS 21)* [Data presentation]. Texas Commission on Environmental Quality.
S6	Murphy, S. (2026, March 11). *$PM_{2.5}$ monitors—Current design values* [Data presentation]. Texas Commission on Environmental Quality.
S7	U.S. Environmental Protection Agency. (2026). *Nueces County daily AQI report—Combined ozone and $PM_{2.5}$* [Data set]. EPA AQS Data Mart & AirNow.
S8	U.S. Environmental Protection Agency. (2025). *EPA AQS site-level ozone design value history—2015 8-hour NAAQS* (Table 6).
S9	CoachCora. (2026). *CBAQP board strategic planning retreat summary.* Coastal Bend Air Quality Partnership.

#	Reference	Prepared By	Year
S10	Air Quality Index (AQI) Basics https://www.airnow.gov/aqi/aqi-basics/	AirNow.gov	Live Data
S11	AQS Data Mart https://catalog.data.gov/dataset/aqs-data-mart	Data.gov	Accessed May 2026
S12	EPA Ozone Design Values Report (2022-2024 final)	U.S. EPA	Accessed May 2025
S17	Potential Costs of Ozone Nonattainment in the Corpus Christi Metropolitan Area	Dr. Jim Lee, South Texas Economic Development Center, Texas A&M University-Corpus Christi, for the Port of Corpus Christi	Published May 2020

Implementation Roadmap Development

This Implementation Roadmap process was built on the Coastal Bend Community Air Action Plan and the Coastal Bend Air Quality Partnership Board priorities, bringing together existing project concepts, external plans, and stakeholder input to identify and prioritize actionable emissions reduction projects. The process below outlines how stakeholders moved from initial alignment to a prioritized project portfolio.

Alignment → **Refinement** → **Prioritization** → **Validation**

The sequence included:

Virtual Stakeholder Kickoff (March):

Aligned, informed, and recruited participants

Implementation Action Team Sessions (April):

Four structured virtual working sessions were held to review, refine, and prioritize projects

Target Stakeholder Outreach (May):

Action Team's work was sent back to the original community working groups for review. Prioritized project portfolio was validated and refined and roadmap development was supported

Goals

The Implementation Roadmap process was designed to engage stakeholders in:

- Understanding the **current air quality landscape** and baseline data
- Identifying and prioritizing **implementable emissions reduction projects**
- Aligning stakeholders around the **Board's priority targets**
- Acknowledging and building on the **community sector working group input**
- Gathering stakeholder input to refine **project concepts and implementation details**
- Building stakeholder **buy-in** and **identify partners willing to support implementation** of priority projects

ALIGNMENT

Stakeholder Kickoff

TUESDAY

MARCH 31

10:30-12:00 PM CDT

AUDIENCE:

- Community sector working group members
- Environmental organizations
- Community-based organizations
- Industry representatives
- Local government
- Transportation partners

Purpose

Orient stakeholders to the Implementation Roadmap and build alignment and buy-in for the next phase of work, which will focus on identifying and prioritizing projects that demonstrate measurable emissions reductions.

SESSION OBJECTIVES:

- Provided an overview of the landscape, including high level baseline data
- Recapped prior work, including:
  - Community sector **working groups** (strategies and objectives)
  - Board Retreat outcomes (priority areas and targets)
- Reinforced that this phase **builds on prior work,** advancing toward implementation
- Introduced the **Implementation Roadmap** process, including the transition from project prioritization (April) to roadmap development (May)
- Clarified the goal of the upcoming sessions: a **prioritized, implementation-ready project list**
- Invited participation in a smaller ***Implementation Action Team***

IMPLEMENTATION ACTION TEAM:

- A small, focused group of stakeholders **(approximately 8–10 participants)** participated in up to **4 virtual working sessions (April)** to **review and prioritize projects**
- Participants:
  - Brought **subject matter expertise (SMEs)**
  - Served as **liaisons to broader stakeholder groups or sectors**
  - Provided insight on **implementation feasibility, opportunities, and constraints**
- This approach ensured project prioritization was:
  - **Technically informed**
  - Grounded in real-world implementation considerations
  - Built on prior stakeholder input, using Board priorities and targets

Key Outcomes

Shared understanding of baseline conditions, priorities, and emissions reduction goals

Clear connection to prior work, including stakeholder input and Board direction

Project prioritization approach that will be used by the Implementation Roadmap Team

Gauging interest in participating in the Implementation Roadmap Team

Implementation Action Team Sessions

4 SESSIONS IN APRIL

8-10 PARTICIPANTS

DIVERSE SECTOR REPRESENTATION:

- Community Partners
- Industry Partners
- Government Partners

ACTION TEAM MEMBER PREFERRED **QUALITIES**:

- Subject matter expertise on emissions sources and project feasibility
- Ability to influence or support implementation of potential projects

Virtual Session 1

First week of April
10:30-12:00 pm | 90 mins

AIR QUALITY CONTEXT + PROJECT IDENTIFICATION

PURPOSE:

- Review emissions sources, baseline data, and sector context
- Introduce a **preliminary, sector-based list** of project concepts (from Coastal Bend community sector working groups, other community air action plans)
- Identify which concepts are relevant to the Coastal Bend context

KEY ACTIVITIES / DISCUSSION:

- Reviewed **emissions data**
- **Examined example projects** and discussed relevance **by sector** (freight, industrial, transportation, community)
- **Eliminated** projects that were not viable or applicable
- Identified areas needing **refinement**

Output

- Refined **long list of project concepts**

Virtual Session 2

Second week of April
10:30-12:00 pm | 90 mins

PROJECT SCREENING + INITIAL STRUCTURING

PURPOSE:

- Narrow the **long list of project concepts** based on emissions reduction potential and relevance
- Build alignment on which projects should move forward
- Begin structuring **priority project concepts** for next steps

KEY ACTIVITIES / DISCUSSION:

- Reviewed the **refined long list of project concepts**
- Applied a **screening lens** to assess:
  - **Emissions reduction potential**
  - **Relevance to the Coastal Bend context**
  - **Implementation realism**
- Determined which projects should:
  - Move forward
  - Be eliminated
  - Require additional clarification
- Began to identify potential leads and key partners for priority projects

Outputs

- **Focused shortlist** of priority project concepts for further development
- Initial identification of **potential leads and key partners**

Implementation Action Team Sessions

Virtual Session 3

Third week of April
10:30-12:00 pm | 90 mins

FUNDING + FEASIBILITY

PURPOSE:

- Further develop **priority project concepts**
- Assess **implementation pathways and funding feasibility**
- Prepare projects for **prioritization**

KEY ACTIVITIES / DISCUSSION:

- Reviewed the shortlisted priority project concepts
- Discussed **implementation pathways** (approach, scale, and key requirements)
- Assessed **funding feasibility**:
  - Alignment with potential funding sources
  - Likelihood of securing funding (high-level)
- Identified **key feasibility considerations and constraints**
- Refined project concepts for prioritization

Outputs

- Refined set of **viable project concepts ready for prioritization**
- Initial understanding of **funding feasibility and implementation pathways**

Virtual Session 4

Fourth week of April
10:30-12:00 pm | 90 mins

PROJECT SCREENING + INITIAL STRUCTURING

PURPOSE:

- Evaluate and **prioritize viable project concepts** using Board-approved criteria to develop a focused, actionable project portfolio aligned with air quality goals, funding opportunities, partnership potential, and implementation feasibility.

KEY ACTIVITIES / DISCUSSION:

- Reviewed priority project concepts
- Confirmed shared understanding of Board prioritization criteria
- Applied a **structured, high level assessment** across projects, using a consistent rating approach (e.g., low/medium/high), including:
  - Emissions reduction impact
  - Feasibility and funding potential
  - Community benefit and population reach
  - Partnership potential
  - Measurable outcomes and visibility
  - Implementation readiness
- Compared projects to identify relative strengths and key tradeoffs
- As a group, identified a prioritized and balanced set of projects

Outputs

- **Prioritized project portfolio**, aligned with Board criteria
- Shared understanding of key tradeoffs across projects
- Projects grouped by implementation readiness (near term and longer term)
- Priority projects ready for validation and refinement through targeted stakeholder engagement

What This Process Delivered



Identified emissions reduction strategies and project concepts



Identified initial potential project leads and partners



Assessed feasibility and funding potential



A refined and prioritized project portfolio was made ready for validation and implementation planning

Targeted Stakeholder Outreach

FIRST TWO WEEKS OF MAY

Purpose

Following the Implementation Roadmap sessions (in April), targeted stakeholder outreach was conducted to **refine, validate, and strengthen** the prioritized project portfolio and support final implementation roadmap development.

This phase was designed to **pressure-test the feasibility and alignment** of priority projects and incorporate focused input from key stakeholders before finalizing the CB-CAAP.

APPROACH:

Through a mix of brief virtual meetings, direct outreach, and, if appropriate, a small in-person convening, the project team **engaged targeted stakeholders** with relevant expertise, roles, or implementation responsibilities.

KEY ACTIVITIES / DISCUSSION:

- Vetted proposed project strategies and any initial sequencing considerations
- Clarified roles, responsibilities, and coordination needs across partners
- Reviewed high-level budget considerations and potential funding alignment
- Aligned on monitoring, evaluation, and reporting metrics

Output

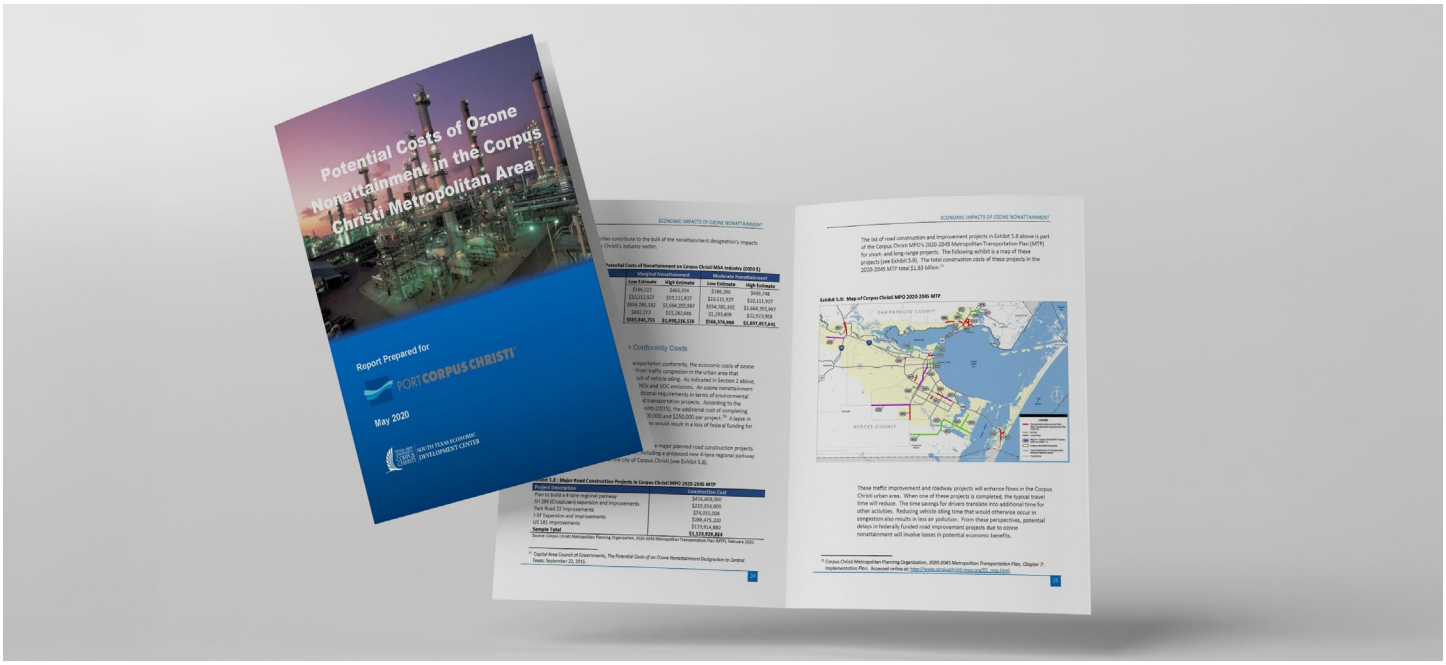
Final Implementation Roadmap was organized by key sectors (e.g., freight, industrial, transportation, or community), including, but not limited to:

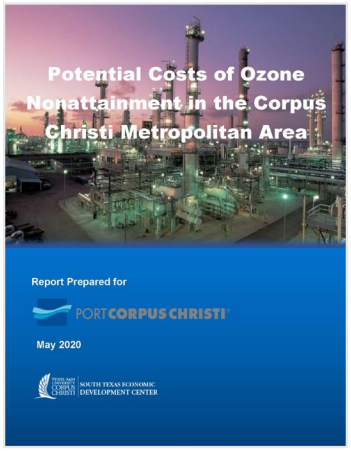
- Priority projects aligned with Board goals
- Associated baseline data and targeted emissions reductions
- Identified leads and supporting partners
- Estimated costs and potential funding pathways
- Defined timelines, milestones, and sequencing considerations

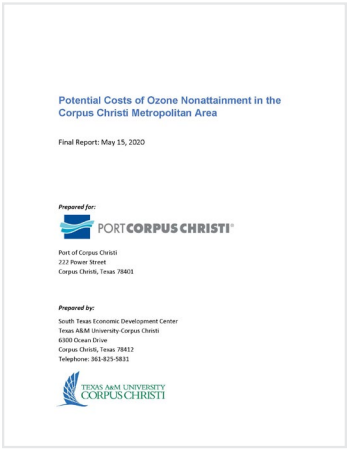
APPENDIX B

Potential Costs of Ozone Nonattainment

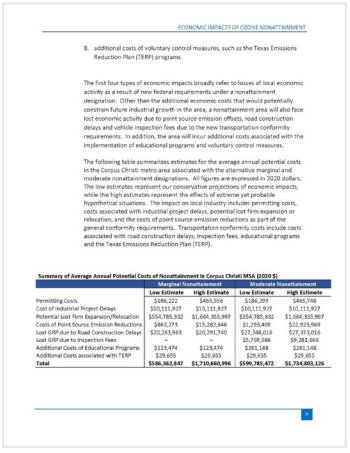
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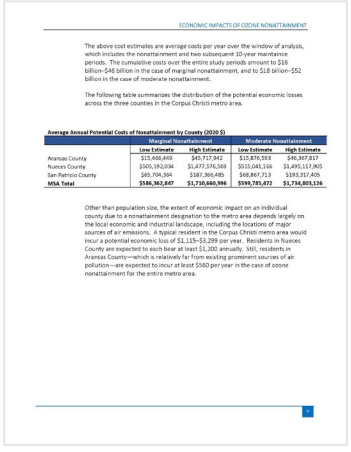




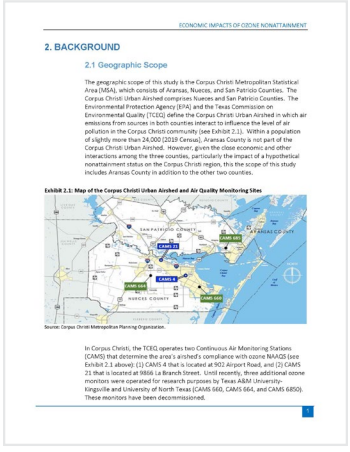


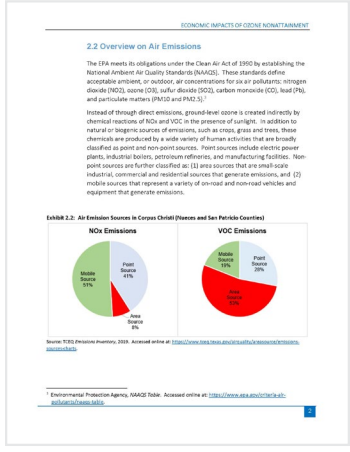








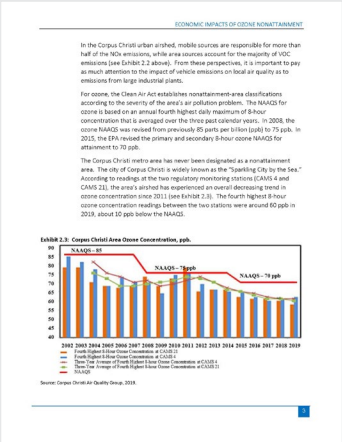




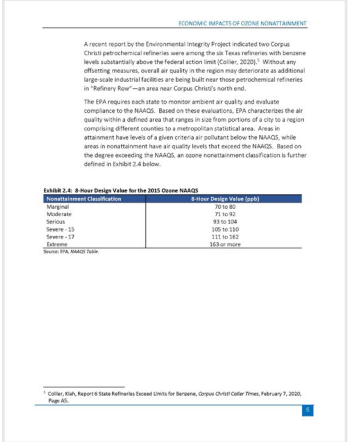
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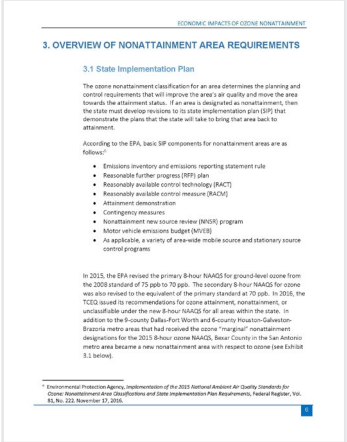
Potential Costs of Ozone Nonattainment

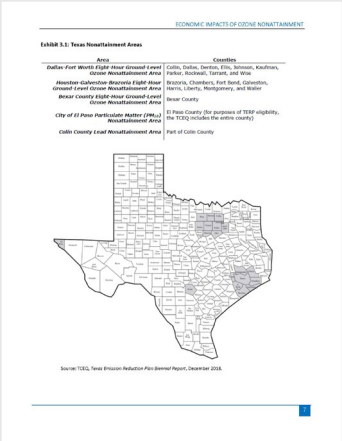
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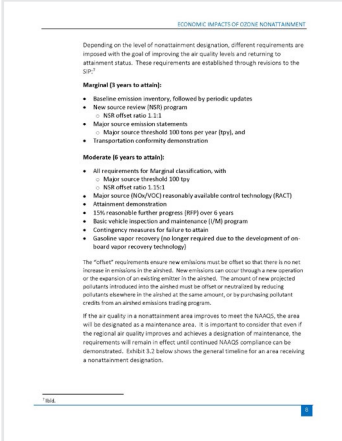


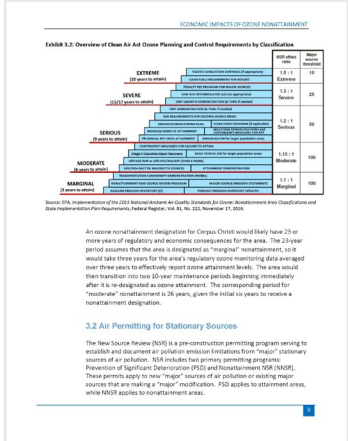


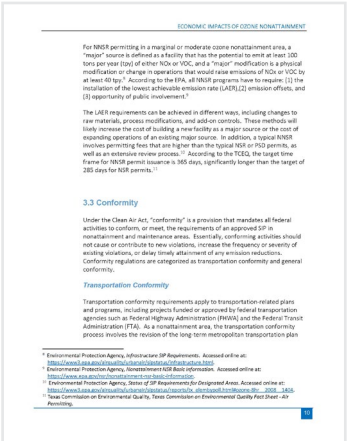


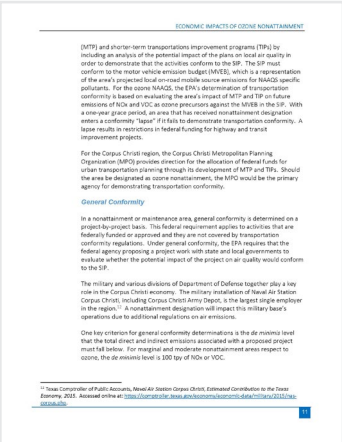




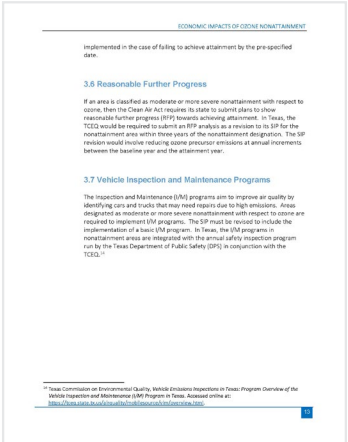


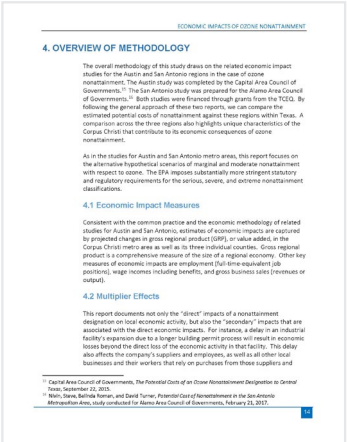








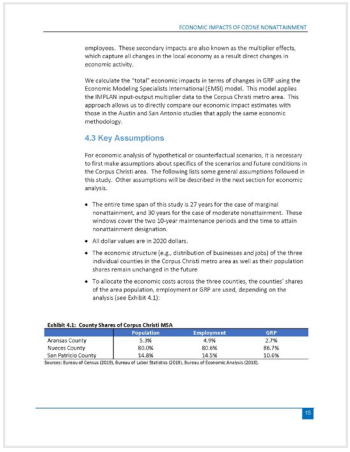


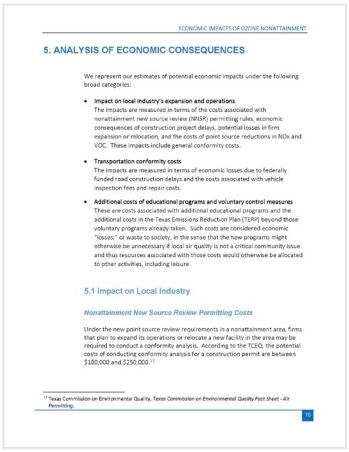


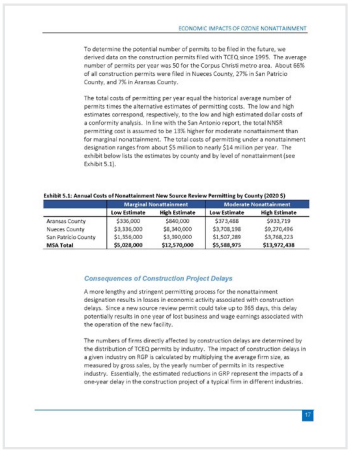
APPENDIX B

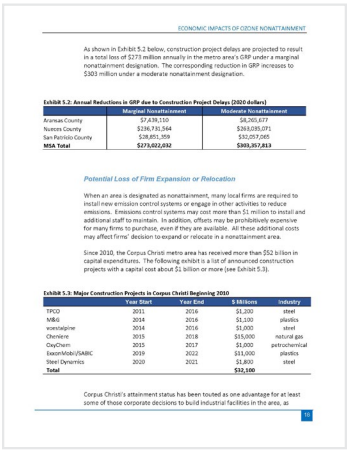
Potential Costs of Ozone Nonattainment

Available upon request. Contact: executiveassistant@cbaqp.org

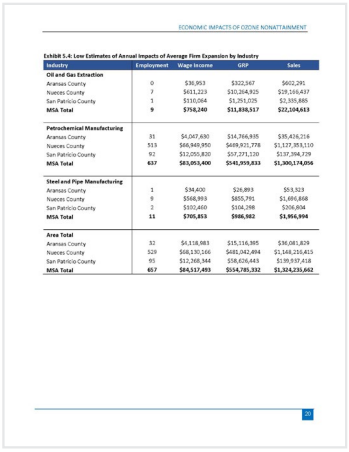


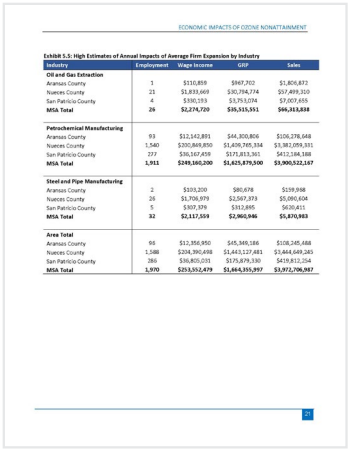


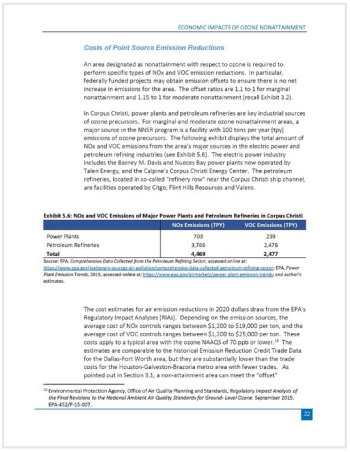


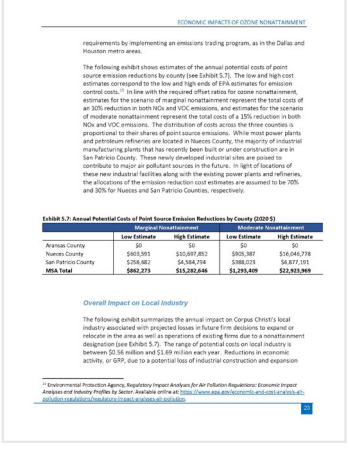


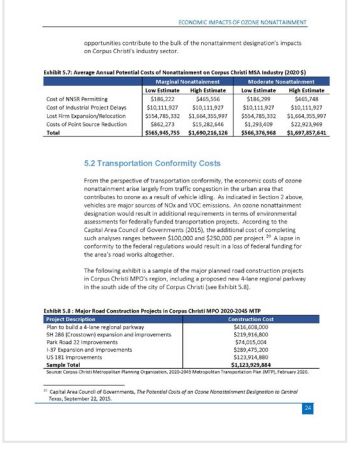


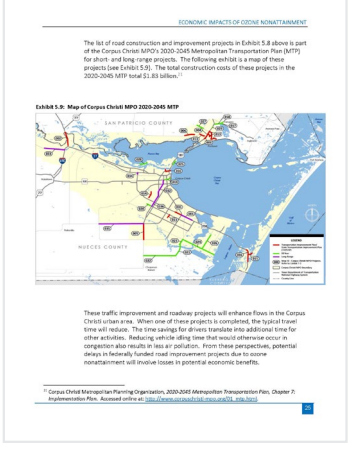


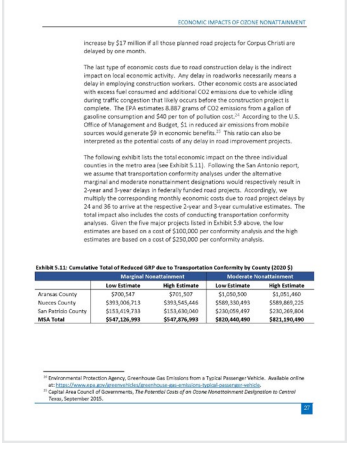






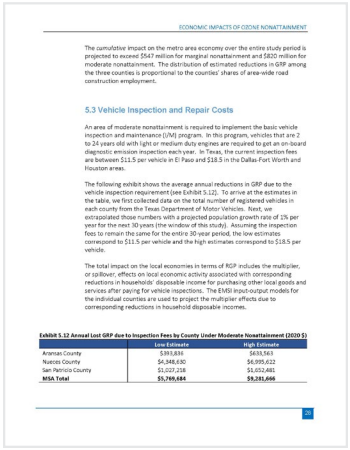






Potential Costs of Ozone Nonattainment

Available upon request. Contact: executiveassistant@cbaqp.org



ECONOMIC IMPACTS OF OZONE NONATTAINMENT

The cumulative impact on the metro area economy over the entire study period is projected to exceed $547 million for marginal nonattainment and $820 million for moderate nonattainment. The distribution of estimated reductions in GRP among the three counties is proportional to the counties' shares of area-wide road construction employment.

5.3 Vehicle Inspection and Repair Costs

An area of moderate nonattainment is required to implement the basic vehicle inspection and maintenance (I/M) program. In this program, vehicles that are 2 to 24 years old with light or medium duty engines are required to get an on-board diagnostic emission inspection each year. In Texas, the current inspection fees are between $11.5 per vehicle in El Paso and $18.5 in the Dallas-Fort Worth and Houston areas.

The following exhibit shows the average annual reductions in GRP due to the vehicle inspection requirement (see Exhibit 5.12). To arrive at the estimates in the table, we first collected data on the total number of registered vehicles in each county from the Texas Department of Motor Vehicles. Next, we extrapolated those numbers with a projected population growth rate of 1% per year for the next 30 years (the window of this study). Assuming the inspection fees to remain the same for the entire 30-year period, the low estimates correspond to $11.5 per vehicle and the high estimates correspond to $18.5 per vehicle.

The total impact on the local economies in terms of RGP includes the multiplier, or spillover, effects on local economic activity associated with corresponding reductions in households' disposable income for purchasing other local goods and services after paying for vehicle inspections. The EMSI input-output models for the individual counties are used to project the multiplier effects due to corresponding reductions in household disposable incomes.

Exhibit 5.12 Annual Lost GRP due to Inspection Fees by County Under Moderate Nonattainment (2020 $)

	Low Estimate	High Estimate
Aransas County	$393,834	$633,563
Nueces County	$4,348,630	$6,995,622
San Patricio County	$1,027,228	$1,652,481
MSA Total	**$5,769,684**	**$9,281,666**

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ECONOMIC IMPACTS OF OZONE NONATTAINMENT

As shown in the above exhibit, the requirement for vehicle inspections in the Corpus Christi metro area would result in a reduction in GRP between $5.8 million and $9.3 million each year. According to the historical data of Dallas-Fort Worth and Houston areas, about 4% of vehicles fail initial inspections and the typical repair cost of those vehicles was between $200 and $300 per vehicle. For the Corpus Christi metro area, this would result in about $4.4 million annually in repair costs due to inspections. However, such costs are not included in this report because vehicle repairs represent economic activity and thus income transfers from vehicle owners to auto repair shops.

5.4 Educational and Outreach Programs

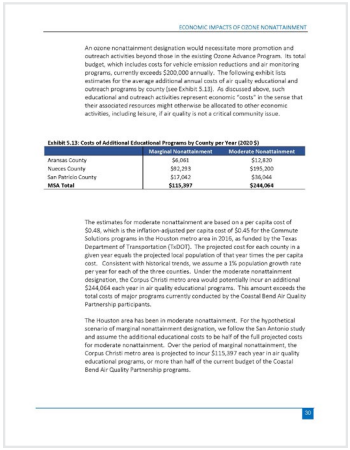
As indicated above, the Coastal Bend Air Quality Partnership is at the forefront to address NAAQS ozone attainment issues for the Corpus Christi metro area. Participants in this group include municipal and county government agencies in the area, the Port Authority and port industry, the MPO, universities, the military sector, and the news media across the region.

One strategy spearheaded by this alliance is participation in the EPA's Ozone Advance Program. Through this program, a diverse group of local community stakeholders have been participating in the following Path Forward activities:[28]

- Air quality education and outreach programs
- Grade school air quality curricula
- Additional air quality monitoring and research with CAMS 660, CMAS 664, and CMAS 685 (recently discontinued)
- Pollution Prevention Partnership's Clean Fleet program for voluntary vehicle emission testing and repairs (AutoCheck)
- Detection of fugitive emissions by infrared cameras
- Corpus Christi Army Depot Ozone Action Day for pollution reduction and prevention actions
- Operation of public use Compressed Natural Gas (CNG) fueling facilities
- RTA's replacement of the existing fleet with CNG and electric vehicles
- MPO's bicycle mobility planning in roadway projects
- Bike Share program in Corpus Christi downtown
- RTA Van Share and community shuttle programs
- Local home builders' Coastal Bend GreenBuilt initiative for "green" building

[28] Corpus Christi Air Quality Group, *Corpus Christi Urban Alcohol Annual Ozone Advance Report*, May 2019.

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ECONOMIC IMPACTS OF OZONE NONATTAINMENT

An ozone nonattainment designation would necessitate more promotion and outreach activities beyond those in the existing Ozone Advance Program. Its total budget, which includes costs for vehicle emission reductions and air monitoring programs, currently exceeds $200,000 annually. The following exhibit lists estimates for the average additional annual costs of air quality educational and outreach programs by county (see Exhibit 5.13). As discussed above, such educational and outreach activities represent economic "costs" in the sense that their associated resources might otherwise be allocated to other economic activities, including leisure, if air quality is not a critical community issue.

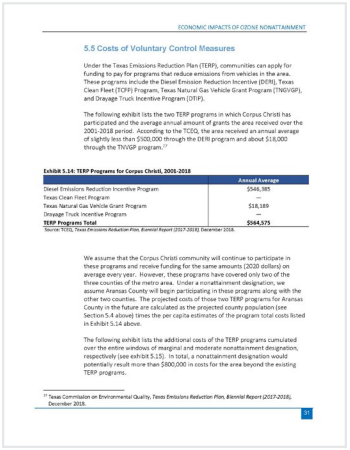
Exhibit 5.13: Costs of Additional Educational Programs by County per Year (2020 $)

	Marginal Nonattainment	Moderate Nonattainment
Aransas County	$6,041	$12,820
Nueces County	$92,293	$195,300
San Patricio County	$17,043	$36,044
MSA Total	**$115,397**	**$244,064**

The estimates for moderate nonattainment are based on a per capita cost of $0.48, which is the inflation-adjusted per capita cost of $0.45 for the Commute Solutions programs in the Houston metro area in 2016, as funded by the Texas Department of Transportation (TxDOT). The projected cost for each county in a given year equals the projected local population of that year times the per capita cost. Consistent with historical trends, we assume a 1% population growth rate per year for each of the three counties. Under the moderate nonattainment designation, the Corpus Christi metro area would potentially incur an additional $244,064 each year in air quality educational programs. This amount exceeds the total costs of major programs currently conducted by the Coastal Bend Air Quality Partnership participants.

The Houston area has been in moderate nonattainment. For the hypothetical scenario of marginal nonattainment designation, we follow the San Antonio study and assume the additional educational costs to be half of the full projected costs for moderate nonattainment. Over the period of marginal nonattainment, the Corpus Christi metro area is projected to incur $115,397 each year in air quality educational programs, or more than half of the current budget of the Coastal Bend Air Quality Partnership programs.

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ECONOMIC IMPACTS OF OZONE NONATTAINMENT

5.5 Costs of Voluntary Control Measures

Under the Texas Emissions Reduction Plan (TERP), communities can apply for funding to pay for programs that reduce emissions from vehicles in the area. These programs include the Diesel Emission Reduction Incentive (DERI), Texas Clean Fleet (TCFP) Program, Texas Natural Gas Vehicle Grant Program (TNGVGP), and Drayage Truck Incentive Program (DTIP).

The following exhibit lists the two TERP programs in which Corpus Christi has participated and the average annual amount of grants the area received over the 2001-2018 period. According to the TCEQ, the area received an annual average of slightly less than $500,000 through the DERI program and about $18,000 through the TNVGP program.[37]

Exhibit 5.14: TERP Programs for Corpus Christi, 2001-2018

	Annual Average
Diesel Emissions Reduction Incentive Program	$546,385
Texas Clean Fleet Program	–
Texas Natural Gas Vehicle Grant Program	$18,189
Drayage Truck Incentive Program	–
TERP Programs Total	**$564,575**

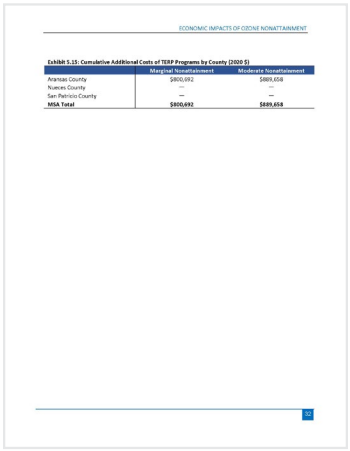
Source: TCEQ, *Texas Emissions Reduction Plan, Biennial Report (2017-2018)*, December 2018.

We assume that the Corpus Christi community will continue to participate in these programs and receive funding for the same amounts (2020 dollars) on average every year. However, these programs have covered only two of the three counties of the metro area. Under a nonattainment designation, we assume Aransas County will begin participating in these programs along with the other two counties. The projected costs of those two TERP programs for Aransas County in the future are calculated as the projected county population (see Section 5.4 above) times the per capita estimates of the program total costs listed in Exhibit 5.14 above.

The following exhibit lists the additional costs of the TERP programs cumulated over the entire windows of marginal and moderate nonattainment designation, respectively (see exhibit 5.15). In total, a nonattainment designation would potentially result more than $800,000 in costs for the area beyond the existing TERP programs.

[37] Texas Commission on Environmental Quality, *Texas Emissions Reduction Plan, Biennial Report (2017-2018)*, December 2018.

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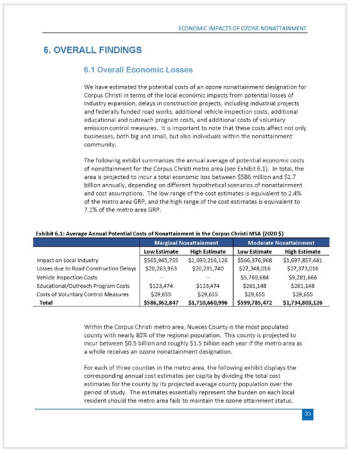


ECONOMIC IMPACTS OF OZONE NONATTAINMENT

Exhibit 5.15: Cumulative Additional Costs of TERP Programs by County (2020 $)

	Marginal Nonattainment	Moderate Nonattainment
Aransas County	$800,692	$889,658
Nueces County	–	–
San Patricio County	–	–
MSA Total	**$800,692**	**$889,658**

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ECONOMIC IMPACTS OF OZONE NONATTAINMENT

6. OVERALL FINDINGS

6.1 Overall Economic Losses

We have estimated the potential costs of an ozone nonattainment designation for Corpus Christi in terms of the local economic impacts from potential losses of industry expansion, delays in construction projects, including industrial projects and federally funded road works, additional vehicle inspection costs, additional educational and outreach program costs, and additional costs of voluntary emission control measures. It is important to note that these costs affect not only businesses, both big and small, but also individuals within the nonattainment community.

The following exhibit summarizes the annual average of potential economic costs of nonattainment for the Corpus Christi metro area (see Exhibit 6.1). In total, the area is projected to incur a total economic loss between $586 million and $1.7 billion annually, depending on different hypothetical scenarios of nonattainment and cost assumptions. The low range of the cost estimates is equivalent to 2.4% of the metro area GRP, and the high range of the cost estimates is equivalent to 7.1% of the metro area GRP.

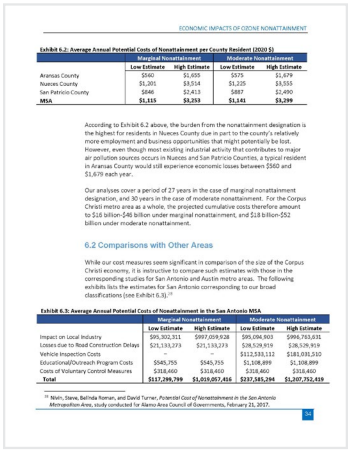
Exhibit 6.1: Average Annual Potential Costs of Nonattainment in the Corpus Christi MSA (2020 $)

	Marginal Nonattainment		Moderate Nonattainment	
	Low Estimate	High Estimate	Low Estimate	High Estimate
Impact on Local Industry	$565,945,735	$1,390,216,126	$566,376,968	$1,697,857,641
Losses due to Road Construction Delays	$20,263,963	$30,281,740	$27,368,016	$37,373,016
Vehicle Inspection Costs	–	–	$5,769,684	$9,281,666
Educational/Outreach Program Costs	$123,474	$123,474	$281,148	$281,148
Costs of Voluntary Control Measures	$29,655	$29,655	$29,655	$29,655
Total	**$586,362,847**	**$1,710,660,996**	**$599,785,472**	**$1,734,809,126**

Within the Corpus Christi metro area, Nueces County is the most populated county with nearly 80% of the regional population. This county is projected to incur between $0.5 billion and roughly $1.5 billion each year if the metro area as a whole receives an ozone nonattainment designation.

For each of three counties in the metro area, the following exhibit displays the corresponding annual cost estimates per capita by dividing the total cost estimates for the county by its projected average county population over the period of study. The estimates essentially represent the burden on each local resident should the metro area fails to maintain the ozone attainment status.

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ECONOMIC IMPACTS OF OZONE NONATTAINMENT

Exhibit 6.2: Average Annual Potential Costs of Nonattainment per County Resident (2020 $)

	Marginal Nonattainment		Moderate Nonattainment	
	Low Estimate	High Estimate	Low Estimate	High Estimate
Aransas County	$560	$1,655	$575	$1,679
Nueces County	$1,201	$3,514	$1,225	$3,555
San Patricio County	$846	$2,413	$867	$2,490
MSA	**$1,115**	**$3,253**	**$1,141**	**$3,299**

According to Exhibit 6.2 above, the burden from the nonattainment designation is the highest for residents in Nueces County due in part to the county's relatively more employment and business opportunities that might potentially be lost. However, even though most existing industrial activity that contributes to major air pollution sources occurs in Nueces and San Patricio Counties, a typical resident in Aransas County would still experience economic losses between $560 and $1,679 each year.

Our analyses cover a period of 27 years in the case of marginal nonattainment designation, and 30 years in the case of moderate nonattainment. For the Corpus Christi metro area as a whole, the projected cumulative costs therefore amount to $16 billion-$46 billion under marginal nonattainment, and $18 billion-$52 billion under moderate nonattainment.

6.2 Comparisons with Other Areas

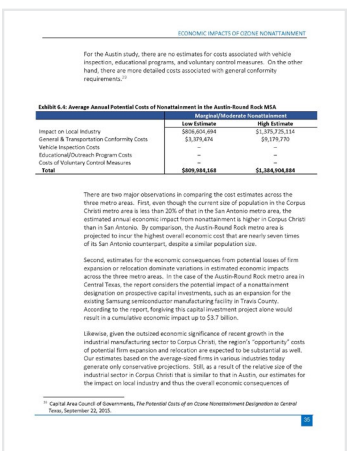
While our cost measures seem significant in comparison of the size of the Corpus Christi economy, it is instructive to compare such estimates with those in the corresponding studies for San Antonio and Austin metro areas. The following exhibits lists the estimates for San Antonio corresponding to our broad classifications (see Exhibit 6.3).[39]

Exhibit 6.3: Average Annual Potential Costs of Nonattainment in the San Antonio MSA

	Marginal Nonattainment		Moderate Nonattainment	
	Low Estimate	High Estimate	Low Estimate	High Estimate
Impact on Local Industry	$95,302,311	$997,059,928	$95,094,903	$996,763,031
Losses due to Road Construction Delays	$21,133,273	$21,133,273	$28,529,919	$28,529,919
Vehicle Inspection Costs	–	–	$112,333,112	$181,031,310
Educational/Outreach Program Costs	$545,755	$545,755	$1,108,899	$1,108,899
Costs of Voluntary Control Measures	$318,460	$318,460	$318,460	$318,460
Total	**$117,299,799**	**$1,019,057,416**	**$237,385,294**	**$1,207,752,419**

[39] Nishi, Steve, Belinda Noman, and David Turner, *Potential Cost of Nonattainment in the San Antonio Metropolitan Area*, study conducted for Alamo Area Council of Governments, February 21, 2017.

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ECONOMIC IMPACTS OF OZONE NONATTAINMENT

For the Austin study, there are no estimates for costs associated with vehicle inspection, educational programs, and voluntary control measures. On the other hand, there are more detailed costs associated with general conformity requirements.[40]

Exhibit 6.4: Average Annual Potential Costs of Nonattainment in the Austin-Round Rock MSA

	Marginal/Moderate Nonattainment	
	Low Estimate	High Estimate
Impact on Local Industry	$826,804,494	$1,575,725,114
General & Transportation Conformity Costs	$3,379,474	$9,179,770
Vehicle Inspection Costs	–	–
Educational/Outreach Program Costs	–	–
Costs of Voluntary Control Measures	–	–
Total	**$809,984,168**	**$1,584,904,884**

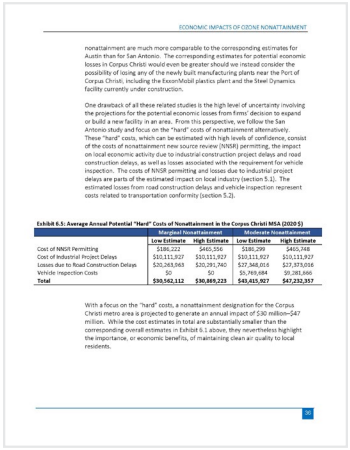
There are two major observations in comparing the cost estimates across the three metro areas. First, even though the current size of population in the Corpus Christi metro area is less than 20% of that in the San Antonio metro area, the estimated annual economic impact from nonattainment is higher in Corpus Christi than in San Antonio. By comparison, the Austin-Round Rock metro area is projected to incur the highest overall economic cost that are nearly seven times of its San Antonio counterpart, despite a similar population size.

Second, estimates for the economic consequences from potential losses of firm expansion or relocation dominate variations in estimated economic impacts across the three metro areas. In the case of the Austin-Round Rock metro area in Central Texas, the report considers the potential impact of the nonattainment designation on prospective capital investments, such as an expansion for the existing Samsung semiconductor manufacturing facility in Travis County. According to the report, forgiving this capital investment project alone would result in a cumulative economic impact up to $3.7 billion.

Likewise, given the outsized economic significance of recent growth in the industrial manufacturing sector to Corpus Christi, the region's "opportunity" costs of potential firm expansion and relocation are expected to be substantial as well. Our estimates based on the average-sized firms in various industries today generate only conservative projections. Still, as a result of the relative size of the industrial sector in Corpus Christi that is similar to that in Austin, our estimates for the impact on local industry and thus the overall economic consequences of

[40] Capital Area Council of Governments, *The Potential Costs of an Ozone Nonattainment Designation to Central Texas*, September 22, 2015.

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ECONOMIC IMPACTS OF OZONE NONATTAINMENT

nonattainment are much more comparable to the corresponding estimates for Austin than for San Antonio. The corresponding estimates for potential economic losses in Corpus Christi would even be greater should we instead consider the possibility of losing any of the newly built manufacturing plants near the Port of Corpus Christi, including the ExxonMobil plastics plant and the Steel Dynamics facility currently under construction.

One drawback of all these related studies is the high level of uncertainty involving the projections for the potential economic losses from firms' decision to expand or build a new facility in an area. From this perspective, we follow the San Antonio study and focus on the "hard" costs of nonattainment alternatively. These "hard" costs, which can be estimated with high levels of confidence, consist of the costs of nonattainment new source review (NNSR) permitting, the impact on local economic activity due to industrial construction project delays and road construction delays, as well as losses associated with the requirement for vehicle inspection. The costs of NNSR permitting and losses due to industrial project delays are parts of the estimated impact on local industry (section 5.1). The estimated losses from road construction delays and vehicle inspection represent costs related to transportation conformity (section 5.2).

Exhibit 6.5: Average Annual Potential "Hard" Costs of Nonattainment in the Corpus Christi MSA (2020 $)

	Marginal Nonattainment		Moderate Nonattainment	
	Low Estimate	High Estimate	Low Estimate	High Estimate
Cost of NNSR Permitting	$186,222	$465,556	$186,299	$465,748
Cost of Industrial Project Delays	$10,111,927	$10,111,927	$10,111,927	$10,111,927
Losses due to Road Construction Delays	$20,263,963	$20,281,740	$27,368,016	$37,373,016
Vehicle Inspection Costs	$0	$0	$5,769,684	$9,281,666
Total	**$30,562,112**	**$30,859,223**	**$43,435,907**	**$47,232,357**

With a focus on the "hard" costs, a nonattainment designation for the Corpus Christi metro area is projected to generate an annual impact of $30 million–$47 million. While the cost estimates in total are substantially smaller than the corresponding overall estimates in Exhibit 6.1 above, they nevertheless highlight the importance, or economic benefits, of maintaining clean air quality to local residents.

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South Texas Economic Development Center
Texas A&M University-Corpus Christi
6300 Ocean Drive, Unit 5808
Corpus Christi, Texas 78412

APPENDIX C

Available Funding Opportunities

PRODUCED: APRIL 2026

Programs are organized by funding source and color-coded by status. Most TERP programs open in April 2026 — act quickly as Rebate Grants are first-come, first-served. Many IRA tax credits are stackable with grants, meaning a single project can draw from multiple sources. Always verify current eligibility and application windows directly with the administering agency before submitting.

Open/Active **Opening April 2026** **Awarded — In Use** **Frozen/Uncertain** **Ongoing**

TERP - Texas State

Texas Emissions Reduction Plan (TERP) — administered by TCEQ — is the primary state-level funding engine for NOx and PM reductions in Nueces and San Patricio Counties. Both counties are eligible. Multiple programs open April 2026.

Program	What It Funds	Who Can Apply	Typical Amount	Status	CB-CAAP Sectors
TERP Rebate Grants	Replace/repower on-road heavy-duty diesel vehicles and select non-road equipment. Up to 80% of eligible costs.	Individuals, businesses, local governments, any legal entity	Varies by equipment type	Opening April 2026	Transportation, Freight
TERP ERIG (Emissions Reduction Incentive Grants)	Replace/repower locomotives, marine vessels, stationary equipment, and non-road equipment. Competitive; cost per ton of NOx reduced is the scoring metric.	Individuals, businesses, local govts, any legal entity	Competitive; varies	Opening April 2026	Industrial, Freight, Transportation
TERP SPRY (Seaport & Rail Yard Areas Emissions Reduction)	Replace/upgrade older drayage trucks and cargo handling equipment at eligible seaports and Class I rail yards.	Operators at eligible seaports and rail yards	Varies by equipment type	Opening April 2026	Freight
TERP GAFF (Governmental Alternative Fuel Fleet)	Purchase/lease new alternative fuel vehicles (CNG, LNG, propane, hydrogen, electric) for government fleets of 15+ vehicles.	State agencies, political subdivisions with 15+ vehicle fleets	Varies	Opening April 2026	Transportation
TERP Texas Clean School Bus (TCSB)	Replace or retrofit diesel-fueled school buses with cleaner alternatives. First-come, first-served, statewide.	School districts, any legal entity owning school buses	Varies by project	Opening April 2026	Transportation, Community
TERP Alt Fuel Infrastructure	Construct or expand fueling stations providing natural gas and other alternative fuels within the Clean Transportation Zone.	Any legal entity in eligible counties	Competitive	Opening April 2026	Transportation, Freight

Available Funding Opportunities

PRODUCED: APRIL 2026

Federal - EPA

EPA programs provide the largest direct grant opportunities for port, air quality, and diesel reduction projects. PCCA has already secured $105M under Clean Ports — these programs represent the next layer of federal opportunity.

Program	What It Funds	Who Can Apply	Typical Amount	Status	CB-CAAP Sectors
EPA Clean Ports Program (PCCA Grant — Active)	Zero-emission port equipment (ZE tugboats, forklifts, locomotives, CHE) and shore power infrastructure. PCCA's $105M award is in implementation through 2027–2028.	PCCA and named sub-recipients (Bay Houston, Signet, Suderman & Young, Watco)	$105M awarded to PCCA	Awarded — In Use	Freight
EPA DERA National Grants	Retrofit or replace diesel engines in school buses, heavy-duty vehicles, locomotives, marine vessels, and nonroad construction/ agricultural equipment.	Regional/state/ local govts, port authorities, MPOs, nonprofits focused on air quality	~$115M per round nationally; 4–10 awards per EPA region	Open / Active	Freight, Transportation, Industrial
EPA DERA State Grants (via TCEQ)	Formula-based pass-through to states for diesel emissions reduction programs; TCEQ sub-grants to eligible entities.	Eligible entities through TCEQ sub-grant process	Formula allocation to Texas annually	Ongoing	Freight, Transportation
EPA IRA Air Monitoring Grants (CAA §60105)	Deploy, maintain, or upgrade ambient air monitoring stations including fence-line and community sensors. Priority for disadvantaged communities.	State/local/tribal air pollution control agencies (via TCEQ)	$81M nationally; formula allocation to states	Ongoing	Community, Policy
EPA CAA Section 105 Grants	Annual formula grants to state and local air agencies for air pollution prevention and control programs including monitoring, planning, and enforcement.	State and local air pollution control agencies (TCEQ administers; subrecipients are select cities)	Up to 60% of approved program costs; formula-based	Ongoing	Community, Policy
EPA Environmental Justice Collaborative Problem-Solving (EJCPS)	Fund collaborative EJ projects in overburdened communities. Relevant for Hillcrest, Refinery Row, and fence-line community air quality projects.	Nonprofits, CBOs, local govts in EJ communities	Up to $1M per award	Open / Active	Community, Policy

APPENDIX C

Available Funding Opportunities

PRODUCED: APRIL 2026

Federal - FHWA / TxDOT

Transportation-focused federal programs — primarily through FHWA and administered by TxDOT — fund EV infrastructure, congestion mitigation, and freight corridor improvements.

Program	What It Funds	Who Can Apply	Typical Amount	Status	CB-CAAP Sectors
FHWA CMAQ (Congestion Mitigation and Air Quality Improvement Program)	Transportation projects that reduce emissions and improve air quality: signal optimization, transit, bike/pedestrian, alt fuel infrastructure, idle reduction.	MPOs, state/ local govts in nonattainment or maintenance areas (CCMPO is the local administrator)	Formula allocation; Texas receives significant annual CMAQ funds	Ongoing	Transportation, Community
TxDOT NEVI Formula Program	EV fast-charging infrastructure along designated highway corridors. Texas receives $407.8M total for FY2022–2026. Phase 2 expands to all counties.	Private entities applying through TxDOT competitive grant process; 20% match required	80% federal / 20% state match; site-level grants vary	Open / Active	Transportation, Freight
FHWA CFI (Charging & Fueling Infrastructure) Discretionary Grants	Community charging and alternative fuel corridor infrastructure grants. Separate from NEVI formula — competitive discretionary program.	State/local govts, MPOs, tribes, transit agencies, port authorities	Competitive; varies by project	Open / Active	Transportation, Freight
FHWA Truck Emissions at Port Facilities Program	Projects and studies to reduce idling and electrify operations at port facilities.	Port authorities, state/local agencies	~$80M per round nationally	Open / Active	Freight

Federal - USDA

USDA programs fund agricultural conservation practices relevant to the CB-CAAP's dust reduction, nutrient management, and vegetative buffer strategies in San Patricio and Nueces Counties.

Program	What It Funds	Who Can Apply	Typical Amount	Status	CB-CAAP Sectors
USDA EQIP (Environmental Quality Incentives Program)	Financial and technical assistance for conservation practices: no-till, nutrient management, vegetative buffers, windbreaks, cover crops, energy efficiency on farm.	Agricultural producers and non-industrial forest managers in eligible counties	Cost-share; payment rates vary by practice and county	Ongoing	Community & Area Sources
USDA NRCS Windbreak/REAP Program	Technical and financial assistance for windbreak plantings and shelterbelts to reduce dust and PM exposure near agricultural lands and communities.	Agricultural landowners in eligible areas	Cost-share; varies	Ongoing	Community & Area Sources
USDA Conservation Stewardship Program (CSP)	Payments for existing conservation activities and incentive payments for adopting additional conservation practices including air quality and energy efficiency.	Agricultural producers with existing conservation stewardship	Annual payments; competitive ranking	Ongoing	Community & Area Sources

Available Funding Opportunities

PRODUCED: APRIL 2026

Federal - DOE

DOE programs support industrial energy efficiency, clean energy transition planning, and workforce development relevant to the Coastal Bend's industrial and freight sectors.

Program	What It Funds	Who Can Apply	Typical Amount	Status	CB-CAAP Sectors
DOE Industrial Efficiency & Decarbonization Office (IEDO) Grants	Funding for industrial energy efficiency, electrification, and emissions reduction projects. Includes technical assistance for process heat upgrades and fuel switching.	Industrial facilities, manufacturers, research institutions	Competitive; project-specific	Ongoing	Industrial
DOE Clean Cities and Communities Program	Technical and financial resources for clean fuel fleets and infrastructure through regional coalitions. Membership may qualify CB region for additional DOE grant access.	Local governments, fleet operators, nonprofits through Clean Cities coalition	Technical assistance + targeted grants	Ongoing	Transportation, Freight
DOE State Energy Program (SEP)	Annual formula grants to state energy offices for energy efficiency, renewable energy, and transportation electrification. Texas receives annual SEP allocation via SECO.	Texas State Energy Conservation Office (SECO) administers; eligible sub-grantees vary	Formula-based state allocation	Ongoing	Industrial, Transportation

Available Funding Opportunities

PRODUCED: APRIL 2026

Tax Credits & Incentives

Federal tax-based incentives from the Inflation Reduction Act (IRA) and existing tax code provide significant cost offsets for industrial, commercial, and transportation projects — often stackable with grants.

Program	What It Funds	Who Can Apply	Typical Amount	Status	CB-CAAP Sectors
IRA §45L / §179D — Commercial & Industrial Energy Efficiency Tax Credits	Tax deductions for energy-efficient commercial/industrial building upgrades including HVAC, insulation, and lighting. §179D: up to $5/sq ft for qualifying improvements.	Commercial/ industrial building owners and designers in Nueces and San Patricio Counties	§179D: up to $5.00/sq ft; varies by project	Ongoing	Industrial, Community
IRA §45X — Advanced Manufacturing Production Credits	Production tax credits for domestic manufacturing of clean energy components including solar modules, wind components, and battery storage systems.	Manufacturers producing eligible clean energy equipment	Per-unit production credit	Ongoing	Industrial
IRA §48C — Qualifying Advanced Energy Project Credit	Investment tax credit for industrial facilities transitioning to clean energy, including process electrification, clean manufacturing, and industrial heat pump projects.	Industrial facilities; competitive application required	Up to 30–48% ITC on qualifying investment	Ongoing	Industrial
IRA §30C — Alternative Fuel Vehicle Refueling Property Credit	Tax credit for EV charging and alternative fuel infrastructure. 30% credit (up to $100K commercial) for qualifying equipment in eligible census tracts.	Businesses and individuals installing qualified refueling property	30% of cost; up to $100K/item commercial	Ongoing	Transportation, Freight
Federal §45W — Commercial Clean Vehicle Credit	Tax credit for purchase of qualified commercial clean vehicles. Up to $40K for vehicles over 14,000 lbs (heavy-duty trucks, ZE port equipment).	Businesses purchasing new qualified commercial clean vehicles	Up to $40K per vehicle	Ongoing	Transportation, Freight

⚠ Important Note

Important note on federal funding uncertainty (April 2026):
Some federal programs — particularly NEVI EV charging infrastructure and certain IRA-funded programs — have experienced funding freezes or administrative delays under the current administration. Always confirm current availability before investing planning resources. TERP programs (administered by TCEQ, not EPA directly) are state-funded and more stable. DERA and Clean Ports grants already awarded are in active implementation and unaffected. The CB-CAAP team should monitor terpgrants.org, epa.gov/dera, and grants.gov for updates.

APPENDIX D

2024 Non-Industry Checklist

CBAQP Ozone and $PM_{2.5}$ Advance Program Annual Report Checklist - Non-Industry									
Activity	CCRTA	CCMPO	P3	CCAD	Port of Corpus Christi	City of Corpus Christi	City of Portland	Nueces County	San Patricio County
Have/Develop an Ozone/$PM_{2.5}$ Action Day Plan	☐	☐	☐	☐	☐	☐	☐	☐	☐
Register to Receive Air Quality Notifications	☐	☐	☐	☐	☐	☐	☐	☐	☐
Communicate Emission Tips to Employees and Vendors	☐	☐	☐	☐	☐	☐	☐	☐	☐
Provide Air Quality Education to Personnel	☐	☐	☐	☐	☐	☐	☐	☐	☐
Promote Car-Pooling	☐	☐	☐	☐	☐	☐	☐	☐	☐
Promote Anti-Idling	☐	☐	☐	☐	☐	☐	☐	☐	☐
Have/Develop an Anti-Idling Policy	☐	☐	☐	☐	☐	☐	☐	☐	☐
Postpone Deliveries/Activities on Action Days	☐	☐	☐	☐	☐	☐	☐	☐	☐
Promote Alternative or Mass Transit Usage	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative Fuel Fleet	☐	☐	☐	☐	☐	☐	☐	☐	☐
Fleet Emissions Testing	☐	☐	☐	☐	☐	☐	☐	☐	☐
Replace Older Fleet	☐	☐	☐	☐	☐	☐	☐	☐	☐
Repower or Replace Older Engines	☐	☐	☐	☐	☐	☐	☐	☐	☐
Use Low Sulfur Diesel	☐	☐	☐	☐	☐	☐	☐	☐	☐
Routine Storage Tank Inspections	☐	☐	☐	☐	☐	☐	☐	☐	☐
Energy Reduction Program	☐	☐	☐	☐	☐	☐	☐	☐	☐
Enclosed Material Storage and Conveyors	☐	☐	☐	☐	☐	☐	☐	☐	☐

The Port of Corpus Christi submits its own report and may also complete this checklist.

APPENDIX D

2024 Industry Checklist

Activity	Cheniere	Flint Hills Resources	Valero Refining	Citgo Refining	Equistar Chemicals	GCGV	Arcelor Mittel	Port of Corpus Christi	Occidental Chem	Plains Pipeline	Buckeye Partner	NuStar	Celanese	Lyondell Basel	Enbridge	Air Liquide	Chemours	VOPAK	
Register to receive ozone elevation notifications	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Provide ozone education and emission reduction suggestions to personnel	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Anti-idle policy	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Utilize low VOC surface coating materials	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Vapor control for mobile equipment	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
*Alternative fuel fleet within fence-line	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
*Utilize alternative energy (solar light plants, electricity, etc.)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Emissions test fleet vehicles	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Replace older combustion fleet every 100,000 miles or 7 years	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Flare minimization plan	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Utilization of IR cameras and alternative technology for inspections	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
*Additional non-regulatory tank controls	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Energy reduction programs (i.e., LEDs, motion sensor switches, etc.)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Utilize all preheat systems	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Use tier 4 generators and portable engines	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Routine use of early detection equipment, above and beyond LDAR	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Utilize dust suppression	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Proivde EV charging stations for employees	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Other Activities	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

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COASTAL BEND

Community Air Action Plan

(CB-CAAP) • 2026-2031

CBAIRQUALITY.ORG

PUBLIC COMMENT DRAFT

Comment Period: October 20 - November 19.
Submit comments at https://cbairquality.org/programs/