



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Environmental Impact Report (EIR) for the Proposed
Florence-Firestone Transit Oriented District Specific Plan (Proposed Project)
(State Clearinghouse No.: 2021030300)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The County of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments include information on the Community Emissions Reduction Plan (CEPR) for the designated Assembly Bill 617 (AB 617) Southeast Los Angeles community that the Lead Agency should include in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of development of transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community in the Los Angeles County.

The Proposed Project encompasses a 3.48-square-mile area. The Proposed Project area is heavily impacted by air pollution generated from sources, such as heavy-duty diesel trucks, warehouses, and railroad activities, and includes the designated AB 617 Southeast Los Angeles community, which requires South Coast AQMD to work with community and other stakeholders to identify and address community concerns in disadvantaged communities. Through the AB 617 program, the community and South Coast AQMD staff have developed a Community Emissions Reduction Plan (CERP)¹ that identifies air quality priorities and actions to reduce air pollution in the community. The South Coast AQMD's Governing Board adopted the AB 617 Southeast Los Angeles Community CERP on December 4, 2020. Since the adopted CERP existed at the time of the publication of the Notice of Preparation for the Proposed Project in March 2021, the Final EIR should include a discussion of the CERP. Additionally, the Proposed Project is a blueprint for the community's future development. The Draft EIR for the Proposed Project serves as the first-tier, programmatic level environmental analysis that can provide guidance to subsequent, project-level environmental analyses. Therefore, South Coast AQMD staff recommends that the Lead Agency review the actions included in Chapter 5 of the adopted CERP to explore whether additional mitigation measures can be identified and implemented by future development projects at the Proposed Project.

¹ South Coast AQMD. December 2020. Assembly Bill 617 Southeast Los Angeles Community Emissions Reduction Plan. Accessed at: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/final-cerp/final-cerp.pdf>.

Based on Figure 2-1, *Regional Location*, in the Draft EIR, the Proposed Project is located entirely within the South Coast AQMD's jurisdiction. The Draft EIR included a reference to the applicable air quality plans of the Antelope Valley AQMD (AVAQMD). It appears that AVAQMD's air quality plans are not relevant to the evaluation of the Proposed Project's air quality impacts and should not be included in the CEQA thresholds of significance for air quality (question 1) in the Final EIR. If the reference to the AVAQMD's air quality plans is not deleted, the Lead Agency should provide reasons for not deleting it supported by substantial evidence in the record.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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