

---

# APPENDIX 7:

## COMMENT LETTERS

---

**From:** Tahirah Farris <[TFarris@planning.lacounty.gov](mailto:TFarris@planning.lacounty.gov)>  
**Sent:** Wednesday, November 4, 2020 9:11 AM  
**To:** Gina Triviso <[gtriviso@aqmd.gov](mailto:gtriviso@aqmd.gov)>  
**Subject:** RE: Now posted: Draft SELA CERP for your review

Hi Gina,

Thank you for the opportunity to comment on the CERP. I've provided a list of comments by section below. Please let me know if you have any questions based on the comments or would like to have any follow-up conversation.

#### Executive Summary:

- Page 2 mentions ongoing activities such as regulation and enforcement. Is this further clarified somewhere else in the document on what and how that plays out? What does ongoing regulation look like? Is it regular compliance checks, indefinitely? 1-1

#### Chapter 5a: Introduction

- Page 1, under "Ongoing Efforts" references the LA County Green Zones Program. There should be a footnote to explain this program and link to more information. 1-2
- Page 1, the last sentence references "rule development." I believe rules are discussed in more detail in Chapter 4, but should be clear about what a rule is/means for AQMD (ex, this is the method for establishing regulations and provides a check to ensure compliance). Is rule synonymous with regulation? 1-3

#### Chapter 5b: Tucks and Freeways

- Page 2, action A describes establishment of a Community Pollution Enforcement Workgroup. The only metric listed under this action is the number of meetings held. Think about adding additional metrics tied to the goals of the group, such as number of complaints identified through the workgroup and number of complaints addressed by CARB, number of complaint referrals to other agencies, etc. 1-4

#### Chapter 5c: Rendering Facilities

- Should there be an explanation of what rendering facilities are similar to the explanation for metal processing facilities? 1-5
- General comment: Is odor the only concern with rendering facilities? Are there other types of emissions from these facilities such as dust, particulate matter, other compounds, etc.? If so, should there be some way to measure and address other outputs from these facilities? 1-6
- Is the goal simply to reduce odors from existing facilities or prevent new facilities from emitting odors? 1-7
- What is AQMD's role in permitting when new rendering facilities are established? This is something our two agencies are beginning to discuss, but I wonder if there can be some inclusion about review and inspection of proposed facilities to ensure compliance with AQMD's rules. Consider a goal regarding coordination with land use agencies/County Green Zones Program. 1-8

#### Chapter 5d: Green Spaces

- Goal A mentions collaboration with land-use agencies. It would be good to also include Public Works as they can implement greening along right-of-ways and Parks and Rec/public parks 1-9

agencies as an additional agencies. Aside from requiring landscaping on private property, the Planning Department has little to no control in actually designating new open/green spaces that would be designed and maintained by Parks and Rec.	1-9 Cont.
Chapter 5e: Metal Processing Facilities	
- Goal G discusses referrals to other agencies. Please include land use agencies (e.g. Planning). Public Health might be appropriate as well.	1-10
Chapter 5g: General Industrial Facilities	
- Goal B discusses identifying a list of industrial facilities of concern. This should be done in collaboration with other agencies. The County has an Industrial Use Task Force that focuses on the Alameda Corridor. It is still operating as a pilot, but would be great if we could expand this work or at least continue coordination with AQMD and other agencies so we are all aware of the facilities of concern.	1-11
-	
Chapter 6: Community Air Monitoring Plan	
- A summary of the CAMP is provided. Is the full plan available somewhere else or will that be detailed in Appendix 6?	1-12

Thank you  
Tahirah

Tahirah Farris, AICP  
**Regional Planner**  
Los Angeles County Department of Regional Planning  
320 W. Temple Street, 13th Floor | Los Angeles, CA 90012  
Email [tfarris@planning.lacounty.gov](mailto:tfarris@planning.lacounty.gov)  
<http://planning.lacounty.gov>

*Please note: In response to the evolving coronavirus emergency, Los Angeles County facilities are currently closed to the public. All Department of Regional Planning staff are teleworking at this time and available by email. For the most current information about available services, public meeting schedules, and planning projects, please visit [planning.lacounty.gov](http://planning.lacounty.gov).*

**From:** Gina Triviso [<mailto:gtriviso@aqmd.gov>]  
**Sent:** Wednesday, October 28, 2020 6:31 PM  
**To:** Gina Triviso <[gtriviso@aqmd.gov](mailto:gtriviso@aqmd.gov)>  
**Subject:** Now posted: Draft SELA CERP for your review

**CAUTION:** External Email. Proceed Responsibly.

Dear CSC members and Interested Parties,  
The draft CERP for SELA has now been posted online at the link below:

<http://www.aqmd.gov/nav/about/initiatives/community-efforts/environmental-justice/ab617-134/southeast-los-angeles/cerp-archive>

If you have time to review portions of the plan before our meeting tomorrow, please focus on chapters 5 and 6. Looking forward to seeing you tomorrow at our meeting. Have a good night. Thank you.

Best regards,  
Gina

***Gina Triviso***

Senior Public Information Specialist  
Office of Legislative, Public Affairs & Media  
**South Coast Air Quality Management District**  
21865 Copley Drive, Diamond Bar, CA 91765  
Phone: (909) 396-2957  
Email: [gtriviso@aqmd.gov](mailto:gtriviso@aqmd.gov)



\*Please note that we are closed on Mondays.

The information contained in this e-mail is intended only for the individual or entity to whom it is addressed. Its contents and/or any attachments may be confidential and/or privileged and are protected from disclosure. No privilege or right to confidentiality is waived because this is an e-mail transmission. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you have received this communication in error, please notify the sender at [gtriviso@aqmd.gov](mailto:gtriviso@aqmd.gov) and permanently delete this email, its contents and/or attachments immediately.

**From:** Moreno, Edith1 <[EMoreno5@socalgas.com](mailto:EMoreno5@socalgas.com)>  
**Sent:** Friday, November 6, 2020 11:15 PM  
**To:** Gina Triviso <[gtriviso@aqmd.gov](mailto:gtriviso@aqmd.gov)>  
**Cc:** AB 617 <[ab617@aqmd.gov](mailto:ab617@aqmd.gov)>  
**Subject:** SELA CERP Comments

Hi Gina,

I know I'm several hours past the 5pm Friday 11/6 deadline, but it's still COB Friday right? 😊 It's been a really busy time for me at work, but I wanted to make sure I had the time to thoroughly read through the CERP and provide my feedback. My comments are below. I'd be happy to discuss further!

#### Chapter 4 Enforcement Plan

- This chapter does not provide additional details on the additional enforcement and inspection to be conducted in SELA. Reads to me as business as usual activities would be conducted. 2-1
- Figure 4-1 is meant to show the number of complaints and the response, but according to the data presented in Appendix 4 (Table 4-2) out of the 692 complaints received, 632 resulted in no action. There is a big disconnect here and I realize that any nuisance odor or fugitive emission may not be present when an inspector comes by, but my recommendation would be to increase the frequency of inspection (e.g. once or twice a week for a month?) in the area where the complaint originated. The current enforcement actions in place are just not enough. 2-2
- If possible, could Figure 4-2 be modified to show the different categories of facility types that received an NOV or NC? As I looked at all of the facilities in the appendix there are many schools and even city facilities that are getting dinged for things like not updating their permit. Are these NOVs actually being given to a toxics facility of concern? It's like giving a speeding ticket. People are still going to speed. In my opinion, the figure is really misleading. 2-3

**Chapter 5:** Overall I think it's very well written and captures a lot of the recommendations made by the CSC. Comments to this section are as follows

- Chapter 5c (Rendering Facilities) under Table 1, row D. I recognize Rule 415 is being implemented in 2023, but are there any additional controls above and beyond what 415 requires that we could possibly put in place sooner? This is just a suggestion as this seems to be something that has been a huge nuisance for over 20 years. 2-4
- Chapter 5g (General Industrial Facilities). I know we didn't have enough time to get into more details on what the concern of the community is, but as I've mentioned in the past, I really want to see a reduction in air toxics in SELA. I recognize PM2.5 and NOx are huge air pollutant sources, but reactive organic gases are a significant contributor to poor air quality that needs to be addressed. The figure from our January 9 CSC meeting highlights this (see below). Through the AB 617 process CARB developed "Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants" to implement statewide annual reporting of criteria air pollutant and toxic air contaminant emissions data from facilities. The reporting regulation became effective January 1, 2020. In Chapter 5g, we need to include CARB as a responsible entity as the community needs to be aware of this new regulation and we need to know what is being reported. CARB 2-5

and SCAQMD need to work together to figure out how to use the CTR as a tool to identify which facilities are toxics hotspots. As 2020 data will be available mid next year, I propose we have CARB give us an update during Q2 of 2021. I recommend we take out Action A as an informational handout is just too generic and replace it with the following action:

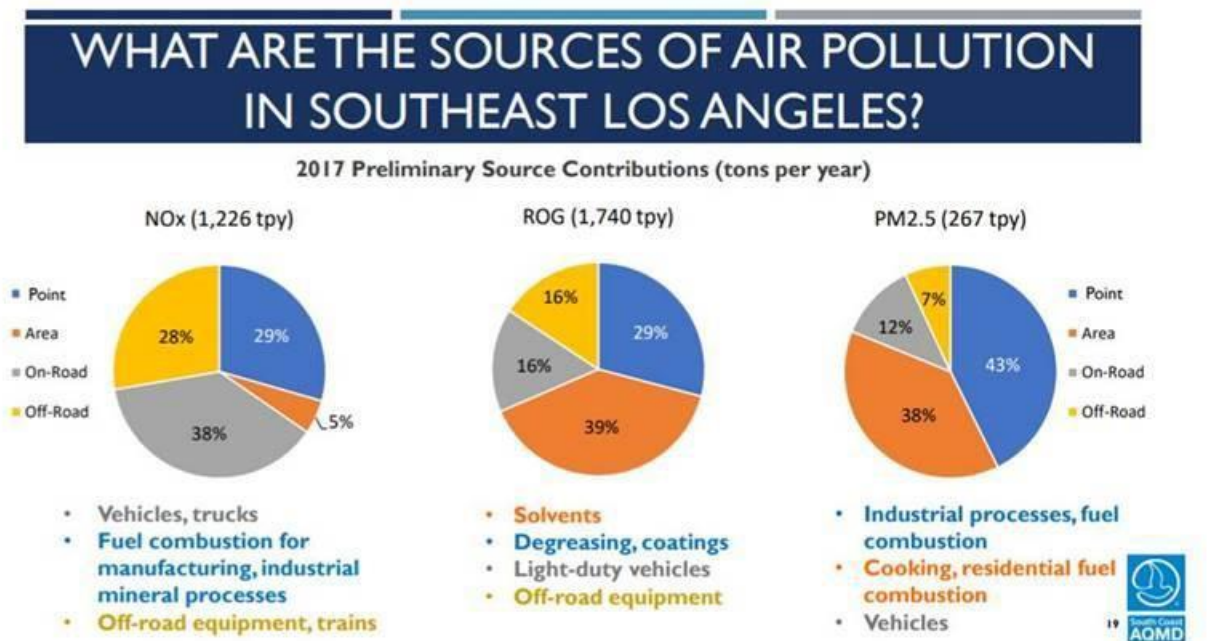
2-5  
cont.

**Action:** Conduct an annual community workshop with CARB to educate the community on the CTR process and share the data that has been collected from facilities in the SELA community. SCAQMD and CARB to help community interpret results and identify industrial facilities with highest toxics emissions.

**Responsible Entity:** CARB/AQMD

**Metric:** Conduct CTR Public Workshop and Identify Industrial Facilities of Highest Concern

**Timeline:** Annual. Starting Q3 2021/End 2025.





November 5, 2020

Dr. Jo Kay Ghosh  
 Director of Community Air Programs/Health Effects Officer  
 South Coast Air Quality Management District (SCAQMD)  
 21865 Copley Drive  
 Diamond Bar, CA 91765

**Re: Comments on AB 617 Community Emissions Reduction Plans (CERP) for the Southeast Los Angeles (SELA) Community**

Dear Dr. Ghosh,

The Coalition for Clean Air (CCA) is writing to provide comments regarding the discussion draft CERP for the SELA community. Since its passage in 2017, CCA has been actively involved with the implementation of AB 617 (C. Garcia) at both the statewide and local level. CCA staff has participated in many of the AB 617 meetings hosted by the California Air Resources Board (CARB) and SCAQMD. We also advocate for AB 617 funding before the California State Legislature. Specific to the SELA Community, CCA has partnered with a local community-based organization, Comite Pro Uno, to deploy a community air monitoring network within the city of Maywood. We have also worked with the City of South Gate's Community Environmental Health Action Team (CEHAT) to deploy air quality monitors.

CCA recognizes the SELA AB 617 process faced unique challenges due to the COVID-19 pandemic. SCAQMD was required to quickly reinvent the AB 617 process to ensure the safety of the Community Steering Committee (CSC) members, staff, and the public at large. This is in addition to the other challenges posed by COVID-19, such as working remotely, constraints on staff capacity, and other difficulties. SCAQMD staff, the CSC, and others who participated in the process should be commended for overcoming these challenges. CCA understands that some data may be unavailable and the discussion draft CERP may not be as complete as the Year 1 discussion drafts. Yet, the COVID-19 pandemic stresses the need for immediate and real emissions reduction. Long-term exposure to elevated air pollution levels is a contributing factor to COVID-19 mortality.<sup>1</sup>

---

<sup>1</sup> Michael Petroni, Dustin Hill, Lylla Younes, Liesl Barkman, Sarah Howard, I Brielle Howell, Jaime Mirowsky, and Mary B Collins, *Hazardous air pollutant exposure as a contributing factor to COVID-19 mortality in the United States*, [https://www.eenews.net/assets/2020/09/11/document\\_gw\\_15.pdf](https://www.eenews.net/assets/2020/09/11/document_gw_15.pdf) (accessed November 3, 2020.)

---

660 S. Figueroa Street, Suite 1140  
Los Angeles, California 90017  
(213) 223-6860

[www.ccair.org](http://www.ccair.org)

1107 Ninth Street, Suite 440  
Sacramento, California 95814  
(916) 527-8048



CCA’s comments are not intended to speak for the Community Steering Committee (CSC) or the local community. Rather, our comments seek to identify opportunities to strengthen the CERP. Through AB 617, SCAQMD can begin righting decades of environmental injustice by developing the strongest possible emissions reduction plan and empowering the local community.

- **The discussion draft CERP addresses many of the significant environmental justice concerns facing the community. SCAQMD must avoid “cookie-cutter” implementation for concerns shared with other AB 617 communities. Similarly, SCAQMD must also acknowledge and address other threats such as contamination from Exide and pollution from aviation operations.**

3-1

Being a hub for industry and goods movement, Southeast LA has long been disproportionately impacted by air pollution. As with the Year 1 communities, Southeast LA has subsidized much of the global economy with their health and quality of life. The six areas identified as community concerns are among the most pressing air quality challenges in the region. Some of these concerns, however, are shared with other AB 617 communities. Truck traffic,<sup>2, 3, 4</sup> railyards,<sup>2, 3, 4</sup> metal finishing operations,<sup>4</sup> and rendering plants<sup>4</sup> were also identified as concerns in other communities’ CERPs. While this is expected, SCAQMD must avoid taking a “cookie-cutter” approach to these concerns. Ultimately, the CERP must be implemented in a way that addresses the local needs of each community.

Further, there are other pressing environmental justice issues which are not referenced in the CERP. Though the CERP cannot address every single air quality issue in the community, both contamination from the Exide battery recycling plant as well as emissions from aviation should also be acknowledged and addressed. As with the East LA, Boyle Heights, and West Commerce (ELABHWC) AB 617 community, SELA was contaminated by lead and other heavy metals from Exide.<sup>5</sup> Additionally, aviation fuel

<sup>2</sup> SCAQMD, *Community Emissions Reduction Plan: Wilmington, Carson, and West Long Beach*, <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlw.pdf?sfvrsn=8>, pgs. 5d-1 - 10, 5f-1 - 8 (accessed November 3, 2020.)

<sup>3</sup> SCAQMD, *Community Emissions Reduction Plan: San Bernardino and Muscoy*, <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/san-bernardino/cerp/carb-submittal/final-cerp.pdf?sfvrsn=9>, pgs. 5b-1 - 12, 5e-1 - 8 (accessed November 3, 2020.)

<sup>4</sup> SCAQMD, *Community Emissions Reduction Plan: East Los Angeles, Boyle Heights, and West Commerce*, <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/east-la/cerp/carb-submittal/final-cerp.pdf?sfvrsn=8>, pgs. 5b-1 - 14, 5c-1 - 8, 5d-1 - 5, 5e-1 - 3 (accessed November 3, 2020.)

<sup>5</sup> Dr. Jill E. Johnston, Meredith Franklin, Hannah Roh, Christine Austin, and Manish Arora, *Lead and Arsenic in Shed Deciduous Teeth of Children Living Near a Lead-Acid Battery Smelter*,

<https://pubs.acs.org/doi/10.1021/acs.est.9b00429>, May 6, 2019 (accessed November 3, 2020.)

was dumped on the City of Cudahy and other SELA communities in early 2020.<sup>6</sup> Being under the flight path of one of the world’s busiest airports, SELA is disproportionately impacted by aircraft emissions. Though the CERP may not need a specific section for these and other issues, it should acknowledge they exist and commit to taking action to protect the community. Such action should include school HVAC modernization and installation through newly enacted legislation: AB 841 (Ting, 2020.)<sup>7</sup>

- **The next draft of the CERP should include emissions reduction projections. Further, these targets should have a nexus with community health needs. Reductions from future rulemakings should be shared with the CSC as soon as they are available.**

3-2

The discussion draft CERP does not contain any specific emissions reduction projections; rather, these projections are listed as “TBD.”<sup>8</sup> While this is likely due to constraints stemming from the pandemic, SCAQMD should include these projections in the next draft of the CERP. Further, these projections should be shared with the CSC ahead of the Stationary Source Committee’s consideration of the CERP, which is scheduled for November 20<sup>th</sup>, 2020. The text of AB 617 mandates emissions reduction targets: section 44391.2(c)(3) of the Health and Safety Code (HSC) states, “[T]he community emissions reduction programs shall be consistent with the state strategy and include emissions reduction targets, specific reduction measures, a schedule for the implementation of measures, and an enforcement plan.”<sup>9</sup>

In addition to providing specific emissions reduction, these targets should have a demonstrated benefit to community health. In response to our comments on the Year 1 CERPs, SCAQMD staff stated tying emissions reduction to health outcomes was difficult, if not impossible to demonstrate. While demonstrating a direct causation between emissions reduction and individual cases of cancer, asthma, or other ailments is indeed difficult, SCAQMD should set emissions targets that directly address community health needs. SCAQMD will be better able to tailor the CERP implementation to local

<sup>6</sup> Ruben Vives, *Jet fuel dump on schools raises heat at Cudahy town hall meeting*, Los Angeles Times, <https://www.latimes.com/california/story/2020-01-18/cudahy-town-hall-jet-fuel-dump>, January 18, 2020 (accessed November 3, 2020.)

<sup>7</sup> California Legislature, *Assembly Bill 841: Energy: transportation electrification: energy efficiency programs: School Energy Efficiency Stimulus Program*, [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201920200AB841](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB841) (accessed November 4, 2020.)

<sup>8</sup> SCAQMD, *Community Emissions Reduction Plan: Southeast LA (Discussion Draft)*, <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/sela-draft-cerp-chapter-5a-introduction.pdf?sfvrsn=6>, pg. 5a-2 (accessed November 3, 2020.)

<sup>9</sup> California Legislature, *Assembly Bill 617: Nonvehicular air pollution: criteria air pollutants and toxic air contaminants*, [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201720180AB617](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB617) (accessed

November 3, 2020.)

needs if community health is considered. To this end, CCA, in partnership with local community-based organizations, is conducting a community health survey in some AB 617 communities to identify these health needs. This community health survey is funded through CARB’s Office of Community Air Protection, which is part of AB 617.

Lastly, as with the other AB 617 CERPs, we understand that emissions reduction from future rulemaking proceedings may not yet be available. SCAQMD should commit to informing the CSC of anticipated emissions reduction from future rulemaking processes.

- **To the greatest extent possible, CERP emissions reduction should meet the same criteria as the State Implementation Plan (quantifiable, surplus, enforceable, and permanent.) Projects and efforts that do not meet these criteria (e.g., working with local agencies to rectify bad land use decisions) should be included on their merits.**

3-3

The emissions reduction achieved by the CERP should be real, measurable, and verifiable. “Paper” compliance threatens to undermine the effectiveness of the CERP and reduce the benefit to the local communities. The closer they are to meeting the criteria for being SIP creditable, the more confidence the community will have in the effectiveness of the Community Air Protection program.

At the same time, we recognize that not every important reduction and mitigation measure lends itself to meeting these criteria. Other opportunities which are not as easily measured but still have a positive community-level impact should still be prioritized. In particular, the CERP’s green space priority will promote environmental justice and climate resiliency even though it will not directly lead emissions reduction. As such, we support green space being prioritized in the SELA CERP.

- **SCAQMD and the CERP should substantially expand its commitments relating to Interstate 710 expansion, which is the next environmental injustice facing SELA communities.**

3-4

SCAQMD must commit to stronger action as it relates to the expansion of Interstate 710. This project poses a significant threat to the health of three Los Angeles County AB 617 communities. Rather than merely identifying already well-known impacts, SCAQMD and the CERP should adopt a set of community air protection principles targeting the I-710 expansion project. These principles should stipulate that any 710 south freeway project must:

- Reduce diesel emissions and exposure in AB 617 communities
- Fully comply with Clean Air Act transportation conformity requirements

- Avoid displacement of residences and businesses
- Include dedicated clean truck lanes
- Incorporate complete streets and active transportation components in communities within the 710 corridor, and
- Provide for meaningful and substantive opportunities for public participation throughout the decision-making process.

Further, SCAQMD must commit to being actively engaged in the 710 south freeway project decision-making process. SCAQMD has a responsibility to protect community members from any adverse air pollution impacts that could result from the construction and operation of the freeway. We laud SCAQMD for protecting communities impacted by the ports and freight transportation industry through California Environmental Quality Act lawsuits. These include the lawsuits against China Shipping, the Southern California International Gateway (SCIG), and World Logistics Center. We also appreciate SCAQMD for notifying environmental advocates and community members about the proposed Colton Railyard, as well as expressing concerns about the project. We strongly urge SCAQMD to not ignore I-710 expansion and to take an active role in protecting the SELA community, as well as all communities that will be adversely impacted by freeway expansion.

- **Some strategies in the discussion draft are vague and only commit to further study, identification of sources, and developing reduction strategies later. Rather than deferring action and implementation, SCAQMD should strengthen these strategies and yield immediate emissions reduction.**

3-5

The strategies addressing the Alameda Corridor and “General Industrial Facilities” are exceptionally vague. Rather than committing to immediate emissions reduction, both strategies only commit to studying emissions or identifying pollution sources and developing strategies in the future. While we understand and appreciate the desire to be thorough, these portions of the CERP need to be strengthened.

Regarding the Alameda Corridor, CCA recognizes SCAQMD has limited authority over rail transportation. We appreciate the district’s work with CARB to create a new emissions tier of locomotive engines. In the meanwhile, SCAQMD and CARB should do what it can to increase the number of cleaner locomotives that operate in the Alameda Corridor. The district should also commit to mitigation and exposure reduction for what emissions it cannot reduce. Again, AB 841 should be included as part of the strategy.

Further, more action and specificity are needed regarding “General Industrial Facilities.” Based on SCAQMD’s F.I.N.D. tool, there are at least 19 Title V and RECLAIM facilities

within the SELA AB 617 community’s ZIP codes. While there are many different types of industries that impact the SELA community, the CERP should do better in identifying these sources and outlining strategies to reduce their emissions, including increased regulation and enforcement.

- **As with other SCAQMD AB 617 CERPs, the SELA CERP relies heavily on incentives and funding which may not exist. Additionally, it does not adequately assign responsibilities to polluters.**

3-6

The SELA CERP relies heavily on incentive to the possible detriment of more stringent rules and enforcement. Additionally, due to the state’s budget uncertainty, this revenue source may run dry. While incentives should be included as part of the final CERP, other strategies need to be prioritized. For example, creating strong Indirect Source Rules over warehouse and railyards, mandating on-site mitigation, and requiring, rather than just incentivizing, zero-emissions warehouse and railyard equipment are clear examples where tighter rules will yield emissions reduction. Additionally, rules must be enforced in order to be effective. As such, SCAQMD should include tougher penalties as authorized by Section 9 of AB 617 along with greater enforcement efforts as part of its overall strategy.

- **Clarity over the implementation of Best Available Retrofit Control Technology (BARCT) requirements is needed, especially considering the heavy industrial presence in the region.**

3-7

The SELA CERP discussion draft does not specifically reference BARCT implementation for any of its areas of concern. This omission is problematic, given the large number of industrial sources in the region. The community would benefit greatly from knowing what BARCT is and if it is being implemented in the SELA community. Lastly, any applicable BARCT requirements should be implemented no later than the 2023 deadline set by Health and Safety Code §40920.6(c)(1).<sup>10</sup>

- **We support the community’s call for stronger action relating to odors from rendering plants.**

3-8

Rendering plants are a unique problem to the SELA and ELBHWC communities. The odors from these facilities have a significant impact on the quality of life. In addition to emitting odorous compounds, rendering plants also emit volatile organic compounds and

<sup>10</sup> California Legislature, *Assembly Bill 617: Nonvehicular air pollution: criteria air pollutants and toxic air contaminants*, [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201720180AB617](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB617) (accessed November 3, 2020.)

other pollutants which can harm human health. The CSC members have called for stronger action and regulation of odors from rendering plants. We strongly support this call and urge the district to restrict fugitive odors and emissions from these sources.

- **The CERP needs to commit to a strong Indirect Source Rule (ISR) for railyards, warehouses, and other pollution magnets.**

3-9

A major contributor to the SELA community's air pollution challenges are warehouses and facilities that attract trucks. Similarly, the railyards bring in pollution from trains and cargo handling equipment. As such, the finalized CERP should commit SCAQMD to developing a strong ISR to address these pollution magnets. We applaud SCAQMD for beginning to develop the framework for a strong warehouse ISR, as well as committing to develop a railyard ISR rather than a memorandum of understanding. The CERP, however, should go into greater detail as to what the rules would look like. This includes requiring on-site mitigation, near-zero and zero-emissions cargo handling equipment, plug-in technology and other emission reduction and exposure-reduction strategies, as well as firm deadlines.

We appreciate the opportunity to submit these comments for your consideration. CCA acknowledges and commends the thousands of staff-hours put into the implementation of AB 617, and understands this is a living, evolving process and document. However, the draft SELA CERP still needs much work and strengthening if it is going to live up to the promise of bringing cleaner, healthier air to California's most polluted, vulnerable communities.

Sincerely,



Christopher Chavez  
Deputy Policy Director

Cc:

Wayne Nastri, Executive Officer, SCAQMD

Phillip Fine, Deputy Executive Officer, SCAQMD

Susan Nakamura, Assistant Deputy Executive Officer, SCAQMD

Sarah Rees, Ph.D., Assistant Deputy Executive Officer, SCAQMD



November 6, 2020  
 Gina Triviso  
 21865 Copley Dr, Diamond Bar, CA 91765  
 gtriviso@aqmd.gov



RE: CBE Comments to AQMD on AB617 SELA Draft CERP

Dear Ms. Triviso,

Below are comments of Communities for a Better Environment (CBE) on the Draft Community Emission Reduction Plan (CERP) of the South Coast Air Quality Management District (AQMD), pursuant to AB 617 (California Assembly Bill 617, C. Garcia, 2017). CBE appreciates the hard work of AQMD staff and the Community Steering Committee (CSC). We also want to ensure adoption of a strong CERP with clear goals and measures to substantially and measurably cut pollution in our overburdened communities of Southeast Los Angeles (SELA). We support many measures in the plan. We have both detailed comments in this letter and in the attached tables, as well as key contextual comments below.

Communities for a Better Environment is a statewide Environmental Justice organization, organizing our communities disproportionately burdened by industrial and other pollution in Southeast LA, Wilmington, Richmond, and East Oakland. The mission of CBE is to build people's power in California's communities of color and low-income communities to achieve environmental health and justice by preventing and reducing pollution and building green, healthy and sustainable communities and environments. CBE has been working with SELA community members since the mid-1990s, collectively challenging serial polluters and working towards a just transition. Many SELA community members are part of CBE's staff.

It is important to review the context of cumulative impacts in SELA. For example, two reports by CBE have long identified the need to deeply address environmental injustice and environmental racism in SELA. While the facilities have changed, the overarching approach and recommendations are the same: SELA is still saturated with polluting sources, and stricter standards in rule design and permitting must be applied to protect residents. In fact, current requirements are not health-protective for a wide range of sources. Even existing weak permits are not adequately enforced, and community complaints and input are often not taken seriously by AQMD. We ask the District to review these observations and recommendations in detail in two reports which remain all-too relevant:

- *Holding Our Breath: Environmental Injustice Exposed in Southeast Los Angeles. Communities for a Better Environment*, Shipra Bansal, et al., July 1998, and
- *Cumulative Impacts Changing Regulatory Culture to Address Environmental Injustice & Environmental Racism Case Studies and Recommendations*, Bahram Fazeli, CBE, October 2009.<sup>1</sup>

<sup>1</sup> Available at: <http://www.cbecal.org/wp-content/uploads/2012/05/Cululative-Impacts-report.pdf>

**Northern California Office**  
 340 Marina Way  
 Richmond CA 94801  
 510.302.0430

**Southern California Office**  
 6325 Pacific Blvd, Suite 300  
 Huntington Park, CA 90255  
 323.826.9771

## I. We urge three steps to begin to adequately address these deep structural and cultural regulatory failings

**As a first step, AQMD needs to assemble a transparent / open-source comprehensive database online**, of all the polluting sources in SELA, to identify all possible measures that could reduce emissions or eliminate emissions regardless of the cost, for each of these. This will assist both the community and AQMD in solving specific and overall cumulative impacts. This approach should include the upcoming Industrial Source category (yet to be completed for the CERP), as well as all sources.

4-1

**Second, some facilities are likely too close to sensitive receptors including schools, even when best emission reductions measures and practices are put in place.** Consequently, there must be a partnership between AQMD, the City, impacted communities and industry for creating land-use solutions, zoning changes, amortization proceedings, and relocation of these facilities.

4-2

**Third, AQMD needs to cooperate with CalOSHA (in addition to other agencies) to assist facilities to comply with best practices** for creating worker safety standards and programs. Workers are often the most impacted group in polluting facilities, are frequently people of color or low-income people, who may also live in the local community, and worker and community safety overlap in many ways. While AQMD regularly states that worker conditions are outside its purview, that does not mean that AQMD should ignore severe worker hazards it witnesses when doing its own inspections. CBE has directly witnessed such cases when AQMD inspectors ignored such conditions. AQMD has the ability to document and report hazardous conditions to OSHA, and to work to develop strong pollution prevention measures for everyone. Poor working conditions frequently also translate to poor health and safety for the residential community. Conversely, facilities with strong pollution prevention measures protect both the community and workers. We urge AQMD to incorporate a deeper analysis and implementation of pollution prevention.

4-3

## II. We also urge specific additions to the CERP Tables.

In addition to incorporating the above into all aspects of the CERP, here are a few additional specific comments on the overall plan and for the categories of Metals operations, Trucks & Freeways, and Rendering. (We do not have capacity at this time to comment on every category; we do support other EJ organizations work on other sources such as reducing rail emissions.)

### • Overall goals

- **Add robust emission reductions to Table 1:** at least 50% cuts by 2025, at least 75% by 2030 in SELA. 4-4
- The plan is still missing a list of measures by the California Air Resources Board (CARB, in Table 2). 4-5
- **Add a measure to begin developing a SELA community-specific Just Transition Plan for inherently safer energy sources, with equity.** 4-6
- **Add a measure to support adoption of a robust regional ozone attainment plan for expeditious reductions of criteria pollutants in SELA,** consistent with AQMD & CARB regional development of the next plan. This plan must bring SELA into attainment with Clean Air Act health standards. 4-7
- We do not support “bridge fuels” such as Natural Gas for transportation, which have major damaging impacts during extraction, transport, and refining, and are not zero emission options. 4-8

- **Metals**
  - It is important to **add an overall goal to eliminate community exposure to hazardous metals processing and nuisance odors and noise.** | 4-9
  - AQMD should review existing regulations such as Bay Area metals processing rules and others, for potential inclusion of any strong measures into an AQMD regulation. | 4-10
  - Include installation of **permanent monitoring**, so as not to overly rely on monitoring snapshots in time. | 4-11
- **Trucks and Freeways**
  - In addition to the Warehouse Indirect Source Rule (ISR), AQMD should adopt a Ports ISR rule, which will benefit all communities along the freeway corridors including SELA, which are heavily impacted by diesel traffic. This is well-within AQMD's authority, and has been put off for too long. | 4-12
  - Include specific goals for Zero Emission Transportation as soon as possible. We need CARB and AQMD staff to do everything in their power to plan and implement Zero Emission Transportation. | 4-13
  - Include a goal to make the 710 Freeway a Zero Emissions Corridor. | 4-14
  - AQMD should ensure that CalTrans and Metro revise the 710 South Freeway Project EIR (Environmental Impact Report) to include Zero Emissions options, and should coordinate with other agencies like CARB, to strengthen zero emissions requirements. | 4-15
  - AQMD should include more efforts to support truck drivers. Too many responsibilities now fall mostly on individual truckers. Truckers need places to rest legally without causing idling emissions in neighborhoods, and need more support in transitioning to clean fuels. | 4-16
- **Rendering**
  - Add an overall goal to eliminate noxious odors from rendering facilities | 4-17
  - Identify specific monitoring equipment in the CERP, since odorous compounds can be difficult to detect. Identify an expeditious deadline for a monitoring plan, with public comment. | 4-18
  - Report to community on status and progress on compliance with Rule 415 | 4-19
  - Regarding exploring the schools odor notification process – also work with Community Groups that already work with schools to help facilitate this process, including Huntington Park High School and others, and report on progress to CSC biannually. | 4-20
- **Green Spaces**
  - Create state and local partnerships that would ensure new housing developments in SELA incorporate Green Spaces in their building designs.
    - In instances where affordable housing sites are being contemplated, collaborate with state agencies like Department of Housing and Community Development to incentivize integration of Green Spaces. | 4-21
  - Incentivize green spaces to all new developments within SELA (this includes, bikeways, river paths, transit corridors). | 4-22

- Identify appropriate sites where local communities have access to land for community gardens.

Thank you for your consideration. **Please also see our comments in the attached tables, with edits and additional measures added to tables in the CERP.**

Sincerely,

Dilia Ortega, SELA Youth Program Coordinator, CBE, and AB617 Steering Committee Member

Lena Ruvalcaba, Huntington Park community member and AB617 Steering Committee Member

Natalie Martinez, South Gate community member and AB617 Steering Committee Member

Citlalli Gutierrez, Huntington Park community member and AB617 Steering Committee Member

Dayana Ortega, Florence-Firestone community member and AB617 Steering Committee Member

#### **Attachment**

## Attachment – Metals, Trucks/Freeways, Rendering – CBE additions in highlight.

### METALS PROCESSING

Table 1 – Goal: Reduce Emissions from Metal Processing Facilities					
Action		Responsible Entity	Metric	Timeline	
Start			Complete		
<b>CBE Added</b>	<b>GOAL - Eliminate community exposure to hazardous metals processing, odors and noise.</b>				
<b>A</b>	<p><b>Conduct public outreach using plain language materials explaining various types of metal processing operations and rules that are currently regulating metal-related facilities</b></p> <p>Conduct an informational workshop for the public regarding various types of metal processing facilities in their neighborhood highlighting current and future South Coast AQMD regulatory efforts</p>	South Coast AQMD	<p>Development of outreach materials for metals-related rules</p> <p>Amount of materials distributed</p> <p>Number of outreach events</p>	1st quarter 2022	4th quarter 2022
<b>B</b>	<p><b>Initiate rule development process to address housekeeping and best management practices at metal recycling plants to reduce fugitive emissions</b></p> <p><b>CBE Added: Review existing regulations such as Bay Area metals processing rules as well as others, for potential inclusion.</b></p>	South Coast AQMD	Number of updates to the CSC on rule making process	4th quarter 2021	4th quarter 2023
<b>C</b>	<p><b>Work with the CSC and local land use agencies to identify all metal processing facilities within the SELA emissions study area and provide a list of South Coast AQMD rules applicable to the metal processing facilities identified, provide a three (3) year compliance history of the facilities, summarize emissions data and air monitoring data</b></p>	South Coast AQMD	<p>Develop metal processing facility list</p> <p>Provide applicable rules list, compliance history, air monitoring data, or other sources of information to the CSC</p>	2nd quarter 2021	2nd quarter 2022

4-9  
cont.4-10  
cont.

	collected at or near facilities, and other sources of information				
<b>D</b>	Based on the information from Action C above, <b>work with the CSC to identify air quality issues</b> related to metal processing facilities and work to prioritize them. Based on the prioritization of sources and their issues, identify potential strategies and approaches to address the issues	South Coast AQMD	Conduct CSC activity to prioritize sources of metal emissions  Develop strategies list, if appropriate	3rd quarter 2022	1st quarter 2023
<b>E</b>	<b>Conduct air monitoring</b> to help identify elevated levels of air toxic metals and support efforts to identify potential sources of emissions <b>CBE Added – Install permanent monitoring.</b>	South Coast AQMD	Conduct air monitoring to identify potential sources of metal emissions	1st quarter 2021	4th quarter, 2025
<b>F</b>	Implement strategies and approaches based on the prioritization of sources and issues identified in Actions C and D.	South Coast AQMD	Present the CSC with results of evaluation	2nd quarter 2023	4th quarter 2023
<b>G</b>	<b>Make referrals to the appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD’s jurisdiction</b> (e.g., Water Board, DTSC, Cal-OSHA)	South Coast AQMD	Number of updates to the CSC regarding referrals	1st quarter 2021	4th quarter, 2025
<b>H</b>	<b>Pursue collaborations with local land-use agencies</b> to provide outreach information to metal processing facilities on required South Coast AQMD permits.	South Coast AQMD	Number of meetings/outreach to land use agencies	1st quarter 2022	4th quarter 2025
<b>I - CBE Added</b>	<b>Develop a health-protective setback (at least 2500 ft or more) for any new metals processing facilities and/or permits, between the facility and sensitive receptors and neighbors</b>				
<b>J – CBE Added</b>	<b>Explore development of a notification system for schools and sensitive receptors on public nuisances caused by metals facilities, including dust, noise, odors and others.</b>	South Coast AQMD	Number of event notifications sent	1st quarter, 2021	4th quarter, 2021

4-11 cont.

4-24

4-20 cont.

## TRUCKS

Table 1 – Goal: Reduce Emissions from Truck Traffic and Freeways					
	Action	Responsible Entity	Metric	Timeline	
				Start	Complete
CBE Added – OVERALL GOAL	Goal: Make the 710 Freeway a Zero Emissions Zone			Start 1/1/2021	2050
A	<p>CARB will <b>establish a Community Pollution Enforcement Workgroup for trucks and other vehicles</b> in the SELA community, including interested community and CSC members, pollution enforcement agencies (e.g., air, water, solid waste pollution control agencies at the federal, state, regional, and local levels, as available), local law enforcement agencies, local municipalities, and other interested agencies, as needed, and meet quarterly to:</p> <ul style="list-style-type: none"> <li>• <b>Discuss community complaints and improve the process for complaints communication</b></li> <li>• <b>CARB Enforcement will share information for where to make a complaint</b>, and a list of potential air pollution concerns which CARB and South Coast AQMD can address with local law enforcement agencies, public health agencies, municipalities, and other agencies that are regularly contacted instead of CARB and South Coast AQMD for air pollution related concerns. CARB, in conjunction with the CSC, will share air pollution complaint information with community members and local organizations for where to make a complaint.</li> <li>• <b>Update the community on inspections</b> by state and local partners</li> <li>• <b>Identify areas for future work</b>, such as those</li> </ul>	CARB	Number of meetings with the workgroup to collaborate	3rd quarter 2022	4th quarter 2025

4-14  
cont.

	<p>listed in the following two strategies (Reducing Exposure to Idling in the Community and Deterring Catalytic Converter Theft)</p> <p>•<b>CARB’s Community Pollution Enforcement Group would work with local municipalities and law enforcement to help establish truck routes</b>, local no idling ordinances, parking zoning to move truck parking from local neighborhoods to an approved parking location, and greening to help separate the community from idling within the community</p>				
<b>B</b>	<p><b>CARB would work with local trucking companies to distribute educational material to incentivize the reduction of non-critical idling</b> (e.g., maintenance costs savings due to reduced wear and tear, and fuel cost savings).<sup>3</sup></p>	CARB	<p>Number of meetings with local trucking companies</p> <p>Amount of educational material distributed</p>	1st quarter, 2021	4th quarter, 2025
<b>C</b>	<p><b>CARB to collaborate with South Coast AQMD to conduct quarterly enforcement sweeps</b>, evaluate findings, seek input from CSC, and report back to CSC periodically</p>	CARB South Coast AQMD	<p>Number of enforcement sweeps per quarter and CSC updates</p>	2nd quarter, 2021	1st quarter, 2022
<b>D</b>	<p><b>Collaborate with the CSC to identify and prioritize “No Idling” sign placement in the SELA community.</b> CARB to coordinate with South Coast AQMD, land-use agencies, school districts, and law enforcement agencies to install and enforce “No Idling” signs. Signs will include CARB and South Coast AQMD’s contact information and roles in enforcing heavy duty truck idling regulations.<sup>4</sup></p>	CARB South Coast AQMD	<p>Number of signs placed in community</p>	3rd quarter, 2021	4th quarter, 2022
<b>E</b>	<p><b>Continue development of the Warehouse Indirect Source Rule (ISR)</b> to reduce emissions from large warehouses and fulfillment centers and inform CSC members about Warehouse ISR working group meetings and provide warehouse information to the CSC.</p> <p><b>CBE Added:</b> Adopt a Ports ISR rule, which will benefit all communities along the freeway</p>	South Coast AQMD	<p>Completion of Warehouse ISR</p> <p>Provide CSC with warehouse information</p>	1st quarter, 2021	2nd quarter, 2021

4-12  
cont.



	cooridors including SELA, which are heavily impacted by diesel traffic.					4-12 cont.
F	<p><b>Outreach to small businesses (e.g., independent truck owners and operators) and local fleets for incentive funds, prioritizing zero emission trucks where commercially available (e.g., Class 6 or below).</b></p> <p><b>CBE added:</b> AQMD should include more efforts to support truck drivers. Too many responsibilities now fall mostly on individual truckers. Truckers also need places to legally rest without causing idling emissions in neighborhoods, and need support in transitioning to clean fuels.</p>	South Coast AQMD	Amount of truck incentive outreach in SELA	3rd quarter, 2021	4th quarter, 2025	4-16 cont.
G	<p><b>Conduct outreach to the SELA community to provide information to the community about battery electric, fuel cell, and hybrid options and incentives available to encourage replacement of older polluting light duty vehicles with <del>cleaner</del> cleaner vehicles,</b> and work with partners to increase the availability of publicly accessible electric vehicle charging stations in the community</p>	South Coast AQMD	Number of outreach events	3rd quarter 2022	1st quarter 2025	4-25
H	<p><b>Identify freeway projects (e.g., freeway expansion projects) within the community that are circulated to South Coast AQMD for review under the California Environmental Act (CEQA)</b></p> <p><b>CBE Added</b> – CARB &amp; AQMD will propose to the Metro Board of Directors and CalTrans the incorporation of a Clean Truck Program that prioritizes zero emissions technology into any freeway project EIR published, effective 1/1/2021.</p>	South Coast AQMD	Monthly report to South Coast AQMD Mobile Source Committee	1st quarter 2021	4th quarter 2025	4-26
I	<p><b>Conduct air monitoring in the community to support implementation of truck emission reduction strategies</b> and help track concentration trends of key indicator pollutants of truck emissions; and help to assess the impact of truck emissions on community exposure</p>	South Coast AQMD	Conducting air measurements in the community	4th quarter of 2020	4th quarter 2025	

<b>J – CBE Added</b>	<b>Develop a plan for Zero Emission Transportation in SELA</b>	CARB & AQMD			
----------------------	--	-------------	--	--	--

<b>Table 2 – Goal: Reduce Catalytic Converter Theft in SELA</b>							
<b>Action</b>		<b>Responsible Entity</b>		<b>Metric</b>		<b>Timeline</b>	
<b>Start</b>				<b>Complete</b>			
<b>J</b>	CARB to pursue a catalytic converter theft deterrence and education program in SELA.s	CARB		Creation of catalytic converter theft deterrence program	1st quarter, 2021	4th quarter, 2025	

<b>Table 3 – Goal: Reduce Exposure to Truck Emissions</b>							
<b>Action</b>		<b>Responsible Entity</b>		<b>Metric</b>		<b>Timeline</b>	
<b>Start</b>				<b>Complete</b>			
<b>K</b>	Work with local school districts, and CSC members to identify and prioritize schools exposed to truck emissions that may benefit from installation of air filtration systems	South Coast AQMD		Complete identification and prioritization activity with CSC  Number of schools that receive air filtration systems	1st quarter, 2022	4th quarter 2025	

## RENDERING

Table 1- Goal: Reduce Odors from Rendering Facilities						
Action	Responsible Entity		Metric		Timeline	
Start			Complete			Additional CBE Comments
<b>CBE - ADDED</b>	The overall goal is to eliminate noxious odors from rendering facilities					
<b>A</b>	<b>Engage in community outreach and provide information on Rule 415 and how to file odor complaints</b>	South Coast AQMD	Number of Rule 415 updates to community groups and CSC	1st quarter, 2021	4th quarter, 2025	
<b>B</b>	<b>Conduct air monitoring for VOCs and odorous compounds near each rendering facility</b> and in the community to better characterize the emissions and to make data available to the public	South Coast AQMD	Begin conducting air measurements around rendering facilities	2nd quarter, 2021	4th quarter, 2025	Identify specific monitoring equipment in the CERP, since odorous compounds can be difficult to detect. Identify an expeditious deadline for a monitoring plan, with public comment.
<b>C</b>	<b>Continue complaint response including SELA complaint tracking</b> , provide timely updates to complainants, continue Rule 415 compliance inspections, and provide an annual summary of findings to the CSC	South Coast AQMD	Number of complaints responded to	1st quarter, 2021	4th quarter, 2025	
<b>D</b>	<b>After the installation of the emissions controls (e.g., permanent total enclosures) required by Rule 415, work with the CSC to identify remaining odor</b>		<ul style="list-style-type: none"> <li>Number of odor complaints pre and post emission controls required by Rule 415</li> </ul>	1st quarter, 2023	4th quarter, 2023	Should clarify that one goal of the CERP is the installation of permanent total enclosures per rule 415.

4-17  
cont.

	concerns, evaluate the need for additional requirements to address odors, (e.g., conduct additional air monitoring for VOCs and odorous compounds) and establish a rule development schedule, if needed		• Additional metrics will be identified, if needed			
E – CBE Added	Report to community on status and progress on compliance with Rule 415	South Coast AQMD		1 <sup>st</sup> quarter 2021	Ongoing quarterly	

4-19 cont.

Table 2- Goal: Reduce Exposure to Odors from Rendering Facilities							
Action		Responsible Entity		Metric		Timeline	
Start				Complete			
E	Explore the development of an odor event notification system, for schools and sensitive receptors	South Coast AQMD		Number of event notifications sent	1 <sup>st</sup> quarter, 2021	4 <sup>th</sup> quarter, 2021	
F	CBE added: Work with Community Groups that already work with schools to help facilitate this process, including Huntington Park High School and others.						
G	CBE added: Report on progress to CSC biannually.						

4-20 cont.

## CARB Comments on the Draft Discussion CERP for SELA

### Process

- Overall the CERP does a good job of responding to CSC member air quality concerns by incorporating a variety of measures to address those concerns. South Coast AQMD and the CSC members could benefit from keeping the monthly meeting schedules while developing Actions C and D on page 5e-2 and Actions B and C on page 5g-1 and 5g-2. 5-1
- To help the CSC and CARB review the CERP for requirements in the Blueprint, will South Coast AQMD provide a chart mapping the Blueprint checklist to the CERP? 5-2
- CSC member participation has been an issue some of the 2018 Selected communities and more recently in ECV, to promote transparency CSC member attendance could be added to Table 2-3: Meeting Dates, Times, and Locations in Appendix 2. 5-3

### Emission Reduction Targets

- Will Table 1 - CERP Emission Reduction Targets in Chapter 5a incorporate emission reduction targets for those strategies South Coast AQMD is the responsible agency? 5-4

### Technical Foundation

- Though documentation of data sources and methods were provided, the CERP could include a discussion about any existing data gaps as described in the Blueprint on page C-16. 5-5

### CARB Statewide Regulations

- The TRU regulation referenced in the Rail Action 5e is specific to trucks, it would be a good idea to make a distinction between the Trucks TRU and the Railcar TRU that will be considered by the CARB board in 2023. 5-6

SOUTHEAST LOS ANGELES COUNTY



GATEWAY CITIES  
COUNCIL OF GOVERNMENTS

November 6, 2020

- Artesia
- Avalon
- Bell
- Bellflower
- Bell Gardens
- Cerritos
- Commerce
- Compton
- Cudahy
- Downey

Gina Triviso, Senior Public Information Specialist  
Office of Legislative, Public Affairs & Media  
**South Coast Air Quality Management District**  
21865 Copley Drive  
Diamond Bar, CA 91765

**STAFF COMMENT LETTER FOR THE DRAFT COMMUNITY EMISSION REDUCTION PLAN {CERP} FOR THE AB 617 SOUTHEAST LOS ANGELES {SELA} COMMUNITY**

- Hawaiian Gardens
- Huntington Park
- Industry
- La Mirada
- Lakewood
- Long Beach
- Lynwood
- Maywood
- Montebello
- Norwalk
- Paramount
- Pico Rivera

Dear Ms. Triviso:

The Gateway Cities Council of Governments (Gateway Cities COG) thanks the South Coast Air Quality Management District (AQMD) staff for their important work in developing the draft Southeast Los Angeles (SELA) Community Emissions Reduction Plan (CERP) through Assembly AB 617.

Gateway Cities COG staff is grateful for the opportunity to participate in the SELA Community Steering Committee (CSC) as a representative for six of its 27-member jurisdictions, which include all of the SELA community jurisdictions of Bell, Bell Gardens, Cudahy, Huntington Park, South Gate, and unincorporated areas of the County such as Florence-Firestone.

Based on our review of the draft CERP document, we respectfully offer the following staff comments and questions in the matrix below, by chapters:

<b>Chapter 5b: Trucks and Freeways</b>		
	<b>Action</b>	<b>Comments/Questions</b>
Signal Hill	C. <u>CARB to</u> collaborate with South Coast AQMD to conduct quarterly enforcement sweeps, evaluate findings, <u>seek input</u> from the CSC, and report back to CSC periodically.	As this action relates to <u>enforcement</u> , consider bringing these reports to the CARB Community Pollution Enforcement Workgroup (to be established per Chapter Sb, Action A).
South Gate		
Vernon		
Whittier		
County of Los Angeles	E. Continue development of the <u>Warehouse Indirect</u> Source Rule (ISR)	For programs where CARB and AQMD <u>are not</u> jointly responsible
Port of Long Beach		

16401ParamountBoulevard · Paramount, California 90723 · phone (562)663-6850 fax (562)634-8216  
[www.gatewaycog.org](http://www.gatewaycog.org)

South Coast Air Quality Management District

November 6, 2020

Page 2

to reduce emission from large warehouses and <u>fulfillment centers</u> and inform CSC members about Warehouse ISR working group meetings and provide warehouse information to the CSC.	entities, such as for this <u>action</u> , how will they collaborate or coordinate?	6-2 cont.
H. Identify freeway projects (e.g., freeway expansion projects) within the community that are circulated to South Coast AQMD for review under the California Environmental Quality Act (CEQA).	<u>Clarify the</u> meaning, purpose, and accomplishments of including this action. <u>What freeway</u> projects are there in the SELA community besides CA-91, 1-5 and 1-710?	
I. Conduct air monitoring in the community to support implementation of truck <u>emission reduction</u> strategies and help track concentration trends of key indicator pollutants of truck emissions; and help to assess the impact of truck emissions on community exposure	How will this be further defined? Will the CSC and public have opportunities <u>for input</u> ? What will be the governing committee or body for this action?	6-4
<b>Chapter 5c: <u>Renderinij</u> Facilities</b>		
<b>Action</b> E. Explore the development of an odor <u>event notification</u> system, for schools and sensitive receptors.	<b>Comments/Questions</b> Add "number of notification systems <u>installed for</u> schools and sensitive receptors" as a metric.	6-5
<b>Chapter 5d: Green Spaces</b>		
<b>Action</b> A. Collaborate with land-use, state and local <u>agencies,</u> and non-profit organizations to develop a list of low- <u>VOC</u> and drought tolerant trees.	<b>Comments/Questions</b> Consider additional metrics, such as number of agencies identified, <u>potential for</u> tree plantings in the SELA community, and/or number of trees identified. As a follow-up action, consider also " <u>planting</u> " low-VOC and <u>drought tolerant</u> trees.	6-6
<b>Action</b> C. <u>Collaborate with</u> nonprofits, local and regional agencies to provide letters of support and air quality information for	Include "reporting of funding opportunities <u>to the</u> CSC and local agencies" as a metric or deliverable.	6-7

South Coast Air Quality Management District

November 6, 2020

Page 3

urban greening funding opportunities,  
includin maintenance.

**Chapter Se: Metal ProcessinQ Facilities**


Action	Comments/Questions
A. Conduct an informational workshop for the public regarding various types of metal processing facilities in their <u>neighborhood highlighting</u> current and future South Coast AQMD regulatory efforts.	Include "number of participants" as a metric.
E. Conduct air monitoring to help identify elevated levels of air toxic <u>metals and</u> support efforts to identify potential sources of emissions.	Include "reporting of elevated levels of air toxic metals to the CSC" to the metrics.

6-8

6-9

Thank you again for the opportunity to review and provide comments on the Draft CERP for the SELA community. We would like to channel all communications in regards to this comment letter to Gateway Cities COG staff Stephanie Cadena at [scadena@gatewaycog.org](mailto:scadena@gatewaycog.org) or (562)663-6850.

Sincerely,



Nancy Pfeffer, Executive Director  
Gateway Cities Council of Governments