

Summary of Response to Comments

The CSC, South Coast AQMD staff, and CARB closely collaborated to develop the Southeast Los Angeles CERP. Development of the CERP occurred over a year-long process that included 9 CSC meetings, 2 Technical Advisory meetings, an AB 617 Incentives Strategies meeting, and over 40 individual or small group meetings. South Coast AQMD staff received approximately 80 comments from businesses, government agencies, community residents, environmental organizations and other entities for the CERP. The table below summarizes each comment and identifies if the commenter's request is included (●) or not included (◆) in the CERP. The table also provides a brief staff response that explains where requests that are included in the CERP can be found or why the request was not included.

#	Comment ¹	Commenter(s)	Included = ● <u>Not</u> Included= ◆	Staff Response
General Questions or Concerns on the CERP				
1	CERP should include actions prioritizing small businesses for incentives and assistance with navigating South Coast AQMD rule and permit requirements.	Edith Moreno (SoCalGas)	●	<p>The comment is addressed in the actions for the Trucks and Freeways air quality priority. Table 1, Action D commits South Coast AQMD staff to outreach to small businesses (e.g., independent truck owners and operators) and local fleets for incentive funds, prioritizing zero emission trucks where commercially available.</p> <p>CERP action F for Chapter 5b – Trucks and Freeways also includes outreach to small businesses to provide</p>

¹ Clarifying comments or questions from CSC members not included in table.

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				<p>information about the South Coast AQMD Small Business Assistance Office which helps small business owners to comply with South Coast AQMD rules and regulations, permit conditions, and recordkeeping through a variety of services offered. The small business office can be contacted at 1-800-388-2121 or smallbizassistance@aqmd.gov. Additional details about the Small Business Assistance Office are available at http://www.aqmd.gov/home/programs/business/business-detail?title=small-business-assistance.</p>
2	<p>Page 2 [of Executive Summary] 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?</p>	<p>Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-1</p>	<p></p>	<p>South Coast AQMD conducts regular compliance inspections at facilities and responds to community complaints as part of the overall enforcement program. Chapter 4 includes an overview of South Coast AQMD and CARB enforcement programs, regulatory authority, enforcement history, and an outline of each agency’s complaint process. Appendix 4 provides details on South Coast AQMD and CARB’s legal right to issue violations and penalties, interagency collaboration, and contains summaries of all permitted facilities, complaints received, inspections conducted, enforcement actions taken, and vehicle/engine inspections conducted.</p> <p>The implementation timeline for the SELA CERP is five years beginning January 2021 and ending January 2026. The actions in the SELA CERP are tailored to address the air</p>

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				quality concerns prioritized by the SELA CSC. However, South Coast AQMD staff efforts to enforce South Coast AQMD rules and to develop new or amend existing rules that benefit the SELA and other communities in the South Coast Air Basin will continue after January 2026. For example, Rule 415 (Odors from Rendering Facilities) will continue to be in effect after January 2026 and South Coast AQMD compliance staff will continue to conduct regular inspections at rendering facilities.
3	Page 1 [of Introduction], under “Ongoing Efforts” references the LA County Green Zones Program. There should be a footnote to explain this program and link to more information.	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-2		A footnote with more information about the LA County Green Zones Program has been included to Chapter 5a.
4	Page 1 [of Introduction], 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?	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-3		At South Coast AQMD, a regulation is composed of rules, each of which deals with a specific topic within that regulation. For example, Regulation II deals with permits, while Rules 201 through 221 pertain to specific types of permits, how they are granted and administered, and their impact. South Coast AQMD staff develops rules to reduce air pollution from specific sources and to protect public health. Generally, the rule-making process incorporates extensive

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				<p>information gathering and research into available technologies, coordination with industry groups, and analysis of the economic impact of each proposed rule or rule amendment. South Coast AQMD provides an opportunity for public input on every proposed rule. At public workshops and consultations, the public can voice suggestions and concerns about the impact of a proposed rule. A public hearing is held before the South Coast AQMD Governing Board votes on a proposed or amended rule.</p> <p>A footnote will be provided in Chapter 5a to provide this information.</p>
5	<p>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.</p>	<p>Chris Chavez (Coalition for Clean Air) Comment 3-1</p>	<p></p>	<p>The air quality priorities in the Southeast Los Angeles community and other AB 617 communities are selected by the community steering committees. The SELA Draft CERP actions were developed with the input from the SELA CSC provided during 9 CSC meetings, and over 40 individual and small group phone calls or virtual meetings. The SELA Draft CERP actions are a result of multiple iterations of edits between South Coast AQMD staff and the CSC. Additionally, staff updated Chapter 3a to include information about Exide and the Delta Jet Fuel Release.</p>
6	<p>The next draft of the CERP should include emissions reduction projections. Further, these targets should have a nexus with community</p>	<p>Chris Chavez (Coalition for Clean Air)</p>	<p></p>	<p>Staff updated Chapter 5a of the Draft CERP to include emission reduction targets for 2025 and 2030 for NOx and DPM. DPM is emitted from heavy-duty trucks, trains and</p>

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	health needs. Reductions from future rulemakings should be shared with the CSC as soon as they are available.	Comment 3-2		industrial off-road equipment. DPM emissions continue to be the main driver of air toxics cancer risk in this community. Therefore, a reduction of DPM will provide long-term benefits for public health in the SELA community. Additionally, South Coast AQMD staff will continue to keep the CSC updated on the progress of CERP implementation, including emission reductions from rulemaking efforts that are described in the CERP.
7	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	Chris Chavez (Coalition for Clean Air) Comment 3-3		South Coast AQMD staff continues to pursue a suite of actions (e.g., regulatory efforts, incentives, and outreach) to achieve emission reductions. Some actions meet SIP creditable criteria, and some do not; however, they are equally important to the emissions and exposure reduction goals of the CERP.
8	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	Chris Chavez (Coalition for Clean Air) Comment 3-5		The CSC has requested that we use available data as a guide and follow a methodical process to develop appropriate and effective actions to reduce emissions in this community. Thus, Chapter 5e – Metal Processing Facilities and Chapter 5g – General Industrial include actions that require a stepwise approach to 1) identify the sources of emissions; and 2) develop strategies to address those specific emissions sources. With a stepwise approach, these actions allow staff to work with the CSC to identify local community concerns

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				and air quality issues related to metal processing and other industrial facilities. This approach enables the CSC to focus on emissions and exposures reduction efforts on air quality issues affecting the community within the CERP implementation timeframe.
9	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.	Chris Chavez (Coalition for Clean Air) Comment 3-6		Incentives are among the strategies used in the CERP because they can bring expedited emissions reductions above and beyond current requirements. However, the CERP does not rely on any single strategy, and instead uses a combination of strategies to reduce emissions, including regulation, enforcement, air monitoring, outreach and incentives. The totality of these actions will bring emission reductions to this community, as quantified in Chapter 5a.
10	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-1		South Coast AQMD developed a web tool that allows the user to search for public information about South Coast AQMD-regulated facilities (that is, facilities that are required to have a permit to operate equipment that releases pollutants into the air). The system is called F.I.N.D. (Facility INformation Detail). The FIND tool provides detailed information for each facility, including equipment lists, facility air pollution emissions information on key enforcement actions (Notices of Violation, Notices to Comply, Hearing Board cases), and other documents. The information in FIND is updated daily. FIND includes an interactive map that users can use to locate facilities and link to information about those facilities.

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				<p>Users can also search for addresses and place names, and the tool will show a list of active facilities close to that address. Users can also click a link to access more detailed information about the facility.</p> <p>Visit this webpage to access the South Coast AQMD FIND tool: https://xappprod.aqmd.gov/find</p> <p>Furthermore, AB 617 legislation requires CARB to establish and maintain a statewide Technology Clearinghouse that identifies the best technologies for reducing emissions, namely Best Available Control Technology (BACT), Best Available Retrofit Control Technology (BARCT), and related technologies for the control of toxic air contaminants (T-BACT). The Community Air Protection Program Blueprint requires the new Technology Clearinghouse to be used to identify rules, regulations, technologies, or practices that could offer emissions or exposure reduction opportunities within impacted communities. South Coast AQMD has been actively collaborating and supporting CARB in this statewide effort.</p> <p>More information on the Technology Clearinghouses is available here: https://ww2.arb.ca.gov/our-work/programs/technology-clearinghouse</p>

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11	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-2	●	<p>South Coast AQMD recognizes the importance of collaboration with local land-use agencies and other relevant agencies to address land-use, zoning, and other issues surrounding facility emissions. Thus, the Draft CERP includes various actions require collaboration and outreach to local land-use and resource agencies.</p> <p>For example, Chapter 5c, Action C includes a commitment to “Collaborate with local land-use agencies and L.A. County Green Zones Program to review and inspect new rendering facilities for compliance with South Coast AQMD rules.”</p> <p>Chapter 5e, Actions G and H, commit to making “referrals to the appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD’s jurisdiction (e.g., Water Board, DTSC, Cal-OSHA, local land-use agencies, and Public Health departments)” and pursuing “collaborations with local land-use agencies to provide outreach information to metal processing facilities on required South Coast AQMD permits”, respectively.</p> <p>Additionally, South Coast AQMD staff will work with the cities in SELA, the impacted community, and industry to address air quality concerns related to facilities.</p>

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12	<p>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,</p>	<p>Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-3</p>	<p>●</p>	<p>South Coast AQMD staff recognizes the importance of inter-agency communication and has included an action in the Draft CERP to address concerns at facilities that may be outside this agency’s purview.</p> <p>South Coast AQMD staff have made such referrals to Cal-OSHA in the recent past, and will work closely with our staff who enter facilities to be aware of environmental and occupational health hazards that may warrant a referral to the appropriate agency.</p> <p>Chapter 5e, Action G, states the following: “Make referrals to the appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD’s jurisdiction (e.g., Water Board, DTSC, Cal-OSHA, local land-use agencies, and Public Health departments).”</p>

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	<p>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.</p>			
13	<p>Add a measure to begin developing a SELA community-specific Just Transition Plan for inherently safer energy sources, with equity.</p>	<p>Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-6</p>	◆	<p>According to the United Nations “Just Transition of the Workforce, and the Creation of Decent Work and Quality Jobs” Technical Paper, the transition towards inclusive and low-carbon economies must be just and fair, maximizing opportunities for economic prosperity, social justice, rights and social protection for all, leaving no one behind. Just Transition Plans have a strong emphasis on combating the effects of climate change, with social equity in mind.</p> <p>CARB is charged with implementing California's comprehensive suite of policies to reduce emissions of greenhouse gases. The 2017 Scoping Plan for Achieving California’s 2030 Greenhouse Gas Target identifies how the State can reach our 2030 climate target to reduce greenhouse gas emissions by 40 percent from 1990 levels, and substantially advance toward CARB’s 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels. The 2017 Scoping Plan builds on and integrates efforts already underway to reduce the State’s GHG, criteria</p>

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				<p>pollutant, and toxic air contaminant emissions. Programs such as the Low Carbon Fuel Standard and Renewables Portfolio Standard are delivering cleaner fuels and energy, the Advanced Clean Cars Program has put more than a quarter million clean vehicles on the road, and the Sustainable Freight Action Plan will result in efficient and cleaner systems to move goods throughout the State. Enhancing and implementing these ongoing efforts, paired with a more stringent Cap-and-Trade Program, puts California on the path to achieving the 2030 target per SB 32 and to deliver climate, air quality, and other benefits. CARB will consider the CSC’s suggestion to create a community-specific Just Transition Plan.</p> <p>More information about CARB’s 2017 Climate Change Scoping Plan here: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan</p>
14	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega		The Air Quality Management Plan (AQMP or Plan) is a regional blueprint for achieving air quality standards and healthful air. On October 1, 2015, the U.S. Environmental Protection Agency (EPA) strengthened the National Ambient Air Quality Standards (NAAQS) for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion (ppb). The South Coast Air Basin is classified as an “extreme” non-attainment area for the 2015

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		(Communities for a Better Environment) Comment 4-7		Ozone NAAQS. The 2022 AQMP is being developed to address the requirements for meeting this standard, and will represent a comprehensive analysis of emissions, meteorology, regional air quality modeling, regional growth projections, and the impact of existing and proposed control measures. Various CERP actions (e.g., incentives prioritizing zero-emission trucks where commercially available) contribute to the reduction of criteria pollutants in SELA and to regional ozone attainment goals.
15	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-8		Chapter 5b – Trucks and Freeways, Table 1, Action F of the CERP prioritizes zero-emission technologies where commercially feasible. South Coast AQMD’s incentive programs provide a much larger incentive for zero-emission technologies compared to other technologies. These larger incentives for zero-emission projects recognize that these technologies are currently more expensive, and in many cases, not available, relative to near-zero technologies. It would take larger financial incentives, cause significant delays, and thus less emission reductions, if only the adoption of zero-emission technologies were encouraged.
Trucks and Freeways				
16	CERP should include language regarding air monitoring actions along	Lizette Ruiz (Active		Chapter 5b, Action I, was modified to include focused air monitoring efforts along the Alameda Corridor.

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	the Alameda Corridor to help assess truck emissions.	Residents – South Gate)		
17	Would also like to see CERP language regarding air monitoring actions along the Alameda Corridor to help assess truck emissions.	Laura Cortez (East Yard Communities for Environmental Justice)		The Alameda Corridor is one of the high priority areas for mobile surveys, as discussed in Appendix 6, section 7.2 of the CERP: “Measurements will be prioritized in the areas immediately surrounding the three railyards in this community and along major railways (e.g., Alameda Corridor).”
18	CERP should also incorporate language encouraging increasing the accessibility of fuel cell refueling infrastructure in addition to electric charging stations.	Mark Sheldon (Member of the public)		Chapter 5b, Action G, was modified to include accessibility to other alternative fueling stations in the community in addition to electric charging stations.
19	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.	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-4		Chapter 5b, Metric A, was modified to include the metric “Number of complaints identified through the workgroup and addressed by CARB”.

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20	SCAQMD and the CERP should substantially expand its commitments relating to Interstate 710 expansion, which is the next environmental injustice facing SELA communities.	Chris Chavez (Coalition for Clean Air) Comment 3-4		Chapter 5b, Action H, commits to identifying 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). However, the Interstate 710 (I-710) expansion project is projected to take place beyond the timeframe of the CERP. More information on this project can be found here: https://www.metro.net/projects/i-710-corridor-project/
21	The CERP needs to commit to a strong Indirect Source Rule (ISR) for railyards, warehouses, and other pollution magnets.	Chris Chavez (Coalition for Clean Air) Comment 3-9		Chapter 5b, Action E, commits to continuing the development of the Warehouse Indirect Source Rule (ISR) 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. Furthermore, Chapter 5f, Action C, also commits to continuing to develop the Railyard ISR, which includes strategies such as addressing exposures from load testing and maintenance activities.
22	The plan is still missing a list of measures by the California Air Resources Board.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega		Chapter 5b – Truck Traffic and Freeways and Chapter 5f – Railyards and Locomotives collectively contain over 10 different actions lead by CARB to help address these air quality priorities. Also, staff has provided a list of statewide measures that contribute to the emissions reduction targets in Chapter 5a. The list includes Advanced Clean Car 2, Heavy -Duty Inspection and Maintenance, Low- NOx Engine Standard, and the Small Off-Road Engine Amendment.

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		(Communities for a Better Environment) Comment 4-5		
23	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-12	◆	Over the last two years, under the Board's direction, AQMD staff has been working on developing a memorandum of understanding (MOU) with the Ports of Los Angeles and Long Beach based on the implementation of the San Pedro Bay's Clean Air Action Plan (CAAP). A Ports MOU Working Group as well as a more focused Ports MOU Technical Working Group (TWG) with representatives from AQMD, CARB, Ports, Coalition for Clean Air, Sierra Club, PMSA, and California Trucking Association were established to quantify the potential emissions benefits of CAAP measures. Through this process, the CAAP's Clean Truck Program was identified as the primary CAAP measure with a performance target (i.e., \$10/TEU) which could result in quantifiable emission reductions based on implementation of incentive programs for deployment of near-zero or zero-emission trucks. In March 2020, the Ports Boards of Harbor Commissioners adopted a resolution for the Clean Truck Fund (CTF) Rate of \$10/TEU but the Boards delayed the full adoption of the Clean Truck Program until later in 2020 (i.e., exemptions, CTF collection mechanism, tariff amendments, structure of incentive program). The adoption and implementation of the Clean Truck Program has been further delayed by the Ports citing uncertainties related to COVID-19 and

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				associated economic impacts (although Ports are currently experiencing record volumes of cargo). Since the details of the Ports Clean Truck Program have not been determined, the Ports MOU development has been delayed until that occurs.
24	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-13		In 2018, the California Air Resources Board (CARB) was directed by Governor Jerry Brown to assess possible regulatory requirements to ensure greater inclusion of zero emission vehicles in public and private light- and heavy-duty vehicle fleets. ^[1] As CARB looks for ways to meet our 5 million zero-emission vehicle target by 2030, the conversion of public and private fleets to zero emission cars and trucks offers an important opportunity to get a large number of carbon-polluting fleet vehicles off the road. ^[2] In June 2020, CARB adopted the Advanced Clean Trucks Rule requiring truck manufacturers to transition from producing diesel trucks and vans to electric zero-emission trucks including heavy-duty vehicles beginning in 2024. CARB is developing a medium and heavy-duty zero-emission fleet regulation ^[3] with the goal of achieving a zero-emission truck and bus California fleet by 2045 everywhere feasible and significantly earlier for certain market segments such as last mile delivery and drayage applications; the CARB Governing

^[1] https://ww2.arb.ca.gov/sites/default/files/2020-06/zero_emission_fleet_letter_080118_ADA.pdf

^[2] <https://ww2.arb.ca.gov/our-work/programs/zero-emission-vehicle-fleet>

^[3] <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets>

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				Board is anticipated to consider the adoption of the proposed Advanced Clean Fleets Regulation in 2021. In September 2020, Governor Gavin Newsom issued an executive order requiring sales of all new passenger vehicles to be zero-emission by 2035 and additional measures to eliminate harmful emissions from the transportation sector. ^[4] CARB is charged with developing regulations to mandate that 100 percent of in-state sales of new passenger cars and trucks are zero-emission by 2035 – a target which would achieve more than a 35 percent reduction in greenhouse gas emissions and an 80 percent improvement in oxides of nitrogen emissions from cars statewide.
25	Include a goal to make the 710 Freeway a Zero Emissions Corridor.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-14		Chapter 5b, Actions J and K, were added to the Draft CERP. The two new actions state: Action J - “Encourage the designation of clean truck lanes on the I-710 Freeway.” Action K - “Encourage the deployment of zero-emission trucks in the Southeast Los Angeles community where commercially available (e.g., Class 6 or below).” The AB 617 legislation does not expand South Coast AQMD’s authority to address land-use issues. Land-use and transportation agencies (e.g., CalTrans) have authority over the Interstate 710 (I-710) Freeway and I-710 corridor. However, South Coast AQMD staff will continue to

^[4] <https://www.gov.ca.gov/2020/09/23/governor-newsom-announces-california-will-phase-out-gasoline-powered-cars-drastically-reduce-demand-for-fossil-fuel-in-californias-fight-against-climate-change/>

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				<p>collaborate with land-use and transportation agencies to support the implementation of clean technologies (e.g., zero emission technology) for mobile sources along the I-710 corridor.</p> <p>Additionally, on June 25th, 2020, CARB adopted the Advanced Clean Truck Regulation. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:</p> <p>Zero-emission truck sales: Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of class 4 – 8 straight truck sales, and 40% of truck tractor sales.</p> <p>Company and fleet reporting: Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero emission trucks and place them in service where suitable to meet their needs.</p>

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				More information about the Advanced Clean Truck Regulation is available at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks
26	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-15		On October 20, 2017, South Coast AQMD staff submitted a comment letter on the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Interstate 710 (I-710) Corridor Project. A key comment in the letter included a need for zero-emission freight corridor and need to provide specificities regarding the schedule and process for development, construction, deployment, selection, and implementation of the zero-emission truck technology in the Final EIR/SEIS. The letter is available at http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2017/102717-710corridor.pdf
27	CARB & AQMD should 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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-26		South Coast AQMD staff is supportive of opportunities to provide for zero emissions technology. Because zero emissions technologies are not currently feasible or available for all sectors, there may be times where deployment of zero emissions technology is not possible for a given project. However, where incorporation of zero emissions technology is possible we request that the use of such technology be considered.

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28	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-16		South Coast AQMD and CARB recognize the importance of supporting truck drivers. Chapter 5b, Action A, includes a commitment from CARB to have CARB’s Community Pollution Enforcement Group work with local municipalities and law enforcement to help establish truck parking zoning to move truck parking from local neighborhoods to approved parking locations. South Coast AQMD staff will focus outreach efforts on independent truck owners and operators for incentive funds, prioritizing zero emission trucks where commercially available, through Action F.
29	As this action (5b, Action C) relates to enforcement, consider bringing these reports to the CARB Community Pollution Enforcement Workgroup (to be established per Chapter 5b, Action A).	Gateway Cities Council of Governments Comment 6-1		Chapter 5b, Action A, establishes CARB’s Community Pollution Enforcement Group, which would work with local stakeholders, including the CSC, to address community issues. Chapter 5b, Action C, commits to conducting quarterly enforcement sweeps, evaluating the findings, seeking input from CSC, and reporting back to CSC periodically. South Coast AQMD staff recognizes that there is overlap in these CARB enforcement efforts, and has updated the metric to Chapter 5b, Action C to state, “Number of enforcement sweeps per quarter and CSC and CARB Pollution Enforcement Workgroup updates”
30	For programs where CARB and AQMD are not jointly responsible entities, such as for this action (5b, Action E),	Gateway Cities Council of Governments		An example of CARB and South Coast AQMD collaboration is community outreach, such as, the joint CARB and South Coast AQMD Railyard ISR Workshops in the San Bernardino,

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	how will they collaborate or coordinate?	Comment 6-2		<p>Muscoy and East Los Angeles, Boyle Heights, West Commerce AB 617 communities. CARB staff presented statewide concepts to address emissions from rail operations including: 1) establishing a locomotive emission reduction spending account 2) Establishing an in-use locomotive remanufacture limit 3) adopting the U.S. EPA 30-minute idling limit and 4) genset repurposing. South Coast AQMD staff presented concepts for 1) an Indirect Source Rule (ISR) to reduce exposures from locomotive maintenance emissions 2) an ISR to require engineering plans for zero emissions operations 3) a new incentive program focused on the cleanest locomotive use 4) evaluating new monitoring approaches for 4 in-use locomotives. CARB and South Coast AQMD staff are continuing to closely coordinate their efforts on this rulemaking and will continue to take a similar approach on other rulemaking efforts.</p> <p>Additional examples of collaboration between CARB and South Coast AQMD include discussion on emissions information, regulatory development and incentive opportunities.</p>
31	Clarify the meaning, purpose, and accomplishments of including this action (5b, Action H). What freeway projects are there in the SELA	Gateway Cities Council of Governments Comment 6-3		The Southeast Los Angeles (SELA) community is surrounded by the Interstate 105 to the south, Interstate 110 to the west, and Interstate 710 (I-710) to the east. The SELA community has

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	community besides CA-91, 1-5 and 1-710?			<p>consistently expressed concern about emissions from heavy-duty trucks traveling along the I-710.</p> <p>By committing to Chapter 5b, Action H, South Coast AQMD staff can identify future freeway projects within the community and take part in the review process under the California Environmental Act (CEQA). This would allow South Coast AQMD staff to submit letters responding to proposed projects, and comment on the potential local impact to the SELA community.</p> <p>More information about the I-710 Corridor Project here: https://www.metro.net/projects/i-710-corridor-project/</p> <p>More Information about the I-105 ExpressLanes Project here: https://www.metro.net/projects/i105-expresslanes/</p>
32	How will this be further defined? Will the CSC and public have opportunities for input? What will be the governing committee or body for this action (5b, Action I)?	Gateway Cities Council of Governments Comment 6-4		Mobile measurements of key indicator pollutants of truck emissions over time can help identify locations where concentrations of pollutants are persistently elevated and help assess the impact of truck emissions on community exposure, particularly at schools, day care centers and other sensitive receptors. South Coast AQMD staff will provide annual updates on monitoring results in future CSC meetings and through publication of progress reports to gather CSC input to identify next actions. The CSC, in conjunction with

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				the South Coast AQMD and CARB, serves as the body that oversees these and all actions in the SELA CERP.
Rendering Facilities				
33	Should there be an explanation of what rendering facilities are similar to the explanation for metal processing facilities?	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-5	●	Appendix 5 includes a Rendering Facilities section that provides details about community concerns, emissions, air monitoring, and regulatory and enforcement efforts around rendering facilities in SELA.
34	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?	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-6	●	The CSC identified odors from rendering facilities as the main concern from this air quality priority, which is why the CERP actions specifically address this concern. However, these facilities are also subject to additional rules that help control emissions of other pollutants. For example, although not specifically identified by the CSC, fugitive dust and particulate matter from rendering facilities are subject to South Coast AQMD Rule 403 – Fugitive Dust. Members of the public may submit a dust or other complaint at 1-800-CUT-SMOG or online at www.aqmd.gov .

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36	Is the goal simply to reduce odors from existing facilities or prevent new facilities from emitting odors?	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-7		The actions outlined in Chapter 5c apply to all rendering facilities in the SELA community and emissions study area. South Coast AQMD Rule 415 – Odors from Rendering Facilities, applies to new and existing rendering facilities that process raw rendering materials; and wastewater associated with rendering. New rendering facilities would have to comply with the requirements in Rule 415 (e.g., odor best management practices, permanent total enclosure or operation in closed system).
37	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.	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-8		Chapter 5c, Action C, was modified to include “Collaborate with local land-use agencies and L.A. County Green Zones Program to identify proposed new rendering facility projects in the Southeast Los Angeles Community and identify South Coast AQMD rules that apply to the facilities”.
38	We support the community’s call for stronger action relating to odors from rendering plants.	Chris Chavez (Coalition for Clean Air) Comment 3-8		Chapter 5c includes four distinct actions to meet the goal to reduce odors from rendering facilities. Each action was carefully written to address the specific concerns that CSC has voiced. For example, providing information on filing odor complaints, tracking complaint responses, updates to

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				complainants, and identifying remaining odor concerns after Rule 415 emission control requirements go into effect.
39	Add an overall goal to eliminate noxious odors from rendering facilities	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-17	●	<p>The first goal of Chapter 5c is to “Reduce Odors from Rendering Facilities”. There are four different actions written in the Draft CERP to help achieve this goal. Additional details on these actions are listed above.</p> <p>The goal is to eliminate odor nuisance from rendering facilities. In the CERP, South Coast AQMD staff commits to achievable short-term goals to reduce odors from these facilities. While Rule 415 will be fully implemented in 2023, portions that can be implemented already – such as Best Management Practices (BMPs) – are currently required and enforced.</p> <p>For example, one of the BMPs is to have a limit on the holding time for raw materials, and inspectors have issued multiple violations at rendering plants when noncompliance with this BMP has been found. Staff will continue to inspect rendering facilities and to take enforcement action, as appropriate.</p>

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40	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment Comment 4-18		Information on specific monitoring equipment to be used for this AQ priority is provided in the sections 5.5 of the CAMP (mobile platform #3). A draft of the CAMP document was released as part of the CERP and South Coast AQMD is accepting public comments. The CAMP is available here: http://www.aqmd.gov/nav/about/initiatives/community-efforts/environmental-justice/ab617-134/ab-617-community-air-monitoring/communities/southeast-los-angeles-community-air-monitoring
41	Report to community on status and progress on compliance with Rule 415	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-19		Chapter 5c, Action C, includes a commitment from South Coast AQMD staff to provide an annual summary to the CSC.

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42	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-20		Chapter 5c, Action E, was updated to: “Explore the development of an odor event notification system, for schools and sensitive receptors. Consult with Community Groups that work with schools on key considerations for an odor event notification system (e.g., objectives of the notification system), and update CSC biannually on odor event notification system progress”
43	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.	Edith Moreno (SoCal Gas) Comment 2-4		While Rule 415 will be fully implemented in 2023, portions that can be implemented already – such as Best Management Practices (BMPs) – are currently required and enforced. For example, one of the BMPs is to have a limit on the holding time for raw materials, and inspectors have issued multiple violations at rendering plants when noncompliance with this BMP has been found. Staff will continue to inspect rendering facilities and to take enforcement action, as appropriate.
44	(5c, Action E) Add "number of notification systems installed for schools and sensitive receptors" as a metric.	Gateway Cities Council of Governments Comment 6-5		The purpose of Chapter 5c, Action E, is to 1) explore the development of a notification system, 2) identify the types of notifications that would be effective, and 3) determine the infrastructure of the system (e.g., email or web notifications).

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				<p>For example, South Coast AQMD’s Rule 1118 - Control of Emissions from Refinery Flares, requires that certain facilities submit notifications and reports to the South Coast AQMD. Flare event notifications reported to South Coast AQMD from the facilities subject to Rule 1118 can be received by the public via email. Therefore, such notification systems may not be systems that are “installed”, so that should not be part of the metric.</p> <p>The metric for Chapter 5c, Action E, has been updated to, “Biannual updates on odor event notification progress to the CSC”</p>
Green Spaces				
45	CERP should specify planting of tree species which are known for their ability to trap particulate matter and dust while also being able to provide shade, which can indirectly reduce emissions by helping to reduce energy consumption for air conditioning.	Lizette Ruiz (Active Residents – South Gate)		Chapter 5d, Action A, is modified to read “Collaborate with land-use, state and local agencies, non-profit organizations, <u>and the CSC</u> to develop a list a low-VOC and drought tolerant trees.” Also, South Coast AQMD staff will review the CAL FIRE calculations as part of this development process.

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46	How would the installation of vegetative buffers along freeways planned and executed?	Niki Okuk (Active Residents – Florence-Firestone)		South Coast AQMD will work with the CSC to identify freeway segments of concern in the community. Next, South Coast AQMD will identify the agency (Caltrans, LA Metro, etc.) responsible for maintaining that segment and see if there are plans to install any kind of vegetative buffers. Efforts to encourage installation of vegetative buffers will then be based off those plans.
47	Should we include an action to fund vegetative buffers along parts of I-710 to help capture some of the particulate emissions associated with the freeway expansion?	Lizette Ruiz (Active Residents – South Gate)		<p>It is known that the I-710 expansion project has dedicated funding towards vegetative buffers for air pollution mitigations efforts. South Coast AQMD staff will work with LA Metro to identify existing efforts to fund vegetative buffers in Southeast Los Angeles and explore new funding opportunities through Community Air Protection Incentives, other local, state and federal programs.</p> <p>Section 2.3.2 and Section 3.6 of the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) discuss maximizing trees, shrubs, and foliage that are drought resistant and provide biosequestration/biofiltration.</p> <p>The I-710 Corridor Project RDEIR/SDEIS can be found here: http://media.metro.net/projects_studies/I710/images/DEIR-SEIS/RDEIR_SDEIS-July-2017.pdf</p>

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48	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 agencies as an additional agency. 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.	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-9	●	Chapter 5d, Action A, modified to read “Collaborate with land-use, state and local agencies (e.g., Public Works, Parks and Recreation), non-profit organizations, and the CSC to develop a list a low-VOC and drought tolerant trees”
49	CERP should include a metric to evaluate the progress made towards increasing the tree canopy in SELA in Action A for this air quality priority. Another metric which could be included to assess progress on this action could be the completion of the recommended list of tree-types for planting to increase green spaces. Assessment methods for tree canopy programs in the cities of Commerce and Lynwood might be helpful in developing this metric.	Stephanie Cadena (Gateway Cities Council of Governments)	●	Chapter 5d, Action C, was modified to add the following, “Collaborate with nonprofits, local, and regional agencies to identify potential metrics to measure progress in increasing tree canopy in SELA. “

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50	<p>Create state and local partnerships that would ensure new housing developments in SELA incorporate Green Spaces in their building designs.</p> <p>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.</p>	<p>Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-21</p>		<p>Chapter 5d, Action C states “Collaborate with nonprofits, local, and regional agencies to provide letters of support and air quality information for urban greening funding opportunities, including maintenance.” Through this action, South Coast AQMD staff is looking to partner with appropriate organizations or entities to encourage green spaces in the community, including new development projects (e.g., new affordable housing projects).</p>
51	<p>Incentivize green spaces to all new developments within SELA (this includes, bikeways, river paths, transit corridors).</p>	<p>Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-22</p>		<p>Chapter 5d, Action B, includes “evaluate opportunities to use future settlement funds to support community green space projects (e.g., bikeways, river paths, transit corridors). The evaluation would include the use of settlement funds to incentivize green spaces in the community.</p>
52	<p>Identify appropriate sites where local communities have access to land for community gardens.</p>	<p>Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli</p>		<p>Local land-use agencies (e.g., cities and Los Angeles County) have the authority to identify and designate land uses for green space and community gardens. For example, the City of South Gate identified designated green space uses in the</p>

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		Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-23		South Gate General Plan 2035 that is available at https://www.cityofsouthgate.org/192/General-Plan . The South Gate General Plan 2035 sets goals, objectives, policies, and implementation actions on making South Gate a green city. The actions in the CERP respect the land-use policies of the land-use agencies in Southeast Los Angeles and support efforts to improve and expand green space in the community. For example, Action B of Chapter 5d – Green Spaces requires South Coast AQMD staff to evaluate opportunities to use future settlement funds to support community green space projects.
53	(5d, Action A) Consider additional metrics, such as number of agencies identified, potential for tree plantings in the SELA community, and/or number of trees identified. As a follow-up action, consider also "planting" low-VOC and drought tolerant trees.	Stephanie Cadena (Gateway Cities Council of Governments) (Communities for a Better Environment) Comment 6-6		Chapter 5d, Metric(s) A, has been updated to: <ul style="list-style-type: none"> • Number of agencies and nonprofits identified • Number of meetings with land-use agencies, state and local agencies, and nonprofit organizations • Present the list of trees to the CSC Although South Coast AQMD does not have a program through which to conduct tree planting, Chapter 5d, Action C would facilitate collaboration between South Coast AQMD and relevant agencies to support urban greening projects, such as tree planting.
54	(5d, Action C) Include "reporting of funding opportunities to the CSC and	Stephanie Cadena		Chapter 5d, Action C, has been updated to include, "Collaborate with nonprofits, local, and regional agencies to

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	local agencies" as a metric or deliverable.	(Gateway Cities Council of Governments) Comment 6-7		identify potential metrics to measure progress in increasing tree canopy in SELA. “
Metal Processing Facilities				
55	Goal G discusses referrals to other agencies. Please include land use agencies (e.g. Planning). Public Health might be appropriate as well.	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-10		Chapter 5d, Action G, was modified to “Make referrals to the appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD’s jurisdiction (e.g., Water Board, DTSC, Cal-OSHA, <u>local land-use agencies, and Public Health departments</u>) “
56	Add robust emissions reductions to the metals processing air quality priority: at least 50% reductions by 2025, at least 75% by 2030 in SELA	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-4		Establishing emission reduction targets for metal processing is challenging as there are a wide variety of toxic air contaminants that vary for the different metal processing activities. Fugitive emissions are generally a significant portion of metal processing emissions but are very difficult to quantify. Other metrics such as adopted and amended rules that are establishing point and fugitive point source control requirements may be a better indicator that these sources are being addressed.

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57	It is important to add an overall goal to eliminate community exposure to hazardous metals processing and nuisance odors and noise.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4- 9		Chapter 5e was updated to include the CSC’s goal to eliminate community exposure to metal toxic air contaminants, hazardous metals processing, odors and noise from metal processing facilities. This goal and 8 various actions in Chapter 5c will help achieve the goal are aimed at achieving the community’s goal, to reduce and eliminate exposure to metal toxic air contaminants to the maximum extent feasible.
58	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.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-10		South Coast AQMD staff generally does review rules and regulations at other agencies. Staff will take a closer look at other air quality agencies to identify if there are any regulatory gaps in South Coast AQMD’s toxics rules that are regulating metal processing facilities. In most cases, South Coast AQMD toxic rules are more stringent than other California air district rules and CARB air toxic control measures.
59	Include installation of permanent monitoring, so as not to overly rely on monitoring snapshots in time.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli		Monitoring activities in SELA will include measurements of air toxic metals at a fixed monitoring station, which will be established as part of the AB 617 program. This type of measurement is initially conducted for a year and then repeated at the end of the AB 617 program to establish

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		Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-11		<p>baseline concentrations for the pollutants of interest and to assess the effectiveness of emission reduction strategies.</p> <p>The monitoring strategy to address Metal Processing Facilities is comprised of fixed monitoring, mobile monitoring, and follow-up measurements and investigative actions, as appropriate (see Appendix 6, section 7.3 of the CERP for more details).</p>
60	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	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-24		<p>The AB 617 legislation does not expand South Coast AQMD's authority to address land-use issues. However, the South Coast AQMD is collaborating with land-use agencies and programs, such as the Los Angeles County Green Zones Ordinance, to support setbacks and other measures to reduce residents' exposures to toxic metals.</p> <p>South Coast AQMD staff wrote a comment letter on the Los Angeles County Draft Green Zones Program (Proposed Project) and Notice of Preparation (NOP) for the Proposed Project on August 24, 2020. In this letter, South Coast AQMD staff recommended that the Lead Agency include requirements in the Green Zones Program consistent with the CARB Air Quality and Land Use Handbook to avoid siting sensitive land uses within 1,000 feet of chrome platers. This recommendation is based on scientific studies that showed</p>

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				<p>that potential health risk drops off rapidly, with over 90 percent reduction in risk within 300 feet.</p> <p>The letter from South Coast AQMD staff is available here: http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2020/August/LAC200616-01.pdf</p> <p>The CARB Air Quality and Land-Use Handbook can be found here: https://ww3.arb.ca.gov/ch/handbook.pdf</p>
61	Explore development of a notification system for schools and sensitive receptors on public nuisances caused by metals facilities, including dust, noise, odors and others.	Dilia Ortega, Lena Ruvalcaba, Natalie Martinez, Citlalli Gutierrez, Dayana Ortega (Communities for a Better Environment) Comment 4-20		<p>Chapter 5e, Action I, was added to the CERP and states, “Explore the development of e-mail notifications, for schools and sensitive receptors. Consult with Community Groups that work with schools on key considerations for the e-mail notifications (e.g., objectives of the notifications), and update CSC biannually on e-mail notifications progress”.</p> <p>Members of the public may submit a dust, nuisance, or other complaint at 1-800-CUT-SMOG or online at www.aqmd.gov. Additionally, to encourage the posting of South Coast AQMD compliant hotline for industrial uses, the South Coast AQMD staff wrote a comment letter on the Los Angeles County Draft Green Zones Program, which includes portions of the SELA community, on August 24, 2020. In this</p>

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				<p>letter, South Coast AQMD staff recommended that the Lead Agency include requirements in the Green Zones Program to include signage requirements for industrial uses, including metal processing facilities, within the Green Zone Districts and subject to South Coast AQMD rules. South Coast AQMD staff recommends that signage include information about how to submit air quality complaints by phone by calling 1-800-CUTSMOG or online by visiting www.aqmd.gov. An example of signage requirements is in Paragraph (K) of South Coast AQMD Rule 1430 – Control of Emissions from Metal Grinding Operation at Metal Forging Facilities available at http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1430.pdf.</p> <p>The comment letter from South Coast AQMD staff is available here: http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2020/August/LAC200616-01.pdf</p>
62	(5e, Action A) Include "number of participants" as a metric.	Gateway Cities Council of Governments Comment 6-8		Chapter 5e, Action A, a metric was included that states, "Number of informational workshop participants"
63	(5e, Action E) Include "reporting of elevated levels of air toxic metals to the CSC" to the metrics.	Gateway Cities Council of Governments		Chapter 5e, Action E, a metric was included that states, "Report air monitoring findings to CSC".

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		Comment 6-9		
Railyards and Locomotives				
64	CERP should incorporate language encouraging increasing the accessibility of fuel cell refueling infrastructure at railyards since railyard equipment can be powered through fuel cell technology.	Mark Sheldon (Member of the public)	■	<p>South Coast AQMD staff have presented Railyard ISR Workshops concepts to address emissions from rail operations including requiring engineering plans for zero emission operations. These zero emission operation fuel types are not specified and can be interpreted as either electric, fuel cell, or other viable zero emission options.</p> <p>The four South Coast AQMD Railyard ISR concepts being developed include: 1) an ISR to require engineering plans for zero emissions operations, 2) a new incentive program focused on the cleanest locomotive use, 3) evaluating new monitoring approaches for 4 in-use locomotives, and 4) reduce exposures from locomotive maintenance emissions.</p> <p>Additional information on the South Coast AQMD Railyard ISR rule development and other facility based mobile source measures, please visit: http://www.aqmd.gov/home/air-quality/air-quality-studies/special-monitoring/clean-air-plans/air-quality-mgt-plan/facility-based-mobile-source-measures</p>

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65	Has a baseline level of emissions been established for the railyards and locomotive air quality priority to help track future progress addressing this concern? Also, has an emissions inventory been established for the SELA community which can be used to help develop such reduction targets and track the progress made towards achieving them?	Stephanie Cadena (Gateway Cities Council of Governments)	●	CARB staff are committed to present the updated locomotive line-haul and switcher inventories to the SELA CSC mid-2021. Additionally, for community specific rail and railyard emissions for SELA, CARB can work to allocate the emissions to develop an updated locomotive/railyard community inventory to address this comment.

General Industrial Facilities				
66	CERP should include language outlining follow-up actions if an industrial facility is found to exceed emissions standards and encouraging the adoption of best available control technologies.	Lizette Ruiz (Active Residents – South Gate)	◆	<p>Over the next six months, South Coast AQMD staff will work with the SELA CSC to identify the types of industrial facilities of concern. The CSC will then prioritize emissions sources and identify potential air monitoring or emissions and exposure reduction measures, if necessary. Once this information is identified, staff can assess the state of control technologies currently being used by these facilities before evaluating the best available control technologies/best available retrofit control technology which those facilities might be able to adopt.</p> <p>South Coast AQMD staff will identify opportunities to use incentive funds to encourage the adoption of technologies above and beyond rule requirement.</p> <p>Facilities that have issues complying with South Coast AQMD rules are issued violations and can be brought before the Hearing Board to develop a plan for the facility to come into compliance.</p>
67	The CERP should encourage the use of zero-emission power sources in the industrial sector.	Mark Sheldon (Member of the public)	◆	<p>Over the next six months, South Coast AQMD staff will work with the SELA CSC to identify the types of industrial facilities of concern. The CSC will then prioritize emissions sources and identify potential air monitoring or emissions and exposure reduction measures, if necessary. Once this information is identified, staff can review this suggestion in consultation with the CSC as potential new actions are developed.</p>
68	Goal B discusses identifying a list of industrial facilities of concern. This should be done in collaboration with	Tahirah Farris (Los Angeles County)	●	<p>Chapter 5g, Action B, modified to read “Work with the <u>CSC and local agencies (e.g., L.A. County Industrial Use Task Force)</u> to identify industrial facilities of concern within the</p>

	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.	Department of Regional Planning Comment 1-11		SELA emissions study area, provide a list of South Coast AQMD rules applicable to the industrial facilities identified, provide a three (3) year compliance history of the facilities, summarize available emissions data and air monitoring data collected at or near facilities, and other sources of information.”
69	Clarity over the implementation of Best Available Retrofit Control Technology (BARCT) requirements is needed, especially considering the heavy industrial presence in the region.	Chris Chavez (Coalition for Clean Air) Comment 3-7	●	Please see Response 66, which describes the process we will undertake to prioritize and address facilities within this General Industrial air quality priority. Appendix 3a provides additional information regarding BARCT requirements, including the specific South Coast AQMD rules that implement such requirements. Appendix 3a also includes a list of NOx RECLAIM facilities within this community that may be subject to BARCT. Additional non-RECLAIM facilities may also be subject to BARCT requirements, but this assessment is still ongoing.
70	Recommends that air monitoring campaigns for the CAMP take into consideration facilities operating overnight.	Lizette Ruiz (Active Residents – South Gate)	●	Mobile air monitoring efforts occur at different times throughout normal business hours – from morning to late afternoon – to assess if there are any locations with persistent elevated levels or air pollution. If these locations are identified, stationary air monitors are placed in that area for 24 hours to determine if an emission source can be determined. This can then lead to enforcement or further investigative actions to reduce emissions at a given facility, including scheduling mobile air monitoring efforts during off hours for certain pollutants.
71	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	Edith Moreno (SoCalGas) Comment 2-5	●	Chapter 5g, Action A, was modified to include, “Conduct an annual community workshop with CARB to educate the community on the Criteria Pollutant and Toxics Emissions Reporting (CTR) process and share the data that has been collected from facilities in the SELA community. South Coast AQMD and CARB to help community interpret results

<p>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 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: 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.</p>			<p>and identify industrial facilities with highest toxics emissions.”</p>
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Other				
72	<p>Does South Coast AQMD address emissions from planes flying over the community? Also, does the agency address situations such as the incident in January when a Delta jet dumped gasoline over the community?</p>	<p>Jasmine Beltran (Active Residents – South Gate)</p>	●	<p>South Coast AQMD has an incidence report program to address specific situations including the example mentioned. However, emissions from airplanes flying overhead are not appropriately measured by air monitors at ground level. In general, airplane emissions are regulated by international organizations and the U.S. EPA, and not at the state or local level.</p> <p>South Coast AQMD issued a Notice of Violation (NOV) on January 17, 2020 to Delta Airlines following the jet fuel dump that impacted students, teachers and other members of the public in Los Angeles County.</p> <p>The NOV alleges that Delta Airlines caused a public nuisance in violation of the agency’s Rule 402 and California Health and Safety Code Section 41700. South Coast AQMD’s investigation was prompted by community complaints which resulted in inspectors being dispatched to several locations. Complaints regarding the exposure to the jet fuel were reported at multiple schools within the Los Angeles Unified School District, the Cudahy Public Library, and two schools within the El Rancho Unified School District.</p> <p>Once issued, NOVs can result in civil penalties. In some cases, the company can choose to implement measures to reduce emissions or otherwise prevent further violations. If no settlement is reached, a civil lawsuit may ultimately be filed in superior court. South Coast AQMD has coordinated with, among others, the Los Angeles County Fire Department, the Los Angeles County Department of Public</p>

				Health, the Los Angeles Unified School District and the El Rancho Unified School District.
73	Are there plans to incorporate drones into the Community Air Monitoring Plan (CAMP) to conduct air measurements?	Jasmine Beltran (Active Residents – South Gate)	◆	This is a technology which South Coast AQMD is evaluating but is not currently being used for air measurements. The technology is currently under development and could possibly be a useful tool in the future to make air measurements in locations which are difficult to access, such as landfills. However, it is not currently being considered for AB 617 given its early stages of development.
74	A summary of the CAMP is provided. Is the full plan available somewhere else or will that be detailed in Appendix 6?	Tahirah Farris (Los Angeles County Department of Regional Planning) Comment 1-12	●	The Community Air Monitoring Plan is available at: http://www.aqmd.gov/nav/about/initiatives/community-efforts/environmental-justice/ab617-134/ab-617-
75	For the General Industrial air quality priority, has South Coast AQMD considered replacing the large amount of diesel generators with zero-emission alternatives?	Mark Abramowitz (Member of the public)	●	South Coast AQMD staff plans to continue working with the CSC to develop the General Industrial air quality priority in the upcoming months to identify and address emission sources of concern. Incentives could then be provided for back-up diesel engine alternatives such as fuel cells, battery storage, or cleaner combustion technologies. South Coast AQMD staff is also working to encourage alternatives to diesel back-up generators district-wide through upcoming rulemaking and the 2022 Air Quality Management Plan.

76	Where is the budget for the South Coast AQMD program coming from? And has South Coast AQMD prioritized the CERP actions or air quality priorities to receive the allotted funding to address those concerns?	Stephanie Cadena (Gateway Cities Council of Governments)	●	The funding allotted to the AB 617 program is never guaranteed as it is determined on a year-by-year basis by the state legislature. There is approximately \$70M available in AB 617 incentive funds for all of the South Coast AQMD communities to support the third year of the program and the agency will seek to identify emission reduction projects to effectively use those funds. Also, South Coast AQMD held the Incentives Strategies Public Consultation Meeting on October 15 th to seek input from CSC members from the different AB 617 communities as to how to equitably distribute those funds.
Chapter 4				
77	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.	Edith Moreno (SoCal Gas) Comment 2-1	●	<p>The intention of the chapter was to introduce the enforcement process and approach for both CARB and South Coast AQMD. The actions to address community concerns through compliance and enforcement – which constitute enhanced enforcement, and not merely business as usual, are written into Chapter 5.</p> <p>The following actions are examples of actions that go beyond business as usual:</p> <ul style="list-style-type: none"> • Chapter 5b, Action C, “CARB to collaborate with South Coast AQMD to conduct quarterly enforcement sweeps, evaluate findings, seek input from CSC, and report back to CSC periodically” • Chapter 5c, Action C, “Continue complaint response including SELA complaint tracking, provide timely updates to complainants, continue

				<p>Rule 415 compliance inspections, and provide an annual summary of findings to the CSC. “</p> <ul style="list-style-type: none"> • Chapter 5e, Action G, “Make referrals to the appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD’s jurisdiction (e.g., Water Board, DTSC, Cal-OSHA, local land-use agencies, and Public Health departments)” • Chapter 5f, Action I, “CARB to prioritize the SELA community for enforcement of the TRU Regulation with semi-annual inspections and report the compliance rate to CSC “ • Chapter 5f, Action J, “CARB to prioritize the SELA community for enforcement of the Cargo Handling Equipment (CHE) Regulation by conducting an annual audit for each railyard detailing: <ul style="list-style-type: none"> ○ Total number of regulated pieces of equipment – both yard and non-yard trucks at each rail facility ○ Compliance rates for opacity and performance standards at each rail yard <p>CARB will be establishing a Community Pollution Enforcement Workgroup under Chapter 5b, Action A, and will work with local stakeholders, including the CSC, to address community issues related to enforcement.</p>
78	<p>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</p>	<p>Edith Moreno (SoCal Gas) Comment 2-2</p>		<p>Complaints vary significantly depending on the type of complaint (odor, dust, smoke, etc.), and the alleged source (e.g., a particular facility, jobsite, or industry).</p> <p>For odor complaints, there may be small windows of opportunity for inspectors to detect the odors at issue depending on weather conditions and the particular type of facility or operation. Many inspectors are assigned to</p>

	<p>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.</p>			<p>geographic areas and will make note of repeated or ongoing community concerns. In some situations, enforcement staff will conduct field operations (including during nights and/or weekends, when warranted) designed to position inspectors close to sites or areas where odor complaints are being received, so that they can respond more quickly and have a better chance to identify emission sources. We encourage community members to lodge complaints with South Coast AQMD every time they experience odors or other air pollution concerns. The complaints are documented and tracked in our system and allow us to identify ongoing problems that we can attempt to address through proactive field operations.</p> <p>For complaints associated with specific equipment at a facility, inspectors conduct focused inspections of the equipment or processes in question when responding to the complaints. That means more frequent in-person visits to the facility and enforcement actions for any violations observed while on-site.</p>
<p>79</p>	<p>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</p>	<p>Edith Moreno (SoCal Gas) Comment 2-3</p>	<p>◆</p>	<p>The purpose of Figure 4-2 is to provide a global look at the number of NCs and NOVs issued annually in the SELA community. We enforce permit requirements and rules/regulations uniformly across all different types of air pollution sources. So while a certain portion of the notices may be issued to cities or schools, there are also notices issued to many other kinds of sources, including toxics facilities.</p> <p>South Coast AQMD takes toxics sources very seriously. We have a specialized enforcement team that is trained to</p>

	<p>still going to speed. In my opinion, the figure is really misleading.</p>			<p>inspect and evaluate – and focus exclusively on – facilities/sites where hazardous air pollutants are found. Some of these industries receive more frequent inspections. For example, we attempt to inspect certain types of facilities that use hexavalent chromium in their operations on a quarterly basis.</p> <p>We can provide to the CSC a future update on the breakdown of the types of facilities, industries, and sectors where NCs and NOVs are being issued.</p>
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