

Community Air Protection Program

**East Los Angeles, Boyle Heights, West
Commerce**

Community Emissions Reduction Program

Staff Report

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For more information

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Staff Recommendation

Staff recommends that the California Air Resources Board (CARB or Board) approve the East Los Angeles, Boyle Heights, West Commerce community emissions reduction program developed pursuant to Assembly Bill (AB) 617¹ and direct CARB staff to work with the South Coast Air Quality Management District (South Coast AQMD) to take additional actions to strengthen implementation.

Background

CARB established the Community Air Protection Program (Program) to implement AB 617, which requires new community-focused action to reduce air pollution. On September 27, 2018, the Board selected the community of East Los Angeles, Boyle Heights, West Commerce in South Coast AQMD to develop a community emissions reduction program and a community air monitoring plan as one of ten initial communities. The Board also approved the *Community Air Protection Blueprint*² (Blueprint), which, among other things, establishes criteria for developing and implementing community emissions reduction programs, contained in the Blueprint *Appendix C* and summarized in the *Checklist for Community Emissions Reduction Program Evaluation*³.

CARB staff reviewed the Community Emissions Reduction Plan for East Los Angeles, Boyle Heights, West Commerce (Plan)⁴, adopted by the South Coast AQMD Governing Board on September 6, 2019. This staff report summarizes the results of CARB staff's review and evaluation of the Plan to determine if it meets the criteria established in AB 617⁵ and the Blueprint, reflects community priorities, and is likely to reduce emissions and exposure to air pollution in the community.

Plan Overview

South Coast AQMD convened a community steering committee to develop the Plan. The steering committee is made up of 34 primary members⁶ and held 10 meetings between October 2018 and October 2019. South Coast AQMD also hosted a workshop to get the broader public's feedback on the Plan in July 2019.

The Plan focuses on reducing exposure to diesel particulate matter (DPM), oxides of nitrogen (NOx), volatile organic compounds (VOC), and toxic air contaminants from sources such as neighborhood and freeway traffic from trucks and automobiles, railyards, metal processing facilities, rendering facilities, and auto body shops along with actions to reduce exposure to air pollution at schools and daycare centers with 25 actions summarized in Figure 1⁷.

¹ Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017.

² The Blueprint is available at: <https://ww2.arb.ca.gov/resources/documents/final-community-air-protection-blueprint>

³ The Checklist for the Community Emissions Reduction Program Evaluation begins on page C-41.

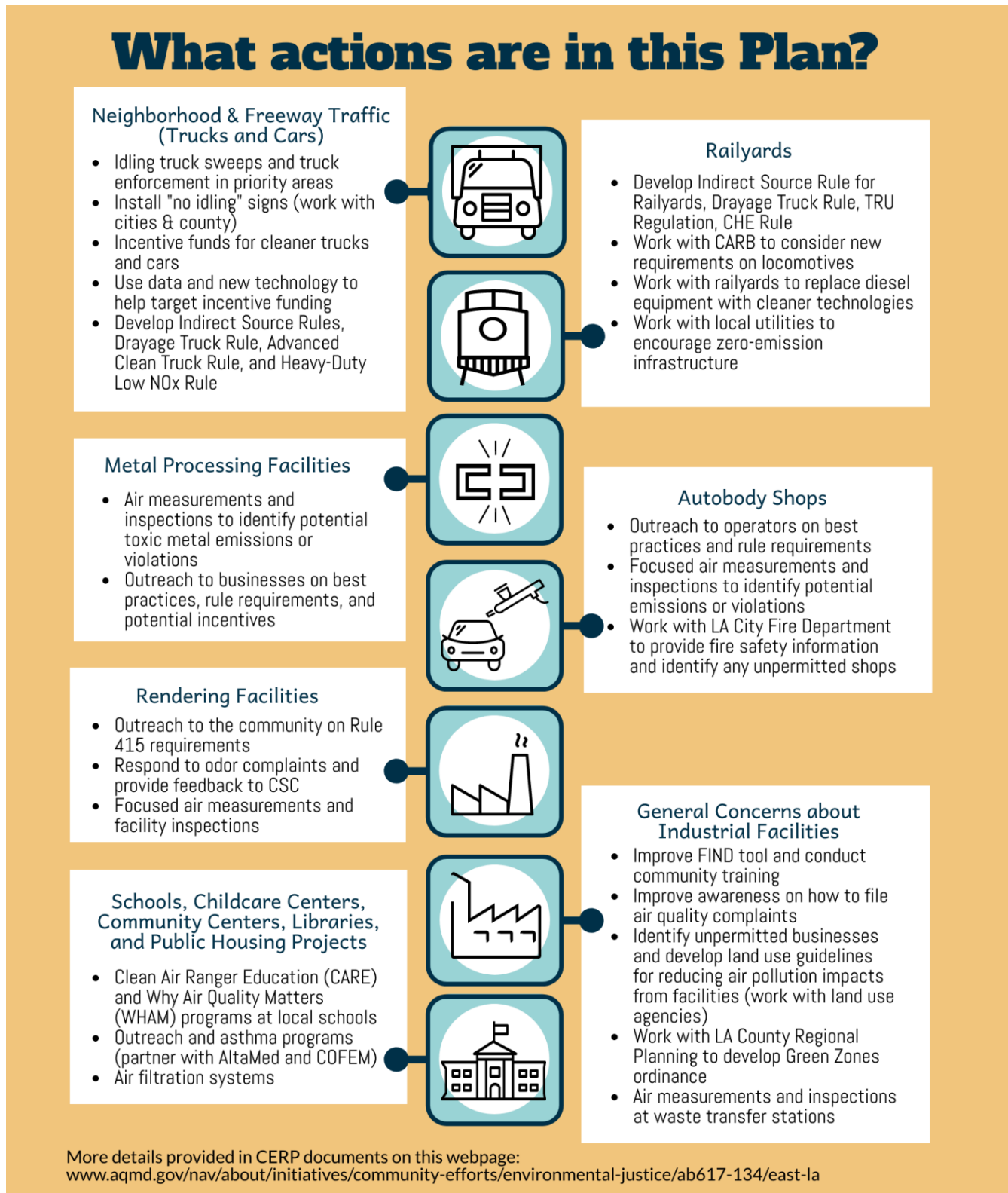
⁴ To review the Plan and associated documents, visit <http://www.aqmd.gov/nav/about/initiatives/community-efforts/environmental-justice/ab617-134/east-la>.

⁵ California Health and Safety Code §44391.2.

⁶ See pages 2-3 and 2-4 in the Plan for the community steering committee roster.

⁷ For the full list of strategies, see Chapter 5 of the Plan.

Figure 1. Excerpt from South Coast AQMD Board package for Agenda No. 25B September 6, 2019



Summary of CARB's Evaluation

CARB staff's review of the Plan follows the framework established in the Blueprint. In addition to the Plan itself, staff also reviewed meeting materials including a record of public comments and responses to those comments by South Coast AQMD, included in the Plan. During the Plan development process, CARB staff attended every East Los Angeles, Boyle Heights, West Commerce community steering committee meeting and met regularly with South Coast AQMD staff. Finally, CARB staff also hosted a community meeting in Boyle Heights on January 30, 2020, in coordination with South Coast AQMD, to solicit additional community input to the CARB staff recommendations.

State law gives communities and air districts 12 months to develop a community emissions reduction program following CARB community selection. One year is a very short amount of time to organize a community steering committee, develop a process for operation of the community steering committee, establish the technical foundation for understanding the community's air quality status, and develop the strategies to reduce air pollution emissions and exposure. Additionally, the East Los Angeles, Boyle Heights, West Commerce community concurrently developed a community air monitoring plan.

To ensure that the Plan successfully delivers on the identified strategies, there are elements of the Plan that need additional clarification and detail as the Plan moves from the short time frame provided for development into the implementation phase. While each of the initial communities and their community emissions reduction programs have now been approved by the air districts, the need to focus on strengthening the plans during implementation is a theme that applies to all first-year communities, not just the East Los Angeles, Boyle Heights, West Commerce community.

Therefore, CARB staff is recommending approval of the Plan with additional Board direction to CARB staff, South Coast AQMD, and the community steering committee to begin Plan implementation immediately, while taking steps to strengthen implementation of the Plan. These recommendations draw directly from the core principles of the Board-adopted Blueprint.

Staff has organized the results of this review into two categories:

- Key strengths of the Plan, which highlights areas staff found particularly noteworthy; and
- Recommended actions to strengthen implementation, including areas where additional discussion, information, clarification and detail will help ensure the Plan is successful and achieves emissions reductions in the East Los Angeles, Boyle Heights, West Commerce community.

Key Strengths

CARB staff recognizes South Coast AQMD and the community steering committee for their commitment to work together while meeting the ambitious deadlines required by AB 617. During development of the Plan, South Coast AQMD took a number of measures to ensure accessibility and transparency, including streaming community steering committee meetings on Facebook Live and archiving the recordings on their program webpage, and posting bios of steering committee members. The South Coast AQMD also provided individual steering committee members the opportunity to share their air pollution expertise and experiences within the community.

South Coast AQMD worked with the steering committee to identify key air quality priorities and developed a set of strategies designed to work together to address each priority. For example, actions to address metal processing facilities and auto body shops include employing air monitoring as an investigative tool to identify the need for enhanced enforcement, incentives, public outreach, and collaboration. The Plan also includes commitments by South Coast AQMD and CARB to work together to explore new technologies such as Automatic License Plate Readers (ALPR) and the Portable Emission Acquisition System (PEAQS) to better understand the impacts of mobile sources, and explore using this information to help inform targeted outreach for incentive programs.

South Coast AQMD and the community steering committee drew from multiple sources of information to develop a strong technical foundation for the reduction strategies. This included a comprehensive three-year enforcement history, an interactive story map⁸ for the community, which was accessible through their website, and information from previous air quality studies, such as Multiple Air Toxics Exposure Study IV (MATES IV). South Coast AQMD also created a Technical Advisory Group composed of technical experts and community steering committee members, to help develop the technical components of the plan and provide an intermediary between technical experts within various agencies and community steering committee members.

Recommended Actions to Strengthen Implementation

Staff recognizes that the Plan is the culmination of an extensive amount of work in the first year of a new program. In future efforts, South Coast AQMD and CARB staff should work with the community steering committee to refine issues related to implementation as the strategies in the Plan move forward, as well as the periodic status reports required under AB 617.

To support implementation moving forward, CARB staff has developed a set of recommended actions in four key areas: reduction strategies, mobile and indirect sources, ensuring effective enforcement, and community-level technical foundation. Progress in implementing these recommendations should be included in the annual progress report required by the AB 617 statute.

⁸ For East Los Angeles, Boyle Heights, West Commerce Community Story Map visit: <https://scaqmd-online.maps.arcgis.com/apps/MapJournal/index.html?appid=a4cccd0a6419486d942b45cddb3d3301>

Reduction Strategies

The Plan includes a set of emissions and exposure reduction strategies, which are generally responsive to community concerns and recommendations. However, community members have expressed the need to continue to discuss the specific types of incentive projects that will be funded, with a focus on zero emission technologies where feasible, as well as additional detail on criteria for project selection. This process has already begun with discussion of community steering committee priorities to determine locations for school filtration projects and idling enforcement. South Coast AQMD has also continued to expand on metrics to track progress over the course of developing the Plan, however many are still high level in nature and would benefit from additional specificity as individual strategies are further developed. Finally, the Plan includes a process to periodically update the community steering committee with new information on air monitoring, focused enforcement activities, outreach efforts, and collaborations with other agencies and partners. This may require ongoing adjustments to the Plan strategies based on new information and continued discussion gained through implementation.

Therefore, to help clarify and enhance implementation, staff recommends that the Board direct CARB staff to work with South Coast AQMD and the community steering committee to undertake the following actions during the Plan implementation process:

1. Prioritize project types for incentive funding based on steering committee recommendations, including the use of zero emission technologies, where feasible, and identify funding sources for incentive-based and other strategies, including AB 617 incentive funds.
2. Define implementation steps and milestones for Plan actions that require further detail such as incentive funding, outreach, and exposure reduction measures for specified sensitive receptors in order to provide additional clarity on how these actions will be implemented.
3. Refine metrics for tracking progress to establish what constitutes a successful action.
4. Update the emissions reduction targets as new information becomes available for the regulatory and other strategies that currently do not have defined benefits.

Mobile and Indirect Sources

The impacts of mobile and indirect sources of emissions such as trucks and railyards were a significant community concern. Both CARB and South Coast AQMD are committed to a suite of measures to reduce emissions from these sources. The Plan includes South Coast AQMD's commitment to the proposed regulatory Indirect Source Rule (ISR) for railyards, and CARB's commitment to reduce railyard emissions. CARB and South Coast AQMD are developing a coordinated set of actions for rail, and have jointly held workshops to discuss concepts such as incentivizing fleet turnover, limiting re-manufacturing of older engines, and adopting U.S. EPA's idling limit. CARB's rulemaking efforts for trucks, and other freight sources are placing a focus on accelerating the transitions to zero emission technologies in light of the needs to reduce exposure in AB 617 communities. CARB is also supporting these efforts through development of the Freight Handbook, with a Concept Paper released in December 2019. The Plan also includes commitments by South Coast AQMD and CARB to work together to explore new truck identification technologies such as ALPR and PEAQS to better understand their impacts.

Therefore to further support and enhance implementation, staff recommends that the Board direct CARB staff to work with South Coast AQMD to undertake the following actions during the Plan implementation process:

5. Provide ongoing reports back to the steering committee on collaboration with other agencies for designating truck routes and parking away from sensitive receptors.
6. Continue work on reducing impacts from railyards, with consideration of any additional mechanisms that may be needed to ensure anticipated exposure reductions are achieved.
7. Work with the steering committee to advance implementation of the strategies outlined in the Freight Handbook Concept Paper in the community.
8. CARB commit to supporting a one-week ALPR pilot study using a mobile ALPR measurement station in the community and subsequently train South Coast AQMD staff to take ALPR measurements independently. CARB staff will also collaborate with South Coast AQMD to design, build, and operate a PEAQS-style system. This collaboration will be iterative as South Coast AQMD, CARB, and the community steering committee work to develop the system for specific objectives that support the Plan.

Ensuring Effective Enforcement

Steering committee members expressed strong interest in the importance of effective and coordinated enforcement of both South Coast AQMD and CARB programs, particularly for heavy duty truck idling within the community. Staff recommends that the Board direct CARB staff to work with South Coast AQMD and the community steering committee to undertake the following action during Plan implementation:

9. Review the results of South Coast AQMD and CARB's enhanced enforcement activities with the community steering committee, discuss the steps taken to address any issues identified, and identify appropriate refinements to the focused enforcement activities within the community.

Community-Level Technical Foundation

The Plan relies upon a community-scale emissions inventory to estimate local source contributions to DPM and NOx concentrations, and MATES IV modeling for estimated cancer risks. Community steering committee members have expressed interest in continuing to understand this data, and to bring updated data to the community as new information becomes available, such as through MATES V. Such updated data may be helpful to refine actions during Plan implementation. To help further characterize air quality in East Los Angeles, Boyle Heights, West Commerce and to support tracking progress, staff recommends the Board direct CARB staff to work with South Coast AQMD to undertake the following and continue to share this information through the Technical Advisory Group:

10. Continue community air monitoring and the ongoing process to improve emissions inventory and air quality modeling by incorporating the newest resources and tools as they become available as part of Plan implementation and to characterize current air quality in the community.