

California Air Resources Board
Community Air Protection Program

South Los Angeles Community Emissions Reduction Plan Staff Report

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Staff Recommendation

Staff recommends that the California Air Resources Board (CARB or Board) approve the South Los Angeles community emissions reduction plan developed pursuant to Assembly Bill (AB) 617¹ and direct CARB staff to work with the South Coast Air Quality Management District (SCAQMD or District), the community co-leads, and the South Los Angeles Community Steering Committee (CSC), 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 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. At the same meeting, the Board also approved 10 initial communities to develop and implement community emissions reduction programs, community air monitoring plans, or both. On February 25, 2021, the Board selected three additional new communities, including the South Los Angeles community. The South Los Angeles community was selected to develop a community emissions reduction program and a community air monitoring plan.

The District and the community co-leads worked with a community steering committee to develop the *Community Emissions Reduction Plan for South Los Angeles* (Plan or CERP)⁴ to reduce emissions and exposure to air pollution in the community. The community co-leads included representatives from Physicians for Social Responsibility – Los Angeles (PSR-LA), Strategic Concepts in Organizing and Policy Education (SCOPE), and Watts Clean Air and Energy Committee (Watts Clean Air).

On June 3, 2022, the SCAQMD Governing Board adopted the Plan, which contains a set of strategies to provide benefits to the South Los Angeles community. Examples of these actions include enhanced enforcement, collaboration, rule development, incentives, and air monitoring. The CARB Board will be acting on this Plan.

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

² The Blueprint is available at: <https://ww2.arb.ca.gov/capp-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/docs/default-source/ab-617-ab-134/steering-committees/south-la/final-cerp.pdf?sfvrsn=12>.

This 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.

Community Emissions Reduction Plan Overview

In accordance with the Blueprint, SCAQMD and the community co-leads convened a community steering committee to develop the Plan. The steering committee is made up of 41 primary members, 26 of whom are residents, and held 18 public meetings between January 2021 and May 2022. To further facilitate the CERP development process, SCAQMD hosted over 50 meetings with the community co-leads during this same time. During the last six months of CERP development, there was a notable decrease in meeting attendance by steering committee members. The reasons for this decrease in attendance are not yet known. CARB staff support anticipated efforts by the District to engage with CSC members to better understand how they wish to participate in the implementation of the Plan, including additional recruitment to increase representation from more jurisdictions within the community boundary.

The Plan focuses on reducing emissions and exposure to oxides of nitrogen (NO_x), volatile organic compounds (VOCs), metal particulates and hexavalent chromium, diesel particulate matter (diesel PM or DPM) and fine particulate matter (PM_{2.5}) from sources such as heavy-duty trucks and passenger vehicles; auto body shops; metal processing facilities; and oil and gas production. The District estimates a reduction of 193 tons per year of NO_x, and 2.32 tons of DPM from incentive projects⁶ by 2026. The estimated additional contributions in emissions reductions from CARB statewide measures that will directly benefit the South Los Angeles community are⁷:

- NO_x by 152 tons in 2026 and by 259 tons in 2031;
- DPM by 2.3 tons in 2026 and by 3.8 tons in 2031;
- VOC by 146 tons in 2026 and by 438 tons in 2031;
- PM_{2.5} by 4.2 tons in 2026 and by 16 tons in 2031.

⁵ California Health and Safety Code § 44391.2.

⁶ Estimated NO_x and DPM emissions reduction targets from this CERP are from projected incentive projects (assuming a minimum of \$10 million invested for mobile source projects) and emissions reduction targets from CARB's statewide measures. For more information, see page 5a-5 of the Plan.

<http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/final-cerp.pdf?sfvrsn=12>

⁷ For more information, see Estimated Emission Reductions from CARB Measures section starting on page 5a-8 of the Plan. <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/final-cerp.pdf?sfvrsn=12>

Figure 1, below, lists examples of the actions and strategies in the Plan to reduce emissions and exposure in eight categories. For the comprehensive list of strategies along with details, see Chapter 5 of the Plan.

Figure 1. Examples of Actions in the South Los Angeles Community Emissions Reduction Plan

<p>Mobile Sources</p>	<p>Concerns: warehouses; idling near residences and schools; truck traffic; freeway rush hour traffic.</p> <p>Actions: idling enforcement sweeps; warehouse outreach on Rule 2305 (facility based mobile source measure for warehouses); compliance inspections; school filtration; explore potential options for incentive funds for cleaner technologies within the community.</p>
<p>Auto Body Shops</p>	<p>Concerns: permitted and unpermitted auto body shops; proximity to residences and schools; improper storage and disposal of hazardous chemicals</p> <p>Actions: auto body shop enforcement sweeps with appropriate enforcement agencies; outreach to auto body shop owners and operators on best management practices; initial air measurement surveys near facilities of concern; initiate rule development of 1151 (coatings at body shops) and 1171 (solvent cleaning).</p>
<p>General Industrial Facilities</p>	<p>Concerns: pallet manufacturers; gas stations; chemical manufacturers; tire manufacturers; dry cleaners</p> <p>Actions: identify facilities of concern, gather information and use information to identify emissions and exposure reduction measures; enforcement of Rule 1102 (non-perc) and Rule 1421 (perc) at dry cleaners; initiate rule development of Rule 1102 to set new emission standard.</p>
<p>Metal Processing Facilities</p>	<p>Concerns: emissions of toxic air contaminants; odors; locations next to sensitive receptors.</p> <p>Actions: identify metals facilities to gather data and determine strategies for emissions reduction; conduct air monitoring; rule development of Rule 1460 (metal recycling and shedding) to address best management practices.</p>
<p>Oil and Gas Industry</p>	<p>Concerns: proximity of oil and gas sources to residences; limited transparency of monitoring data and enforcement; lack of reporting and noticing for acidizing injection wells.</p> <p>Actions: air monitoring to characterize emissions; collaborate with partner agencies; rule development for Rule 1148 series (oil and gas wells and chemical suppliers); identify opportunities to support community scientists.</p>

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 reviewed steering committee meeting materials and a record of public comments and responses to those comments by SCAQMD, which are included in the appendices of the Plan. During the CERP development process, CARB staff attended every South Los Angeles community steering committee meeting, met regularly with SCAQMD staff and separately with SLA CSC co-leads and with steering committee members, as requested. Finally, CARB staff also engaged in one-on-one focused interviews with community steering committee members to solicit additional community perspectives to help inform CARB staff's recommendations. Seven community steering committee members participated in one-on-one discussions. The discussions focused on the roles of SCAQMD, the community co-leads, and CARB, in the development of the Plan and the Plan itself, and what was learned during the process that could benefit other communities. The most prominent messages from the seven interviews centered around: ensuring the District provided a community-driven process for developing the CERP; addressing the difficulty of working under a compressed timeline; needing quantifiable, permanent, enforceable emissions reductions; and requiring zero-emission equipment and fleets for industrial operations.

State law gives communities and air districts 12 months to develop a CERP following CARB community selection. One year is a very short amount of time to convene a community steering committee, develop a process for governance of the community steering committee, build relationships within the steering committee and with regulatory agencies, establish the technical foundation for understanding the community's air quality status, and develop strategies to reduce air pollution emissions and exposure. The Statewide stay-at-home orders through June 2021 and the ongoing need to protect public health during this time exacerbated the already short timeline, with the community steering committee requesting that the steering committee meetings remain virtual.

In December 2021, SCAQMD and the community co-leads sent letters to CARB requesting an extension for the CERP development deadline. It highlighted the challenges that the South Los Angeles community faced in developing the Plan and asked for an additional four months to continue working on the Plan. While AB 617 does not give CARB the authority to adjust the statutory 12-month deadline, CARB's response noted the challenging circumstances related to the global pandemic and commended the Air District and co-leads on the intentional approach to ensure meaningful engagement in development of the Plan.⁸

The Plan meets the criteria established in AB 617 and the Blueprint, reflects the community's priorities, and is likely to reduce community emissions and exposure to air pollution. However,

⁸ Extension request letters and CARB responses: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/ceip-extension-letter.pdf?sfvrsn=8> and <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/ceip-acknowledgment-letter-3-3-2022.pdf?sfvrsn=8>

to ensure successful implementation, the Plan must be strengthened by continuing to refine details around strategies and ensuring continued collaboration.

CARB staff recommends approval of the Plan with additional Board direction to CARB staff, SCAQMD, the community co-leads, and the community steering committee to begin Plan implementation immediately to start reducing emissions and exposures, 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, and the Plan development process, which highlight areas staff found particularly noteworthy; and
- Recommended actions for SCAQMD and CARB 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 South Los Angeles Community, as well as commitments CARB will make based on feedback provided about CARB's role in the process to date.

Key Strengths

Community Engagement

A major strength is the level of community engagement that went into developing the CERP. The District has built on its experience in supporting a co-lead model by expanding the number of co-lead organizations represented in the CERP development process to better reflect the range of stakeholders in the South Los Angeles community. This included providing contract support to the co-leads for their increased responsibilities for CSC governance.

While there were many concerns from the community co-leads and CSC members centered around being able to implement an authentic community-driven process during CERP development, SCAQMD made notable improvements in how they shared information, collaborated with the community co-leads and CSC members, and incorporated feedback into further discussions. This included the high degree of CSC and co-lead participation in the competitive selection of a third-party facilitator, Castillo Consulting Partners, LLC. During one-on-one conversations with CARB staff, CSC members indicated that the facilitation services had a positive impact on CERP development. Additionally, SCAQMD paused in October 2021 to reassess the District's entire AB 617 program and to better integrate community input and better align with the community co-leads' vision of a community-driven process within the South Los Angeles community. The level of work that SCAQMD, the community co-leads, and CSC members put into identifying concerns and developing solutions was immense and something that all participants should be proud of. To better engage community members during CSC meetings, SCAQMD, the community co-leads, and the facilitator used a variety of tools, such as breakout sessions, Google Forms, Google Jamboard, and even added additional

time for engagement through office hour sessions. In the end, the feedback from CARB staff's one-on-one discussions with CSC members indicated that CSC members felt they had an equal opportunity to provide input and that they were satisfied with the final CERP.

Diverse Set of Strategies

Throughout Plan development, the CSC made it clear that they wanted to see a multi-pronged approach to reducing emissions and exposures. This included amending District rules to set stricter standards on emissions, conducting enforcement against non-compliant emissions sources, and providing incentives necessary to replace higher polluting equipment with cleaner technologies. Additionally, community members expressed a need for monitoring, as well as collaboration between agencies, to reduce exposures. Throughout Chapter 5 of the CERP, which describe actions to respond to community source concerns, all of these approaches for reducing emissions and exposures are described. Across all sources of concern, the Plan leans on everything from commitments to conduct rule development, strengthen enforcement based on data collection, and conduct outreach to ensure that incentives can bring much needed reductions to the South Los Angeles community. Furthermore, the Plan has robust monitoring elements throughout its actions, to ensure the community is always at the forefront of data collection. Lastly, the Plan looks to maximize interagency collaboration to reduce emissions from a variety of sources. To implement this effort, the Plan identifies other agencies the District plans to collaborate with on particular strategies that the District is responsible for. This approach aligns well with the statutory goal of AB 617 to use all existing authorities to reduce emissions.

Overall Goals for the CERP

The Plan includes 37 goals encompassing 73 actions, that are meant to address the community's highest priorities. The goals are a representation of the vision the community has for the emissions and exposure reductions and the timelines by which those reductions would be achieved as part of that vision, such as:

- Initiate rule development to further reduce emissions from dry cleaners;
- Collaborate with CARB to conduct inspections of CSC-identified oil and gas facilities of concern;
- Explore incentives opportunities to provide low-VOC paints to auto body shops within the community; and
- Conduct outreach to owners and operators of metal processing facilities to facilitate implementation of best management and "Good Neighbor" practices.

Recommended Actions to Strengthen Implementation

Staff recognizes that the Plan is the culmination of an extensive amount of work in a short timeframe. CARB staff remain committed to work with SCAQMD, the community co-leads and the community steering committee to refine implementation strategies and support periodic status reports required under AB 617.

CARB staff has developed a set of recommended actions in two key areas: refining details and continued collaboration. Progress in implementing these recommendations should be included in the annual progress reports submitted to CARB as required by the Blueprint.

Continue to Refine Strategies Informed by CSC Direction

The compressed timeline required to develop a CERP makes it difficult to create and document detailed strategies. Throughout implementation, SCAQMD and the community co-leads should work with the CSC to ensure these details are refined and provided in the annual progress reports submitted to CARB.

During one-on-one conversations with CARB staff, CSC members indicated that they want to make sure that SCAQMD and CARB follow through on the actions in the CERP. By continuing to engage the CSC in the refinement of strategies, goals, and actions, SCAQMD can build more investment in shared outcomes across the community and support more informed decisions during implementation. CARB staff remain committed to support this process.

CARB staff encourage the District to consider the use of the work team or subcommittee approach used in other CSCs during implementation. Creating opportunities for additional CSC leadership focused on specific strategies that are the subject of specific work teams or subcommittees can support more effective implementation.

Ensure Continued Collaboration and Clear Roles

A community-focused approach to priority setting is a cornerstone of AB 617. This often means that some community-identified priorities may not fall neatly within either Air District or CARB jurisdictions. As such, the South Los Angeles CERP rightly looks to collaborations with other agencies with relevant jurisdiction over a community concern, including referring matters to those agencies, as one of the approaches to implement certain strategies to reduce air pollution exposure and emissions from sources within the South Los Angeles community. CARB staff acknowledge that many of these details will need to be worked out during implementation. There are ways the District can support effective interagency collaboration. When seeking to collaborate, the District and the community co-leads should look to ensure collaboration continues during the implementation timeframe and, if necessary, beyond. Additionally, the District should look to maximize the possibility of memoranda of understanding (MOU) with other agencies, or other appropriate partnerships, to solidify collaborative actions and clarify respective roles on paper. CARB can provide a crucial link in bridging gaps between local agencies, communities, and other state agencies.

During one-on-one conversations with CSC members, CARB staff learned that CARB's role and responsibilities weren't necessarily clear. Facilitating collaboration between local agencies, community members, and state agencies is a role that CARB has taken on in other CSCs and will continue to do so here. CARB staff commit to seek out useful collaborations with relevant state agencies as the CERP is implemented over the next five years.