



# South Coast Air Quality Management District

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December 16, 2021

Deldi Reyes  
Director, Office of Community Air Protection  
California Air Resources Board  
Office of Community Air Protection  
1001 I Street  
Sacramento, CA 95812

Re: Request for Time Extension for the South Los Angeles Community Emissions Reduction Plan

Dear Ms. Reyes:

The South Coast Air Quality Management District (AQMD) staff is formally requesting CARB to allow a 4-month extension for the continuing development of the South Los Angeles (SLA) Community Emissions Reduction Plan (CERP). Since 2018, CARB has designated fifteen (15) communities for AB 617 implementation, six of which are in the South Coast AQMD's jurisdiction. The most recent community added is South Los Angeles (SLA), which was designated on February 25, 2021, as part of the third year of implementation for the AB 617 program. The South Coast AQMD staff has been working closely with the community co-leads (PSR-LA, SCOPE, WCAE), community residents, and other community stakeholders to develop a Community Air Monitoring Plan (CAMP) and CERP for SLA. Under AB 617, a community air monitoring system must be deployed and the CERP is required to be adopted within one year of community selection by CARB, therefore by February 24, 2022.

The primary challenge posed by the AB 617 program is the one-year CERP development timeline that has been a concern for all AB 617 communities designated in South Coast AQMD's jurisdiction and throughout the state. This challenge is especially relevant to SLA due to CARB's delay in designating Year 3 communities, from December 2020 to February 2021. Adhering to this timeframe would require staff and community members to work through the holidays to prepare for a February 2022 CERP adoption by our Governing Board. Staff and SLA community-based organizations have met monthly since January 2021 to discuss the development process and weekly since the co-leads were designated in April 2021. In most of these meetings, the community co-leads expressed significant concern with the one-year timeline, stating the short development timeframe does not allow sufficient time to ensure a community-led CERP development process. The co-leads have also shared that an extension would allow for more meaningful community engagement in subcommittee meetings, workshops, and monthly CSC meetings. The community co-leads have provided the attached letter to highlight their concerns and express their support for the extension request.

A second challenge is the limited authority of air districts to sufficiently address all air quality related issues raised by the CSC when AB 617 legislation does not require other responsible agencies, who do have authority over those sources of concern, to address the cumulative burden experienced by disadvantaged communities. An extension to the development timeline would provide staff the additional time needed to collaborate with and involve other responsible agencies in discussions on potential solutions and actions that may be included in the CERP to address the community's concerns.

Lastly, as mentioned in the community co-leads' letter, South Coast AQMD took a brief pause in October to realign the AB 617 process for all six of our AB 617 communities. South Coast AQMD staff is committed to working with the community and legislators to seek solutions and propose legislative changes to address several concerns raised by the community, including the CERP development timeline, lack of accountability with other responsible agencies (e.g., land-use, health-based organizations), and limited program resources. Limited resources, such as staffing and implementation funds, have already been stretched across the other five communities in our region, with each required to implement their CAMP and adopted CERP. As part of South Coast AQMD's community adopted recommendation proposal to add SLA, the Governing Board directed staff to seek additional funding from the legislature to support the sixth community in our jurisdiction, which we are working on.

In summary, to uplift concerns of the community and ensure that the CERP development process is community-led, as our community co-leads and CSC members have requested, South Coast AQMD staff formally requests that this process be extended by an additional 4-months for the benefit of stakeholders and community members within the SLA community boundary. If this extension is supported, South Coast AQMD staff will present a completed CERP to the Governing Board for adoption consideration on June 3, 2022. If you have any questions or concerns regarding this extension request, please feel free to contact me at 909-396-3309 or [khiggins@aqmd.gov](mailto:khiggins@aqmd.gov). Thank you for your consideration.

Sincerely,

*Kathryn Higgins*

Kathryn Higgins  
Acting Director of Community Air Programs

Cc: Richard Corey, California Air Resources Board  
Vernon Hughes, California Air Resources Board  
Wayne Nastri, South Coast Air Management District  
Jill Whynot, South Coast Air Management District  
Sarah Rees, South Coast Air Management District

Enclosure: AB617 South LA Community Steering Committee Community Co-Leads Support for CERP and CAMP Development Timeline Extension

KH:JN:JW:SR:NS