

April 20, 2019

Dave Edwards, Assistant Division Chief
Air Quality Planning and Science Division California Air Resources Board
1001 "I" Street
Sacramento, CA 95815

RE: AB 617 Proposed Amendments - Opposed

Dear Mr. Edwards,

We are contacting you on behalf of the Los Angeles County Business Federation, also known as BizFed. We are an alliance of 180 business associations, representing about 400,000 employers with 3.5million employees in Los Angeles County. As a united federation, we advocate for policies and projects that strengthen our regional economy. We are writing to respectfully express our opposition to CARB's proposed amendments under the 15-day non-substantive process.

The California Air Resources Board (CARB) on December 14, 2018 approved a new regulation for Criteria Air Pollutant and Toxic Air Contaminant Emissions Reporting pursuant to AB 197 and AB 617.

It is our understanding that CARB staff intends to approve proposed amendments to the reporting regulations without another public hearing before the Board.

Our members are very concerned the proposed amendments may impact an enormous number of additional sources in and out of AB 617-designated communities without going through an adequate public hearing process.

One of the major changes to the Board approved regulation is broadening the scope of sources required to report emissions. A second major change is the proposal to lower the levels of toxic contaminants required to be reported.

The original Board resolution approving the new reporting regulation referenced an Initial Statement of Reasons (ISOR) that was circulated and made available for public comment 45 days before the Board adoption hearing. The ISOR contained the required economic impact assessment [Gov. Code Sec. 11346.2(b)(2) and 11346.3(b)] including the estimated costs to businesses and public agencies to comply with the proposed regulatory language that was also made available 45 days before the adoption hearing.

Specifically, the economic impact assessment, including the estimated costs, was based on an expectation that the regulation would affect approximately 13,980 business entities. The total cost impact to all affected entities, including private businesses and local and state government entities, was projected to be \$10.5 million over a four-year period.

CARB staff held a series of workshops in early March to discuss the potential updates to the applicability requirements of the regulation and other proposed changes based on comments received. At these workshops CARB staff shared that the proposed amendments would apply to approximately 80,000 entities.

This is almost six times the number of covered entities used in the economic impact assessment on which the Board based its affirmative adoption vote.

The cost impact for all affected entities, including private businesses and local and state government entities may then be almost six times the original estimate — or more than \$60 million over a four- year period.

ased on the lack of business participation in the workshops, potentially impacted businesses are not even aware of the proposed amendments, thus did not have the opportunity to comment on how it may affect them, nor suggest changes to make the program more effective and less burdensome.

They also don't have the benefit of an applicable economic review of the potential effect of the proposed revised regulations.

The spirit of existing California administrative law, and AB 617 itself, clearly leans toward greater public review and participation rather than less. BizFed members feel that a 15-day review (or even a subsequent 15-day review) combined with the abbreviated approval process is not enough for a full evaluation of the proposed amendments to already complex and wide-ranging reporting requirements.

Broadening the geographic scope of reporting and lowering the levels at which emissions will be required to be reported will create a significant cost increase for potentially affected businesses, non- profits such as hospitals and local and state government agencies. These entities should have the opportunity to examine the proposed amendments and the impact that they may have on their operations and be given ample time to make comments at a public hearing before the California Air Resources Board.

We appreciate CARB staff's effort to explain the proposed amendments in the current series of workshops, but we feel workshops alone are not adequate.


We urge CARB to examine the proposed reporting amendments through a standard public review process, which must include a significant comment period and review of potential economic impacts.

Thank you for your consideration of our letter. If you have any questions, please contact Sarah Wiltfong, who is the policy manager of this issue at sarah.wiltfong@bizfed.org.

Sincerely,



Steve Bullock
BizFed Chair
Cerrell Associates



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.

BizFed Association Members

Action Apartment Association
 AIA - Los Angeles
 Alhambra Chamber
 American Beverage Association
 American Hotel & Lodging Association
 Antelope Valley Board of Trade
 Angeles Emeralds
 Apartment Association, California Southern Cities
 Apartment Association of Greater Los Angeles
 Arcadia Association of Realtors
 AREAA North Los Angeles SFV SCV
 Asian Business Association
 Association of Independent Commercial Producers
 Azusa Chamber
 Beverly Hills Bar Association
 Beverly Hills Chamber
 Beverly Hills / Greater LA Association of Realtors
 BNI4SUCCESS
 Burbank Association of Realtors
 Building Industry Association, LA / Ventura Counties
 Building Owners & Managers Association, Greater LA
 Business & Industry Council for Emergency Planning & Preparedness
 CalAsian Chamber
 California Apartment Association, Los Angeles
 California Asphalt Pavement Association
 California Bus Association
 California Business Roundtable
 California Cannabis Industry Association
 California Construction Industry and Materials Association
 California Contract Cities Association
 California Fashion Association
 California Gaming Association
 California Grocers Association
 California Hotel & Lodging Association
 California Independent Oil Marketers
 California Independent Petroleum Association
 California Life Sciences Association
 California Metals Coalition
 California Restaurant Association
 California Small Business Alliance
 California Sportfishing League
 California Trucking Association
 Carson Chamber of Commerce
 Carson Dominguez Employers Alliance
 CDC Small Business Finance
 Central City Association
 Century City Chamber of Commerce
 Cerritos Chamber
 Citrus Valley Association of Realtors
 Commerce Industrial Council/Chamber of Commerce
 Construction Industry Air and Water Quality Coalitions
 Council on Trade and Investment for Filipino Americans
 Covina Chamber of Commerce
 Culver City Chamber of Commerce
 Downey Association of Realtors
 Downey Chamber of Commerce
 Downtown Long Beach Alliance
 El Monte/South El Monte Chamber
 Employers Group
 Engineering Contractor's Association
 F.A.S.T.-Fixing Angelenos Stuck In Traffic
 FilmLA
 FuturePorts
 Gardena Valley Chamber of Commerce
 Gateway to LA
 Glendale Association of Realtors
 Glendale Chamber
 Glendora Chamber
 Greater Antelope Valley AOR
 Greater Lakewood Chamber
 Greater Los Angeles African American Chamber
 Greater Los Angeles New Car Dealers Association
 Harbor Trucking Association
 Historic Core Bid
 Hollywood Chamber
 Hong Kong Trade Development Council
 Hospital Association of Southern California
 Hotel Association of Los Angeles
 Industry Business Council
 Inglewood Airport Area chamber of Commerce
 International Warehouse Logistics Association
 Irwindale Chamber
 La Canada Flintridge Chamber
 LAX Coastal Area Chamber
 League of California Cities
 Long Beach Area Chamber
 Los Angeles Area Chamber
 Los Angeles County Medical Association
 Los Angeles County Waste Management Association
 Los Angeles Gateway Chamber of Commerce
 Los Angeles Gay & Lesbian Chamber of Commerce
 Los Angeles Latino Chamber
 Los Angeles Parking Association
 Maple Business Council
 Motion Picture Association of America
 MoveLA
 NAIOP Southern California Chapter
 National Association of Royalty Owners
 National Association of Tobacco Outlets
 National Association of Women Business Owners
 National Association of Women Business Owners, LA
 National Hispanic Medical Association
 National Latina Business Women's Association
 Netherlands-America Foundation
 Orange County Business Council Pacific
 Merchant Shipping Association
 Pacific Palisades Chamber
 Panorama City Chamber
 Paramount Chamber of Commerce
 Pasadena Chamber
 Pasadena-Foothills Association of Realtors
 PhRMA
 Planned Parenthood Southern California Affiliates
 Pomona Chamber
 PropellA
 Rancho Southeast Association of Realtors
 Recording Industry Association of America
 Regional Black Chamber - San Fernando Valley
 Regional San Gabriel Valley Chamber
 Rosemead Chamber
 San Gabriel Chamber
 San Gabriel Valley Civic Alliance
 San Gabriel Valley Economic Partnership
 Santa Clarita Valley Chamber
 Santa Clarita Valley Economic Development Corp.
 San Pedro Peninsula Chamber
 Santa Monica Chamber
 Santa Monica Junior Chamber
 Sherman Oaks Chamber of Commerce
 South Bay Association of Chambers
 South Bay Association of Realtors
 Southern California Contractors Association
 Southern California Golf Association
 Southern California Grantmakers
 Southern California Leadership Coalition
 Southern California Minority Supplier Development Council Inc.
 Southern California Water Coalition
 Southland Regional Association of Realtors
 The Young Professionals at the Petroleum Club
 Torrance Area Chamber
 Town Hall Los Angeles
 Tri-Counties Association of Realtors
 United Chambers San Fernando Valley
 United States-Mexico Chamber
 Unmanned Autonomous Vehicle Systems Association
 US Resiliency Council
 Valley Industry & Commerce Association
 Vernon Chamber
 Vietnamese American Chamber
 Warner Center Association
 West Hollywood Chamber
 West Los Angeles Chamber
 West San Gabriel Valley Association of Realtors
 West Valley/Warner Center Chamber
 Western Manufactured Housing Association
 Western States Petroleum Association
 Westside Council of Chambers
 Westwood Village Rotary Club
 Wilmington Chamber
 World Trade Center
 Young Professionals in Energy - LA Chapter