

August 1, 2019

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814
<http://www.arb.ca.gov/lispub/comm/bclist.php>

SUBJECT: Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants-Second 15-Day Notice

The California Chamber of Commerce is the largest broad-based business advocate in the state, representing the interests of 14,000 California businesses, both large and small. CalChamber submitted comments on July 7, 2019 setting forth various concerns with respect to the draft regulation, including a dramatic expansion of a new fourth category of businesses subject to data collection and enforcement.

CalChamber appreciates the thoughtful changes made by the California Air Resources Board (CARB), including reconsideration of the fourth category and other changes that better create a state-wide approach to data collection and monitoring to avoid piecemeal data collection and ensure best available technology is utilized to appropriately measure air emissions across the state while keeping costs down and avoiding a disproportionate impact on regulated entities

We remain concerned regarding some issues raised in our July 7 letter that were not addressed in this second 15-day notice, including clarification around confidentiality of data and remaining definitions. However, we appreciate the efforts of CARB and the districts and look forward to continuing to work with you as the regulations move forward.

Sincerely,



Leah Silverthorn, Policy Advocate
California Chamber of Commerce

On behalf of the following organizations:

California Fuels & Convenience Alliance
California Independent Petroleum Association
California Metals Coalition
Chemical Industry Council of California
Climate Change Policy Coalition
Industrial Environmental Association (IEA)
National Federation of Independent Business (NFIB)
Western Wood Preservers Institute

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