



Shasta County

DEPARTMENT OF RESOURCE MANAGEMENT

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November 13, 2020

Richard Corey, Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

SUBJECT: Proposed Criteria Pollutant and Toxics Emissions Reporting (CTR) and Emissions Inventory Criteria and Guidelines (EICG) Regulations Revisions

Dear Mr. Corey:

The Shasta County Air Quality Management District (District) appreciates this opportunity to formally submit comments regarding changes to the CTR and EICG regulations. The District has always maintained a strong emission inventory program and understands the California Air Resources Board's (CARB's) reasons for updating the criteria and toxics inventory process. Additionally, the District appreciates your willingness to include California's Air Districts in this process. While the District is aware of comments made by fellow agencies regarding several aspects of the proposed regulation, the District would like to go on record regarding the analysis of the implementation and outreach costs.

The Initial Statement of Reasons (ISoR) states that the estimated ten-year cost to the private sector of implementing the CTR Amendments would be \$67.4 million (ISoR page 22) and the Notice of Public Hearing (NoPH) states the ten-year costs to Air Districts would be an additional \$39 million (NoPH page 8) of the \$41.5 million estimated ten-year costs to local governments. The highest annual costs to the private sector during the implementation of the amendments is expected to be \$9.6 million; in that same year (2027), the projected annual costs to local government (though this includes some regulated sources operated by local agencies, not just Air Districts) will be \$5 million (ISoR page 16). While the ISoR states the estimated cost to businesses were based on estimated "primary costs incurred for determining applicability, data gathering and recordkeeping activities, preparation of an annual emissions data report, reviewing the report, and submitting the report to the local air district," there does not seem to have been an effort to account for the resulting increase in permit fees collected by Air Districts to cover their portion of the estimated \$5 million costs attributable to local government (for that year alone) in implementing this program (ISoR page 16). Based on the current cost break-down presented in Table 1 of the ISoR (page 16), it seems reasonable to expect accounting for increased fees imposed by Air Districts on regulated facilities to increase the annual costs to the private sector above \$10 million for several years which

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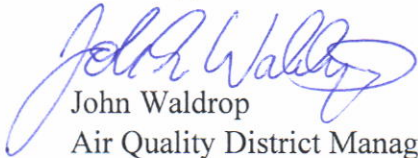
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would exceed the threshold for definition as a major regulation per H&SC Section 57005. As such, the estimated cost to the private sector presented are an under-estimation of the costs the private sector is likely to experience as a consequence of this proposed regulatory amendment. An evaluation which considers the full costs to the private sector accounting for the Air Districts' need to recover costs of implementation of these regulatory amendments should be made prior to approval and the process of considering Major Regulation Alternatives should be thoroughly conducted prior to approval of the proposed regulatory amendment.

Since 2018, small businesses and residents of Shasta County have been economically impacted by wildfire and the current pandemic. Our local governments are wary of introducing increased fees for programs that would mostly benefit AB 617 disadvantaged communities of which Shasta does not possess. We urge CARB to re-examine the ultimate associated cost of the CTR and provide clear analysis of the resulting costs to small business.

Feel free to contact me in discussing this matter at 530-225-5674.

Sincerely,



John Waldrop
Air Quality District Manager

C: David Edwards, CARB
Gabe Ruiz, CARB

CTR-EICG Comments 11.12.20