



El Dorado County Air Quality Management District

Dave Johnston, Air Pollution Control Officer

330 Fair Lane, Placerville CA, 95667 • Tel. 530.621.7501 • Fax 530.295.2774 • Edcgov.us/AirQualityManagement • EDCCleanAir.org

November 13, 2020

Richard Corey, Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95814

Subject: Proposed CTR Regulation and EICG Rule

Mr. Corey:

The El Dorado County Air Quality Management District (EDCAQMD) appreciates the outreach work of your staff and the opportunity to submit comments. As noted by several other air districts and the Sacramento Region Clean Air Partnership, EDCAQMD respectfully requests:

- CARB comprehensively overhaul the multiple overlapping emission reporting regulations and create a single streamlined requirement,
- The proposed reporting threshold of 4-tons per year be significantly increased,
- The proposed implementation timeline be extended, and
- The proposed regulatory changes be applicable only to sources in 617 communities.

As proposed the requirements would impose costs on air districts, businesses and residents, that will exceed the value of the public health benefit derived from the data compiled. Any benefit is likely to be offset by the negative health impact resulting from the decreased economic activity. Scarce resources would be better spent on more cost effective health, public health and emission reduction activities and programs or simply not taken from Californians.

Respectfully,

Dave Johnston