



April 13, 2021

Richard Corey
Executive Officer
California Air Resources Board
1001 I street
Sacramento, CA 95814

RE: 15 Day Comments EICG/CTR Regulations

Dear Mr. Corey:

The California Construction and Industrial Materials Association (CalCIMA), and the California Asphalt Pavement Association (CalAPA) appreciate the opportunity to provide comments on CARB's 15 Day Modifications to the EICG and CTR regulations. We would like to thank CARB staff for taking the time to meet with us and hear our concerns regarding these regulatory proposals. Your staff's efforts to ensure we understood the intent of the regulations, as well as to clarify regulatory text to help ensure obligations were clear and understandable, is very much appreciated. We believe it has resulted in a clearer and more understandable rule.

As we have noted previously, the changes made by CARB in these 15-day modifications have aided our ability to understand the obligations created by the rules. In particular, we believe the changes made to Table A-3, clarifying the activity-level reporting thresholds that apply to permitted processes and clarifications to when districts might request additional information, will significantly aid producers in identifying and retaining the proper information for the reporting program and to help prevent misinterpretation. Further, we support the modifications extending compliance timelines for smaller districts. CARB has correctly recognized the significant scope of these two rules, and as a result, these changes help mitigate the significant increase in workload at the district and producer levels that will occur to implement them. The phased implementation created with the modifications made to reporting timing should aid smaller producers and air districts in complying with these new obligations.

We believe implementation will be critical as California regional air districts, producers and manufacturers implement these obligations. CalCIMA and CalAPA look forward to continued engagement with CARB staff and districts in facilitating those efforts. Particularly as these rules capture small permittees into complex reporting systems, we know education and outreach efforts will be

critically important to ensuring successful compliance and implementation. We are pleased that your recognize that trade associations like ours are essential to this outreach effort.

About CalCIMA and CalAPA

CalAPA is a statewide trade association, founded in 1953, representing the asphalt pavement industry in California, including asphalt producers, refiners, paving contractors, and other firms that build and maintain California's vital road transportation network. Asphalt facilities are already subject to stringent reporting requirements by local air districts across the state. CalCIMA is the state trade association for aggregate, industrial mineral, and ready-mix concrete producers in California. CalCIMA members provide the essential materials needed to build the state's public highways, roads, rail, and water infrastructure; to build homes, schools, and hospitals; to grow crops and feed livestock; and to manufacture wallboard, roofing shingles, paint, glass, low-energy light bulbs, and battery technology for electric cars and windmills.

Respectfully,

A handwritten signature in black ink, appearing to read "Russell W. Snyder", with a long horizontal flourish extending to the right.

Russell W. Snyder, CAE
Executive Director
CalAPA

A handwritten signature in blue ink, appearing to read "Adam Harper", with a long horizontal flourish extending to the right.

Adam Harper
Director of Policy Analysis
CalCIMA