



# Cleaner Air Partnership

A joint project of Breathe California Sacramento Region, the Sacramento Metro Chamber of Commerce, Valley Vision, and others to help the Sacramento region meet clean air standards that protect health, promote economic growth, and support equity.



April 14, 2021



Dr. David Edwards, Branch Chief

Air Quality Planning and Science Division



California Air Resources Board (CARB)

1001 I Street



Sacramento, CA 95814



**RE: Formal Comments on Proposed Amendments to the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants**



Dear Dr. Edwards,



On behalf of the Sacramento region's Cleaner Air Partnership, please consider these formal comments on the Modified Regulatory Language to the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR Regulation).



The Cleaner Air Partnership (CAP) is a project of Breathe California Sacramento Region, the Sacramento Metro Chamber of Commerce, Valley Vision, and other public, private and nonprofit partners, to help the Sacramento region meet clean air standards that protect health, promote economic growth, and support equity. We have worked together to achieve emissions reductions and improve health outcomes in our region for many years.



Lack of Funding to Implement This Mandate: While we support the goals of the CTR regulation, we continue to have concerns about the lack of funding and some of the requirements in the recently released 15-day changes on the regulation. Primarily, the state has not identified a viable and sustained source of funding for implementation of the CTR regulation at the local level. Without proper financial support for this mandate, it will be difficult for air districts to implement the regulation to a level where the intended goals of transparency and access to reliable air quality information are ultimately realized. Not having adequate compliance assistance, data review and technological solutions may lead to a challenging phase-in on the front end and increased confusion and misinterpretation of the emissions data for all stakeholders on the back end. Further, costs for air districts to implement these rules could be passed on to permit holders/businesses in the form of new fees.



Education Is Needed: Without adequate funding noted above, meaningful education of the public and other stakeholders to ensure shared understanding is not possible. The CTR Regulation is deeply complex, so we recommend that CARB begin planning for how online emission data can be made clear and more understandable to the public. Doing so can help reduce confusion and misinterpretation and help explain the limitations and caveats inherent in the collected emission data.



Reporting Thresholds Must Be Consistent: CAP highly recommends standardized reporting thresholds for the CTR Regulation. Whether they are ultimately set at the 4-ton or 10-ton level, these thresholds should be consistent across air districts. This regulation is particularly onerous for businesses to interpret and implement and having disparate thresholds for businesses that operate across the State or between County lines can increase confusion for reporting entities.

A Unified Online Emission Reporting Tool Is Needed: The addition of the CTR Regulation means that there are now multiple emission inventory and reporting regulations that the public, air districts, and regulated entities must be able to decipher. CARB needs to continue to look for ways to streamline emission inventory efforts between the Air Toxics “Hot Spots” Information and Assessment Act of 1987, GHG emissions reporting, criteria pollutant emission data submitted through CEIDARS, and the CTR regulation. CARB has committed to developing an online reporting tool that will be used for all emission reporting requirements and CAP is very supportive of that effort. Having a single, unified online reporting tool will avoid duplicative efforts by local air districts and foster consistent reporting requirements for regulated entities, especially for businesses that operate in multiple air districts. Furthermore, CAP encourages CARB to work collaboratively with local air districts in the development of the online reporting tool, with feedback from members of the public as well.

On behalf of the Cleaner Air Partnership, we appreciate the opportunity to provide input on the modified regulatory language and appreciate your diligent review prior to finalizing the regulation. If you have any questions, please reach out by emailing [adrian.rehn@valleyvision.org](mailto:adrian.rehn@valleyvision.org) or calling (707) 813-1913.

Sincerely,

The Cleaner Air Partnership



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