

January 17, 2017

Ms. Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Comments on the California Air Resources Board Revised Proposed Short-Lived Climate Pollutant Reduction Strategy (November 2016)**

Dear Chair Nichols:

The California Chamber of Commerce appreciates the opportunity to comment on the California Air Resources Board's (CARB) Revised Proposed Short-Lived Climate Pollutant Reduction Strategy (Strategy).

CalChamber is the largest broad-based business advocate in the state, representing the interests of over 13,000 California businesses, both large and small. Many of CalChamber's larger members are directly affected by climate change regulations, while many other smaller members will likely experience indirect impacts in the form of new costs passed down from upstream fuel and energy providers. The proposed Strategy will add additional regulations and increased costs for operations within the state. It is imperative that we evaluate all regulations stemming from the Strategy to ensure that they are both cost-effective and technologically feasible.

#### **OVERLAPPING REGULATIONS**

SLCPs include methane, black carbon (i.e. soot), tropospheric ozone, and some hydrofluorocarbons (HFCs). Some of these emissions are already regulated under AB 32/SB 32, but all of these emissions are currently directly or indirectly regulated at the Federal, State, or Local level. Duplicative regulations will drive up costs without regard to environmental or health benefits.

This Strategy will lead to new regulations, therefore creating additional regulatory burdens on businesses in the state. Localized emissions, many of which are precursors of short-lived climate pollutants, are already heavily regulated by local air districts as well as by state and/or federal law. The Strategy will triple the efforts to regulate these emissions resulting in increased costs and unnecessary regulatory burdens.

#### **REVIEW**

In conjunction with economic analysis, our climate change policies need robust and regular oversight. Informational hearings need to accompany our climate policies to date and policies under consideration from the Strategy. Each regulation should be reviewed on its own merits to ensure that it is achieving its intended outcomes while ensuring it is being done so in a cost-effective manner.

#### **DIRECT REGULATION ELIMINATES IN-STATE OFFSETS**

Offsets are an important part of the state's cap-and-trade program. While offsets are limited to only 8% of one's compliance obligation, they are a way to help keep compliance costs down while making direct GHG emission reductions in the state. The direct regulation of methane will eliminate the potential for these in-state offsets.

Thank you for the opportunity to provide comments on the Proposed Short-Lived Climate Reduction Strategy Plan. We look forward to participating in the process with the CARB on the regulations stemming from the Strategy to ensure that they are cost-effective and technologically feasible.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Mmagu', with a large, sweeping loop at the end.

Amy Mmagu  
Policy Advocate

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