Comment Letter #80

Los Angeles County Business Federation
Strengthening the Voice of Business Since 2008

July 22, 2022

Mr. Ian MacMillan
Assistant Deputy Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: BizFed Comments on Appendices to the SCAQMD Draft 2022 Air Quality Management Plan

Dear Mr. MacMillan:

We are contacting you on behalf of BizFed, the Los Angeles County Business Federation. We are an alliance of over 200 business organizations who represent over 400,000 employers in Los Angeles County, including large and small businesses from a wide range of industries throughout the South Coast Air Basin (SCAB). We are writing to comment on the appendices to the South Coast Air Quality Management District (SCAQMD or District) Draft 2022 Air Quality Management Plan (AQMP or Plan). Many of the businesses we represent have or will be writing their own individual comment letters that specifically address the impacts to their industries. Our comments address the impacts to the business community as a whole and include overarching concerns of our diverse membership.

We would like to thank the District for its tireless work improving air quality in the SCAB. Like you, we desire to see continued emissions reduction while maintaining the region's economic vitality. We appreciate the staff and Board's diligence in bringing diverse groups to the table to map out the most effective AQMP as possible.

The 2022 AQMP is a regional blueprint for achieving the 2015 national ambient air quality standards (NAAQS) for ground level ozone of 70 parts per billion (ppb).[1] The District faces unique challenges in achieving the 2015 NAAQS for ground level ozone, including unique topography and meteorology, as well as sources of significant ozone pollution for which the District has limited control authority, such as mobile source emissions. Additionally, climate change is playing a significant role in ozone production. Higher temperatures produce more biogenic and evaporative VOC emissions and result in greater risk of wildfire emissions that contribute to ozone formation. Additionally, climate change is resulting in higher temperatures in spring and fall, resulting in longer ozone formation seasons. The 2022 AQMP projected emissions must consider the increased ozone resulting from climate change.

On June 1, 2022, the District released the remaining draft appendices to the Draft 2022 AQMP, with a comment period extended to July 22, 2022. BizFed offers the following comments on the appendices to the Draft 2022 AQMP.[2]

[1] 2015 Revision to 2008 Ozone NAAQS. Available at: https://www.federalregister.gov/documents/2015/10/26/2015-26594/national-ambient-air-quality-standards-for-ozone.
[2] SCAQMD Draft 2022 AQMP. Available at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/draft2022aqmp.pdf?sfvrsn=12

1. **SCAQMD should maintain consistency with the 2016 AQMP and prior plans and provide technology and fuel neutral performance-based control measures to achieve the federal ozone targets.**

Historically, the SCAQMD has remained neutral on technology and fuel in their rulemakings. The SCAQMD 2016 AQMP noted[3]:

Air quality regulatory agencies have traditionally set policies and requirements that are performance-based, and thus technology- and fuel-neutral. This is a policy that the SCAQMD intends to continue.

SCAQMD's white paper "A Business Case for Clean Air Strategies" laid out principal planning concepts to guide the development of the 2016 AQMP, including maintaining a technology neutral approach.[4] The white paper notes:

Acknowledging that different fuel technologies may be more suitable for different types of business operations, the 2016 AQMP will maintain a technology-neutral approach in the design of control measures and related programs to the extent practicable. A technology-neutral approach, where practicable, will allow businesses to select and diversify their energy sources, thus allowing compliance flexibility to buffer the effect of energy price fluctuations. Diversity in fuel choices can spur innovation and trigger cost reductions as more technology developers compete. Moreover, given that businesses located in the Basin often compete with out-of-state firms not subject to the same regulations, the SCAQMD will advocate for national performance standards to level the playing field.

However, the 2022 AQMP Policy Brief on Infrastructure and Energy Outlook states[5]:

The 2022 AQMP relies on a significant transition to zero emissions (ZE) technologies across many sectors. Traditional technologies are not capable of delivering the 71 percent NOx emission reduction above and beyond current measures on the books needed to attain the 2015 8-hour standard by the 2037 deadline. ***The only pathway to attainment requires widespread deployment of ZE technologies at scale.*** [Emphasis added]

BizFed believes it is important for SCAQMD to continue its policy and remain neutral on the technologies and fuels to meet the goals of the 2022 AQMP. A dramatic shift in policies between the two Plans would undercut the previous efforts established to reduce emissions from key sectors and would limit the flexibility of industries to find strategies for emission reductions at the lowest costs. Promoting competition amongst producers of technologies results in the next generation of products with lower emissions at a reasonable cost. BizFed strongly recommends that the 2022 AQMP include a technology and fuel neutral policy, consistent with prior AQMPs.

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[3] SCAQMD 2016 AQMP. Available at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

[4] SCAQMD Final Business Case for Clean Air Strategies, October 2015. Available at: http://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-bizcase-final.pdf.

[5] SCAQMD Policy Brief, Infrastructure – Energy Outlook. Available at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-infrastructure---energy-outlook.pdf?sfvrsn=8.

2. **SCAQMD must encourage greater coordination between fleets, facilities, and utilities to anticipate and assess the impacts of growing electricity load. SCAQMD must also consider whether the California electric grid will have the capacity and infrastructure that would be needed to support widespread electrification mandates for equipment as proposed in the 2022 AQMP. Without this, many of the control measures outlined AQMP Appendix IV could fail to deliver the needed NO_X emissions reductions on the necessary timetables.**

SCAQMD has stated that the only pathway to attainment requires widespread deployment of ZE technologies and has focused many of the proposed control measurements on deployment of such technologies.[6] In order to ensure that widespread electrification is a viable pathway, SCAQMD and CARB must consider whether the electric grid will have the capacity, transmission, and distribution infrastructure to support the numerous proposed control measures which would depend on ready and abundant access to electricity.

As utilities continue to assess their systems and ZEV infrastructure planning needs in the region, these infrastructure assessment and planning activities will be aided by more and better data related to future load growth. But today, California energy officials have estimated a potential gap between energy demand and supply of 3,500 MW in Summer 2022, leaving as many as 3.5 million homes without power, with potential gaps in subsequent years as follows:[7]

Table 1. Potential Energy Shortfall

Year	California Potential Energy Shortfall (MW)
2023	600
2024	2,700
2025	3,300

Such market concerns over electricity shortfalls are already causing a dramatic increase in the number of diesel backup generators in California. An M.Cubed report recently found:[8]

…in 2020 there were 12,104 back-up generators totaling 2,697 MW of capacity in the South Coast Air Quality Management District (SCAQMD). Just a year later this population had grown to 14,785 BUGs, with 7,360 MW capacity, a 22 percent increase in the fleet.

[6] Ibid.

While the emissions from these diesel generators should be a serious concern, so should the market condition which is driving it.

Challenges to the electric grid include not only generation capacity, but the readiness of transmission and distribution infrastructure. The California Energy Commission's review of constraints associated with electricity transmission and distribution showed that the California grid currently has little to no capacity to add electrical load on most circuits.[9,10]

SCAQMD has noted that the preliminary estimates of statewide ZE infrastructure needs developed by the CEC and CARB "are largely based on a transition to ZE vehicles for on-road transportation sources, and do not fully address the adoption of ZE technologies by other sources, such as stationary, locomotives, and off-road equipment. These preliminary estimates will need to be further developed to include the ZE infrastructure needs of all sources and address the unique needs of the South Coast and Coachella Valley Air Basins."[11] The grid will need to be upgraded to accommodate more customers, more power, and more renewables. This is a costly and time consumptive process, with individual projects frequently requiring five to ten years or more. Such projects are regulated by multiple agencies including the California Public Utilities Commission (CPUC).[12]

3. **Climate change increases the urgency for NO_x emission reductions. Performance-based standards allowing for flexible deployment of technologies must be available to facilities in order to attain emission reduction targets.**

Climate change is causing environmental conditions that favor higher ozone concentrations such as increased and more intense wildfires, a longer wildfire season, increased biogenic and evaporative VOC emissions, and increased photochemical reaction rates. In the last 7 years, California had the 6 hottest summers in a 127-year record, with the record warmest summer occurring in 2021.[13]

While maximum ozone design values (3-year average of the 4th highest 8-hour ozone) in the SCAB have been greatly reduced over the last 40 years, the rate of design value reduction has been slowing in recent years and increased from 2017 – 2021.[14]

Figure 1. South Coast Air Basin Ozone Design Value

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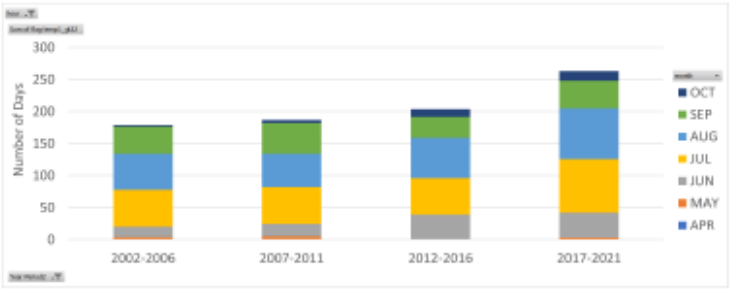
[11] SCAQMD Policy Brief, Infrastructure – Energy Outlook. Available at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-infrastructure---energy-outlook.pdf?sfvrsn=8.
[12] Southern California Edison Comment on the Draft 2022 AQMP. Available at: http://www.aqmd.gov/docs/default-source/planning/aqmp-public-comments/comment-letter-69.pdf?sfvrsn=4.
[13] NOAA National Centers for Environmental Information, National Temperature and Precipitation Maps. Statewide Average Temperature Ranks June-August. Available at: https://www.ncei.noaa.gov/access/monitoring/us-maps/3/202108?products[]=statewidetavgrank.
[14] US EPA 2021 Design Value Reports. Available at: https://www.epa.gov/air-trends/air-quality-design-values#previous.

Per the report on Ozone Trends and the Ability of Models to Reproduce the 2020 Ozone Concentrations in the South Coast Air Basin in Southern California under the COVID-19 Restrictions:[15]

The single most descriptive parameter for determining the ozone formation potential of the atmosphere in the SoCAB is the 850 mb temperature (T850). High T850 gives an indication of the strength of the temperature inversion that can trap pollutants near the surface as well as the presence of high temperatures and slow wind speeds, all of which lead to higher ozone formation.

Figure 2 shows that the number of high 850 mb temperature days has increased significantly since 2002.[16]

Figure 2. Number of High 850 mb temperature days



The trends above demonstrate the impacts of climate change. The result is higher ozone levels, making it more difficult to attain the ozone NAAQS. NOx and VOC emission control strategies focused on attaining the ozone NAAQS under current climate conditions will thus be insufficient under the impacts of climate change.

Climate change increases the urgency with which SCAQMD must achieve further emission reductions, and the lack of intermediate milestones within the 2022 AQMP is of concern. SCAQMD has suggested that traditional technologies are not capable of delivering the NOx reductions needed to meet the ozone NAAQS standard and

[15] Ozone Trends and the Ability of Models to Reproduce the 2020 Ozone Concentrations in the South Coast Air Basin in Southern California under the COVID-19 Restrictions, Atmosphere 2022, 13, 528. Available at: https://doi.org/10.3390/atmos13040528
[16] CRC 2022 Real World Emissions Workshop. "Ozone Trends in the South Coast Air Basin Through 2021 and Their Implications on Ozone Mitigation Control Strategies."

the only pathway to attainment relies on widespread use of ZE technologies.[17] But by refusing to consider broader use of lower emitting technologies and fuels which are available today, SCAQMD is foregoing potential near- and intermediate-term emission reductions, which will result in further delays for attainment of the ozone NAAQS in the SCAB. BizFed encourages SCAQMD to consider implementation of performance-based measures in the 2022 AQMP control strategies considered in Appendix IV, with resulting rulemakings that allow for flexible deployment of low NO_X technologies to attain the emission reduction targets.

4. SCAQMD should maintain fixed cost-effectiveness thresholds to ensure that the costs of reducing emissions are not disproportionately imposed on stationary sources which cannot even impact the attainment outcome.

SCAQMD staff have proposed cost-effectiveness thresholds of $36,000 per ton of VOC and $59,000 per ton of NOx (2021 dollars) in the Draft 2022 AQMP and suggested that those values be adjusted to the dollar year used for socioeconomic modeling in each subsequent rulemaking.[18] The Draft 2022 AQMP notes:

The cost-effectiveness thresholds are designed to provide a guide for establishing BARCT emission standards. To ensure that the maximum emission reductions can be achieved, it is important that an emission standard that can achieve significant reductions that are above the cost-effectiveness threshold are not automatically rejected. During the rulemaking process, if a proposed BARCT emission standard has a cost-effectiveness that is above the threshold, staff will hold a public meeting to discuss other emission standards with a cost-effectiveness at or below the cost-effectiveness threshold and/or compliance or implementation options to address an emission standard that is above the cost-effectiveness threshold. At the public hearing for the adoption or amendment of the emission standard, staff must present the options to the emission standard if the cost-effectiveness is above the threshold, highlighting the potential emission reductions associated with each option. Staff is seeking input on this approach.

BizFed does not agree with the proposed approach. The adoption of emission standards that exceed the cost-effectiveness threshold increases the burden on stationary sources when the vast majority of NOx emissions in SCAB are not emitted by stationary sources. Rather, the overwhelming majority of NOx emissions in the SCAB are from mobile sources regulated at the state and federal levels. BizFed recommends that the SCAQMD establish fixed cost-effectiveness thresholds that are not changed from one rulemaking to another.

5. SCAQMD should provide provisions for alternative compliance mechanisms when implementing control measures.

Historically, SCAQMD and other California air districts have allowed alternative compliance mechanisms, which provide flexibility to facilities to meet the SCAQMD

[17] SCAQMD Final Business Case for Clean Air Strategies, October 2015. Available at: http://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-bizcase-final.pdf.
[18] SCAQMD 2022 AQMP. Available at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/draft2022aqmp.pdf?sfvrsn=12.

emission reduction goals in a cost-effective manner. For example, the Warehouse Indirect Source Rule, SCAQMD Rule 2305, allows an affected facility, landowner, or operator to satisfy their compliance obligation through payment of a mitigation fee which then can be used to fund clean air projects.[19] The current strategy under the draft 2020 AQMP does not appear to allow for such alternative compliance mechanisms and instead mandates electrification across most sectors of the economy. The electrification-centric approach may not be the best option for many industries because of cost-effectiveness or technological feasibility concerns. Alternative compliance mechanisms would provide industries flexibility without compromising the District's ability to meet the emission reduction goals.

6. **The 2022 AQMP uses the California Air Resources Board EMission FACtor (EMFAC) 2017 model to estimate baseline and future year on-road motor vehicle emissions. The model does not consider emission reductions from recently adopted regulations, and therefore overestimates on-road emissions. The 2022 AQMP emissions inventories should be adjusted based on projections using EMFAC2021.**

In the 2022 AQMP, on-road motor vehicle emissions are estimated using the California Air Resources Board (CARB) EMission FACtor (EMFAC) 2017 model, which calculates exhaust and evaporative emission rates by vehicle type at varying vehicle speeds and environmental conditions.[20] EMFAC2017 does not address changes in emissions as a result of recently adopted vehicle regulations, including:

- Innovative Clean Transit (ICT), which requires public transit agencies to transition to a 100% ZE bus fleet.[21]
- Advanced Clean Truck (ACT), which requires a certain percentage of zero emission trick sales to be sold on an annual basis.[22]
- Heavy-Duty Omnibus, which ensures that heavy duty engines will emit much lower NOx emissions throughout their lifetimes.[23]

CARB has released an updated version of the model, EMFAC2021, which includes the regulations listed above, as well as other new features and changes addressing the inclusion of hybrid electric vehicles, a light duty zero emission vehicle (ZEV) forecasting framework, a new heavy-duty vehicle miles traveled (VMT) forecasting framework which forecasts VMT by county (as opposed to statewide as in EMFAC2017), and new sales and VMT forecasting, among other significant changes.[24] As shown in the CARB EMFAC2021 Volume III Technical Document, EMFAC2017 overstates projected NOx emissions when compared to EMFAC2021,

[19] SCAQMD Rule 2305, Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Available at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf?sfvrsn=15.
[20] CARB EMFAC Model. Available at: https://arb.ca.gov/emfac/.
[21] CARB Innovative Clean Transit Regulation. Available at: https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit.
[22] CARB Advanced Clean Trucks Regulation. Available at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.
[23] CARB Heavy-Duty Engine and Vehicle Omnibus Regulation. Available at: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox.
[24] CARB EMFAC2021 Volume III Technical Document. Available at: https://ww2.arb.ca.gov/sites/default/files/2021-08/emfac2021_technical_documentation_april2021.pdf.

which will result in an overstatement of on-road emissions in the 2022 AQMP emissions inventory.[25] The overstated projected NOx emissions result in an inaccurate forecast of emission reductions necessary to meet the 2015 ozone NAAQS. BizFed recommends that the 2022 AQMP baseline and future year emissions inventories be adjusted based on projections using EMFAC2021.

7. **The current progress on the development of amendments to Regulations XIII and XX will result in facilities being regulated under both the RECLAIM program and command-and-control rules. BizFed suggests that SCAQMD complete these amendments prior to adoption of further command-and-control rules to minimize this condition.**

SCAQMD has expended significant effort since adoption of the 2016 AQMP to develop rules that are intended to transition facilities out of the REgional CLean Air Incentives Market (RECLAIM) for NOx to command-and-control. In total the District has now developed fifteen landing rules in Regulation XI, and at least two additional landing rules are still in development. The California Health and Safety Code expressly prohibits regulation of companies subject to a market-based program under more stringent regulations, stating:[26]

A market-based incentive program that satisfies the conditions in this section may substitute for current command and control regulations and future air quality measures that would otherwise have been adopted as part of the district's plan for attainment and may be implemented ***in lieu of*** *some or all of the control measures adopted by the district pursuant to Chapter 10 (commencing with Section 40910) of Part 3.* [Emphasis added]

SCAQMD has been working to revise Regulation XIII, New Source Review (NSR), and Regulation XX, RECLAIM, to address facilities that will be required to exit NOx RECLAIM and ensure that there is a sufficient supply of offsets for growth and facility modernization. Remaining issues include the question of whether a transition out of RECLAIM is an NSR event, SIP commitments, offset calculations for major source modifications, regulation XIII post-RECLAIM offsets, and issues associated with Selective Catalytic Reduction (SCR), including ammonia slip requirements and PM BACT applicability for SCR projects.[27] These are significant issues that, if not dealt with, will result in facilities being regulated both under the command-and-control landing rules, as well as the market-based NOx RECLAIM program. BizFed recommends that SCAQMD re-prioritize the rulemaking agenda such that all command-and-control rulemaking is paused until the Regulation XIII and Regulation XX rulemakings are completed and revised regulations are adopted.

8. **The regulated industry in the South Coast Air Basin is in the process of modifying equipment to meet the most recent Best available Retrofit Control Technology emission standards. In some cases, the installation of equipment may not be complete until 2036. SCAQMD**

[25] Ibid
[26] California Health and Safety Code §39616. Available at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=39616.
[27] Regulation XIII, New Source Review, Working Group Meeting presentation, July 14, 2022. Available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/regx111/nsr---wgm-july-2022-final.pdf?sfvrsn=6.

must ensure that there are no stranded assets as a result of the control measures proposed under the 2022 AQMP.

As stated above, SCAQMD has expended significant effort since adoption of the 2016 AQMP on the development and adoption of rules associated with the transition from the RECLAIM program to command-and-control. Many of these facilities are now in the process of upgrading existing equipment to comply with the Best Available Retrofit Control Technology (BARCT) standards contained in the Landing Rules. For many of these facilities, the required capital investments for new/modified equipment are substantial. The 2022 AQMP control measure compliance schedules must consider the implementation timetables of the recently adopted and pending BARCT rules to avoid requiring additional NOx controls where Landing Rule compliance projects are currently being implemented. Additionally, the useful lifetime of the equipment currently being installed to meet BARCT standards will, in most cases, extend well beyond 2037. The 2022 AQMP control measures proposed in Appendix IV must ensure that facilities are not left with stranded assets.

Conclusion

The District has made significant strides in air reductions during the past 30 years, despite a significant population increase, and it should be proud of its accomplishments. Those reductions were accomplished in collaboration with many stakeholders, in particular the business community. We respect that SCAQMD is placed in a uniquely challenging situation to demonstrate attainment of the 2015 ozone NAAQS, and the business community stands ready to help the District achieve all practicable reductions as soon as possible.

We look forward to continuing our work with the District to see progress made in a way that is equitable and lasting.

Thank you for your consideration of our letter. If you have any questions, please contact BizFed's Director of Policy and Advocacy Sarah Wiltfong at sarah.wiltfong@bizfed.org.

Sincerely,

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David Fleming
BizFed Founding Chair

Tracy Hernandez
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BizFed Association Members

7-11 Franchise Owners Association for SoCal
Action Apartment Association
Alhambra Chamber
American Beverage Association
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Azusa Chamber
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Building Industry Association - LA/Ventura Counties
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Burbank Association of Realtors
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CalAsian Chamber
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California Asphalt Pavement Association
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California Cleaners Association
California Contract Cities Association
California Fashion Association
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Oil Marketers Association (CIOMA)
California Independent Petroleum Association
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Natural Gas Producers Association
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Central City Association
Century City Chamber of Commerce
Cerritos Regional Chamber of Commerce
Chatsworth Porter Ranch Chamber of Commerce
Citrus Valley Association of Realtors
Claremont Chamber of Commerce
Coalition for Small Rental Property Owners
Commercial Industrial Council/Chamber of Commerce
Compton Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water Quality
Covina Chamber
Crenshaw Chamber of Commerce
Crescenta Valley Chamber
Culver City Chamber of Commerce
Downey Association of REALTORS
Downey Chamber of Commerce
Downtown Center Business Improvement District
Downtown Long Beach Alliance
El Monte/South El Monte Chamber
El Segundo Chamber of Commerce
Employers Group
Encino Chamber of Commerce
Energy Independence Now EIN
Engineering Contractor's Association
EXP Future
FastLink DTLA
Filipino American Chamber of Commerce
Friends of Hollywood Central Park
FuturePorts
Gardena Valley Chamber
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Greater Antelope Valley AOR
Greater Bakersfield Chamber of Commerce
Greater Lakewood Chamber of Commerce
Greater Leimert Park Crenshaw Corridor BID
Greater Los Angeles African American Chamber
Greater Los Angeles Association of Realtors
Greater Los Angeles New Car Dealers Association
Greater San Fernando Valley Chamber
Harbor Association of Industry and Commerce
Harbor Trucking Association
Historic Core BID of Downtown Los Angeles
Hollywood Chamber
Hong Kong Trade Development Council
Hospital Association of Southern California
Hotel Association of Los Angeles
Huntington Park Area Chamber of Commerce
ICBWA- International Cannabis Women Business Association
Independent Cities Association
Industrial Environmental Association
Industry Business Council
Inglewood Board of Real Estate
Inland Empire Economic Partnership
International Franchise Association
Irwindale Chamber of Commerce
La Cañada Flintridge Chamber
LA Coalition
LA Fashion District BID
LA South Chamber of Commerce
Lancaster Chamber of Commerce
Larchmont Boulevard Association
Latin Business Association
Latino Food Industry Association
Latino Restaurant Association
LAX Coastal Area Chamber
League of California Cities
Long Beach Area Chamber
Long Beach Economic Partnership
Los Angeles Area Chamber
Los Angeles County Board of Real Estate
Los Angeles County Waste Management Association
Los Angeles Economic Development Center
Los Angeles Gateway Chamber of Commerce
Los Angeles Gay & Lesbian Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles Parking Association
Los Angeles World Affairs Council/Town Hall Los Angeles
MADIA
Malibu Chamber of Commerce
Marketplace Industry Association
Monrovia Chamber
Motion Picture Association of America, Inc.
MoveLA
MultiCultural Business Alliance
NAIOP Southern California Chapter
NAREIT
National Association of Minority Contractors
National Association of Tobacco Outlets
National Association of Women Business Owners
National Association of Women Business Owners - LA
National Association of Women Business Owners- California
National Federation of Independent Business
Owners California
National Hookah
National Latina Business Women's Association
Orange County Business Council
Pacific Merchant Shipping Association
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber
Pasadena Foothills Association of Realtors
PhRMA
Pico Rivera Chamber of Commerce
Planned Parenthood Affiliates of California
Pomona Chamber
Rancho Southeast REALTORS
ReadyNation California
Recording Industry Association of America
Regional Black Chamber-San Fernando Valley
Regional Hispanic Chambers
Regional San Gabriel Valley Chamber
Rosemead Chamber
San Dimas Chamber of Commerce
San Gabriel Chamber of Commerce
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Sherman Oaks Chamber
South Bay Association of Chambers
South Bay Association of Realtors
South Gate Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Sportfishing Association of California
Sunland/Tujunga Chamber
Sunset Strip Business Improvement District
Torrance Area Chamber
Tri-Counties Association of Realtors
United Cannabis Business Association
United Chambers – San Fernando Valley & Region
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
US Green Building Council
US Resiliency Council
Valley Economic Alliance, The
Valley Industry & Commerce Association
Venice Chamber of Commerce
Vermont Slauson Economic Development Corporation
Veterans In Business Network
Vietnamese American Chamber
Warner Center Association
West Hollywood Chamber
West Hollywood Design District
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Western Electrical Contractors Association
Western Manufactured Housing Association
Western States Petroleum Association
Westside Council of Chambers
Whittier Chamber of Commerce
Wilmington Chamber
Women's Business Enterprise Council
World Trade Center