

October 31, 2024

By Email: jafshar@aqmd.gov

Jivar Afshar
Air Quality Specialist
South Coast Air Quality Management District
21865 Copley Dr, Diamond Bar, CA 91765

Re: Comments on Draft Supplemental Environmental Assessment for Proposed Amended Regulations 1111 and 1121

Dear Ms. Afshar:

We write on behalf of BizFed, the Los Angeles County Business Federation, an alliance of more than 200 business organizations representing more than 400,000 employers in Los Angeles County, including large and small businesses in a wide range of industries throughout the South Coast Air Basin (SCAB). We are writing regarding Proposed Amended Rule (PAR) 1111 – Reduction of NOx Emissions From Natural Gas-Fired Furnaces and PAR 1121 – Reduction of NOx Emissions From Natural Gas-Fired Water Heaters (collectively, Rules), specifically in regards to the Draft Supplemental Environmental Assessment (a Supplemental Environmental Impact Report (EIR)-equivalent document prepared under the California Environmental Quality Act (CEQA) by the South Coast Air Quality Management District (SCAQMD) pursuant to its Certified Regulatory Program) (Draft SEA). The Draft SEA was released for public comment on September 26, 2024.

As we are sure you are aware, we have previously submitted comments and provided extensive information addressing the impacts on the business community as a whole, as well as the specific concerns of our diverse membership, regarding the Rules. We continue to be concerned about these impacts and, as outlined more fully below, we do not believe that the Draft SEA satisfies the requirements of CEQA. In particular the Draft SEA fails to contain the required analysis of socioeconomic impacts proximately caused by, or resulting from, adoption of the Rules. The Draft SEA also does not include a legally sufficient alternatives analysis. In addition, the Draft SEA fails to mitigate significant energy impacts.

Background and Prior CEQA Analysis

As you know, and as described in the Draft SEA, PAR 1121 is intended to implement 2022 Air Quality Management Plan (2022 AQMP) Control Measure R-CMB-01. PAR 1111 is intended to implement 2022 AQMP Control Measures R-CMB-02 and C-CMB-02. (These three 2022 AQMP Control Measures are referred to collectively as the Control Measures in the remainder of this letter). The Control Measures were evaluated in an Environmental

Impact Report for the 2022 AQMP (2022 Final Program EIR).¹ The 2022 Final Program EIR describes the Control Measures as follows:

“R-CMB-01: Emission Reductions from Replacement with Zero Emission or Low NOx Appliances – Residential Water Heating: This control measure seeks to reduce NOx emissions from residential building water heating sources that are subject to Rule 1121 – Control of Oxides of Nitrogen (NOx) from Residential Type, Natural Gas-Fired Water Heaters. The measure proposes to 1) develop a rule to require zero emission water heating units for installations in both new and existing residences; and 2) allow low NOx technologies as a transitional alternative when installing a zero-emission unit is determined to be infeasible (e.g., colder climate zones, or architecture design obstacles). This control measure would include incentive funds to facilitate the transition to zero emission technologies and promote further emission reductions earlier than required. A primary zero emission residential water heating technology is currently available with the all-electric heat pump water heater.

R-CMB-02: Emission Reductions from Replacement with Zero Emission or Low NOx Appliances – Residential Space Heating: This control measure seeks to reduce NOx emissions from residential space heating sources regulated by Rule 1111 – Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces (Rule 1111). This control measure proposes to 1) develop a rule to require zero emission space heating units for installations in both new and existing residences; and 2) allowing low NOx technologies as a transitional alternative when installing a zero-emission unit is determined to be infeasible. This control measure would also provide incentive funds to facilitate adoption of zero emission technologies that would promote further emission reductions earlier than required.

C-CMB-02: Emission Reductions from Replacement with Zero Emission or Low NOx Appliances – Commercial Space Heating: This control measure seeks to reduce NOx emissions from commercial building space heating sources. (i.e., forced air furnaces) with a rated heat input capacity between 175,000 and 2,000,000 British Thermal Units per hour (BTU/hr). Those sources are currently not subject to the South Coast AQMD NOx rules. The measure proposes to 1) develop rules to require zero emission commercial space heating units for installations in both new and existing buildings; and 2) allow low NOx technologies as a transitional alternative when installing a zero-emission unit is determined to be infeasible. This control measure would also provide incentive funds to facilitate adoption of zero emission technologies that would promote further emission reductions earlier than required. Heat pumps have been broadly applied in commercial applications as the primary zero emission technology.” 2022 Final Program EIR, pgs. 2-16 – 2-17.

Control Measures R-CMB-01 and R-CMB-02 were expected to affect 2 million residential water and space heaters, respectively, and were evaluated with an implementation date of

¹ Final Program Environmental Impact Report for Proposed 2022 Air Quality Management Plan, November 2022, State Clearinghouse No, 2022050287.

2029 in the 2022 Final Program EIR. See, 2022 Final Program EIR, Table 4.2-6, pg. 4.2-32 and Table 2.7-1, pg. 2-14. Control Measure C-CMB-02 was expected to affect 200,000 commercial space heaters and was evaluated with an implementation date of 2031. See, 2022 Final Program EIR, Table 4.2-6, pg. 4.2-32 and Table 2.7-1, pg. 2-14. The 2022 Final Program EIR concluded that implementation of the Control Measures would have potentially significant adverse air quality impacts from construction necessary to install lower and zero emission units, and from operational energy impacts related to electricity demand and increased use of natural gas to generate electricity caused by electrifying space and water heating appliances that are currently natural gas-fired. 2022 Final Program EIR pgs. 4.3-10 – 4.3-11.

As described in the Draft SEA, which tiers off of the 2022 Final Program EIR, PAR 1111 is expected to affect 5,350,000 space heaters. Draft SEA, pg. 1-16. PAR 1111 requires zero-NOx space heaters in new construction starting on January 1, 2026, and zero-NOx replacement space heaters at the end of appliance life starting on January 1, 2028 for units in existing buildings. Par 1121 is expected to affect 5,128,000 water heaters. Draft SEA, pg. 1-16. PAR 1121 requires zero-NOx water heaters in new construction starting on January 1, 2026, and zero-NOx replacement water heaters at the end of appliance life starting on January 1, 2028 for units in existing buildings. Thus, together, the Rules are expected to affect nearly 10.5 million natural gas-fired appliances in the SCAB.

The Draft SEA analysis concludes that the potentially significant adverse air quality impacts from construction and from energy impacts due to electricity and natural gas demand found in the 2022 Final Program EIR “will be substantially made more severe if [the Rules] are implemented.” Draft SEA, pg. 1-5. For the types of physical changes resulting from the implementing of the Rules, the Draft SEA attributes the increase in severity to the increased number of units affected. Draft SEA pg. 1-16. However, the Draft SEA fails to fully acknowledge that some of the increased severity of the environmental impacts is due to accelerating implementation of low- and zero-NOx appliance replacements compared to implementing the Control Measures as analyzed in the 2022 Final Program EIR. As set forth more fully below, this failure results in the Draft SEA failing to comport with the requirements of CEQA.

The Draft SEA Fails To Analyze Impacts Reasonably Foreseeable from Implementing the Rules

CEQA requires an analysis of socioeconomic impacts when proximately caused by, or resulting from, an agency action.² Urban decay, or blight, is required to be evaluated by SCAQMD and the absence of this analysis is a fatal flaw in the Draft SEA for the Rules. The proposed rules impose billions of dollars of unfunded mandates on owners of residential and commercial properties, as well as landlords – who are legally entitled to pass these costs on to renters. Owners of structures who are unable or unwilling to pay these costs will be operating illegal structures, which insurance policies and mortgage covenants prohibit –

² *Bakersfield Citizens for Local Control v City of Bakersfield* (2004) 124 Cal.App.4th 1184; *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173.

resulting in foreclosures, uninsured structures, and blight from vacant or underutilized properties. This blight outcome extends to both commercial and residential structures.

The commercial market is already staggering with vacancies from hybrid/remote work and job losses in critical industries such as entertainment; the retail market is similarly staggering with the ever-increasing volumes of e-commerce. Large commercial structures are already defaulting on loans, and other structures are selling at steep discounts with uncertain future utilization rates. Just a small fraction of the largest commercial property defaults is reported in this recently published article.³

Housing is even more challenging. The median price of a California home (not simply a home in a coastal county) now exceeds \$900,000 – 10 times more than median income; a healthy housing market includes ample supplies of homes priced at 3-5 times median income.⁴ Average monthly rents in Los Angeles County are already \$2,452, and a chronic and growing shortage of less expensive housing, made worse by the continued growth of the homeless population, has caused about 59% of LA households to pay more than 30% of their income on rent⁵ – a level considered unaffordable by federal government standards. There are about 650,000 apartments covered by rent control, and hundreds of thousands of newer apartments not covered by rent control. All of the older apartments, and most of the new apartments, will eventually need costly retrofits to comply with the ban on gas-fired appliances contained in the Rules. And the evidence is clear: landlords and lenders do not have the resources to make the extraordinarily costly modifications needed to comply with the Rules. In a 2024 article,⁶ for example, it is reported that multi-family housing is already struggling to renew loans. Construction of new multi-family units have slowed significantly in markets like Los Angeles – data reflects that by the end of the first half of 2024, there was a decline of 34.6% in the completion of new apartments, and the sale volumes for multi-family apartment buildings worth more than \$5 million have dropped by 40%.⁷

The Rules also assume massive increases in electric supplies, and electric transmission, distribution, and substation equipment – none of which is funded, and all of which will further burden ratepayers who already pay among the highest electricity costs in the nation. There continues to be a shortfall of electric supplies, and a shortage of critical infrastructure needed to bring supplies to where people live and work. Imposing a premature transition to all-electric appliances will foreseeably result in brownouts and blackouts that have caused catastrophic public safety and health consequences, especially to sensitive needs

³ <https://therealdeal.com/la/2024/01/02/brookfield-dtla-towers-lead-socals-top-defaults-in-2023/>

⁴ <https://www.metroabundance.org/what-would-it-look-like-to-take-an-outcome-oriented-approach-to-housing-abundance/>

⁵ <https://laist.com/news/housing-homelessness/los-angeles-housing-rent-control-increase-caps-rso-limits-economic-roundtable-report>

⁶ <https://www.globest.com/2024/08/14/refinancing-hurdles-and-market-slowdown-in-la-multifamily-sector/?slreturn=20241030133840>

⁷ <https://www2.naicapital.com/l-a-county-multifamily-market-shifts-as-vacancies-rise-and-rents-reach-new-highs-offering-opportunities-for-capital-ready-investors/#:~:text=Elevated%20interest%20rates%20have%20made.Recently%2C%20Blackstone%20Inc.>

populations dependent on critical medical equipment.⁸ The Draft SEA analysis ignores this immediate adverse health consequence while asserting via “models” purported health benefits of removing gas-fired appliances from people’s homes. These appliances have been safely operated for a century or more.

The unfunded mandates represented by the Rules impose billions of dollars of cost burdens on a region already suffering from unaffordable cost burdens. Imposing these unfunded mandates will make the housing crisis worse, drive even more commercial and retail businesses out of the region (and eliminate associated jobs), and result in vacant and underutilized buildings, reduce the tax revenues needed for critical public services like fire, public safety and medical care, and cause disproportionate harms to already distressed disadvantaged communities. It is fiscally, socially and environmentally reckless to impose these costs to obtain the miniscule fraction of NOx reductions attributable to these widespread retrofits mandated by the Rules.

Our region has many pressing needs, but we are at the end of an era where each special interest agency can, within its own silo, unilaterally impose billions of dollars of unfunded mandates without considering the adverse consequences to health, safety, and critical crises like our housing, homeless and poverty crises. The CEQA analysis performed by SCAQMD for the Rules is fundamentally flawed, and must be revised to acknowledge, analyze, and mitigate for these consequences – and importantly must include a thorough alternatives analysis that includes achieving the purported health benefits of removing safe gas appliances from structures through other, far less damaging and costly, methods.

The Draft SEA Fails To Analyze Adequate Alternatives

The Draft SEA is further inadequate because it fails to properly analyze a reasonable range of alternatives. Under CEQA, a proper analysis of alternatives is essential to comply with CEQA’s mandate that significant environmental impacts be avoided or substantially lessened where feasible.⁹ The analysis of alternatives lies at the “core of an EIR,”¹⁰ and an EIR must “ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.”¹¹

The purpose of the requirement to contemplate alternatives is to identify ways to mitigate or avoid the significant effects of a project.¹² “[A]n agency may not approve a proposed project if feasible alternatives exist that would substantially lessen its significant

⁸ <https://pinkerton.com/our-insights/blog/the-impact-of-power-outages#:~:text=Power%20outages%20and%20impact%20on,heat%20stroke%2C%20and%20food%20ins%20ecurity>.

⁹ Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15002(a)(3), 15021(a)(2), 15126(d); *Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 443–45.

¹⁰ *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564.

¹¹ *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 735; see also Pub. Resources Code, § 21002.1(a).

¹² Pub. Resources Code, § 21002.1.

environmental effects.”¹³ The alternatives discussion must be “meaningful” and must “contain analysis sufficient to allow informed decision making.”¹⁴ The alternatives analysis is critical to the integrity of an EIR.¹⁵ An EIR must “ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.”¹⁶ An alternatives analysis under CEQA must focus on potentially feasible alternatives to the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.¹⁷

As noted above, the 2022 Final Program EIR concluded that implementing the Control Measures would result in significant and unavoidable impacts in the environmental topic areas of air quality and energy. The Draft SEA concludes that implementing the Rules would make those impacts substantially more severe. As noted above, the Draft SEA attributes that increased severity to the greater number of units affected by the Rules.

In addition to the “No Project” alternative (“Alternative A”) required to be analyzed under CEQA, the Draft SEA evaluates three other alternatives – “Alternative B” is described as the “more stringent” alternative (advances the compliance date for new construction to January 1, 2025 for PAR 1111 and mandates changeout of existing appliances by the compliance date at which end of life replacements would occur under the Rules as drafted); “Alternative C” is described as the “less stringent” alternative (keeps same compliance dates and structure as the Rules as drafted, but allows replacement of existing units with low-NO_x (rather than zero-NO_x) units where the Rules as drafted allow temporary alternative compliance options (estimated to be 50% of replacements)); and “Alternative D” (keeps the compliance dates and rule structure the same as the Rules as drafted, but provides additional incentive funding which is estimated to result in about 1% (rather than .5%) of existing units being changed out before the end of useful life).

Notably, none of the alternatives examines the effect of a compliance date later than January 1, 2028 for space heaters and January 1, 2030 for water heaters. This is the case despite the fact that The 2022 Final Program EIR analyzed 2029 and 2031 compliance dates for these appliances respectively. This is a fundamental failure to present an adequate and legally

¹³ *Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 52 (citations omitted); see also Pub. Resources Code, §21081(a); CEQA Guidelines, §15091(a)(3); *Cal. Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1002.

¹⁴ *Laurel Heights Improvement Association of San Francisco, Inc. v. Regents of the University of California* (1988) 47 Cal.3d 376 at 403–04.

¹⁵ *In re Bay-Delta Programmatic Env'tl. Impact Report Coordinated Proceedings*, 43 Cal.4th 1143, 1162 (2008) (“The EIR is the heart of CEQA, and the mitigation and alternatives discussion forms the core of the EIR.”).

¹⁶ *San Joaquin Raptor/Wildlife Rescue Center, supra*, 27 Cal.App.4th at 735; see also Pub. Resources Code, § 21002.1(a).

¹⁷ CEQA Guidelines, § 15126.6(b), (f); see also Pub. Resources Code, § 21102.1(a) (“The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.”).

sufficient alternatives analysis that examines all reasonable alternatives to inform the public and the responsible officials of feasible alternatives as required by CEQA.¹⁸

Moreover, although the Draft SEA acknowledges that the impacts on natural gas demand that the Draft SEA finds severe and unavoidable will diminish as renewable energy use grows and reliance on natural gas for heating appliances decreases (Draft SEA, pg. 5-6), no alternative is analyzed that takes this into account. Indeed, California Senate Bill 100 (2018) established a goal for grid power of 60% renewable and zero-carbon resources by 2030. In light of this fact, a legally sufficient alternatives analysis would include at least one alternative that examines whether extending the compliance date until more renewables are available on the grid would ameliorate some or all of the severe and unavoidable impacts found. For example, an alternative that tied the compliance date to the accomplishment of a defined level of renewable power on the grid would inform decision makers and the public about the important trade-offs inherent in the decision making around the Rules as required by CEQA. Whether these or other reasonable and feasible alternatives would decrease the impacts of the Rules cannot be known because the Draft SEA fails in its fundamental purpose to present them for consideration. The Draft SEA for the Rules is fundamentally flawed and must be revised to properly analyze all reasonable and feasible alternatives as outlined above. The Revised SEA must then be recirculated for public comment before it and the Rules can be further considered by SCAQMD.

The Draft SEA Fails to Mitigate Significant Energy Impacts

The discussion of a proposed project's environmental impacts is an essential component of an EIR.¹⁹ The fundamental purpose of CEQA is to "inform the public and its responsible officials of the environmental consequences of their decisions before they are made."²⁰ To do so, an EIR must contain facts and analysis, not just an agency's bare conclusions.²¹

CEQA also requires an EIR to describe and adopt all feasible mitigation measures to address a project's significant environmental impacts.²² Mitigation measures must be "fully enforceable through permit conditions, agreements, or other legally binding instruments."²³ Generally, the "[f]ormulation of mitigation measures should not be deferred until some future time."²⁴ As an exception, "measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way."²⁵ Crucially, there is a "distinction between stating a generalized goal and

¹⁸ That these later compliance dates are reasonable and feasible alternatives is further demonstrated by the fact that the Bay Area Air Quality Management District (Bay Area AQMD) adopted amendments in March of 2023 to its Regulation 9, Rule 6 which sets forth a zero-NOx compliance date of January 1, 2031 for typical residential water heaters, and its Regulation 9, Rule 4 which contains a zero-NOx compliance date of January 1, 2029 for furnaces.

¹⁹ See CEQA Guidelines, § 15126.2(a) ("An EIR *shall* identify and focus on the significant effects of the proposed project on the environment.") (emphasis added).

²⁰ *Laurel Heights, supra*, 6 Cal.4th at 1123.

²¹ *Citizens of Goleta Valley, supra*, 52 Cal.3d at 568.

²² Pub. Resources Code, § 21002; CEQA Guidelines, § 15126.4(a)(1).

²³ CEQA Guidelines, § 15126.4(a)(1)(B), (a)(2).

²⁴ CEQA Guidelines, § 15126.4(a)(1)(B).

²⁵ *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 856.

adopting specific performance criteria,” and “[s]imply stating a generalized goal for mitigating an impact does not allow the measure to qualify for the exception to the general rule against the deferred formulation of mitigation measures.”²⁶ Further, even where the deferred formulation of mitigation might be allowable, there is a point beyond which delayed implementation is not allowed: “[o]nce the project reaches the point where activity will have a significant adverse effect on the environment, the mitigation measures must be in place.”²⁷ “Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified.”²⁸

All of the mitigation for energy impacts identified in the Draft SEA are lifted from the 2022 Final Program EIR. The Draft SEA states as follows:

“The following mitigation measures have been identified for reducing potential electricity demand impacts:

- E-1 Project sponsors should pursue incentives to encourage the use of energy efficient equipment and vehicles and promote energy conservation during electricity generation.
- E-2 Utilities should increase capacity of existing transmission lines to meet forecast demand that supports sustainable growth where feasible and appropriate in coordination with local planning agencies.
- E-3 Project sponsors should submit projected electricity calculations to the local electricity provider for any project anticipated to require substantial electricity consumption. Any infrastructure improvements necessary should be completed according to the specifications of the electricity provider.
- E-4 Project sponsors should include energy analyses in environmental documentation with the goal of conserving energy through the wise and efficient use of energy.
- E-7 Project sponsors should evaluate the potential for reducing peak energy demand by encouraging the use of electrified stationary sources during off-peak hours.”

Draft SEA, pgs. 4-20 – 4-21.

None of these mitigation measures were adequate when they were included in the 2022 Final Program EIR and they remain inadequate in the context of the Draft SEA. Even a cursory examination of these “measures” reveals that they express aspirational goals at best. None of the measures are enforceable, as required by CEQA, through “permit conditions, agreements, or other binding instruments” by South Coast AQMD or anyone else. In addition, none of these measures specifies any sort of performance standard that could lead to formulation of appropriate mitigation in the future. Moreover, other than explaining that

²⁶ *Id.* at 856.

²⁷ *Id.* at 860, quoting *POET, LLC v. Cal. Air Resources Bd.* (2013) 218 Cal.App.4th 681, 738.

²⁸ CEQA Guidelines, § 15126.4(a)(1)(B).

some of the measures that were included in the 2022 Final Program EIR are inapplicable to mitigating energy impacts, the Draft SEA provides no explanation for the assertion that these specific measures will address the energy impacts that the Draft SEA describes as more severe than the impacts found in the 2022 Final Program EIR. See Draft SEA, pg. 4-20. In short, the mitigation measures identified in the Draft SEA that purport to reduce the potential electricity demand impacts that have been identified are wholly inadequate under CEQA. To address this inadequacy, the Draft SEA must be revised to identify and analyze appropriate mitigation measures for energy impact. The revised Draft SEA must then be recirculated for public comment before it and the Rules can be further considered by SCAQMD.

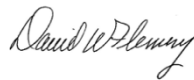
For the reasons set forth above, we urge SCAQMD to revise its analysis, prepare and circulate a revised Draft SEA, and, ultimately, to reject the Rules. We reserve the right to identify new issues, provide additional information, and propose additional mitigation measures during SCAQMD's ongoing decision-making process for the Rules.

Thank you for your thoughtful consideration of these critical issues.

Sincerely,




Fran Inman
BizFed 2024 Chair
Majestic Realty



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.



David Englin
BizFed President

CC: Governing Board

BizFed Association Members

Action Apartment Association
Advanced Medical Technology Association
Alhambra Chamber
American Beverage Association
Antelope Valley Chamber formerly Lancaster Chamber of Commerce
Apartment Association of Greater Los Angeles
Apartment Association of Orange County
Apartment Association, CA Southern Cities, Inc.
Apartment Association of California
Arcadia Association of Realtors
AREAA North Los Angeles SFV SCV
Armenian American Business Association
Armenian Trade & Labor Association
Arts District Los Angeles
ASCM Inland Empire Chapter
Associated Builders & Contractors SoCal (ABC SoCal)
Associated General Contractors
Association of Independent Commercial Producers
AV Edge California
Azusa Chamber
Bell Chamber
Beverly Hills Chamber
BioCom
Black Business Association
Black Professional Network

Boyle Heights Chamber of Commerce
Bridge Compton Org
Building Industry Association - LA/Ventura Counties
Building Industry Association of Southern California
Building Industry Association- Baldyview
Building Owners & Managers Association of Greater Los Angeles
Burbank Association of Realtors
Burbank Chamber of Commerce
Business and Industry Council for Emergency Planning and Preparedness
Business Resource Group
CalAsian Chamber
CalChamber
California African American Chamber of Commerce
California Apartment Association- Los Angeles
California Asphalt Pavement Association
California Bankers Association
California Black Chamber of Commerce
California Business Properties
California Business Roundtable
California Cleaners Association
California Contract Cities Association
California Council for Environmental & Economic Balance (CCEEB)
California Fuels & Convenience Alliance- Formerly

California Independent Oil Marketers Association (CIOMA)
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Petroleum Association
California Infrastructure Delivery Coalition
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Natural Gas Producers Association
California Restaurant Association
California Retailers Association
California Self Storage Association
California Small Business Alliance
California Travel Association (CalTravel)
California Trucking Association
Californians For Smarter Sustainability
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
Central City Association
Century City Chamber of Commerce
Chatsworth Porter Ranch Chamber of Commerce
Citrus Valley Association of Realtors
Civil Justice Association of California CJAC
Claremont Chamber of Commerce

Commerce Business Council formerly Commercial Industrial Council/Chamber of Commerce
Compton Chamber of Commerce
Compton Community Development Corporation
Compton Entertainment Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water Quality
Council of Infill Builders
Crenshaw Chamber of Commerce
Culver City Chamber of Commerce
Downey Chamber of Commerce
Downtown Alliance
Downtown Long Beach Alliance
DTLA Chamber of Commerce
El Monte/South El Monte Chamber
El Salvador Corridor Association
El Segundo Chamber of Commerce
Employers Group
Energy Independence Now EIN
Engineering Contractor's Association
EXP The Opportunity Engine
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 Coachella Valley Chamber of Commerce
Greater Downey Association of REALTORS
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
Hospital Association of Southern California
Hotel Association of Los Angeles
ICBWA- International Cannabis Women Business Association
Independent Cities Association
Independent Hospitality Coalition
Industrial Environmental Association
Industry Business Council
Inglewood Board of Realtors
Inland Empire Economic Partnership
Irwindale Chamber of Commerce
Kombucha Brewers International
La Cañada Flintridge Chamber
LA County Medical Association
LA Fashion District BID
LA South Chamber of Commerce
Larchmont Boulevard Association
Latin Business Association
Latino Food Industry Association
Latino Golfers Association
Latino Restaurant Association
LAX Coastal Area Chamber
Licensed Adult Residential Care Association- LARCA
Long Beach Area Chamber
Long Beach Economic Partnership
Long Beach Major Arts Consortium
Los Angeles Area Chamber
Los Angeles Economic Development Center
Los Angeles Gateway Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles LGBTQ Chamber of Commerce
Los Angeles Parking Association
Los Angeles Regional Food Bank
MADIA Tech Launch
Malibu Chamber of Commerce
Manhattan Beach Chamber of Commerce
Manhattan Beach Downtown Business & Professional Association
Marina Del Rey Lessees Association
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 Theatre Owners
CA/Nevada
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
Norwegian American Chamber of Commerce
Ofiso Community Foundation
Orange County Business Council
Orange County Hispanic Chamber of Commerce
Pacific Merchant Shipping Association
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber
Pasadena Foothills Association of Realtors
PGA
Pharmaceutical Care Management Association
PhRMA
Pico Rivera Chamber of Commerce
Pomona Chamber
Rancho Southeast REALTORS
ReadyNation California
Recording Industry Association of America
Regional CAL Black Chamber, SVF
Regional Hispanic Chambers
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber of Commerce
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Secure Water Alliance
Sherman Oaks Chamber
Signal Hill 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 KFC Franchise
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Specialty Equipment Market Association
Structural Engineers Association of Southern California
Sunland/Tujunga Chamber
Sunset Strip Business Improvement District
Swiss American Chamber of Commerce
Thai American Chamber of Commerce
The Bridge Network
The LA Coalition for the Economy & Jobs
The Los Angeles Taxpayers Association
The Two Hundred for Homeownership
Torrance Area Chamber
Tri-Counties Association of Realtors
United Chambers – San Fernando Valley & Region
United Contractors
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
Urban Business Council
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
Vietnamese American Chamber
Village of Sherman Oaks BID
Warner Center Association
West Covina Chamber
West Hollywood Chamber
West Hollywood Design District
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Westchester BID
Western Electrical Contractors Association
Western Manufactured Housing Association
Western Propane Gas Association
Western States Petroleum Association
Westside Council of Chambers
Westwood Community Council
Whittier Chamber of Commerce
Wilmington Chamber
World Trade Center
Yes in My Backyard
7-Eleven Franchise Owners Association of Southern California