Jarod Egan

I am submitting this comment in strong opposition to the California Air Resources Board's (CARB) proposed amendments to the Mandatory Reporting of Greenhouse Gas (GHG) Emissions regulation. While I support responsible environmental stewardship, these amendments expand the scope of the MRR program in ways that unfairly burden homeowners, increase costs, and extend CARB's regulatory reach far beyond the program's original intent.

1. The amendments create indirect reporting obligations that fall on homeowners
Although the proposal does not explicitly list homeowners as regulated entities, the expanded definitions and new data-collection requirements effectively shift compliance responsibilities onto private residents. Homeowners would be forced to rely on contractors, installers, and service providers who must now gather and report emissions-related data for routine residential projects. This creates a de facto reporting burden on homeowners who have no expertise in emissions accounting and no practical way to verify the accuracy of the information being collected in their name.

2. The amendments will increase the cost of homeownership and essential home projects
Any new reporting, documentation, or verification requirement imposed on contractors or small businesses will be passed directly to homeowners through higher prices. This includes:

Home renovations

HVAC replacements

Solar or battery installations

Landscaping and outdoor construction

Routine maintenance requiring licensed professionals

California homeowners already face some of the highest housing, insurance, and utility costs in the nation. CARB's proposal adds yet another layer of cost without providing any measurable benefit to residential consumers.

3. The proposal introduces compliance risks and legal uncertainty for homeowners
The amendments rely on broad, ambiguous definitions that create uncertainty about when emissions-related data must be collected, who is responsible for reporting it, and what penalties may apply for incomplete or inaccurate information. This exposes homeowners to:

Disputes with contractors

Delays in home projects

Unexpected compliance obligations

Potential liability for reporting errors they cannot control

Regulations that carry penalties must be clear, narrowly tailored, and predictable. These amendments fail to meet that standard.

4. CARB is expanding the MRR program beyond its statutory purpose
The Mandatory Reporting Regulation was designed for large industrial emitters, not private residences or small-scale home projects. The proposed amendments represent a significant expansion of CARB's authority into areas that were never intended to fall under industrial emissions reporting. This type of regulatory creep undermines public trust and imposes burdens on Californians who are not major contributors to statewide emissions.

5. Environmental goals can be met without imposing new burdens on homeowners
If CARB seeks more accurate emissions data, it should focus on:

Improving reporting requirements for large emitters

Enhancing utility-level data collection

Supporting technological improvements in industrial monitoring

Offering incentives—not mandates—for residential efficiency upgrades

California can pursue climate goals without creating new administrative, financial, and legal burdens for homeowners.

Conclusion
For these reasons, I urge CARB to withdraw or substantially revise the proposed amendments. The current proposal imposes unnecessary costs, creates compliance uncertainty, and expands regulatory authority in ways that negatively affect homeowners who are already struggling with California's high cost of living. Any changes to the MRR program must be transparent, narrowly targeted, and designed to avoid unintended consequences for ordinary residents.