

## Los Angeles County Business Federation (BizFed) (Chris Wilson)

On behalf of the Los Angeles County Business Federation, known as BizFed, please see our attached comment letter on the proposed rulemaking.

April 29, 2026

Industrial Strategies Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: BizFed Comments on Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (Cap-and-Invest)**

Dear Industrial Strategies Division:

On behalf of the Los Angeles County Business Federation (BizFed), we respectfully submit the following comments on the California Air Resources Board's (CARB) proposed amendments to the California Cap on Greenhouse Gas Emissions and Market- Based Compliance Mechanisms Regulation ("Cap-and-Invest").<sup>1</sup> BizFed is a grassroots alliance of chambers of commerce, trade associations, minority business groups, economic development organizations, and business improvement districts advocating for policies that strengthen the regional economy. Our coalition unites more than 240 business organizations that represent over 420,000 employers with 5+ million employees across California.

BizFed has long supported an "all of the above" energy policy that keeps California competitive in a volatile global economy, and we support the role of a well-designed carbon market in achieving the State's emissions goals that is affordable for Californians. We write today not as opponents of Cap-and-Invest, but as a diverse group of stakeholders with a direct interest in its long-term success. Our members, spanning manufacturing, energy, logistics, real estate, retail, hospitality, and professional services, understand that a credible climate program must align environmental ambition with economic reality. The proposal, as drafted, presents significant deficiencies that warrant the Board's attention prior to final adoption. We offer the comments below with the goal of strengthening the program's long-term durability and public support as a cost-effective policy.

Cap-and-Invest compliance costs do not stop at the covered facilities. They flow downstream through fuel prices, natural gas rates, electricity costs, and the price of cement, steel, packaging, and refined products to the tens of thousands of small and mid-sized businesses that make up the backbone of the California economy. Our comments reflect that broader downstream reality, which is not otherwise well represented in this rulemaking. Several BizFed member organizations are submitting

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<sup>1</sup> California Air Resources Board (CARB). Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market- Based Compliance Mechanisms Regulation. Available at: <https://ww2.arb.ca.gov/rulemaking/2026/cap-and-invest2026>.

sector-specific comments separately; the comments below reflect the cross-industry perspective of our broader coalition.

**1. The proposed amendments fail to provide industry with a transparent view of the longer-term trajectory of the program, denying employers the information needed to plan, invest, and modernize in California.**

California's industrial employers evaluate and finance major capital investments on 10- to 30-year time horizons. Decisions regarding new production capacity, facility modernization, and decarbonization retrofits will require reasonable visibility into future compliance costs and allocation treatment over the full useful life of the assets. When the regulatory signal is ambiguous beyond 2030, capital flows elsewhere, regardless of whether a facility's California operations are otherwise competitive. In an environment where other U.S. states have actively positioned themselves as alternatives to California's regulatory environment, that ambiguity carries real consequences.

The proposed amendments extend the Cap-and-Invest program through 2045, with annual allowance budgets defined for each year of the program's duration, declining from 254 million allowances in 2026 to 158.8 million in 2030 and to 30.3 million by 2045.<sup>2</sup> Yet the Cap Adjustment Factor (CAF), the core mechanism through which CARB calibrates leakage protection for energy-intensive, trade-exposed industrial activity, is defined only through budget year 2030.<sup>3</sup> For the 15 years from 2031 through 2045, during which the annual allowance budget declines by more than 80 percent<sup>4</sup>, the proposed 15-day amendments now provides no defined CAF values and no published methodology for establishing them a mere four years from now.

This structure creates several concrete problems for California employers:

First, capital allocation decisions are being made today for assets that will operate well into the 2040s. Without reasonable confidence regarding post-2030 compliance treatment, investment committees at multi-state and multinational firms will apply risk premiums to California opportunities or redirect capital to jurisdictions with clearer regulatory horizons. The cost of that uncertainty is paid in deferred investment, reduced workforce hours, and in some cases facility closure – also known as leakage, which CARB is statutorily obligated to minimize.

Second, the Manufacturing Decarbonization Incentive (MDI), which CARB has rightly included as a modernization and financial support tool, loses much of its intended effect without a defined long-term allocation framework. The MDI reflects the Board's own acknowledgment that declining allowance budgets alone will not drive deep decarbonization in hard-to-abate sectors, and the proposed amendments create a

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<sup>2</sup> CARB. Attachment A-1 Proposed 15-Day Amendments. Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. Table 6-2. Available online at: [https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap\\_invest/nc\\_a-1\\_ci\\_15d.pdf](https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap_invest/nc_a-1_ci_15d.pdf).

<sup>3</sup> *Id.*, Table 9-2.

<sup>4</sup> *Id.*, Table 6-2.

limited new MDI pathway for industrial activities otherwise listed as ineligible under Table 9-1a, including petroleum refining, industrial gas manufacturing, asphalt paving and block manufacturing, and other basic organic chemical manufacturing, in connection with qualifying GHG emissions reduction activities under §95891(g)(2)(H).<sup>5</sup> This permits those facilities to use the MDI allowance value for capital, electricity, design, engineering, and permitting costs associated with carbon capture, utilization, and sequestration equipment, contingent on a future Board-approved quantification methodology.<sup>6</sup> The MDI is available for budget years 2028 through 2035 and provides an eligible facility with a CAF modifier of up to 0.8 added to the applicable CAF "by budget year and sector as listed in Table 9-2."<sup>7</sup> However, Table 9-2 contains no CAF values for budget years 2031 through 2035, more than half of the MDI's eligibility window.<sup>8</sup> An MDI applicant cannot meaningfully model the value of the incentive over the life of a capital project when the underlying CAF values to which the modifier attaches have not been established. The Board's modernization and financial support tool is thus undermined by the proposed regulation's silence on the post-2030 period.

Third, California's broader regulatory environment compounds the line-of-sight problem. Employers evaluating California investments are simultaneously navigating numerous other regulatory mandates from CARB, other State agencies, and the regional air pollution control districts. No single agency accounts for the cumulative compliance burden. When Cap-and-Invest adds long-term uncertainty on top of a regulatory stack that already imposes near-term compliance costs from multiple directions, the effect on investment decisions is not additive, it is multiplicative. A facility that might absorb any one of these programs may decline to absorb all of them simultaneously without a clearer long-term signal.

A credible long-term signal does not require CARB to lock in today's numbers forever. It would, however, allow employers to understand, with reasonable confidence, how the program will treat energy-intensive, trade-exposed activity over the life of their investments. Without that signal, the program will continue to accelerate the very outcome it is intended to avoid – the relocation (or "leakage") of production, jobs, and emissions outside California.

## **2. The proposal as drafted does too little to protect California producers from out-of-state competitors that do not face comparable carbon costs, and is**

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<sup>5</sup> *Id.*, Table 9-1a.

<sup>6</sup> *Id.*, Table 9-1a, as amended, and §95891(g)(2)(H). Section 95891(g)(2)(H) provides that facilities in sectors otherwise listed as ineligible under Table 9-1a may use MDI allowance value for CCUS-related capital and operating costs, provided a Board-approved quantification methodology is incorporated into the Regulation pursuant to §95852.3 (§95891(g)(2)(H)).

<sup>7</sup> *Id.*, §95891(g).

<sup>8</sup> Proposed §95891(g)(9) establishes dedicated MDI allowance pools of up to 59,150,000 allowances each for specified NAICS-code industrial activities and for all other eligible industrial activities, available for budget years 2028 through 2035. The CAF modifier of up to 0.8 is, however, added to "the applicable cap adjustment factor by budget year and sector as listed in Table 9-2" (§95891(g)). Because proposed Table 9-2 defines CAF values only through budget year 2030, the mechanism by which the CAF modifier would apply during budget years 2031 through 2035 is not made clear in the proposed regulatory text. An MDI applicant evaluating a capital project spanning the full MDI eligibility window therefore cannot fully model the effective industrial allowance allocation that would result from a successful application in those years.

**being advanced without the statutorily required leakage analysis that is necessary to inform decisionmakers. The result is a growing leakage risk that threatens California manufacturing employment, middle-class jobs, and the emissions accountability that in-state production provides.**

Leakage is no longer a theoretical concern. It is an observable, documented phenomenon affecting California's industrial base today, and the proposed amendments, while improving on prior drafts in several respects, do not go far enough to address it.

The proposed cap trajectory makes the leakage concern more acute, not less. Under proposed Table 6-2, the annual allowance budget declines from 254 million in 2026 to 158.8 million in 2030, a reduction of more than 37 percent in four years, and continues declining to 109.6 million by 2035 and 30.3 million by 2045.<sup>9</sup> Against this accelerating stringency, the regulation's cost-containment cushion is shrinking in parallel: the number of California allowances allocated to the Allowance Price Containment Reserve drops from 2,272,600 in 2030 to 1,473,000 in 2031, an approximately 35 percent reduction in a single year, and continues declining to 303,000 by 2045.<sup>10</sup> This happens as the price floor and reserve tier prices continue to increase every year. Compliance pressure is rising while the buffer against price shocks is diminishing.

The Board is also considering these amendments without the analytical foundation the Legislature required CARB to provide. Under Assembly Bill (AB) 398, CARB was required to develop a report on the leakage risk posed by the regulation and recommendations for necessary statutory changes to reduce leakage by December 31, 2025.<sup>11,12</sup> That deadline has passed and no such report has been released, even as CARB's own Standardized Regulatory Impact Assessment estimates total direct cost over the 2025 to 2046 regulatory lifetime at \$143 billion, averaging \$6.8 billion annually.<sup>13</sup> BizFed respectfully submits that decisionmakers, the business community, and the Californians who, by CARB's own assessment<sup>14</sup>, will pay compliance costs through increases in food, fuel, energy, and goods prices cannot meaningfully evaluate a rulemaking of this magnitude without the statutorily required leakage analysis.

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<sup>9</sup> *Id.*, Table 6-2.

<sup>10</sup> *Id.*, Tables 8-2 and 8-3.

<sup>11</sup> Garcia. AB 398 California Global Warming Solutions Act of 2006: market-based compliance mechanisms: fire prevention fees: sales and use tax manufacturing exemption. 2017. Available online at: [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=201720180AB398](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398).

<sup>12</sup> CARB. Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation. Staff Report: Initial Statement of Reasons (ISOR). Appendix D: AB 398: Evaluation of Allowance Budgets 2021 through 2030. Available online at: <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2018/capandtrade18/ct18398.pdf>.

<sup>13</sup> CARB. Appendix C Standardized Regulatory Impact Assessment, Department of Finance Comment Letter, and CARB Responses Proposed Amendments to the Cap-and-Trade Regulation. January 20, 2026. Available online at: [https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap\\_invest/nc\\_app%20c.pdf](https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap_invest/nc_app%20c.pdf).

<sup>14</sup> *Id.*, e.g., "Both compliance costs and abatement costs are considered an increase in production costs that may be passed down to consumers" (p. 52), "...small businesses may be indirectly affected by any increased carbon costs from the Program that covered entities pass through to consumers" (p. 54), "the costs incurred by affected businesses and the public sector may be passed through the economy and affect individuals" (p. 74).

Recent years have seen documented closures, job losses, curtailments, and capacity reductions across California's manufacturing base, including in cement, glass, food processing, and related sectors. The consequences of this leakage fall directly on the Californians the program is intended to protect, and they fall most heavily on the Los Angeles County economy that BizFed represents. LA County is home to the largest port complex in the Western Hemisphere, a diverse manufacturing base stretching from the South Bay to the San Fernando Valley, and goods movement corridors that serve both regional consumers and national supply chains. When in-state production declines and imports expand to fill the gap, the cost does not fall evenly across the State. It falls disproportionately on the harbor-adjacent communities, industrial corridors, and working-class neighborhoods where BizFed members employ and serve Californians.

Downstream cost impacts extend well beyond covered entities. Small businesses across LA County pay Cap-and-Invest costs embedded in the goods and services they purchase. LA County already carries some of the highest cost-of-living pressures in the State, with housing, utility, and transportation costs that exceed the statewide average. When compliance costs rise without adequate leakage protection, it is these businesses who absorb the consequences.

The timing compounds the concern. Over the next thirty months, LA County will host the 2026 FIFA World Cup matches and the 2028 Olympic and Paralympic Games – the two largest sporting events in the world, staged on a regional economy, energy system, fuel supply chain, and goods movement network that is already strained. The accelerated cap decline under proposed Table 6-2 lands squarely in that window. BizFed is not aware that CARB has modeled the interaction between accelerated compliance stringency, potential fuel and energy supply volatility, and the logistics demands of these global events. The question deserves explicit consideration in the rulemaking record.

These downstream effects are compounded at the global scale. Global emissions do not decline when California loses production; they shift, often to jurisdictions with weaker environmental standards, yielding higher lifecycle emissions while California absorbs the economic loss. These outcomes are contrary to the leakage-minimization directive of AB 32<sup>15</sup> and the affordability directive of AB 1207.<sup>16</sup>

The proposed amendments include features that move in the right direction, including the continued provision of industry assistance through Table 8-1 allocations,<sup>17</sup> the

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<sup>15</sup> Nunez. AB 32 Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006. Available online at: [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=200520060AB32](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=200520060AB32).

<sup>16</sup> Irwin. AB 1207 Climate change: market-based compliance mechanism: extension. 2025. Available online at: [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=202520260AB1207](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1207).

<sup>17</sup> CARB. Attachment A-1 Proposed 15-Day Amendments. Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. Table 8-1. Available online at: [https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap\\_invest/nc\\_a-1\\_ci\\_15d.pdf](https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap_invest/nc_a-1_ci_15d.pdf).

recognition of high-leakage-risk classifications in Table 9-2<sup>18</sup>, and the creation of the MDI. BizFed appreciates these elements. They are, however, insufficient on their own to offset the compounding pressure created by the Table 6-2 cap trajectory, the Table 8-2 and 8-3 Allowance Price Containment Reserve (APCR) decline<sup>19</sup>, and the absence of defined CAF values beyond 2030.

BizFed respectfully urges CARB to strengthen the leakage-protection architecture of the proposed amendments by: (i) releasing the AB 398 leakage report and supporting analysis before final adoption; (ii) reclassifying sectors with documented exit, closure, or production-decline activity as high leakage risk; (iii) establishing defined, or at minimum methodologically transparent, CAF values for budget years 2031 through 2045, with particular moderation for high-leakage-risk sectors; and (iv) evaluating whether the combined effect of the declining APCR allocation and existing price ceiling escalation structure adequately protects California consumers from price shocks under the accelerating cap trajectory, and adjusting the structure where it does not.

### **3. The proposed amendments do not provide a workable compliance pathway for carbon capture, utilization, and sequestration, despite the State's climate framework depending on negative-carbon technologies to meet the 2045 neutrality target.**

California's statutory carbon neutrality framework depends materially on the deployment of carbon capture, utilization, and sequestration (CCUS) and carbon dioxide (CO<sub>2</sub>) removal (CDR) technologies. AB 1279 establishes an architecture under which at least 85 percent of greenhouse gas reductions must come from direct emission reductions and up to 15 percent may be achieved through net reductions such as carbon removal and sequestration.<sup>20</sup> The 2022 Scoping Plan for Achieving Carbon Neutrality operationalizes that framework through a CO<sub>2</sub> removal and capture target of 20 million metric tons (MMT) by 2030 and 100 MMT by 2045.<sup>21</sup> AB 1207 further directs CARB to consider developing additional compliance offset protocols, including CO<sub>2</sub> removal.<sup>22</sup>

The proposed amendments reorganize CCUS compliance obligations under §95852.3, which provides that an entity has a compliance obligation for every metric ton of CO<sub>2</sub> captured from a CO<sub>2</sub> stream, except where that CO<sub>2</sub> is verified to be sequestered or

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<sup>18</sup> CARB. Attachment A-1 Proposed 15-Day Amendments. Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. Table 9-2. Available online at: [https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap\\_invest/nc\\_a-1\\_ci\\_15d.pdf](https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap_invest/nc_a-1_ci_15d.pdf).

<sup>19</sup> CARB. Attachment A-1 Proposed 15-Day Amendments. Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. Tables 8-2 and 8-3. Available online at: [https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap\\_invest/nc\\_a-1\\_ci\\_15d.pdf](https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap_invest/nc_a-1_ci_15d.pdf).

<sup>20</sup> Muratsuchi. AB 1279 The California Climate Crisis Act. 2022. Available online at: [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB1279](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1279).

<sup>21</sup> CARB. 2022 Scoping Plan for Achieving Carbon Neutrality. Table 2-3: GHG emissions and removals needed to achieve carbon neutrality and meet the 20 MMTCO<sub>2</sub> removal and capture target in 2030 and the 100 MMTCO<sub>2</sub> removal and capture target in 2045. Available online at: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>.

<sup>22</sup> Irwin. AB 1207 Climate change: market-based compliance mechanism: extension. 2025. Available online at: [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202520260AB1207](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1207).

utilized pursuant to a Board-approved quantification methodology that is incorporated into the Regulation before it can be used to reduce a supplier's compliance obligation.<sup>23</sup> The limited CCUS-related MDI pathway under §95891(g)(2)(H) is contingent on the same methodology incorporation.

This sequencing effectively defers CCUS compliance recognition indefinitely. In the interim, a facility that deploys CCUS and reduces its actual emissions must surrender allowances as if 100 percent of its CO<sub>2</sub> were released to the atmosphere. The economic consequence is direct: a California facility investing in CCUS bears the capital and operating costs of the capture system and the full Cap-and-Invest compliance cost for emissions it has not released. There is no financial incentive under the proposed amendments to deploy the technologies the State's own climate framework relies on.

The affordability consequences flow directly to California consumers and small businesses. When a facility cannot reduce its compliance obligation by capturing and sequestering CO<sub>2</sub>, the full compliance cost is embedded in the price of the fuel, natural gas, electricity, cement, steel, or refined product it produces. Californians pay that cost in their utility bills, at the pump, and in the price of goods throughout the economy, including for emissions that never reached the atmosphere. A compliance structure that imposes costs on emissions that have been prevented is not a cost-effective structure and is inconsistent with the affordability directive of AB 1207.

A workable compliance structure should reflect actual atmospheric outcomes: verified captured and sequestered CO<sub>2</sub> has not reached the atmosphere, and the compliance-obligation structure should recognize that reality. The sectors best positioned to deploy CCUS are the same energy-intensive, trade-exposed sectors most affected by leakage concerns, and the same sectors that anchor industrial employment across the State. A CCUS framework that operates on real investment timelines keeps modernization capital in California; a framework that does not accelerates capital flight to better-aligned jurisdictions.

BizFed respectfully urges CARB to: (i) establish a defined regulatory timeline for incorporating Board-approved quantification methodologies under §95852.3, so that CCUS projects can advance on real-world investment timelines; (ii) consider a narrowly tailored provisional compliance pathway that preserves the permanence and verification standards of §95852.3 while permitting time-limited compliance recognition before full methodology incorporation; and (iii) align the compliance-obligation treatment of verified captured and sequestered CO<sub>2</sub> with the negative-carbon pathway architecture established under AB 1279.

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<sup>23</sup> CARB. Attachment A-1 Proposed 15-Day Amendments. Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. §95852.3. Compliance Obligations for Sequestered or Utilized Captured Carbon Dioxide. Available online at: [https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap\\_invest/nc\\_a-1\\_ci\\_15d.pdf](https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/cap_invest/nc_a-1_ci_15d.pdf).

## Conclusion

BizFed and our members want California's Cap-and-Invest program to succeed. A durable, credible carbon market that achieves real emissions reductions while preserving in-state production, protecting jobs, and moderating consumer costs is in the long-term interest of every Californian, including the small businesses, working families, and industrial communities that BizFed represents across Los Angeles County. A program that inadvertently accelerates industrial exit or compounds affordability pressures is not.

The concerns raised in this letter such as the absence of long-term regulatory line of sight for industry, and the inadequate protection against leakage are central to whether the program will retain the public, political, and business support it needs to operate through 2045 and beyond. A program that loses the support of the employers, workers, and consumers who bear its costs will not endure, regardless of the integrity of its environmental ambition.

We respectfully request that CARB carefully consider these comments and make meaningful revisions to the proposed amendments prior to final adoption.

If you have any questions, please contact our Director of Advocacy, Chris Wilson, at [chris.wilson@bizfed.org](mailto:chris.wilson@bizfed.org).

Sincerely,



Mitchell Vieyra

BizFed Executive Vice President



Trini Jimenez

2026 Board Chair  
Watson Land Company



David Fleming

BizFed Founding Chair

cc: The Honorable Gavin Newsom, Governor of California  
Chair Lauren Sanchez, California Air Resources Board  
Vice Chair Siva Gunda, California Energy Commission  
The Honorable Monique Limón, President Pro Tempore, California State Senate  
The Honorable Robert Rivas, Speaker, California State Assembly

# 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