California Council for Environmental and Economic Balance
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November 13, 2026

Electronic submittal via Public Comment Website and email to Evan Kersnar (evan.kersnar@arb.ca.gov)

Re: Comments from the California Council for Environmental and Economic Balance regarding CARB's Draft Roadmap to Reduce Air Toxics

Dear Mr. Kersnar,

The California Council for Environmental and Economic Balance ("CCEEB") appreciates the additional opportunity to provide comments on the California Air Resources Board's ("CARB") draft Roadmap to Reduce Air Toxics ("Roadmap"). CCEEB is a coalition of business, labor, and public leaders that work together to advance strategies to achieve a sound economy and a healthy environment. Founded in 1973, CCEEB is a non-profit and non-partisan organization that strives to provide pragmatic pathways - balancing the need to reduce emissions while keeping businesses competitive in California.

CCEEB is very concerned that CARB is forging ahead to develop a plan and possible regulations even though others have pointed out significant concerns with the science and data, or lack of science and data, to support OEHHA's findings. In summary, OEHHA and CARB are moving forward even though:

- the IURs are not supported by human studies, and extrapolations are made from very few animal studies;
- exposure assessments are based on extremely limited mobile monitoring data that CARB acknowledges cannot support regulatory action;
- there is very little monitoring data to support OEHHA's and CARB's assessments; and
- "*[t]here is currently no CARB-approved test method for acrolein from stationary sources.*" (https://ww2.arb.ca.gov/acrolein-test-method-advisory-and-data. OEHHA/CARB should suspend any planning or rulemaking activities until such time as an acrolein test method for stationary sources is developed and implemented.

These, and many other criticisms of OEHHA's proposed IURs, lead CCEEB and others to question whether the proposed IURs are accurate. CARB should clearly acknowledge these uncertainties and state that the data is not ready to support planning or regulatory action.

CARB should also acknowledge new regulations will significantly expand CARB's and local air district's Toxic Air Contamininant Identification and Control Program and the Air Toxics Hots Spots Programs. In addition, districts will need to incorporate evaluation of cancer risks into their air toxics new source review programs and, in certain air districts, evaluation of health risk assessments. The impact is that many new sources will be incorporated into these programs, and the sources that are already in these programs will face impossible control requirements. Even public services such as water treatment, sanitation systems, and power generators will face unprecedented pressures to control emissions to levels that are not affordable or even possible. All of these changes will be based on unsupported and questionable IURs and data

CCEEB asks that CARB take the time to understand the underlying data and acknowledge that far more work is needed before it can consider actions to control acrolein and ethylene oxide. CARB should state that it will not move ahead with controls and regulations until the data is ready, and that this will take time.

It is irresponsible for CARB to proceed with planning and regulatory activity based on limited, flawed, or otherwise inadequate scientific evidence. The state should not rationalize adopting plans or regulations now with the idea that it can revise them in the future. It is important to note that it is rare for CARB to re-assess plans and regulations once they are established. As an example, neither OEHHA nor CARB are considering revisiting the URF for diesel particulate matter or the associated regulations even though a significant percentage of diesel fuel burned in California is renewable diesel (a fuel that was never assessed when the DPM URF was established).

For all of the reasons listed above, CCEEB asks that CARB not move forward with the proposed Roadmap and subsequent plans and regulations. CARB should work closely with the broader scientific community to develop the necessary data and protocols before taking any further action.

CCEEB appreciates the opportunity to provide comment and looks forward to continuing to work with staff.

Sincerely,



Tim Carmichael
President and CEO