



California Council for Environmental and Economic Balance

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October 17, 2014

Chairman Mary Nichols
ATTN: Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms
Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions
Amendments to the Cost of Implementation Fee Regulation

Dear Chairman Nichols:

On behalf of the members of the California Council for Environmental and Economic Balance (CCEEB), we wish to provide you with brief comments on ARB's proposed amendments to the items referenced above. CCEEB is a non-profit, non-partisan association of business, labor, and public leaders, which advances balanced policies for a strong economy and a healthy environment.

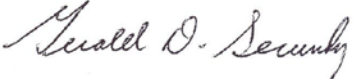
As you know, CCEEB has been an active stakeholder in the many rule-making processes conducted by the Air Resources Board (ARB). The ARB released a series of three proposed regulations earlier this year amending: the "California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms"; the "Regulation for the Mandatory Reporting of Greenhouse Gas Emissions"; and, the "Cost of Implementation Fee Regulation."

CCEEB supports the proposed amendments to the "California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms" related to the provisions regarding corporate associations. We appreciate the time and effort ARB staff spent on working with our members to cooperatively achieve supportable harmonization of data reporting requirements.

CCEEB supports the positions of our members with whom your staff has been working diligently to find practical, feasible solutions on the remaining outstanding issues regarding amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions and, the Cost of Implementation Fee Regulation. We ask for that work to continue and hope we can continue to work with ARB staff to make the necessary changes that will ensure these regulations are both technologically sound and economically feasible.

We appreciate your consideration of our comments. Please contact me or Kendra Daijogo of The Gualco Group, Inc. at 916/441-1392 should you have any questions or comments.

Cordially,


GERALD D. SECUNDY
President

cc: Honorable Members, Air Resources Board
Mr. Richard Corey
Ms. Edie Chang
Ms. Rajinder Sahota
Mr. William J. Quinn
Ms. Janet Whittick
Mr. Jackson R. Gualco
Ms. Kendra Daijogo