

Comment 1 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Diego
Last Name: de Leon Segovia
Email Address: diego.deleon@jalisco.gob.mx
Affiliation: State Governmnet of Jalisco

Subject: Letter from Governor Sandoval
Comment:

RESPUESTA AL DIPUTADO ISMAEL DEL TORO

Hon. Mr. Edmund Brown Jr.
Governor of the State of California
PRESENT

It is with great pleasure that I have been entrusted to deliver the letter of the Governor of the State of Jalisco, Mr. Aristoteles Sandoval, where he acknowledges the importance of the Cap-and-Trade project for the fight against climate change, as well as its social, economic, political and environmental positive implications as Governor of the State of Jalisco and the 2016 chair of the GCF Task Force.

Best regards,
Diego de León

Attachment: www.arb.ca.gov/lists/com-attach/3-sectorbased4-ws-BWZXMAZ1BSIDZANc.pdf

Original File Name: Carta GCF para Edmund Brown[3] (1).pdf

Date and Time Comment Was Submitted: 2016-04-29 15:31:38

No Duplicates.

Comment 2 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Advisory Committee
Last Name: Enviro Justice
Email Address: ombcomm@arb.ca.gov
Affiliation:

Subject: Environmental Justice Perspectives on Offsets & REDD
Comment:

Please See attached document. Received 4:30 4/28/16

Attachment: www.arb.ca.gov/lists/com-attach/6-sectorbased4-ws-Am8FcQB1BXsEZ1M5.pdf

Original File Name: MRT-EJAC Offsets Workshop 2016-0428 .pdf

Date and Time Comment Was Submitted: 2016-04-29 16:14:57

No Duplicates.

Comment 3 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Amy

Last Name: Vanderwarker

Email Address: amy@caleja.org

Affiliation: California EJ Alliance

Subject: Comments given at ARB workshop on April 28th regarding
Comment:

We've heard some compelling comments about how REDD has worked, or how people hope it will work, but for every example of positive, there is also an example of negative, as Mr Fyneface has really described. And those examples of negative experiences are extremely risky.

You all have highlighted many important social safeguards, but there is a fundamental disconnect: how really can you guarantee that any of these safeguards are met? How do you enforce these? I totally understand that ARB does not want to expose the state to being party to human rights violations, but really - how can you monitor any of these things when you are dealing with projects in extremely remote and far flung places.

You mention "a system for monitoring and reporting on safeguards," but that was very cursory. That to me is the critical component of this system, and I have not really heard any details on what that system looks like and how it is enforced.

I also hear a lot of effort from you all to distance yourselves from REDD projects of the past, and as I understand it, the main point there is that this is a jurisdictional approach.

I just don't see how you get away from the potential HR violations. I know you say that Cross River state is not a jurisdiction you are looking to link with, but I think Fyneface's comments reflect the broader dangers with the program, whether its in Nigeria or elsewhere, that need to be taken seriously.

We've also been talking a lot about Brazil today - I also just want to highlight that Brazil is in the middle of major political upheaval and we have no idea how that will impact the government's long term capacity or commitment to implementing equitable, effective climate programs. It is exactly that kind of volatility in other countries that ARB cannot predict and thus highlights some major challenges to this program.

I also want to flag that the issues environmental justice communities are struggling with here in California, are in fact social issues that also need to be addressed by ARB and I have not yet heard anything about that.

So just looking at what is happening here, this is what we see:

The State of the Air for 2015 just came out. The top five US cities

most impacted by unhealthy ozone days are in California, as are the top seven cities burdened with unhealthy particle pollution days.

And we know that many of these air quality issues are disproportionately impacting low-income communities and communities of color.

Our current regulations are simply not getting the job done - that is exactly why ARB is looking at new regs for Short Lived Climate Pollutants. As you explore a new protocol that will allow polluters to continue, it is absolutely your responsibility to think about ways to strengthen this.

I think there are serious questions about the overall offset program that haven't been addressed before we expand it.

We have also been looking at the offsets program more generally.

We have also found that the majority of offset users are large corporations: the top ten users are: Chevron, CalPine, Tesoro, So Cal Edison, Shell, PG&E, La Paloma, SDG&E, and NRG.

These top 10 account for 55% of all offsets; over 60% of companies do not use ANY offsets.

These big companies can access this complicated system and get the cheapest prices for carbon emissions, below even what CO2 is being auctioned at, which is already quite low.

So, it seems to be really only the major polluters using offsets, not small facilities who would be most hard hit by pricing issues.

So from a cost containment perspective, this expansion seems entirely unnecessary. And, ARB seems to have already done A LOT to make it cost effective for corporations to comply with C&T regs, so additional protocols seem unnecessary.

And it seems like REDD just give some of the largest corporations in the world, with multi billionaire dollar budgets, access to an even lower price to continue polluting.

And according to the most recent GHG reporting data, oil & gas emissions have even risen slightly since cap & trade was started.

I would add that there are even verification concerns with the CURRENT offsets program. We've been trying to better understand exactly what projects are being paid for by large corporations in states such as Arkansas and Michigan, and it is extremely difficult and concerning to understand what really are being approved as offset projects in the current program, much less one that is international.

So my questions to you are:

- What is your system for enforcing / monitoring safeguards?
- given the intense scrutiny that is required to make these linkages successful, how is this a good use of your staff time when there is SO MUCH to be done here in California?
- From the cost containment perspective, why is it that you think more mechanisms are necessary to provide more mechanisms for companies to pollute when prices are already extremely low
- And what exactly are you doing to ensure that CA's offset program specifically - not the other activities at ARB - is NOT

exacerbating EJ issues here in California?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-04-29 17:31:36

No Duplicates.

Comment 4 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Katherine

Last Name: Valenzuela Garcia

Email Address: kbvale@gmail.com

Affiliation: AB 32 EJAC

Subject: EJAC Member Comments on International Offsets

Comment:

Cap and Trade is not working in California. The data we have from the Adaptive Management tool shows that emissions have gone up since 2010, quite significantly. This is what we know even before the Cal EPA report on AB 32's impacts on environmental justice communities.

Environmental justice communities need to be prioritized because we are and historically have been most impacted by pollution and exposure to other environmental hazards. And government has a responsibility to ensure public health, not business profits.

I have this inhaler - and the other medications I take every day - because I grew up in Oildale, a community surrounded by oil extraction activities. I continue to need this inhaler more than I should because the community where I live now - a mostly people of color neighborhood thanks to redlining and racial covenants - was deemed the appropriate place for a new freeway.

The EJAC has been to San Bernadino, Brawley, and environmental justice communities across the state, and there are still plenty of improvements that are needed here in California, mostly by reducing the emissions of industry and the products they create. Children today shouldn't continue to pay the price for anyone's unwillingness to change course.

I want to reiterate - as I've told ARB staff many times - that it seems like the decision to pursue REDD+ has already been made, as all of the documents assume an ambitious path forward from this point. This is even though there is significant and continued opposition from environmental justice communities. ARB could learn from the models we've heard about today in Brazil, which are grassroots up.

I think it's ambitious - to say the least - to assume that ARB is somehow more qualified than the United Nations to create a program that doesn't replicate the human rights violations we've heard about in Nigeria and other countries that have current REDD programs.

In conclusion, we oppose REDD+, and encourage ARB and the stakeholders in this room to explore other methods to preserve tropical forests while allowing for more ambitious emissions reductions here in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-04-30 13:26:01

No Duplicates.

Comment 5 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Pamela Tau
Last Name: Lee
Email Address: ptlee14@gmail.com
Affiliation: Just Transition Alliance

Subject: ARB proposal to include international sector-based offsets in cap and trade
Comment:

Chair Mary Nichols
California Air Resources Board
1001 1 Street
Sacramento, CA

Governor Brown
c/o State Capital, Suite 1173
Sacramento, CA 95814

Re: ARB proposal to include international sector-based offsets in cap and trade

Chair Mary Nichols and Governor Brown:

I have worked and volunteered locally and internationally on issues of environment for nearly 3 decades. In 1990 I was a part of crafting the Principles of Environmental Justice and the coming together of voices and presence of communities impacted by environmental injustice. Key to my commitment is addressing environmental racism, i.e. Racism in the way communities of color, poor, elderly and indigenous people are exposed to emissions from greenhouse gas emitting facilities; racism in the way environmental policies perpetuates disparate exposures through exclusion from protection and unequal methods with regard to enforcement of environmental regulations.

I am submitting this letter to express my opposition to your proposal to include international offsets as part of California's cap and trade program. The climate crisis is urgent and life threatening. The crisis at hand requires critical thinking and action. Critical thinking that is inclusive and addresses sustainability and responsible development in a way that significantly moves the needle toward halting global warming. I find it disturbing how industry and climate deniers are able to have so much influence on how climate policies are crafted. I'm disturbed by how maintaining corporate profits takes precedent over human health. Finally, I am disturbed that the voices of those directly impacted are excluded in this process.

I appeal to you to not pursue an international offset program. The details of why are spelled out clearly in a letter signed by organizations that include the Indigenous Environmental Network, the No REDD in Africa, the California Environmental Justice Alliance, the Just Transition Alliance to name a few. Instead of spending time, energy and tax dollars on a program that satisfies

profit margins for industry; I along with millions living on the front lines of the climate crises seek a shift toward policies and action that mandate emission caps for industry. We seek action and policies from you that ultimately reduces our reliance on fossil fuels, coal and gas. Scientific studies have found that current governmental policies including the COP 21 Agreements are not sufficient to keep global warming to below 1.5 degrees; this includes policies such as cap and trade.

Crafting protocols to "fix" international cap and trade negative practices is flawed, unrealistic and environmentally racist. Garnering the political will to mandate caps and striving toward a future where reliance on fossil fuels, coal, and gas is reduced will be challenging, but is ultimately what needs to be done. Take the political leadership necessary to meaningfully and significantly halt the warming.

Signed,
Pamela Tau Lee
San Francisco, California

*Identification
UC Berkeley School of Public Health, Center for Occupational and Environmental Health, retired
Asian Pacific Environmental Network, co-founder/past chair
Just Transition Alliance, training and education lead
Grassroots Global Justice member/ COP 21 delegate
Chinese Progressive Association - SF, board chair

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-05-12 21:45:53

No Duplicates.

Comment 6 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Sandra Lupien &
Last Name: Elizabeth Nussbaumer
Email Address: slupien@fwwatch.org
Affiliation: Food & Water Watch

Subject: Including International, Sector-based Offset Credits in the Cap-and-Trade Program
Comment:

Dear California Air Resources Board,

Please find attached comments from Food & Water Watch expressing strong opposition to the ARB's continuing consideration of international, sector-based offset credits in the state's current Cap-and-Trade Program.

Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/10-sectorbased4-ws-UCJTMFM2BTJQNQdm.pdf

Original File Name: REDDCARB.FWW.Comments.5.13.16.pdf

Date and Time Comment Was Submitted: 2016-05-13 12:21:56

No Duplicates.

Comment 7 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Gary

Last Name: Hughes

Email Address: ghughes@foe.org

Affiliation: Friends of the Earth - US

Subject: Comment letter on proposed International Sector-based Offsets

Comment:

Please find our most recent comment letter attached as a .pdf file.
Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/11-sectorbased4-ws-VDJQOQRgUixVJIAj.pdf

Original File Name: FOE-US_carb_commentltrsector-based_may13.pdf

Date and Time Comment Was Submitted: 2016-05-13 13:29:34

No Duplicates.

Comment 8 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Joanna

Last Name: Durbin

Email Address: jdurbin@climate-standards.org

Affiliation: Climate,Community&BiodiversityAlliance

Subject: advances in jurisdictional REDD+ safeguards validation and monitoring

Comment:

From the Director of the Climate, Community & Biodiversity Alliance

To the California Air Resources Board 13 May 2016

I am submitting these comments as a contribution to the discussion on social and environmental safeguards requirements for potential linked sector-based offset programs during the workshop hosted by CARB on April 28, 2016. I hope this information will help CARB to move forward with the important issue of including tropical forest sector-based credits in California's cap and trade program under AB32.

Significant progress has been made in several jurisdictions on the definition and reporting of safeguards, and methods to validate and monitor them. Specifically, the State of Acre in Brazil has demonstrated that it is feasible to monitor safeguards in a detailed way, covering a comprehensive range of information important for safeguards and ensuring credibility of their report through a participatory and transparent process engaging a full range of stakeholders. Their detailed safeguards self-assessment report finalized in November 2014 identified strengths, weaknesses and some gaps, which California can use to review and find assurance that its requirements on safeguards are addressed. Acre used a detailed and comprehensive framework for their assessment based on the international best-practices on safeguards defined in the REDD+ Social & Environmental Standards (REDD+ SES). The REDD+ SES Initiative conducted an International Review (involving a representative of Indigenous Peoples from Panama and an expert on REDD+ and safeguards from another area of Brazil) that confirmed that Acre completed the full ten-step process defined in the REDD+ SES Guidelines requiring a high level of participation and transparency.

For detailed information on the progress achieved in Acre please find attached:

- REDD+ Social & Environmental Safeguards Monitoring Manual in the System of Incentives for Environmental Services (August 2013)
- Self-evaluation report of compliance with the social and environmental safeguards in the SISA and ISA Carbon Program of the State of Acre (November 4, 2014)
- REDD+ SES International Review State of Acre, Brazil (November 2015)

These reports documenting the progress on safeguards in Acre provide information and assurances that will be very important for consideration of the inclusion of REDD credits in the California cap-and-trade program. The Acre case provides a first experience. Other jurisdictions are planning to follow a similar process. The REDD+ SES Initiative provides guidance and tools to

jurisdictions to enable them to meet requirements on strong, comprehensive safeguards, implemented and monitored in a participatory and transparent manner. The Initiative was started in 2009 by the Climate, Community & Biodiversity Alliance (CCBA), a partnership of NGOs (CARE, Conservation International, Rainforest Alliance, The Nature Conservancy and Wildlife Conservation Society). The Initiative is managed by the CCBA secretariat based at Conservation International. The Initiative is overseen by an International Steering Committee of representatives from governments, multilateral organizations, Indigenous and Community organizations, social and environmental NGOs and private sector mostly from countries where REDD+ is implemented. For more information see www.redd-standards.org

Please do not hesitate to contact me with any questions or for further information.

Dr Joanna Durbin

Director, Climate, Community & Biodiversity Alliance

jdurbin@climate-standards.org

Attachment: www.arb.ca.gov/lists/com-attach/12-sectorbased4-ws-AWdTOgBzBAGFYFc2.zip

Original File Name: for CARB REDD+ SES Acre docs May 13 2016.zip

Date and Time Comment Was Submitted: 2016-05-13 13:35:04

No Duplicates.

Comment 9 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Amy

Last Name: Vanderwarker

Email Address: amy@caleja.org

Affiliation:

Subject: Joint letter in opposition to inclusion of international sector-based offsets

Comment:

Please find the attached sign-on letter on ARB's proposal to include international forest offsets in the cap and trade program. Please do not hesitate to contact me with any questions or to discuss further.

Amy Vanderwarker, California Environmental Justice Alliance
(510) 808-5898 x 101

Attachment: www.arb.ca.gov/lists/com-attach/13-sectorbased4-ws-UjxVPANdWHIRMgRg.pdf

Original File Name: No REDD letter FINAL.pdf

Date and Time Comment Was Submitted: 2016-05-13 14:39:54

No Duplicates.

Comment 10 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: EDF

Subject: EDF comments on Ontario Linkage

Comment:

EDF comments on Ontario Linkage

Attachment: www.arb.ca.gov/lists/com-attach/14-sectorbased4-ws-BWoAaAZzUWNWlIM6.docx

Original File Name: OntarioLinkageComments.docx

Date and Time Comment Was Submitted: 2016-05-13 14:54:22

No Duplicates.

Comment 11 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Mari Rose
Last Name: Taruc
Email Address: mrtaruc@gmail.com
Affiliation: AB32 Env Justice Advisory Committee

Subject: Drop the Sector Based Offsets Program
Comment:

As a 2-term member of the AB 32 Environmental Justice Advisory Committee (EJAC), with over 20 years experience organizing with environmental justice (EJ) communities, I write with grave concerns on ARB's consideration of international forestry offsets, REDD and/or the Sector-Based Offsets (SBO) scheme and propose the program be dropped.

I appreciate the improving effort by the ARB to recognize its responsibility to consult with the EJAC and integrate EJ into AB 32 implementation. The authors of AB 32 recognized that EJ communities are the most impacted by industrial and climate pollution, and thus institutionalized EJ participation in the law's implementation.

Articulated in the Principles of Environmental Justice, the EJ community's opposition of offsets and REDD uses the long-view lens of problematic environmental policies waged under 500 years of colonization and over 100 years of industrialization. The EJAC has repeatedly rejected offsets in AB 32 implementation. In the EJAC's first term, in the 2008 recommendations, offsets were cited as problematic along with carbon trading. In the EJAC's 2014 recommendations, we wanted the offsets program canceled, especially REDD. And in the current EJAC term, we initially recommend ARB to halt pursuing REDD international offsets.

We see the design flaw in Cap & Trade in that the ARB has not yet balanced cost containment for climate polluters, with reducing climate pollution harms in California EJ communities. An initial view of GHG emissions through 2013 shows emission increases in the state's most disadvantaged communities. Since the top offsets users to date, like Chevron at 1.7 million metric tons CO₂e, are the biggest industries to take advantage of the the loophole of offsets by maximizing climate pollution reduction outside of California. The consequence is thus concentrating climate pollution in EJ communities, and minimizing benefits to our state—both of which run counter to the goals of AB 32.

The best safeguards for the SBO program is to drop the program. While ARB looks at safeguarding international, indigenous and forest-dwelling communities for the SBO program, it should guarantee safeguards for EJ communities at home first. ARB cannot run an international safeguards program without knowing how to do it in California. ARB must show EJ communities that it won't allow climate pollution increases in those areas, and that instead the primary emissions reductions are actually there. Similar to the United Nations Declaration of Rights of Indigenous Peoples, there

needs to be free, prior and informed consent of EJ communities in California for the offsets program. Right now, as it stands, I know that California's EJ communities do not consent to the offsets, REDD or SBO program because of the harms that Cap & Trade is already causing. Drop the SBO program now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-05-13 15:45:51

No Duplicates.

Comment 12 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Kathleen

Last Name: McAfee

Email Address: kmcafee@sfsu.edu

Affiliation: San Francisco State University

Subject: A jurisdictional approach will not solve the most serious REDD+ problems

Comment:

As a professor and geographer (PhD, UC Berkeley) specializing in international environmental policy and sustainable development, I have done research and written peer-reviewed publications on trade in environmental services, REDD+, and the results of proto-REDD+ programs and payments for environmental services (PES) projects in Latin America. I have taken part in numerous conference sessions and read dozens of research reports, peer-reviewed case studies, and review articles about carbon sequestration services in the tropics and about the designs and results of proto-REDD+ programs. I have read the ROW recommendations and the ARB White Paper and have observed presentations at the October and April public workshops on the proposed AB32 sectoral offset policy.

It seems that the ARB is largely unaware of the extensive, peer-reviewed academic literature on the implementation and actual results of PES and REDD-type programs in Latin America and other regions. I am also struck by the ROW/ARB's limited and selective interpretation of the dynamics of land-use change and the drivers of deforestation in Amazonia.

The academic literature, as well as in depth studies by the Center for International Forestry Research and other agencies, point to serious problems that are not addressed or are not addressed adequately in the White Paper and ARB presentations. Many of the problems that trouble one-off PES and proto-REDD+ projects are likely to plague jurisdictional REDD+ systems as well. For example, one well-documented problem is that of inequity: the tendency of market-oriented REDD+ and PES implementation to favor larger-scale landholders at the expense of smallholders, a pattern that is very widespread in PES and proto-REDD+ programs and that has been detected in PES projects in Acre.

One of the more dubious suggestions put forward by the ARB is that leakage of forest-destroying activities, both within and beyond the targeted REDD+ jurisdiction, can be prevented or at least can be measured and accounted for. The ARB further proposes that any such leakage can be managed by means of discounting and reserving a small share of credits within a partner jurisdiction. However, even if we assume that most such leakage within a jurisdiction can be detected Ð an assumption that is not justified, in my view Ð it is impossible in principle to measure, much less prevent, deforestation leakage beyond that jurisdiction because the area beyond the jurisdiction is unbounded. It is also impossible in principle to determine whether avoided deforestation within and beyond the jurisdiction is permanent or not, since the future

cannot be predicted.

The jurisdictional approach per se most certainly does not eliminate the high risks of impermanence and of leakage into Amazonas state, Bolivia, and Peru. Even within a jurisdiction such as Acre, the revenues from CA offset credit sales cannot compete with the opportunity values of many non-forest land-use options if land values continue to rise. Rising agricultural land values and commodity prices are a very possible outcome of growing global land and food scarcity and could easily swamp regulatory efforts, such as the proposed sectoral offsets plan for AB32, that depend on markets in greenhouse-gas offsets.

In such a context, the responses to the permanence and leakage problems offered in the ARB white paper are entirely inadequate. A buffer pool of credits would effectively reduce total revenues from credit sales and could quickly become insufficient in the event of land-use changes related to commodity-price increases in soy, beef, timber, wood pulp, palm oil, biofuels, etc. The ARB-proposed risk insurance could also become insufficient in the context of natural events, economic trends, and political factors, as has happened in the case of the OPIC-insured Oddar Meanchey REDD+ project in Cambodia that the ARB white paper cites as a precedent for this approach.

Deforestation also might well accelerate as a result of changes in government in Brazil. Just yesterday the interim president appointed as Minister of Agriculture a soy tycoon and notorious deforester of the Amazon [New York Times May 10, 2016]. Brazil may soon see some combination of changes in state policies for land use, soy and other agricultural subsidies, increased export incentives in the context of the current economic recession, or changes in enforcement practices.

The ARB also suggests that leakage can be monitored and minimized by encouraging agricultural intensification and by assessing the results in terms of the production of animal products and crops. The ARB reasoning here is partial and faulty, since data showing increased productivity of beef, fodder, or other commodities in the targeted area would not prove that leakage is not also occurring, especially leakage beyond the jurisdiction.

But this is more than a matter of poor logic or hypothetical scenarios. There is evidence, corroborated by several recent studies, that when agricultural land use in the tropics is intensified in the context of tightened regulation of deforestation and agronomic practices, the result is not land sparing for conservation but rather the expansion of the land area where the targeted crops are grown or animals raised, including expansion based on forest clearing in jurisdictions neighboring the regulated areas. This trend has been documented in the Brazilian Amazonian and cerrado zones and in neighboring states. Profits from intensified farming and ranching have been reinvested in ranching and large-scale soy production has been shifted to less effectively regulated regions.

UCLA professor Susanna Hecht, one of the world's foremost experts on deforestation in tropical South America, and Gustavo de I. T. Oliveira, who studies land-use change and agriculture in Brazil, summarize some of these findings in an important article published this year.* They write:
Common to all analyses is the evidence that intensification of

profitable land uses tends to enhance its spread rather than to confine it spatially, regardless of the mix of drivers (Hecht 2005; Morton et al. 2008; Rudel et al. 2009; DeFries, Rudel, and Hansen 2010).Ó [p 267].

They continue,

ÓÉthere is evidence that the tight environmental regulations, cadastral requirements, better monitoring and enforcement in the Amazonian fringe have triggered ÓleakageÓ into other woodland systems elsewhere in Brazil, Bolivia, Paraguay and Argentina, operational dynamics that are obvious to cross-continent farm management companies and migration choices of small- and medium-scale soy farmers (Hecht 2005; Pfaff and Walker 2010; Richards 2011). [p 270]

In this light, the ARB propositions that intensification of production should be promoted, and that production increases in ranching and related production will indicate lack of deforestation leakage, is badly misguided. It is also odd that intensification techniques such as N-fixing cover crops and paddock rotation, which have been recognized and studied since at least the 18th century, are portrayed as innovations that ranchers will quickly adopt. More worrisome, and ironic, is that this approach would provide backing from California, in the name of conservation, for intensification of ranching and the meat/fodder/feedgrain complex, which is by far the most efficient way of producing food calories wherever it is practiced.

Finally, the US and Canada together comprise the worldÓs largest source greenhouse-gas emissions both absolutely and per capita. It seems arbitrary and somewhat opportunistic to argue that California has a special responsibility to try to shape forest policy in Acre (or anywhere else), while we continue to enable continued emissions from our own state and make emissions even easier by adding more offset options in the name of Óreducing compliance costsÓ. Californians who feel that there is a particular reason to support conservation in tropical Latin America can do so through many other organizations. The state of Acre has other means of limiting deforestation should it choose to employ them. Both Brazil and the US have made commitments under the Paris climate agreement to make significant reductions in their climate-warming emissions. The appropriate place for California to show leadership in meeting this commitment is right here in our own state.

Kathleen McAfee
Professor of International Relations
San Francisco State University
kmcafee@sfsu.edu

* Gustavo Oliveira & Susanna Hecht (2016) Sacred groves, sacrifice zones and soy production: globalization, intensification and neo-nature in South America, *The Journal of Peasant Studies*, 43:2, 251-285, DOI: 10.1080/03066150.2016.1146705.

Attachment: www.arb.ca.gov/lists/com-attach/16-sectorbased4-ws-VCQFdgdkVGsLZABj.pdf

Original File Name: Public comment CA ARB 13 May 2016 McAfee.pdf

Date and Time Comment Was Submitted: 2016-05-13 16:03:25

No Duplicates.

Comment 13 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Documentary

Last Name: Projects

Email Address: documentaryprojects@yahoo.com

Affiliation: millions of forest people not heard from

Subject: Existing ARB standards do not ensure social safeguards

Comment:

Require a social safeguard standard or a REDD amendment that stipulates the recognition and enforcement of forest people's resource and land tenure, and human rights prior to California's International Sector-based Offsets program's use of REDD offsets (See additional recommendations are at the end of these comments)

The existing standards mentioned by ARB staff, in combination or independently, do not contain criteria that are sufficient to ensure social safeguards. The current REDD agreement & its social safeguards do not require the recognition and enforcement of customary and statutory resource and land tenure, and human rights for forest peoples prior to REDD funding or payment, they should. All the social standards cited by California's International Sector-based Offsets program are ultimately qualified by non binding terms such as respect, promote, support, address or recognize, none require resource and land tenure and human rights prior to the program's involvement.

The world's unprotected forests and their peoples primarily exist because the deforestation of these forests were not able to produce net profits or because in rare instances the inhabitants had sufficient land tenure (LT) and human rights (HR) to protect their forests and themselves. REDD is creating economic incentives to now make these forests and their peoples more profitable to exploit, but without requiring the enforcement of the rights that will protect all forest peoples, their forests & create well regulated markets. REDD projects without requiring these rights will be more prone to carbon sequestration reversals, deforestation leakage to other Jurisdiction, social and political damage and risk, and will be less transferable. Nevertheless carbon credit entrepreneurs, Government entities and NGOs have started promoting REDD without first requiring the enforcement of these rights in the last remote forests; some of these promoters lobbied at the California's International Sector-based Offset program workshop held on 4/28/2016 by California Air Resources Board (CARB).

Environmental NGO's, like Forest Trends, Earth Innovation Institute, Ecosystem Marketplace and Environmental Defense Fund have supported & presented inspiring communities from Acre Brazil other Jurisdictions. Several of these communities had their representatives hosted by some of these environmental organizations in order to lobby for their community's sale of REDD Carbon Credits at the CARB 4/28/16 workshop. These forest people from Acre, represent amazingly successful & privileged communities, that will probable be able to trade their Carbon offsets even without CARB's

involvement. They are extraordinary model communities, that through the bloody struggles of people like Chico Mendes & allied Forest Peoples and the support of environmentalist & land reformers, have forged better LT and HR than the vast majority of forest people worldwide. Acre Brazil is an outlier, they are the 1%, of forest people, that have LT & HR that while still inadequate, are desperately needed by 99% of all forest people. At this workshop, REDD supporters presented a few model communities confident enough in their land ownership and human rights to participate in and support REDD activities, but they are a minuscule minority of the world's forest people.

The vast majority of forest people need those rights now and will need them even more if exposed to REDD schemes. Given the history of land tenure and conflict in most Tropical countries with large remaining forests, it is implausible and inefficient to believe that rights being "requested" at the country level, per the current REDD agreement and standards, will ensure social safeguards and prevent political risk. After remote forests & their peoples are targeted by REDD without requiring these rights, it will be a rearguard nightmare to try to stem the suffering, dislocation & acculturation.

One of the most cost effective methods of ethically sequestering carbon, REDD's main goal, is by recognizing and enforcing the land & resource tenure of forest people. A. Agrawal's study "shows that the larger the forest area under community ownership the higher the probability for better biodiversity maintenance, community livelihoods and carbon sequestration." "The growing evidence that communities and households with secure tenure rights protect, maintain and conserve forests is an important consideration for the world's climate if REDD schemes go forward, and even if they do not." according to Agrawal, A. (2008) 'Livelihoods, carbon and diversity of community forests: trade offs and win wins?'

World Bank SOCIAL DEVELOPMENT WORKING PAPERS Paper No. 120/December 2009 stated, "...the cost range of recognizing community tenure rights (average \$3.31/ha) is several times lower than the yearly costs estimates for ... an international REDD scheme (\$400/ha/year to \$20,000/ha/year)." "...a relatively insignificant investment in recognizing tenure rights has the potential to significantly improve the world's carbon sequestration and management capacity..., prioritizing policies and actions aimed at recognizing forest community tenure rights can be a cost-effective step to improve the likelihood that REDD programs meet their goals."

The promotion of REDD without requiring LT & HR prior to funding or payments makes the vast majority of forest people & their forests much more endangered. This is noted by Jorge Furagaro Kuetgaje, climate coordinator for COICA, the Indigenous People of the Amazon Basin, "For us to continue to conserve the tropical forests ... we need to have strong rights to those forests. Death should not be the price we pay for playing our part in preventing the emissions that fuel climate change."

Tropical forested countries also have very poor land tenure rights enforcement records for forest people. "Living on Earth" radio reported, that, "governments own about 75 percent of the world's forests, less than ten percent legally belong to communities. In Indonesia, 65 million people live off forests, most of them have no official rights to the land they consider theirs. In the eyes of

the Forest Ministries, they're squatters occupying a national resource".

The human rights and land tenure enforcement record of tropical forested countries is alarming. Global Witness's Nov. 30, 2015 Press release stated, "At least 640 land and environmental activists have been killed since the 2009 climate negotiations in Copenhagen - some shot by police during protests, others gunned down by hired assassins." Global Witness also stated, "Most murders occurred in Latin America and Asia with far fewer reported in Africa, however this may be (due) to a lack of information...justice is rarely given to murder victims. Killers are rarely brought to trial and often acquitted when they are. In Brazil, fewer than 10 percent of such murders go to trial, and only 1 percent see convictions." In addition to the ethics of this endangerment, CARB's utilization of REDD without LT & HR binding prerequisites presents grave political risks for California, forest people and REDD schemes. As the world's 1/8th largest economy, California's response to the REDD program is likely to set a global precedent; that is why it should not increase negative social impact and political risk, as well as global warming. California could continue trendsetting by reducing Global warming, and promoting the rule of law and biological sustainability in one stroke.

It is more important to get this rule making done right than done fast, therefore we recommend:

1. CARB lawyers should review all the standards CARB has cited including those in their footnotes and the REDD agreement (including UNFCCC principles established in the Cancun Agreement) and issue a legal opinion as to whether these documents stipulate the recognition and enforcement of forest people's customary and statutory resource and land tenure, and human rights prior to California's International Sector-based Offsets program's use of REDD offsets (herein LT & HR prerequisites).
2. CARB lawyers should stipulate standards that require forest people's LT & HR prerequisites that seem to be lacking in REDD and the various social standard cited? With those rights stipulated, the 99% of Forest People not represented in their workshop, could have a better chance of achieving what Acre's communities are striving for & have not yet achieved.
3. If such standards do not exist then CARB should develop a suite of standards that require these LT & HR prerequisites.
4. CARB should then schedule further LT & HR prerequisite safeguard workshops that are video-archived and transcribed.
5. CARB should provide longer stakeholder comment periods.
6. CARB should either require LT & HR prerequisite safeguards or a REDD amendment that stipulates these LT & HR prerequisites prior to its involvement. CARB should not increase economic interest in those forests by promoting REDD schemes without requiring LT & HR prerequisites in order to prevent subsequent social, environmental and political harm.

The preceding comments and recommendations focused narrowly on the need for binding social standard prerequisites, and not on efficacy of Carbon Offsets which is also problematic. (see Methodological and Ideological Options, Comprehensive carbon stock and flow

accounting: A national framework to support climate change mitigation by I. Ajani et al., Ecological Economics 89 (2013) p61-72. Untangling the confusion around land carbon science and climate change mitigation policy by Brendan Mackey et al., NATURE CLIMATE CHANGE | VOL 3 | JUNE 2013 | www.nature.com/natureclimatechange)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-05-13 16:13:36

No Duplicates.

Comment 14 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Katie
Last Name: Sullivan
Email Address: sullivan@ieta.org
Affiliation: IETA

Subject: IETA Comments on Linkage & Sector-Based Offsets
Comment:

Dear Staff,

Attached, find IETA's comments on the 28 April cap-and-trade workshop on Ontario linkage and sector-based offsets.

We appreciate this opportunity to comment.

Best,

Katie Sullivan, IETA

Attachment: www.arb.ca.gov/lists/com-attach/18-sectorbased4-ws-VD1TMFUgBDYCW1Az.pdf

Original File Name: IETA Comments on ARB Workshop_Linkage Sector Offsets_May2016.pdf

Date and Time Comment Was Submitted: 2016-05-13 16:51:43

No Duplicates.

Comment 15 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Stephan

Last Name: Schwartzman

Email Address: sschwartzman@edf.org

Affiliation: Environmental Defense Fund

Subject: International sector-based offset crediting

Comment:

Please find EDF comments and additional documents attached.

Attachment: www.arb.ca.gov/lists/com-attach/21-sectorbased4-ws-BmMHZQFmV1sCZwFs.pdf

Original File Name: EDF_cmmts_CARB_05-13.pdf

Date and Time Comment Was Submitted: 2016-05-13 16:23:49

No Duplicates.

Comment 16 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Pamela

Last Name: McElwee

Email Address: pamela.mcelwee@rutgers.edu

Affiliation:

Subject: Public comment on REDD+ for CA ARB

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/22-sectorbased4-ws-UD1XMgFlBDsHdII3.pdf

Original File Name: McElweeCarbonFixChapter.pdf

Date and Time Comment Was Submitted: 2016-05-16 13:16:04

No Duplicates.

Comment 17 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Alberto

Last Name: Saldamando

Email Address: saldamando@sbcglobal.net

Affiliation: Indigenous Environmental Network

Subject: Comments on REDD safeguards

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/23-sectorbased4-ws-WjlVMgd0BzZWD1Mw.pdf

Original File Name: CARB Comments May 2016.pdf

Date and Time Comment Was Submitted: 2016-05-16 13:16:04

No Duplicates.

Comment 18 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Rossmery

Last Name: Zayas

Email Address: rossmeryzayas@gmail.com

Affiliation: ITR Delegate

Subject: ARB proposal to include international sector-based offsets in cap and trade
Comment:

I am nineteen years old and I am an environmental justice leader. I have worked and organized on environmental and social justice issues since I was fourteen years old. The most frustrating part of being an environmental justice leader is that people think about environmental or climate justice as protecting polar bears and penguins. It frustrates me that there are laws to protect fish and we have to fight for laws to protect our health and wellbeing.

I appeal to you to not pursue an international offset program. My generation is going to live with the consequence of these compromises that are being made to protect the interests of the fossil fuel companies. I am submitting this letter to express my opposition to your proposal to include international offsets as part of California's cap and trade program.

I am challenging the normalization of low-income communities and communities of color, such as mine in Southeast Los Angeles, overburdened with toxicity creating dirty air, water, and soil. Wilmington alone has three major oil refineries not including the ones bordering the community. Los Angeles is also impacted by pollution coming from the Harbor area. My community and surrounding communities deal with diesel truck pollution, and one major source is 710 freeway (which physically connects Wilmington to Southeast Los Angeles) carrying commercial goods from the ports into our neighborhoods. The fossil fuel industry has a heavy hand in our communities. The climate crisis is urgent and life threatening.

Policies like REDD do absolutely nothing to reduce greenhouse gas emissions at the source- it only allows for carbon trading, which is not ethical. REDD may even result in the biggest land grab of the last 500 years. Folks are told false solutions like REDD address climate change and are good for the people. This is 100% false and our elected officials are pushing for a policy that grabs land, clear-cuts forests, destroys biodiversity, abuses Mother Earth, pimps Father Sky, and threatens the cultural survival of indigenous peoples. This policy privatizes the air we breathe, commodifies the clouds, and allows corporations to buy and sell the atmosphere. It corrupts the sacred.

REDD is bad for the climate because it allows climate criminals like Shell and Chevron off the hook. REDD gives companies like these a legal and official way to call themselves green. This is harmful to the climate, and to the heart of communities. REDD is bad for the environment because it includes clear-cutting, logging, and tree plantations that kill biodiversity. REDD is bad for

Californians because polluters expand sources of pollution and cause more asthma, more cancer, more sickness, and more death. REDD is bad for human rights. REDD-type projects are already resulting in massive land grabs, violent evictions, forced relocation, and carbon slavery of indigenous people. One clear example of this is in Guaraqueçaba, Brazil, where Chevron has a REDD project with the Nature Conservancy, which has a private army that shoots at people for entering their own forest to use their own resources. REDD projects also turn the forests into a militarized zone - with remote sensors, drones, etc to monitor the sites.

I am disturbed by how the fossil fuel industry and its supporters are able to influence climate policies that directly affect my community. I am even more disturbed that politicians care more about corporate wealth and prioritize money and not health. I am agitated that the voices of those in communities like mine are overlooked and excluded in the decision making process. We seek action and policies from you that ultimately reduces our reliance on fossil fuels, coal and gas. Our lungs are simply not for sale.

Our negotiators have blinders on- scientists have said we need to address the climate, Indigenous Peoples have known this for years.

Studies have shown that current governmental policies including the Paris Accord (the overall text fails to mention human rights or the rights of Indigenous Peoples) do not actually require action to meet the goals of pursuing efforts to limit the temperature increase to 1.5 °C above pre-industrial levels. These policies privatize the air through the scheme "carbon neutrality," where countries can buy carbon credits and a green pass to pollute. I am asking you to take the political leadership necessary to meaningfully and significantly halt the warming and protect the people. We need system change not climate change, and that requires us to reject the corporate driven, free trade investment agreements.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-05-16 13:16:04

No Duplicates.

Comment 19 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Yolanda

Last Name: Ariadne Collins

Email Address: Collins_yolanda@phd.ceu.edu

Affiliation:

Subject: Comments on Proposed International Sector based Offsets

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/27-sectorbased4-ws-BWtVPFwpVmADdgFe.docx

Original File Name: Notes on California REDD.docx

Date and Time Comment Was Submitted: 2016-05-19 12:37:52

No Duplicates.

Comment 20 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Dan

Last Name: Nepstad

Email Address: dnepstad@earthinnovation.org

Affiliation: Earth Innovation Institute

Subject: EII comments on April 28 workshop

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/28-sectorbased4-ws-VjNcMwFpU19XMgdo.docx

Original File Name: EII Comments on ARB Workshop3.docx

Date and Time Comment Was Submitted: 2016-05-19 12:37:52

No Duplicates.

Comment 21 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Louis

Last Name: Blumberg

Email Address: lblumberg@TNC.ORG

Affiliation: The Nature Conservancy

Subject: Comments to the ARB Workshop of April 28 May 16, 2016

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/29-sectorbased4-ws-UCQBaQRmU19XMIM8.docx

Original File Name: TNC comments.docx

Date and Time Comment Was Submitted: 2016-05-19 12:37:52

No Duplicates.

Comment 22 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Confucio

Last Name: Aires Moura

Email Address: ombcomm@arb.ca.gov

Affiliation: Governor of State of Rondonia, Brazil

Subject: Letter on AB32

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/30-sectorbased4-ws-WjISNVajAyQAZwBf.pdf

Original File Name: Carta de Apoio a Califórnia.pdf

Date and Time Comment Was Submitted: 2016-05-19 15:19:45

No Duplicates.

Comment 23 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Adeniyi

Last Name: Asiyambi

Email Address: adeniyi.asiyambi@kcl.ac.uk

Affiliation: King's College, University of London, UK

Subject: Comment on REDD+ readiness implementation in Cross River, Nigeria

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/31-sectorbased4-ws-VDcHcwdpUnIFcFQL.pdf

Original File Name: Cross River REDD+ comments submitted to the California ARB (2).pdf

Date and Time Comment Was Submitted: 2016-05-25 15:25:56

No Duplicates.

Comment 24 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Sébastien

Last Name: Costedoat

Email Address: cos.seb@gmail.com

Affiliation:

Subject: omment for April 28, 2016 Cap-and-Trade Workshop

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/32-sectorbased4-ws-VTZQNwZ3VVIQJAls.pdf

Original File Name: cap_redd_arb.pdf

Date and Time Comment Was Submitted: 2016-06-01 15:55:22

No Duplicates.

Comment 25 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Louis

Last Name: Blumberg

Email Address: lblumberg@TNC.ORG

Affiliation:

Subject: April 28 workshop

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/33-sectorbased4-ws-UzRUIFU7V3FXIVUK.pdf

Original File Name: Group Gov Trop For ltr 6-1-16.pdf

Date and Time Comment Was Submitted: 2016-06-03 15:39:24

No Duplicates.

Comment 26 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation:

Subject: Comments on REDD

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/34-sectorbased4-ws-UDgGYVwkWGoLUgBj.pdf

Original File Name: Haya comments to ARB on REDD.pdf

Date and Time Comment Was Submitted: 2016-06-06 13:06:06

No Duplicates.

Comment 27 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Jonah Busch

Last Name: Busch, Ph.D.

Email Address: jbusch@cgdev.org

Affiliation: Center for Global Development

Subject: In support of tropical forests in California's cap-and-trade program

Comment:

See attached document.

Attachment: www.arb.ca.gov/lists/com-attach/35-sectorbased4-ws-VTlcPwZzWX5QM1Ai.pdf

Original File Name: Letter to Governor Brown from CGD Working Group members in support of tropical forests in cap and trade.pdf

Date and Time Comment Was Submitted: 2016-06-07 08:45:15

No Duplicates.

Comment 28 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: B. Holt

Last Name: Thrasher

Email Address: Holt.Thrasher@permianglobal.com

Affiliation: Permian Global Group

Subject: Comments by Permian Global

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/36-sectorbased4-ws-ViZWNQFyBzlSPQlo.zip

Original File Name: Permian Recommended Reading June 24th.zip

Date and Time Comment Was Submitted: 2016-06-24 13:43:45

No Duplicates.

Comment 29 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Alcilene Freitas

Last Name: Bertholdo de Souza

Email Address: alcilene@sema.mt.gov.br

Affiliation: Mato Grosso Environmental State Agency

Subject: Letter on behalf of the California State Cap-and-Trade Program

Comment:

See attached

Attachment: www.arb.ca.gov/lists/com-attach/37-sectorbased4-ws-VTQCdFY4BD4BaAVa.zip

Original File Name: Apoio California Port..zip

Date and Time Comment Was Submitted: 2016-06-27 14:10:42

No Duplicates.

Comment 30 for : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) - 1st Workshop.

First Name: Catherine
Last Name: Reheis-Boyd
Email Address: creheis@wspa.org
Affiliation: WSPA

Subject: WSPA Comment Letter on Linkage and Sector-based Offsets Comment:
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/39-sectorbased4-ws-BXIBdFcmBDYLUIIx.pdf

Original File Name: WSPA comment letter AB 32 Linkage_07_15_2016_final.pdf

Date and Time Comment Was Submitted: 2016-07-19 13:25:46

No Duplicates.

There are no comments posted to : April 28, 2016 Cap-and-Trade Workshop on Sector-Based Offsets (sectorbased4-ws) that were presented during the Workshop at this time.