

## **Comment 1 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Lawton

Last Name: Pelfrey

Email Address: savvydude@hotmail.com

Affiliation:

Subject: The Hoax Lives On in California

Comment:

As we have all learned recently, due to "Climategate", 'global warming' is a manipulated concept driven by those who are determined to enrich themselves by it. And it is in complete control in good, old California - here, we have a radical left-wing legislature, and Governor who has chosen to drink the Kool-Aid and far too many state bureaucrats who couldn't care less if the state goes bankrupt as long as they have their way. And here we are with Cap & TAX. The stupidity of this nonsense knows no bounds, and you at the ARB will have to answer to the people for forcing this horrible, useless overreach by the government down our throats.

The ARB should be ashamed but I'm sure you are not. While the rest of the civilized world has seen through the 'global warming' idiocy, California leaders are acting like robotic lemmings who refuse to see the truth.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-24 16:06:58

No Duplicates.

## **Comment 2 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: marvin

Last Name: reed

Email Address: reed.marvin@gmail.net

Affiliation: American citizen

Subject: I can not afford cap-and-trade regulation

Comment:

I do not support eco-policies (cap-and-trade regulation). They lead to oppressive regulation, higher taxes and higher utility bills. The tide is turning against Global Warming theory. The sceptical view is now the majority view.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-24 16:19:45

No Duplicates.

## **Comment 3 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: James

Last Name: Bonner

Email Address: azonic50@hotmail.com

Affiliation:

Subject: Cap and Trade

Comment:

In light of the fraudulent data the University of East Anglia's Climate Research Unit has provided as evidence of a global climate change, I would think it is obvious that all of your regulations are based on lies, deceit, and manipulation. We should all feel outraged and embarrassed for being taken for such fools. You should cease and desist all talk of Cap and Trade as the entire premise has been shown to be the greatest scandal in modern science.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-24 23:13:49

No Duplicates.

## **Comment 4 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Peter

Last Name: Wilson

Email Address: psfw\_66@roadrunner.com

Affiliation:

Subject: Cap & Trade

Comment:

Cap & Trade will accomplish nothing in the way of mitigating so-called climate change but will destroy jobs and industry (except, of course, for bureaucrats at CARB) in California. I implore you to call a halt to this insanity!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-25 10:07:02

No Duplicates.

## **Comment 5 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Allen

Last Name: Drennan

Email Address: allen@nefsis.com

Affiliation:

Subject: Consider credits from other sources

Comment:

I would like to see the bill include a provision for emitters to offset pollution created by travel ground and air by using video conferencing. In other words, include a provision that buying video conferencing systems or services, would be the same as buying credits under the program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-25 12:53:21

No Duplicates.

## **Comment 6 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Rania

Last Name: Lindroth

Email Address: rania@mailblocks.com

Affiliation:

Subject: Cap and Trade

Comment:

I don't like the idea of Cap and Trade. It is silly and backward to let big polluters buy the ability to pollute more from others who don't pollute so much. It also allows for shenanigans.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-27 19:08:15

No Duplicates.

## **Comment 7 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: KELLY

Last Name: LINDGREN

Email Address: kelku4u22@yahoo.com

Affiliation:

Subject: cap and trade

Comment:

California can't afford cap and trade. We are taxed to death as it is, and yes it is another tax. The middle class will be the ones to lose as usually. The poor don't have to pay their ways and the rich can afford to pay to go over the cap.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-12-08 10:52:03

No Duplicates.

## Comment 8 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: Mike  
Last Name: Sandler  
Email Address: mike@carbonshare.org  
Affiliation:

Subject: The only future for AB32: simplicity, transparency, equity

Comment:

Dear ARB,

Thank you for your hard work in implementing AB32. A carbon price has the potential to transform California's economy and help stop global warming. However, if done incorrectly, cap and trade could increase inequities, give windfall profits to corporate polluters, and delay meaningful GHG reductions.

I have attached a set of fliers regarding Carbon Share, which is a framework for equitably reducing emissions by providing every Californian income from the sale of emission rights under a cap. Such a Cap and Share system is democratic: One person - One Share, and is similar to a Cap & Dividend program, such as the CLEAR Act, proposed by U.S. Senators Maria Cantwell and Collins and currently being considered by the U.S. Senate. Providing rebates or shares back to households is not just a nice idea, or helpful in reducing the regressivity of price increases on low-income households. It is a political necessity. Otherwise, AB32 as a whole will face a political backlash. If you read the news, you know that it is already facing that, and it is at your peril to ignore it.

Simplicity, transparency, and equity provide the only future for AB32 implementation.

Specific recommendations: 1. Include transportation at the outset in 2012, 2. Auction 100%, 3. Return a majority of revenues back to households (According to the EAAC Report, 60% dividends would provide a net benefit to 54% of households, enough to ensure continued political support for AB32) (dividends are preferable to rebates on energy bills which are less transparent and provide not price signal), 4. Include an escalating price floor, 5. Limit offsets (rather than base your program on offsets or "credits," focus on mandatory permits), 6. Incorporate per capita design elements such as dividends when considering linkages to other ETS systems (this will allow states to build a common-based framework towards international Contraction & Convergence).

Sincerely,

Mike Sandler  
San Rafael, CA  
www.carbonshare.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/8-outreachpdf1.pdf>

Original File Name: OutreachPDF1.pdf

Date and Time Comment Was Submitted: 2009-12-29 12:16:20

No Duplicates.

## **Comment 9 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Denzil

Last Name: Armstrong

Email Address: dharmstrong@gmail.com

Affiliation:

Subject: Cap and Trade

Comment:

I prefer a "command & control" approach to regulation and I am skeptical that "cap & trade" will work. Two suggestions to improve the "cap and trade" proposal:

1. Instead of starting the proposed program at 100% of GHG emissions, phase the program in at 5% increments each year. In this way, some facilities could simply reduce production/usage by 5% and have time to evaluate future options.
2. Be consistent. If reducing GHG emissions is important enough to disrupt the economy, then every penny of revenue should be spent on reducing GHG. If the State simply flows the "auction money" into the State's general fund, then the whole process will be perceived as just a "back-door" tax to balance the State budget.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-03 07:44:36

No Duplicates.

## Comment 10 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: Joanna

Last Name: Malaczynski

Email Address: joanna@raimiassociates.com

Affiliation: Raimi + Associates

Subject: Funding from Carbon Markets for Land Use/Transportation

Comment:

Dear ARB Staff and Interested Stakeholders:

ARB recently issued cap-and-trade draft regulations that could potentially offer a funding source for land use/transportation through two different mechanisms, as follows:

1) Auctioning carbon permits. If ARB auctions carbon permits to regulated emitters, the revenues from the auction will be available for climate-related programs. Since transportation-related emissions constitute nearly 40% of California's emissions, why not request that 40% of the auction funds be allocated toward land use and transportation?

2) Carbon offsets. ARB will allow regulated emitters to meet a portion of their regulatory requirements through investment into carbon offsets. Why not allow a land use/transportation fund to qualify as a carbon offset investment? By the time ARB puts cap-and-trade into effect in 2012, California will have a regulatory scheme/protocol under SB375 to sufficiently prioritize land use/transportation projects based on their climate change benefits.

Please consider these ideas for incorporation into ARB's final regulations.

Thanks, Joanna Malaczynski

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-04 13:26:47

No Duplicates.

## **Comment 11 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Jeff

Last Name: Cohen

Email Address: [jcohen@eosclimate.com](mailto:jcohen@eosclimate.com)

Affiliation: EOS Climate

Subject: Comments on PDR

Comment:

Thanks for the opportunity to comment! See attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/11-eos\\_comments\\_ab32\\_pdr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/11-eos_comments_ab32_pdr.pdf)

Original File Name: EOS Comments AB32 PDR.pdf

Date and Time Comment Was Submitted: 2010-01-05 19:12:11

No Duplicates.

## **Comment 12 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Lesley

Last Name: Garland

Email Address: exec@westernpga.org

Affiliation: Western Propane Gas Association

Subject: Western Propane Gas Association Comments on PDR

Comment:

Please see the attached document for our comments and questions regarding the proposed draft regulation for a California cap-and-trade program. Thank you.

Lesley Brown Garland  
Western Propane Gas Association

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/12-wpga\\_comments\\_on\\_cap\\_and\\_trade\\_pdr\\_january\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/12-wpga_comments_on_cap_and_trade_pdr_january_2010.pdf)

Original File Name: WPGA Comments on Cap and Trade PDR January 2010.pdf

Date and Time Comment Was Submitted: 2010-01-08 13:22:01

No Duplicates.

## **Comment 13 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: donald

Last Name: jepson

Email Address: d.jepson@sbcglobal.net

Affiliation:

Subject: No on Cap and Trade Program

Comment:

I sat in on a workshop on 1/6/10. The people who have been drafting the cap and trade rule have no clue on how businesses are run in this state. I listened to CARB members present a program concept which they didn't even understand.

I have been able to deduce that any business in Calif. that emits more than 25,000 MT of CO2 must apply for cap and trade. The company must pay an undetermined amount for CO2 emissions annually. This could be anywhere from \$20/MT/yr to \$200/MT/yr. This fee must be paid annually. This is an annual cost of \$500,000 to \$5 million. In these hard economic times no company can have their overhead costs increased by this amount. Most companies operate on very thin profit margins. This is a hardship that immediately makes businesses leave California or consider bankruptcy.

The Cap and Trade Program defeats the purpose of AB32. AB32 proposes to reduce greenhouse gas emissions. If you take away funds from businesses with Cap and Trade, there is much less funding for improvements that can be implemented by businesses to reduce greenhouse gases. Business knows better how to make our respective operations more efficient and non polluting than the CARB.

Businesses of California are the backbone to the economy of this state if you continue to make the economic climate unhealthy for business you will have no economy.

As a business man operating in this state. I can tell you that our company charter states that we will do business in a way that will protect the environment and conserve our natural resources.

I ask you to not adopt this Cap and Trade program. It will severely damage our state and economy and not reduce greenhouse gas emissions.

Thank you for your time. I would like to discuss this issue further with you before you make a decision.

Donald Jepson PhD  
Director of Engineering  
Seneca Foods Modesto, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-09 09:53:30

No Duplicates.

## **Comment 14 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Josh

Last Name: Margolis

Email Address: jmargolis@cantorco2e.com

Affiliation: CantorCO2e

Subject: CantorCO2e Comments on AB 32 Cap & Trade PDR

Comment:

CantorCO2e comments submitted regarding the AB 32 cap & trade preliminary draft regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/14-cantorco2e\\_pdr\\_cap\\_and\\_trade\\_comments\\_jan\\_09\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/14-cantorco2e_pdr_cap_and_trade_comments_jan_09_2010.pdf)

Original File Name: CantorCO2e PDR Cap and Trade comments Jan 09 2010.pdf

Date and Time Comment Was Submitted: 2010-01-09 23:28:12

No Duplicates.

## **Comment 15 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: David  
Last Name: Ligh  
Email Address: david.ligh@exxonmobil.com  
Affiliation: Exxon Mobil Corporation

Subject: Comments on CARB Cap and Trade PDR

Comment:

ExxonMobil's comments on CARB's Cap and Trade PDR

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/15-exxonmobil\\_comments\\_cap\\_trade\\_pdr\\_011110.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/15-exxonmobil_comments_cap_trade_pdr_011110.pdf)

Original File Name: ExxonMobil comments cap trade PDR 011110.pdf

Date and Time Comment Was Submitted: 2010-01-11 07:37:05

No Duplicates.

## **Comment 16 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Roberta

Last Name: Lawson

Email Address: roberta.lawson@cdph.ca.gov

Affiliation: CA Conference of Local Health Officers

Subject: Public Health input on Preliminary Draft Regulation for a California Cap and Trade Program

Comment:

Please see attached letter with comments and Public Health input on Preliminary Draft Regulation for a California Cap and Trade Program. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/16-cap\\_and\\_trade.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/16-cap_and_trade.pdf)

Original File Name: cap and trade.pdf

Date and Time Comment Was Submitted: 2010-01-11 09:08:06

No Duplicates.

## **Comment 17 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Rob

Last Name: Neenan

Email Address: rob@clfpc.com

Affiliation: California League of Food Processors

Subject: CLFP Comments Regarding the ARB PDR

Comment:

CLFP 1/11/10 comments regarding ARB's cap-and-trade PDR

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/17-jan\\_2010\\_clfp\\_comments\\_re\\_arb\\_cap\\_and\\_trade\\_pdr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/17-jan_2010_clfp_comments_re_arb_cap_and_trade_pdr.pdf)

Original File Name: JAN 2010 CLFP COMMENTS RE ARB CAP AND TRADE PDR.pdf

Date and Time Comment Was Submitted: 2010-01-11 09:43:07

No Duplicates.

## **Comment 18 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Chuck

Last Name: White

Email Address: cbeamon@wm.com

Affiliation:

Subject: Proposed CARB GHG cap and trade regulations

Comment:

Please accept the attached comments from Chuck White on behalf of Waste Management.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/18-carb\\_letter\\_01.11.10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/18-carb_letter_01.11.10.pdf)

Original File Name: CARB letter 01.11.10.pdf

Date and Time Comment Was Submitted: 2010-01-11 10:00:08

No Duplicates.

## **Comment 19 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Welsh

Email Address: [kwelsh@airlines.org](mailto:kwelsh@airlines.org)

Affiliation: Air Transport Association of America, In

Subject: Comments on PDR by Air Transport Association of America, Inc.

Comment:

See Attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/19-ca\\_ab32\\_ata\\_comments\\_on\\_pdr\\_1-11-10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/19-ca_ab32_ata_comments_on_pdr_1-11-10.pdf)

Original File Name: CA\_AB32\_ATA\_Comments\_on\_PDR\_1-11-10.pdf

Date and Time Comment Was Submitted: 2010-01-11 10:36:53

No Duplicates.

## **Comment 20 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Seema

Last Name: Srinivasan

Email Address: sls@a-klaw.com

Affiliation:

Subject: Draft Cap and Trade Regulations

Comment:

Attached are the comments of the Cogeneration Association of California and the Energy Producers and Users Coalition regarding EAAC which were distributed on December 23rd.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/20-sls222\\_ltr\\_011110\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/20-sls222_ltr_011110_.pdf)

Original File Name: sls222 ltr(011110).pdf

Date and Time Comment Was Submitted: 2010-01-11 10:39:03

No Duplicates.

## **Comment 21 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Damian

Last Name: Luisi

Email Address: [damianl@rbbrowns.com](mailto:damianl@rbbrowns.com)

Affiliation:

Subject: Cap and Trade Regulation

Comment:

Efforts and technologies for a more Greener tomorrow are worthy goal. However, There MUST be a more gradual time period for the implementation of these technologies. The A.R.B. and the U.S. Government CANNOT and SHOULD NOT implement policies that put Business, People and Whole communities on a path of economic and eventually social ruin to obtain these goals. You people are so far removed from the real world you may as well be on another planet!! Do you not realize that without people working there is no taxes? No industry and and no sustainable way of life, and that you MORONS will be out of a job!! If you had any honor or decency at all you would step down from your positions or stand up to save tha AMERICAN right for business and to raising a family! A cleaner tomorrow can be achieved but it takes time to do it in a sensable, reasonable fashon. Not by cramming it down the publics throats. PLEASE HELP KEEP WORKING FAMILIES WORKING! the policies you make effect the entire nation!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 10:43:59

No Duplicates.

## **Comment 22 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Brenda

Last Name: Coleman

Email Address: [brenda.coleman@calchamber.com](mailto:brenda.coleman@calchamber.com)

Affiliation: California Chamber of Commerce

Subject: CalChamber's Cap and Trade PDR comment letter

Comment:

Please see the attached .pdf file containing our comment letter on Cap and Trade.

Thank you for considering our comments.

Sincerely,

Brenda Coleman  
Policy Advocate  
California Chamber of Commerce

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/23-calchamber\\_cap\\_\\_trade\\_pdr\\_comments\\_to\\_carb\\_-\\_01\\_11\\_10\\_doc\\_-final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/23-calchamber_cap__trade_pdr_comments_to_carb_-_01_11_10_doc_-final.pdf)

Original File Name: CalChamber Cap Trade PDR Comments to CARB - 01 11 10 doc -FINAL.pdf

Date and Time Comment Was Submitted: 2010-01-11 11:41:10

No Duplicates.

## **Comment 23 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Jeff

Last Name: Horowitz

Email Address: jeff@adpartners.org

Affiliation: Avoided Deforestation Partners

Subject: Comments on Cap & Trade Prelim. Draft Reg.

Comment:

Please see attached for our comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/24-carb\\_letter\\_from\\_ad\\_partners.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/24-carb_letter_from_ad_partners.pdf)

Original File Name: CARB letter from AD Partners.pdf

Date and Time Comment Was Submitted: 2010-01-11 11:51:34

No Duplicates.

## **Comment 24 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Sara

Last Name: Birmingham

Email Address: [sara@solaralliance.org](mailto:sara@solaralliance.org)

Affiliation: The Solar Alliance

Subject: Comments for preliminary draft cap-and-trade regulation

Comment:

Thank you for the opportunity to comment on the Preliminary Draft Cap-and-Trade Regulation.

Best Regards,  
Sara Birmingham

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/25-solar\\_alliance\\_carb\\_011109.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/25-solar_alliance_carb_011109.pdf)

Original File Name: Solar Alliance CARB 011109.PDF

Date and Time Comment Was Submitted: 2010-01-11 11:55:29

No Duplicates.

## **Comment 25 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Michael

Last Name: Tunnell

Email Address: mtunnell@trucking.org

Affiliation: American Trucking Associations

Subject: Preliminary Draft Regulation for a California Cap-And-Trade Program

Comment:

Please accept the attached comments on behalf of the American Trucking Associations. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/26-final\\_ata\\_comments\\_on\\_carb\\_cap\\_\\_trade\\_reg.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/26-final_ata_comments_on_carb_cap__trade_reg.pdf)

Original File Name: Final ATA Comments on CARB Cap Trade Reg.pdf

Date and Time Comment Was Submitted: 2010-01-11 12:42:30

No Duplicates.

## **Comment 26 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Steve

Last Name: Huhman

Email Address: steven.huhman@morganstanley.com

Affiliation: Morgan Stanley Capital Group Inc.

Subject: Comments on Preliminary Draft Regulation for a California Cap-And-Trade Program

Comment:

See attached comments

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/27-arb\\_cap-and-trade\\_1-11-10.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/27-arb_cap-and-trade_1-11-10.doc)

Original File Name: ARB Cap-and-Trade 1-11-10.doc

Date and Time Comment Was Submitted: 2010-01-11 12:50:14

No Duplicates.

## **Comment 27 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Barry  
Last Name: Wallerstein  
Email Address: [bwallerstein@aqmd.gov](mailto:bwallerstein@aqmd.gov)  
Affiliation: SCAQMD

Subject: SCAQMD staff comments on prelim draft cap-and-trade regulation  
Comment:

Comment letter attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/28-goldstein-cap-trade\\_1-11-10\\_\\_2\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/28-goldstein-cap-trade_1-11-10__2_.pdf)

Original File Name: Goldstein-cap-trade 1-11-10 (2).pdf

Date and Time Comment Was Submitted: 2010-01-11 12:51:45

No Duplicates.

## **Comment 28 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: David

Last Name: Copeland

Email Address: [Dave\\_Copeland@Praxair.com](mailto:Dave_Copeland@Praxair.com)

Affiliation: Praxair Inc.

Subject: Preliminary Draft Regulation for a California Cap and Trade Program issued November  
Comment:

Attached are Praxair Inc's comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/29-ca\\_ghg\\_cap\\_\\_trade\\_comments-final\\_-1-11-10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/29-ca_ghg_cap__trade_comments-final_-1-11-10.pdf)

Original File Name: Ca GHG Cap & Trade Comments-final -1-11-10.pdf

Date and Time Comment Was Submitted: 2010-01-11 12:50:48

No Duplicates.

## **Comment 29 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Kyle

Last Name: Gibeault

Email Address: kgibeault@ttcorp.com

Affiliation: Renewable Energy Markets Association

Subject: REMA Comments on Cap & Trade PDR

Comment:

On behalf of the Renewable Energy Marketers Association, I am pleased to submit the following comments on the Cap-and-Trade Regulation 32 Preliminary Draft Regulation.

REMA is eager to engage with the CARB to help craft policy that works for all stakeholders. If you have any questions or comments, or would like to set up a meeting with REMA representatives, please do not hesitate to contact us. Thank you for your time and consideration.

Best,

Kyle Gibeault  
General Manager  
Renewable Energy Markets Association  
p) 202-457-0868  
Email: kgibeault@ttcorp.com

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/30-rema\\_carb\\_comments\\_on\\_cap\\_and\\_trade\\_pdr\\_jan11\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/30-rema_carb_comments_on_cap_and_trade_pdr_jan11_2010.pdf)

Original File Name: REMA\_CARB\_comments\_on\_cap\_and\_trade\_pdr\_Jan11\_2010.pdf

Date and Time Comment Was Submitted: 2010-01-11 12:49:47

No Duplicates.

## **Comment 30 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Mona  
Last Name: Shulman  
Email Address: mshulman@pcoastp.com  
Affiliation:

Subject: PDR  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/31-pdrcomments.pdf>

Original File Name: PDRCComments.pdf

Date and Time Comment Was Submitted: 2010-01-11 13:12:00

No Duplicates.

## **Comment 31 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Brian G

Last Name: Anderson

Email Address: andersonbg@vmcmail.com

Affiliation: Vulcan Materials Co., Western Division

Subject: Comments on Cap & Trade PDR

Comment:

Vulcan Materials Company, Western Division is submitting the following comments on the Cap & Trade PDR.

Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/32-vulcan\\_materials\\_co\\_western\\_division\\_carb\\_pdr\\_comment\\_letter\\_jan\\_10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/32-vulcan_materials_co_western_division_carb_pdr_comment_letter_jan_10.pdf)

Original File Name: Vulcan Materials Co Western Division CARB PDR Comment Letter Jan 10.pdf

Date and Time Comment Was Submitted: 2010-01-11 13:15:16

No Duplicates.

## **Comment 32 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Schrap

Email Address: [mschrap@caltrux.org](mailto:mschrap@caltrux.org)

Affiliation: California Trucking Association

Subject: 1-11-2010 Preliminary Draft Regulation for a California Cap and Trade Program

Comment:

The California Trucking Association would like to respectfully submit the following comments in the attached file.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/33-1-11-2010\\_pdr\\_comments\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/33-1-11-2010_pdr_comments_final.pdf)

Original File Name: 1-11-2010 PDR Comments final.pdf

Date and Time Comment Was Submitted: 2010-01-11 13:24:25

No Duplicates.

## **Comment 33 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Stephanie

Last Name: Batchelor

Email Address: sbatchelor@bio.org

Affiliation:

Subject: BIO Cap-and-Trade Comments

Comment:

BIO is pleased to comment on California's PDR. Detailed comments are attached to this message.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/34-bio\\_cap\\_and\\_trade\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/34-bio_cap_and_trade_comments.pdf)

Original File Name: BIO Cap and Trade Comments.pdf

Date and Time Comment Was Submitted: 2010-01-11 13:37:34

No Duplicates.

## **Comment 34 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 35 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: John

Last Name: Battaglia

Email Address: jbattaglia@evomarkets.com

Affiliation: Evolution Markets

Subject: Evolution Markets Comments to PDR

Comment:

Please see attached comments from Evolution Markets on the Preliminary Draft Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/36-evolution\\_comments\\_arb\\_pdr\\_-\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/36-evolution_comments_arb_pdr_-_final.pdf)

Original File Name: Evolution\_comments\_ARB\_PDR - FINAL.pdf

Date and Time Comment Was Submitted: 2010-01-11 13:46:35

No Duplicates.

## Comment 36 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: Dave

Last Name: Stirpe

Email Address: alliance98@aol.com

Affiliation: Alliance for Responsible Atmospheric Pol

Subject: Comments: Do Not Include HFCs in Cap-and-Trade Program

Comment:

Comments by The Alliance for Responsible Atmospheric Policy  
on California Air Resources Board's  
Preliminary Draft Regulation for a Cap-and-Trade Program

January 11, 2010

On behalf of the Alliance for Responsible Atmospheric Policy (Alliance), an industry coalition representing producers and users of HFC compounds, we submit the following comments on the Preliminary Draft Regulation for a California Cap-and-Trade Program in accordance with the California Global Warming Solutions Act of 2006 (AB 32).

The Alliance was organized in 1980 and has been the leading industry organization on the Montreal Protocol. In addition to addressing effective international and domestic policies for fluorocarbons and for protection of the earth's ozone layer, the Alliance is also working to assess the appropriate manner to address HFCs and their impact on global climate change. A membership list follows at the end of the comments.

The Preliminary Draft Regulation appears to include HFCs in the basket of gases included in the cap-and-trade program. It is noted on page 108 that producers, importers, and exporters of fluorinated greenhouse gases could be covered. The definitions appear to include only HFCs as such a gas. The Alliance points out that none of the cap-and-trade programs that have been established so far, including those in Europe or the US Northeast Regional Greenhouse Gas Initiative (RGGI), include HFCs in their trading scheme.

Unlike most other greenhouse gases, HFCs are not waste gases that are routinely emitted to the atmosphere. HFCs are intentionally produced compounds that serve specific consumer and societal needs in a variety of applications, such as consumer appliances, air conditioning systems, supermarket refrigeration, foam insulation, fire suppression, and medical metered dose inhalers. HFCs are replacements to ozone-depleting CFCs and HCFCs that are being phased out under the Montreal Protocol, and have already reduced the impact on global warming compared to CFCs. Because HFCs have no ozone depletion potential, they are becoming increasingly important as the phaseout of CFCs and HCFCs progresses, and as market growth occurs, particularly in refrigeration and air-conditioning applications.

The US House of Representatives passed H.R. 2454 on June 25, 2009. The bill provided a separate cap-and-trade reduction schedule for HFCs. HFCs were not included in the basket of other greenhouses that were subject to a wider and broad cap-and-trade program. The House appeared to recognize that including HFCs in the broad cap-and-trade basket of gases would result in consumption reductions that are unachievable and unaffordable. Nevertheless, the HFC provisions are significant because they achieve greenhouse gas reductions with a market-based approach while minimizing market disruption.

Theoretically, HFC producers/importers could purchase allowances to meet demand for HFCs in excess of the cap; however, the higher cost of these allowances could make HFCs unaffordable for downstream HFC users (e.g., HFC product/equipment manufacturers, distributors, contractors, consumers). As a result, HFC-containing product/equipment manufacturers and importers might need to scale back, which could result in a shortfall of HFC-containing products/equipment for consumer needs.

The Alliance supported H.R. 2454, which included separate treatment of HFCs, including a substantial phasedown. The Alliance noted that the bill provided challenging framework for achieving a significant reduction of HFC greenhouse gas contributions, while recognizing the important societal role these compounds play by contributing to our health and well being. The bill reduces HFC emission contributions 85% below the 2005 base period by 2033, thereby eliminating between 16 and 25 billion carbon tons of carbon dioxide equivalent emissions between 2012 and 2050, depending on business as usual projections and the progress of substitute technology development. This is a much more accelerated pace of reduction compared with the reduction for the non-HFC greenhouse gases.

S.B. 1533, currently under consideration by the U.S. Senate, contains HFC provisions that are nearly identical to H.R. 2454. In addition, there is a movement underway, supported by the US, Canada, Mexico, and nearly 40 other countries to treat HFCs separately in the international climate treaty process by moving them from the climate treaties to the Montreal Protocol where their production and consumption would be addressed. The climate treaties would continue to address emissions. Many, including the US, believe that the Montreal Protocol is better able to address HFCs since the treaty has the expertise as well as the infrastructure in place to better implement environmental protection through its provisions.

Since 2006, the Alliance has also worked collaboratively with CARB in the implementation of AB 32 relating to HFCs. We note that CARB has developed a comprehensive plan for achieving HFC emissions reductions.

As a result of the work already done by CARB and the precedents for regional, federal and international separation of HFCs, the Alliance believes that HFCs should not be covered by the California Cap-and-Trade Program.

Regards,

Dave Stirpe  
Executive Director

#### MEMBERSHIP LIST

AGC Chemicals Americas  
Air Conditioning, Heating &  
Refrigeration Institute  
Airgas  
American Pacific Corp.  
Arkema  
Association of Home  
Appliance Manufacturers  
Bard Manufacturing Co.  
BASF  
Brooks Automation, Inc.  
Cap & Seal Company

Carrier Corporation  
Center for the  
Polyurethanes Industry  
Coolgas  
Danfoss  
DuPont  
Dynatemp International  
Emerson Climate  
Technologies  
E.V. Dunbar Co.  
Falcon Safety Products  
FP International  
General Electric  
General Motors  
Golden Refrigerant  
Halotron  
Heating, Airconditioning &  
Refrigeration Distributors  
International  
Honeywell  
Hudson Technologies  
ICOR International  
Ineos  
Ingersoll-Rand  
International Pharmaceutical  
Aerosol Consortium  
Johnson Controls  
Lennox International  
McQuay International  
Metl-Span Corporation  
National Refrigerants  
Owens Corning Specialty &  
Foam Products Center  
Polar Technology  
RemTec International  
Rheem Manufacturing Company  
Ritchie Engineering  
Solvay  
Sub-Zero  
The Dow Chemical Company  
Trane Company  
Whirlpool Corporation  
Worthington Cylinder

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/37-cacap\\_tradefinal.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/37-cacap_tradefinal.pdf)

Original File Name: CACap&tradeFINAL.pdf

Date and Time Comment Was Submitted: 2010-01-11 13:34:37

No Duplicates.

## **Comment 37 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 38 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Meghan

Last Name: Schloat

Email Address: [meghan.schloat@ecosecurities.com](mailto:meghan.schloat@ecosecurities.com)

Affiliation: EcoSecurities

Subject: EcoSecurities' Comments on the AB 32 Preliminary Draft Regulation

Comment:

In the document attached please find EcoSecurities' comments on the AB 32 Preliminary Draft Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/39-ab\\_32\\_comments\\_final\\_jan\\_11\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/39-ab_32_comments_final_jan_11_2010.pdf)

Original File Name: AB 32 Comments FINAL\_Jan 11 2010.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:12:47

No Duplicates.

## **Comment 39 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Addie

Last Name: Jacobson

Email Address: addie@lqe1.com

Affiliation: Ebbetts Pass Forest Watch

Subject: California Cap-and-Trade Program, Preliminary Draft Regulation (PDR)

Comment:

Attached please find comments from Ebbetts Pass Forest Watch on the draft CA Cap-and-Trade regulations.

If you have any questions, please contact me.

Thank you.

Addie Jacobson

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/40-epfw\\_arb\\_c\\_tcomments1.11.10.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/40-epfw_arb_c_tcomments1.11.10.doc)

Original File Name: EPFW ARB C&Tcomments1.11.10.doc

Date and Time Comment Was Submitted: 2010-01-11 14:14:09

No Duplicates.

## **Comment 40 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Ted

Last Name: Michaels

Email Address: [tmichaels@energyrecoverycouncil.org](mailto:tmichaels@energyrecoverycouncil.org)

Affiliation: Energy Recovery Council

Subject: ERC Comments on Cap & Trade Preliminary Draft Regulation

Comment:

Please find attached comments from the Energy Recovery Council regarding waste-to-energy considerations in the CARB preliminary draft regulations on a greenhouse gas cap and trade program.

I would appreciate it if you would confirm receipt of this submission.

Thank you,  
Ted Michaels  
President  
Energy Recovery Council

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/41-100111\\_erc\\_comments\\_to\\_carb.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/41-100111_erc_comments_to_carb.pdf)

Original File Name: 100111 ERC comments to CARB.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:19:48

No Duplicates.

## **Comment 41 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Rhea

Last Name: Hale

Email Address: [rhea\\_hale@afandpa.org](mailto:rhea_hale@afandpa.org)

Affiliation: American Forest & Paper Association

Subject: Comments on Cap and Trade PDR

Comment:

Please find attached comments from the American Forest & Paper Association on the Cap and Trade Preliminary Draft Regulation. Thank you for your consideration.

Sincerely,  
Rhea Hale  
Director, Climate & Air Programs  
AF&PA  
202-463-2709

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/42-af\\_pa\\_comments\\_california\\_cap\\_and\\_trade\\_pdr\\_1-11-10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/42-af_pa_comments_california_cap_and_trade_pdr_1-11-10.pdf)

Original File Name: AF&PA comments California Cap and Trade PDR 1-11-10.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:21:02

No Duplicates.

## **Comment 42 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Michael  
Last Name: McAdams  
Email Address: mmcadams@bhfs.com  
Affiliation: ABFA

Subject: Comments of the ABFA

Comment:

Please see attached for the comments of the Advanced Biofuels Association.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/43-abfa\\_comments\\_re\\_ca\\_cap\\_and\\_trade.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/43-abfa_comments_re_ca_cap_and_trade.pdf)

Original File Name: ABFA Comments re CA cap and trade.PDF

Date and Time Comment Was Submitted: 2010-01-11 14:29:18

No Duplicates.

## **Comment 43 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Chris  
Last Name: Kelly  
Email Address: ckelly@infoasis.com  
Affiliation: The Conservation Fund

Subject: Final version of Cap and Trade Comments

Comment:

Attached please find The Conservation Fund's FINAL comments on the Preliminary Review Draft - Article 5: California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms ("PRD". Thank you for the opportunity to comment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/44-arb\\_-1\\_11\\_10\\_comments\\_on\\_arb\\_prd\\_final\\_.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/44-arb_-1_11_10_comments_on_arb_prd_final_.doc)

Original File Name: ARB - 1 11 10 comments on ARB PRD(final).doc

Date and Time Comment Was Submitted: 2010-01-11 14:26:35

No Duplicates.

## Comment 44 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: Barbara  
Last Name: Bramble  
Email Address: bramble@nwf.org  
Affiliation: National Wildlife Federation

Subject: National Wildlife Federation Comments on Cap & Trade Preliminary Draft Reg  
Comment:

January 11th, 2010

Mary Nichols  
Chairman  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Ms. Nichols,

The National Wildlife Federation appreciates the opportunity to comment on the Preliminary Draft Regulation for a California Cap-and-Trade Program published on November 24th, 2009. National Wildlife Federation has over 4 million members, partners and supporters nation-wide, and is among the primary environmental organizations in the United States addressing the critical need for instituting domestic and international forest protection policies for an effective climate change solution. The loss of our planet's tropical forests contributes approximately 15 percent of annual global greenhouse gas emissions. As an organization with 111,918 active members and supporters in California, we recognize that we cannot win the fight against climate change without addressing emissions from global deforestation.

National Wildlife Federation commends the California Air Resources Board (ARB) for its continued leadership in advancing California's landmark climate legislation. Our organization applauds California's exceptional efforts to create the Governors' Climate and Forests Task Force and work with other states in the U.S., Brazil and Indonesia to tackle greenhouse gas emissions from tropical forest loss. Our organization supports California's efforts to include international forestry efforts, including Reducing Emissions from Deforestation and Degradation in Developing Countries (REDD), into the overall framework of the proposed Cap-and-Trade Program.

National Wildlife Federation urges the ARB to ensure that effective environmental and social safeguards are included in the REDD language of the California Cap-and-Trade Program, along the lines of the provisions included in the U.S. House of Representatives H.R. 2454 American Clean Energy and Security Act, and the Senate Clean Energy Jobs and American Power Act S. 1733. Our organization recommends consideration of the Climate, Community & Biodiversity Standards (CCBS) to validate and verify the social and environmental benefits of forest carbon projects, and to guarantee that responsible safeguards are included in California's planning of carbon credits generated by REDD programs abroad.

Our organization would like to simultaneously urge the ARB to ensure that the quantity of offset allowances potentially included in the California Cap-and-Trade Program does not significantly reduce incentives for large-scale emissions reductions from

regulated sectors in California. The international offset provisions in the preliminary Draft Regulation for a Cap-and-Trade Program could achieve dramatic gains in the reduction of global warming pollution, however this must be appropriately balanced to maintain a reasonable price for carbon that will ensure a transition to low-carbon energy development in future market incentives for California. Our organization also encourages the ARB, as it structures the proposed climate Program, to ensure that any provisions for offsets specifically include measures to benefit air quality in communities suffering from disproportionate levels of pollution within California.

National Wildlife Federation commends California for its pioneering efforts to initiate state action to stop global deforestation and address climate change by including tropical forests under the international offset provisions of its Cap-and-Trade Program. Such a program could help protect California jobs by reducing illegal logging and other forms of forest conversion overseas that result in producing goods that compete in the global market with Californian foresters, farmers, and ranchers. At the same time, it could set an essential example for the rest of the country in pursuing equitable and effective solutions to global climate change.

Respectfully,

Barbara Bramble  
Senior Advisor for International Affairs  
National Wildlife Federation

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/45-nwf\\_carb\\_comments\\_jan\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/45-nwf_carb_comments_jan_2010.pdf)

Original File Name: NWF\_CARB\_comments\_Jan\_2010.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:21:09

No Duplicates.

## **Comment 45 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Cathy

Last Name: Reheis-Boyd

Email Address: cathy@wspa.org

Affiliation: Western States Petroleum Association

Subject: WSPA PDR Comments

Comment:

For submittal...

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/46-wspa\\_comments\\_on\\_cap\\_and\\_trade\\_preliminary\\_draft\\_regulation\\_2012.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/46-wspa_comments_on_cap_and_trade_preliminary_draft_regulation_2012.pdf)

Original File Name: WSPA Comments on Cap and Trade Preliminary Draft Regulation 2012.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:25:33

No Duplicates.

## **Comment 46 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Cathy

Last Name: Reheis-Boyd

Email Address: cathy@wspa.org

Affiliation: Western States Petroleum Association

Subject: Comments from WSPA

Comment:

For submittal...

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/47-wspa\\_comments\\_on\\_cap\\_and\\_trade\\_preliminary\\_draft\\_regulation\\_2.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/47-wspa_comments_on_cap_and_trade_preliminary_draft_regulation_2.pdf)

Original File Name: WSPA Comments on Cap and Trade Preliminary Draft Regulation 2.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:41:58

No Duplicates.

## **Comment 47 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Geoff

Last Name: Cooper

Email Address: gcooper@ethanolrfa.org

Affiliation: Renewable Fuels Association

Subject: RFA Comments on PDR for a CA Cap-And-Trade Program

Comment:

Please find our comments attached. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/48-ca\\_ct\\_pdr\\_comments\\_rfa.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/48-ca_ct_pdr_comments_rfa.pdf)

Original File Name: CA CT PDR Comments\_RFA.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:53:30

No Duplicates.

## **Comment 48 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Mike

Last Name: Sandler

Email Address: mike@climateprotectioncampaign.org

Affiliation: Climate Protection Campaign

Subject: Cap and Dividend

Comment:

Dear ARB,

Please see the attached comments, which recommend:

- 1) An upstream system
- 2) 100% auction of permits
- 3) Compensating consumers on a per capita basis - "Cap and Dividend"
- 4) A price floor on allowances (possibly accomplished through a carbon fee)
- 5) Include transportation fuels from the start of the program in 2012, and
- 6) Limit offsets

Thank you for your consideration.

Sincerely,

Mike Sandler  
Climate Protection Campaign

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/49-cpc\\_pdr\\_comment1-11-10pdf.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/49-cpc_pdr_comment1-11-10pdf.pdf)

Original File Name: CPC PDR comment1-11-10pdf.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:56:27

No Duplicates.

## **Comment 49 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Dwayne

Last Name: Phillips

Email Address: [dwayne.phillips@airliquide.com](mailto:dwayne.phillips@airliquide.com)

Affiliation: Air Liquide

Subject: Air Liquide comments regarding Preliminary Draft for California Cap & Trade Regulation  
Comment:

File attached: Air Liquide comments regarding Preliminary Draft for California Cap & Trade Regulation

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/50-ab32\\_al\\_comments\\_final\\_011110.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/50-ab32_al_comments_final_011110.pdf)

Original File Name: AB32 AL comments\_final 011110.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:10:41

No Duplicates.

## **Comment 50 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Jacqueline

Last Name: Kepke

Email Address: [jkepke@ch2m.com](mailto:jkepke@ch2m.com)

Affiliation: CA Wastewater Climate Change Group

Subject: CWCCG Comments on Cap and Trade PDR

Comment:

Attached please find the California Wastewater Climate Change Group's comments on the Preliminary Draft Regulation for a California Cap and Trade Program. Thank you for this opportunity to comment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/51-cwccg\\_cap\\_and\\_trade\\_pdr\\_comments.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/51-cwccg_cap_and_trade_pdr_comments.zip)

Original File Name: CWCCG CAP and TRADE PDR Comments.zip

Date and Time Comment Was Submitted: 2010-01-11 14:59:42

No Duplicates.

## **Comment 51 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Hadley

Email Address: ehadley@reupower.com

Affiliation: Modesto, Redding, & Turlock

Subject: Comments to PDR from MID/REU/TID

Comment:

Attached please find comments on the "Cap-&-Trade Preliminary Draft Regulation" from the Modesto Irrigation District, Redding Electric Utility, and Turlock Irrigation District.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/52-comments\\_to\\_pdr\\_from\\_mid\\_reu\\_tid\\_1-11-10\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/52-comments_to_pdr_from_mid_reu_tid_1-11-10_.pdf)

Original File Name: Comments to PDR from MID\_REU\_TID\_1-11-10\_.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:06:17

No Duplicates.

## **Comment 52 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Brian

Last Name: McQuown

Email Address: BMcquown@rrienergy.com

Affiliation: RRI Energy, Inc.

Subject: RRI Energy Comments on the Cap & Trade Preliminary Draft Regulation

Comment:

Please find attached comments by RRI Energy, Inc. on the Cap-and-trade Preliminary Draft Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/53-rri\\_energy\\_comments\\_to\\_carb\\_on\\_pdr\\_jan\\_11\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/53-rri_energy_comments_to_carb_on_pdr_jan_11_2010.pdf)

Original File Name: RRI Energy Comments to CARB on PDR\_Jan. 11, 2010.pdf

Date and Time Comment Was Submitted: 2010-01-11 14:50:38

No Duplicates.

## **Comment 53 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on PRD, offsets methodologies

Comment:

This comment letter focuses on our concerns related to integrating into the compliance system the quantification methodologies that were previously adopted exclusively for use in voluntary actions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/54-center\\_for\\_biological\\_diversity\\_on\\_prd\\_01\\_11\\_10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/54-center_for_biological_diversity_on_prd_01_11_10.pdf)

Original File Name: Center for Biological Diversity on PRD 01 11 10.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:05:07

No Duplicates.

## **Comment 54 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Frank

Last Name: Caponi

Email Address: fcaponi@lacsd.org

Affiliation:

Subject: Comments for Preliminary Draft Cap-and-Trade Regulation

Comment:

Comments for Preliminary Draft Cap-and-Trade Regulation

From Frank Caponi of LACSD

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/55-01\\_10\\_draft\\_pdr\\_comments\\_final\\_draft.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/55-01_10_draft_pdr_comments_final_draft.pdf)

Original File Name: 01\_10\_draft PDR Comments\_Final Draft.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:00:01

No Duplicates.

## **Comment 55 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Beth

Last Name: Vaughan

Email Address: beth@beth411.com

Affiliation:

Subject: CCC PDR Comments

Comment:

Comments of the California Cogeneration Council on the Cap-and-Trade Program PDR.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/56-ccc\\_comments\\_arb\\_pdr\\_capandtrade\\_20100111.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/56-ccc_comments_arb_pdr_capandtrade_20100111.pdf)

Original File Name: CCC\_Comments\_ARB\_PDR\_CapandTrade\_20100111.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:19:31

No Duplicates.

## **Comment 56 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 57 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 58 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 59 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: John

Last Name: Bloom Jr.

Email Address: houstgrp@pacbell.net

Affiliation: Cement Manufacturing Coalition (CSCME)

Subject: Preliminary Draft Regulation for a California Cap-And-Trade Program

Comment:

Please accept the attached comments on behalf of the Coalition for Sustainable Cement Manufacturing & Environment. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/60-10cscme\\_january\\_11\\_carb\\_cap\\_trade\\_filed.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/60-10cscme_january_11_carb_cap_trade_filed.pdf)

Original File Name: 10CSCME January 11 CARB cap trade filed.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:24:15

No Duplicates.

## **Comment 60 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Emily

Last Name: Rooney

Email Address: emily@agcouncil.org

Affiliation: Agricultural Council of CA

Subject: dec-14-pdr-ws

Comment:

Please find our comments attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/61-carb\\_comments\\_cap\\_and\\_trade.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/61-carb_comments_cap_and_trade.pdf)

Original File Name: CARB Comments Cap and Trade.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:27:55

No Duplicates.

## **Comment 61 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: John

Last Name: Lormon

Email Address: jjl@procopio.com

Affiliation:

Subject: ECOLIFE Foundation Comments

Comment:

Attached please find comments submitted on behalf of the ECOLIFE Foundation. Thanks.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/62-docs-\\_1141498-v1-ecolife\\_\\_comments\\_of\\_pdr\\_cap\\_and\\_trade\\_regs.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/62-docs-_1141498-v1-ecolife__comments_of_pdr_cap_and_trade_regs.pdf)

Original File Name: DOCS-#1141498-v1-ECOLIFE\_\_Comments\_of\_PDR\_Cap\_and\_Trade\_Regs.PDF

Date and Time Comment Was Submitted: 2010-01-11 15:04:57

No Duplicates.

## **Comment 62 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Janet

Last Name: Bell

Email Address: [jbell@mwdh2o.com](mailto:jbell@mwdh2o.com)

Affiliation: Metropolitan Water District

Subject: Comments Re: CARB PDR for California Cap-and-Trade Program for GHG Emissions  
Comment:

Attached are Metropolitan Water District comments on subject PDR.  
Please replace the comments letter previously sent today with this  
version. Thank you, Janet Bell

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/63-carbpdrcommentsletter.january112009.pdf>

Original File Name: CARBPDRCommentsletter.January112009.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:36:53

No Duplicates.

## **Comment 63 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Julee

Last Name: Malinowski-Ball

Email Address: [julee@ppallc.com](mailto:julee@ppallc.com)

Affiliation: Public Policy Advocates, LLC

Subject: CBEA Cap and Trade Draft Comments

Comment:

Attached please find Draft Comments of the California Biomass Energy Alliance relative to Cap and Trade issue. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/64-arb\\_cap\\_and\\_trade\\_draft\\_comments\\_01-11-2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/64-arb_cap_and_trade_draft_comments_01-11-2010.pdf)

Original File Name: ARB Cap and Trade Draft Comments 01-11-2010.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:50:12

No Duplicates.

## **Comment 64 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Amber

Last Name: Riesenhuber

Email Address: amber@iepa.com

Affiliation: IEP

Subject: Comments of IEP on CARBs Preliminary Draft Regulation

Comment:

Here are the comments of IEP on CARBs Preliminary Draft Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/65-comments\\_of\\_the\\_independent\\_energy\\_producers\\_association\\_on\\_preliminary\\_draft\\_regulation--final--1-11-10.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/65-comments_of_the_independent_energy_producers_association_on_preliminary_draft_regulation--final--1-11-10.doc)

Original File Name: Comments of the Independent Energy Producers Association on Preliminary Draft Regulation--Final--1-11-10.doc

Date and Time Comment Was Submitted: 2010-01-11 16:04:17

No Duplicates.

## **Comment 65 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: [buchan@mktpotential.com](mailto:buchan@mktpotential.com)

Affiliation: Graphic Packaging International

Subject: Regulation that Avoids Shutdowns or Reduced Output for GHG Reductions

Comment:

As the policy for the California Cap and Trade Program takes shape, we urge ARB to develop and implement policy that will guide industry to reduce GHG emissions through energy efficiency or replacement with renewable fuels. We are very concerned that the policies under consideration may instead lead to higher costs for businesses to a point where reductions are achieved through reduced output of plant shutdowns, which leads to higher unemployment and scarcity with higher costs for products targeted under the AB32 program (e.g. electricity). We urge ARB to develop and review key choices, such as free allocation or auction, in light of impacts of industry during these recessionary times.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 16:03:36

No Duplicates.

## **Comment 66 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: AB 32 Implementation Group

Subject: AB 32 Implementation Group Comments on the Cap-and-Trade PDR  
Comment:

Good Afternoon --

Attached please find a 'ZIP file' of comments regarding CARB's cap-and-trade PDR.

The initial letter is the AB 32 Implementation Group's cover letter and the subsequent letters (as the cover letter notes) are comments made to EAAC that we believe should also become a part of your consideration during further PDR design workshops.

If you have any questions, or need anything further, please feel free to contact me.

Warm regards --

Shelly Sullivan

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/67-ig\\_eaac\\_letters.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/67-ig_eaac_letters.zip)

Original File Name: IG EAAC Letters.zip

Date and Time Comment Was Submitted: 2010-01-11 16:06:05

No Duplicates.

## **Comment 67 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: [buchan@mktpotential.com](mailto:buchan@mktpotential.com)

Affiliation: Graphic Packaging International

Subject: Recommendation for Free Allocation of Allowances

Comment:

We ask the ARB strongly consider the allocation program that was set up for the US sulfur dioxide emission trading program, which employed free allocation with a modest level of auctions to address expansions and contractions normal in industry. If free allocation is not employed, California is in-effect taxing industry for the privilege to emit GHG, which today carries no cost burden. To do this immediately beginning 2012 provides industry no recourse other than to shutdown or reduce output to avoid unbudgeted tax burdens.

This type of tax burden may be borne by cash-rich firms, but would punish cash-poor firms; hence GHG reductions will come as a result of availability of cash as opposed to incentivizing industry to strive for GHG reductions through greater efficiency. Free allocation will also reduce the level of auction activity, which will then require less management effort from ARB, reducing costs.

While individual auctioned allowances for CO2 may rise some, the overall costs to industry are reduced through free allocation of allowances, regardless of whether distribution is done by output-based, fixed allocation, or benchmarking.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 16:12:32

No Duplicates.

## Comment 68 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: Bill

Last Name: Buchan

Email Address: buchan@mktpotential.com

Affiliation: Graphic Packaging International

Subject: Auction Revenues to GHG R&D

Comment:

It is not clear that technology yet can provide inexpensive, off-the-shelf solutions for industry to implement in the reduction of GHG emissions needed to reach the AB32 goals. As such, industries such as the electric generation industry may be faced with making large capital investments or shutting down. In order to avoid GHG reductions through reduced output or plant shutdowns, we recommend that auction revenues be put toward research and development of technologies that industries impacted under AB32 can utilize to achieve the program goals. While funneling the monies toward reduction of taxes statewide is nice, it does little for reducing the cost of AB32 to industry or reducing the risk of causing higher unemployment from shutdowns or reduced output.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 16:18:08

No Duplicates.

## **Comment 69 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Mark  
Last Name: Wilson  
Email Address: wilson@ieta.org  
Affiliation: International Emissions Trading Assoc.

Subject: IETA Comments on DRAFT PDR

Comment:

Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/70-ietacommentsoncarbpdr1.11.09.pdf>

Original File Name: IETACOMMENTSONCARBPDR1.11.09.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:22:26

No Duplicates.

## **Comment 70 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 71 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Patty

Last Name: Senecal

Email Address: psenecal@iwla.com

Affiliation: Western States Goods Movement Alliance

Subject: OPPOSE: Transportation under the CAP

Comment:

Joint comments opposing transportation fuel under the CAP.  
WSGMA, IWLA, DMA, WSA-OAKLAND, HTFSF-LA/LB

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/72-oppose\\_transportation\\_under\\_cap.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/72-oppose_transportation_under_cap.pdf)

Original File Name: OPPOSE TRANSPORTATION UNDER CAP.pdf

Date and Time Comment Was Submitted: 2010-01-11 15:53:03

No Duplicates.

## **Comment 72 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Adam

Last Name: Stern

Email Address: astern@terrapass.com

Affiliation: TerraPass

Subject: comments on draft AB 32 regs

Comment:

Please find attached our comments on the preliminary draft cap-and-trade regulations. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/73-terrapass-comments-on-ab32-reg.pdf>

Original File Name: TerraPass-comments-on-AB32-reg.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:32:27

No Duplicates.

## **Comment 73 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: James  
Last Name: Takehara  
Email Address: [jtakehara@roseville.ca.us](mailto:jtakehara@roseville.ca.us)  
Affiliation:

Subject: City of Roseville Comments for preliminary draft cap-and-trade regulation  
Comment:

Dear Sir or Madam:

Please find attached the City of Roseville's comments for preliminary draft cap-and-trade regulation.

Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/74-carb\\_pdrcomments\\_20100111.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/74-carb_pdrcomments_20100111.pdf)

Original File Name: CARB\_PDRComments\_20100111.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:37:32

No Duplicates.

## **Comment 74 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Meri

Last Name: Levy

Email Address: [mjh@cpuc.ca.gov](mailto:mjh@cpuc.ca.gov)

Affiliation: CPUC Division of Ratepayer Advocates

Subject: Comments on PDR

Comment:

Please accept the Comments of the Division of Ratepayer Advocates on the Preliminary Draft Regulation.

Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/75-dra\\_comments\\_arb\\_pdr.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/75-dra_comments_arb_pdr.doc)

Original File Name: DRA Comments ARB PDR.doc

Date and Time Comment Was Submitted: 2010-01-11 16:38:44

No Duplicates.

## **Comment 75 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: Comments of Southern California Edison Company on Preliminary Draft Regulation

Comment:

Please see the attached comments of Southern California Edison Company on CARB's Cap-and-Trade Preliminary Draft Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/76-sce\\_comments\\_to\\_carb\\_on\\_cap\\_and\\_trade\\_pdr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/76-sce_comments_to_carb_on_cap_and_trade_pdr.pdf)

Original File Name: SCE Comments to CARB on Cap and Trade PDR.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:28:24

No Duplicates.

## **Comment 76 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: [buchan@mktpotential.com](mailto:buchan@mktpotential.com)

Affiliation: Graphic Packaging International

Subject: Increase Offset Limit

Comment:

The 4% limit of offsets on emissions is too low. After reviewing ARB's algorithm for coming up with the 4% limit, it is clear that calculation is dependent on the use of offsets, assuming that most if not all facilities will use offsets to the allowable limit. This is most likely not the case, and we encourage ARB to factor in the degree of non-participating facilities in the offset program when setting the offset limit. Otherwise, the offset limit will be overly restrictive as compared to the 49% goal set out in the scoping plan. Recommend increasing this limit to at least 8% of total emissions to account for this and allow for sizeable projects.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 16:21:40

No Duplicates.

## **Comment 77 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchan@mktpotential.com

Affiliation: Graphic Packaging International

Subject: Support 3-Year Compliance Period

Comment:

We commend the ARB's thinking in setting out a 3-year compliance period. This gives industry the time it needs to plan and implement reduction projects.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 16:50:36

No Duplicates.

## **Comment 78 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: William

Last Name: Rostov

Email Address: wrostov@earthjustice.org

Affiliation: Earthjustice

Subject: Comments on Preliminary Draft Regulation for a California Cap and Trade Program

Comment:

Please find attached Earthjustice's comments on the PDR for the cap and trade program.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/81-earthjustice\\_letter\\_to\\_carb\\_01\\_11\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/81-earthjustice_letter_to_carb_01_11_2010.pdf)

Original File Name: Earthjustice Letter to CARB 01 11 2010.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:41:12

No Duplicates.

## **Comment 79 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Gregg

Last Name: Morris

Email Address: [gmorris@emf.net](mailto:gmorris@emf.net)

Affiliation: Green Power Institute

Subject: Comments on the Preliminary Draft Regulation for a California Cap-and-Trade Program

Comment:

Attached please find the Comments of the Green Power Institute on the ARB's Preliminary Draft Regulation for a California Cap-and-Trade Program.

The Green Power Institute is the renewable energy program of the Pacific Institute for Studies in Environment, Development, and Security, a 501(C)(3) public interest environmental research and advocacy organization.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/82-comments\\_to\\_arb\\_on\\_cap\\_and\\_trade\\_jan\\_11\\_\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/82-comments_to_arb_on_cap_and_trade_jan_11__2010.pdf)

Original File Name: Comments to ARB on Cap and Trade Jan 11, 2010.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:35:11

No Duplicates.

## **Comment 80 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchan@mktpotential.com

Affiliation: Graphic Packaging International

Subject: Reduce Recordkepping to 5 Years

Comment:

10 year recordkeeping is too long. Recommend 5 years of recordkeeping be implemented to be consistent with current federal and local District requirements.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 16:52:35

No Duplicates.

## **Comment 81 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: William

Last Name: Westerfield

Email Address: [wwester@smud.org](mailto:wwester@smud.org)

Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments on AB 32 Cap and Trade Program Preliminary Draft Regulation

Comment:

Attached please find SMUD's Comments on AB 32 Cap and Trade Program Preliminary Draft Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/84-smud\\_comments\\_on\\_ab\\_32\\_cap\\_and\\_trade\\_program\\_preliminary\\_draft\\_regulation.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/84-smud_comments_on_ab_32_cap_and_trade_program_preliminary_draft_regulation.pdf)

Original File Name: SMUD Comments on AB 32 Cap and Trade Program Preliminary Draft Regulation.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:53:52

No Duplicates.

## **Comment 82 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Robert  
Last Name: Richards  
Email Address: [rrichards@kernoil.com](mailto:rrichards@kernoil.com)  
Affiliation: Kern Oil & Refining Co.

Subject: Resend Comments  
Comment:

Please find the proper pdf version of the Kern Oil comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/85-kern\\_cap\\_trade.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/85-kern_cap_trade.pdf)

Original File Name: Kern cap&trade.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:54:49

No Duplicates.

## **Comment 83 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: PDR Comments

Comment:

PFT PDR comments in PDF format.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/86-pft\\_pdr\\_comments\\_1-11-10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/86-pft_pdr_comments_1-11-10.pdf)

Original File Name: PFT\_PDR\_Comments\_1-11-10.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:08:46

No Duplicates.

## **Comment 84 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Casey

Last Name: Creamer

Email Address: casey@ccgga.org

Affiliation: CCGGA, CCM, NFL, CGTFL, CFC, FCFB, WAPA

Subject: Comments on PDR

Comment:

The attached comments are submitted by the following Ag organizations; California Citrus Mutual, California Floral Council, California Cotton Ginners and Growers Associations, California Grape & Tree Fruit League, Fresno County Farm Bureau, the Nisei Farmers League, and Western Agricultural Processors Association.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/87-ag\\_cap\\_and\\_trade\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/87-ag_cap_and_trade_comments.pdf)

Original File Name: Ag Cap and Trade Comments.pdf

Date and Time Comment Was Submitted: 2010-01-11 16:57:36

No Duplicates.

## **Comment 85 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Diana

Last Name: Peck

Email Address: [kcfb@kcfb.org](mailto:kcfb@kcfb.org)

Affiliation:

Subject: Kings County Farm Bureau Comments

Comment:

Please see attached comment letter.

Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/88-kcfb\\_cap\\_and\\_trade\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/88-kcfb_cap_and_trade_comments.pdf)

Original File Name: KCFB Cap and Trade comments.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:02:55

No Duplicates.

## **Comment 86 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: John

Last Name: Ward

Email Address: wardo@wardo.com

Affiliation:

Subject: Independent Ready Mixed Concrete Comments on Draft

Comment:

Attached please find comments on the Cap & Trade Preliminary Draft Regulation by eight California ready mixed concrete producers.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/89-carb\\_comments\\_1-11-10\\_final\\_ready\\_mix.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/89-carb_comments_1-11-10_final_ready_mix.pdf)

Original File Name: CARB Comments 1-11-10 FINAL Ready Mix.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:00:40

No Duplicates.

## **Comment 87 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 88 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Haines

Email Address: [thaines@swc.org](mailto:thaines@swc.org)

Affiliation: State Water Contractors

Subject: Comments on Proposed Regulation for Cap-and-Trade

Comment:

These are the comments on the Proposed Regulation for Cap-and-Trade by the State Water Contractors.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/91-1-11-10\\_sw\\_comments\\_on\\_carb\\_c-a-tproposed\\_regulations.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/91-1-11-10_sw_comments_on_carb_c-a-tproposed_regulations.pdf)

Original File Name: 1-11-10 SWC Comments on CARB C-A-Tproposed regulations.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:07:36

No Duplicates.

## Comment 89 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: George

Last Name: Getgen

Email Address: George.Getgen@ucop.edu

Affiliation: UC Office of the President

Subject: University of California Comments to ARB on Cap and Trade PDR

Comment:

These written comments expand upon the concerns expressed by the University of California (the University) at the CARB public workshop meeting held at Cal EPA Headquarters in Sacramento, December 14, 2009.

In its AB32 Scoping Plan, CARB recognizes the importance of CHP as an emission reduction strategy that will help California achieve the goals codified in AB 32, and calls for the creation of 4,000 MW of additional CHP generation. The University of California (the University) embraces this finding and goal, but is concerned that Cap and Trade may impact CHP operators in ways that create disincentives to retain and develop CHP plants.

The University believes that the simplest and fairest way to incorporate CHP into Cap and Trade would be to create a stand-alone CHP sector that is regulated separately from the conventional, single-output electrical generation sector. The University operates five CHP plants that would be subject to Cap and Trade regulation as currently proposed. These plants are significantly more efficient than conventional separate heat and power generation; for example, UC Irvine's CHP plant emits 22% less greenhouse gas than procured grid power and natural gas-fired boiler operation.\* To account for the efficiencies of CHP compared to separate heat and power generation, the University also urges CARB to allocate allowances to CHP operators based on separate heat and power double benchmarks. These recommendations are consistent with those of the Cogeneration Association of California (CAC) and the California Cogeneration Council (CCC). Additional details on each of these recommendations may be found in the CAC's and CCC's October 2009 written comments to CARB.\*\*

The University has reservations with the CPUC/CEC recommendation to bifurcate CHP's electric and thermal production and regulate the separate outputs in electrical generation and commercial/industrial sectors, respectively.\*\*\* Under the CPUC/CEC recommendation, the University is concerned that the net cost of operating CHP to meet onsite electric and thermal loads will exceed the combined cost of purchasing electricity from the grid and purchasing the natural gas required to operate boilers to meet the thermal needs of a campus. The University's misgivings in this regard are compounded by the lack of clear guidelines from CARB or from the CPUC/CEC on how the thermal output of topping/combined cycle CHP plants will be handled within Cap and Trade.

The University seeks assurance from CARB that Cap and Trade will not disincentivise the continuing operation of CHP plants, the expansion of existing CHP plants, or the development of new plants. More specifically, the University requests that CARB clarify how the thermal output of topping/combined cycle CHP plants would be treated if the CPUC/CEC Cap and Trade recommendations are adopted. Additionally, if CARB decides to allocate allowances to retail providers to offset rate increases, the University strongly suggests that operators of CHP plants serving onsite electric and thermal loads also receive allowances. Failure to do so will

increase the cost of operating a CHP plant, relative to purchasing grid electricity and operating boilers, creating a powerful disincentive to continue operating or expand existing CHP plants or develop new CHP plants.

In addition, the University strongly discourages CARB from allocating allowances to generators based on historical emissions levels. This allocation method effectively rewards inefficient, heavily polluting plants while penalizing emitters that have previously invested in technologies, such as CHP and thermal energy storage, that minimize pollution and maximize plant efficiency.

Were allowances to be allocated based on historical emissions levels, the University is also concerned that it will be penalized for being an aggressive early actor on energy efficiency. Under Cap and Trade, one of the primary emission abatement strategies for operators of onsite CHP plants would be to implement demand-side energy efficiency measures. Between 2009 and 2012, the University will invest approximately \$250M in energy efficiency projects, substantially reducing its emissions before the onset of Cap and Trade. If CARB elects to allocate allowances based on historical emission levels, the University seeks clarification on how CARB will account for voluntary early actions that reduce emissions.

The University also seeks clarification on how CARB plans to accommodate new CHP plants within Cap and Trade. Absent other subsidies or incentives, any new plants, including CHP, would be at an obvious disadvantage if allowances were allocated to generators based on historical emissions levels. Consistent with the goals of the AB 32 Scoping Plan, the University urges the adoption of final regulations that encourage development of new CHP.

The University strongly favors a three-year compliance period to reduce costs and further recommends that CARB streamline its proposed procedures for allowance surrender. In its draft Cap and Trade guidelines, CARB proposed a multi-step allowance surrender process consisting of an initial allowance surrender, data review, reconciliation, and final surrender. Under this proposed system, by December 31 of the third compliance year, a covered entity would be required to make an initial allowance surrender based on:

- 1) That entity's verified emissions for the first two years of the compliance period, and
- 2) A percentage of the entity's annual average emissions calculated over the first two years of the compliance period.

Once the entity receives a positive verification for its third compliance year, its initial allowance surrender would be compared to its actual surrender obligation. If this comparison determines that an entity has failed to surrender a sufficient number of valid compliance instruments, then the entity must surrender the outstanding balance within 30 days or face a penalty.

The University believes that this system is unnecessarily cumbersome and that CARB would greatly reduce compliance difficulty and costs if it simply required a covered entity to surrender allowances after receiving positive verification for its third year of emissions data.

As a CHP plant operator and a large onsite emitter, the University anticipates that it will face significant compliance costs under the narrow scope of Cap and Trade. While it applauds the goals of AB 32, the University depends on the State of California for its operating budget and is concerned that without increased funding from the state, there is a strong potential that the University's only recourse will be to pass along the costs AB 32 compliance to its students. The University urges CARB to consider the impact of AB 32 compliance on state agencies, particularly institutions of higher education, when determining how allowances and revenue from allowance auctions are allocated.

\*- Data supplied by UC Irvine

\*\*- CCC and CAC recommendations are posted here:

<http://www.arb.ca.gov/lispub/comm2/bccommlog.php?listname=sept-9-chp-ws>,  
recommendations 11 and 15 respectively.

\*\*\*-See "Final Opinion and Recommendation on Greenhouse Gas  
Regulatory Strategies," CEC-100-2008-007-F, Title 6, pp. 220 - 230

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/92-uc\\_comments\\_arb\\_01112010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/92-uc_comments_arb_01112010.pdf)

Original File Name: UC\_Comments\_ARB\_01112010.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:10:49

No Duplicates.

## **Comment 90 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Andrew

Last Name: Schuyler

Email Address: aschuyler@newfuelsalliance.org

Affiliation: New Fuels Alliance

Subject: New Fuels Alliance Comments

Comment:

Please see attached comments.

Thanks

-Andrew Schuyler

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/93-ca\\_ab32\\_preliminary\\_draft\\_reg\\_comments\\_final\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/93-ca_ab32_preliminary_draft_reg_comments_final_.pdf)

Original File Name: CA AB32 Preliminary Draft Reg COMMENTS (final).pdf

Date and Time Comment Was Submitted: 2010-01-11 16:26:05

No Duplicates.

## **Comment 91 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Chan

Email Address: mchan@foe.org

Affiliation: Friends of the Earth

Subject: Comments on PDR

Comment:

Friends of the Earth is pleased to submit the attached comments to the PDR. Thank you for the opportunity.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/94-foe\\_pdr\\_comment\\_letter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/94-foe_pdr_comment_letter.pdf)

Original File Name: FOE PDR comment letter.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:17:55

No Duplicates.

## **Comment 92 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: John

Last Name: McCaull

Email Address: john@geo-energy.org

Affiliation: Geothermal Energy Association

Subject: GEA Comments on PDR for Cap and Trade Program

Comment:

Please see the attached comments of the Geothermal Energy Association on the Preliminary Draft Regulations for a California Cap and Trade Program.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/95-gea\\_letter\\_to\\_carb\\_on\\_res\\_concept\\_outline\\_11-20-09\\_final.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/95-gea_letter_to_carb_on_res_concept_outline_11-20-09_final.doc)

Original File Name: GEA Letter to CARB on RES Concept Outline 11-20-09 Final.doc

Date and Time Comment Was Submitted: 2010-01-11 17:29:17

No Duplicates.

## **Comment 93 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Stephen

Last Name: Burns

Email Address: [stephen.burns@chevron.com](mailto:stephen.burns@chevron.com)

Affiliation:

Subject: Chevron Comments on PDR

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/96-final\\_cvx\\_pdr\\_comments\\_january\\_11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/96-final_cvx_pdr_comments_january_11.pdf)

Original File Name: FINAL\_CVX\_PDR\_comments January 11.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:38:56

No Duplicates.

## **Comment 94 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Jason  
Last Name: Barbose  
Email Address: jason@betterworldgroup.com  
Affiliation: Global Warming Action Coalition

Subject: PDR comments

Comment:

Comments from 12 non-profit environmental and public health organizations that are members of the Global Warming Action Coalition.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/97-gwac\\_pdr\\_comments\\_january\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/97-gwac_pdr_comments_january_2010.pdf)

Original File Name: GWAC\_PDR Comments\_January 2010.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:13:03

No Duplicates.

## **Comment 95 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Gabe  
Last Name: Petlin  
Email Address: gpetlin@3degreesinc.com  
Affiliation: 3Degrees

Subject: 3Degrees ARB PDR Cap-and-Trade Comments

Comment:

Dear Chairman Nichols and Executive Officer Goldstene:

On behalf of 3Degrees, I am pleased to submit the following comments on the ARB Preliminary Draft Regulation for a California Cap-and-Trade Program (See attached).

3Degrees is eager to engage with the ARB to help form policy that achieves AB 32's GHG reduction goals at the minimum cost to our state. If you have any questions or comments, or would like to set up a meeting with 3Degrees, please do not hesitate to contact us. Thank you for your time and consideration and ongoing leadership in implementing California's landmark AB 32 program.

Sincerely,

Gabe Petlin  
Director of Regulatory Affairs  
3Degrees  
San Francisco, CA

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/98-3degrees\\_arb\\_pdr\\_comments\\_1.11.10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/98-3degrees_arb_pdr_comments_1.11.10.pdf)

Original File Name: 3Degrees ARB PDR Comments 1.11.10.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:49:18

No Duplicates.

## Comment 96 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: Cynthia

Last Name: Cory

Email Address: ccory@cfbf.com

Affiliation: California Farm Bureau Federation

Subject: PDR comments

Comment:

January 11, 2010

Ms. Lucille Van Ommering  
Climate Change Cap-and-Trade Section  
California Air Resources Board  
PO Box 2815  
Sacramento, CA 95812

RE: Comments Regarding the Preliminary Draft Regulation for a California Greenhouse Gas Emissions Cap-and-Trade Program

The California Farm Bureau Federation (CFBF) and the California Cattlemen's Association (CCA) appreciate the opportunity to submit the following comments regarding the Preliminary Draft Regulation (PDR) for a California Cap-and Trade Program.

CFBF is a non-governmental, non-profit, voluntary association that represents agricultural interests throughout the state of California and works to find solutions to the challenges faced on farms and in the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 85,000 members in 56 counties. We strive to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

CCA is a statewide trade organization representing California's \$1.85 billion beef industry and all industry sectors from pasture to harvest. Ranchers and beef producers are stewards of our nation's natural resources and own and manage nearly 32 million acres of California range and forestland providing numerous environmental benefits to include carbon sequestration.

The structure of the cap-and-trade program will have significant impact on the future of California's family farms and ranches because they utilize the products and services of many of the entities subject to the mandatory greenhouse gas emission reductions. The fuel and electricity providers that provide our energy inputs and the food processors that add value to the numerous agricultural commodities grown in California will have to pass along even more exorbitant price increases than previously anticipated unless there a number of significant changes in the PDR as noted below:

### Offsets:

We believe that the most cost-effective approach to achieving the emission reduction goal of AB 32 is via a well designed market program that includes a robust offsets program, one with no geographic or quantitative limits. We are very disappointed that the PDR proposes very limited use of offsets and counter to the adopted Scoping Plan is even contemplating limiting those offsets geographically. Such offset restrictions will likely prevent interest and investment in innovative emissions reductions projects

in uncapped sectors, which is a significant missed opportunity for climate change mitigation.

This extreme limitation will result in the loss of cost-containment from the use of offsets especially in the early stages of a cap-and-trade program, when new technologies and best practices are still being developed and implemented by capped sectors. The result will be increased costs of the entire cap-and-trade system and a loss of flexibility during the transitional years post-enactment.

Further, the described approach for development and enforcement of offset protocols is so bureaucratically intensive that it is highly likely that very few authorized/approved offsets will be available for the first compliance period 2012 to 2015 and possibly even up to 2020. If the state's cap and trade program is to truly be cost-effective, CARB must find a way to authorize or approve worldwide offsets with minimal bureaucratic hurdles. Real, permanent, quantifiable, verifiable and additional offsets that are recognized by other emissions trading systems (like the EU ETS) should be automatically accepted for use in California.

#### Cost Containment Principles:

We do not agree that the cost containment mechanisms identified in the PDR will be effective. A robust offsets program along with viable linkage to other programs is the best way to achieve the AB 32 emission reduction goals in the most cost-effective manner.

While some of the soft collar options propose additional availability and use of offsets beyond the contemplated 4% limit they will not result in cost-containment in a timely manner since the planning, implementation, and execution of most offset projects takes a long time to complete and achieve. The soft collar options would need to be signaled and directed years before the offset credits would be required to realistically ease costs.

#### Linkage:

One way to address the availability of plentiful offsets is via linkage to other programs. Unfortunately, the linkage criteria contemplated in the PDR is so stringent that linkage to other programs (even to the WCI) will be so difficult as to make linkage practically impossible. CARB must streamline the linkage criteria to allow California's program access to credits and offsets in other programs worldwide. One of the goals for AB 32 was as a model for the world - that can only happen if California is able to link with other programs

#### Accelerating Transportation Fuels into Cap and Trade by 2012:

We strongly oppose the acceleration of including fuels - transportation fuels and natural gas - under the Cap and Trade Program from 2015 to 2012. CARB is already imposing the LCFS as an early action on the transport sector which will incur its own significant costs and concerns regarding the potential impact on energy supply. These must first be carefully analyzed before further steps are put on the fuel supply of this state.

#### Auction - Transitional Issues:

We believe that CARB has limited authority to conduct anything but a minimal auction to cover administrative costs. Further, even if CARB had broader authority to conduct a more significant auction (via legislative authorization), they must transition from a minimal auction to a more significant auction over the life of the program. CARB must fully consider the potential impact on the economy considering that all capped facilities would have to generate \$14 to 30 billion in a 100% auction at a carbon price of \$20 to 40/ton.

#### Capped Sources:

During the second phase of cap and trade implementation, ARB has proposed to lower the emission threshold to capture additional businesses that emit greenhouse gases through fossil fuel

combustion or the use of natural gas. We are concerned that lowering the threshold below 25,000 MT CO<sub>2</sub>e could then require a number of California farms and ranches to be capped sources. Throughout the AB 32 implementation process, ARB has looked to production agriculture to potentially provide offsets for capped sources to achieve the state's greenhouse gas reduction targets. Dramatically lowering the threshold will weaken the ability for production agriculture to provide real and accurate offsets to help capped sources more cost effectively comply with reduction targets. We oppose production agriculture being included as a capped sector in the second compliance period starting 2015.

We will continue to participate in this regulatory process and appreciate your attention to our concerns.

Cynthia L. Cory  
Director, Environmental Affairs  
California Farm Bureau Federation  
1127 11th Street, Suite 626  
Sacramento, CA 95814

Justin T. Oldfield  
Director of Regulatory Affairs  
California Cattlemen's Association  
1221 H Street  
Sacramento, CA 95814

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/99-pdr\\_011110.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/99-pdr_011110.pdf)

Original File Name: pdr 011110.pdf

Date and Time Comment Was Submitted: 2010-01-11 17:56:42

No Duplicates.

## **Comment 97 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Toby  
Last Name: Janson-Smith  
Email Address: [tjanson@conservation.org](mailto:tjanson@conservation.org)  
Affiliation: Conservation International

Subject: Conservation International comments on Cap & Trade PDR

Comment:

Attached are Conservation International's comments on the PDR for a California Cap-and-Trade Program.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/100-pdr\\_ca\\_cap\\_\\_trade\\_-\\_conservation\\_international\\_comments\\_1-11-10.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/100-pdr_ca_cap__trade_-_conservation_international_comments_1-11-10.doc)

Original File Name: PDR CA cap & trade - Conservation International comments 1-11-10.doc

Date and Time Comment Was Submitted: 2010-01-11 18:18:42

No Duplicates.

## **Comment 98 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Bruce

Last Name: McLaughlin

Email Address: mclaughlin@braunlegal.com

Affiliation:

Subject: PDR Comments of the Offsets Working Group

Comment:

PDR Comments of the Offsets Working Group

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/101-100111\\_owg\\_pdr\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/101-100111_owg_pdr_comments.pdf)

Original File Name: 100111\_OWG\_PDR comments.pdf

Date and Time Comment Was Submitted: 2010-01-11 18:17:53

No Duplicates.

## **Comment 99 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: [sberlin@mccarthylaw.com](mailto:sberlin@mccarthylaw.com)

Affiliation: Northern California Power Agency

Subject: Preliminary Draft Regulation on a Cap-and-Trade Program

Comment:

Attached hereto please find the comments of the Northern California Power Agency on the Cap-and-Trade PDR.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/102-comments\\_re\\_11-24-09\\_cap\\_and\\_trade\\_pdr\\_\\_1-11-10\\_final\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/102-comments_re_11-24-09_cap_and_trade_pdr__1-11-10_final_.pdf)

Original File Name: comments re 11-24-09 cap and trade PDR \_1-11-10 final\_.pdf

Date and Time Comment Was Submitted: 2010-01-11 18:20:54

No Duplicates.

## **Comment 100 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Tamara  
Last Name: Rasberry  
Email Address: [trasberry@sempra.com](mailto:trasberry@sempra.com)  
Affiliation:

Subject: Sempra Comments to PDR

Comment:

Sempra Energy (Sempra) appreciates the opportunity to submit these written comments concerning the Preliminary Draft Regulation (PDR) for a California Cap-and-Trade Program, issued November 24, 2009 and discussed at a December 14, 2009 workshop. We look forward to working with ARB members and staff to develop a cap-and-trade program that accomplishes the goals of the State at a reasonable cost.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/103-sempra\\_comments\\_on\\_capandtrade\\_pdr\\_011110.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/103-sempra_comments_on_capandtrade_pdr_011110.pdf)

Original File Name: Sempra Comments on CapandTrade PDR 011110.pdf

Date and Time Comment Was Submitted: 2010-01-11 18:49:14

No Duplicates.

## Comment 101 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: Joanna

Last Name: Durbin

Email Address: jdurbin@climate-standards.org

Affiliation: Climate, Community & Biodiversity Allian

Subject: comments on preliminary draft regulations

Comment:

California has shown impressive leadership in the development of legislation to mitigate climate change and it is good to see the progress that is being made through the development of these Draft Regulations for a California Cap-and-Trade Program.

It is now understood that the forest sector contributes more than 17% of global greenhouse gas emissions and that activities to reduce emissions from deforestation and forest degradation (REDD) and to contribute to conservation, sustainable management of forests and enhancement of carbon stocks (REDD+) are an essential component of effective climate change mitigation. The greatest potential for REDD+ emissions reductions and removals is in tropical regions of the world, mostly in developing countries where these activities also have tremendous potential to generate significant benefits for some of the poorest communities in the world who rely on forests and healthy ecosystems for their livelihoods and also to conserve biodiversity. The Climate, Community & Biodiversity Alliance provides a mechanism through the Climate, Community & Biodiversity (CCB) Standards to identify projects that deliver robust emissions reductions and removals as well as significant community and biodiversity benefits through a set of objective and comprehensive criteria and an independent auditing system. There are now 17 projects that have completed the audit process and over 85 projects that are under development, each of which represents a real multiple-benefit initiative, verified by a third party. Our experience of REDD+ projects in developing countries shows that REDD+ can be, and is being, implemented in a way that respects the rights and interests of vulnerable people such as Indigenous Peoples and the world's poor, enabling their participation as partners rather than targets of the project to conserve and restore forests and enabling them to achieve their own development goals. REDD+ projects are diversifying and improving long-term livelihood security for rural communities for example by increasing agricultural yields, protecting soil and water resources and generating employment and also conserving biodiversity by restoring and protecting natural ecosystems. These positive social and environmental outcomes are a tremendous additional potential benefit from REDD+ that cannot be delivered at the same scale from any other climate change project type.

There is strong support for the inclusion of REDD+ in UNFCCC and US Federal climate change frameworks currently under discussions and, for the reasons outlined above, REDD+ should be included as an approved offset type in the California and Western Climate Initiative cap-and-trade program. It is good to see that international forestry offsets are included in the concept description for offsets and I look forward to seeing further development of the regulations for this offset type. California is well positioned to lead the way on defining how REDD+ can be integrated into a cap-and-trade program by providing effective and robust offsets, building on California's pioneering work with other states and provinces in the US, Brazil and Indonesia as part of the Governors' Climate and Forests Task Force. While there is an opportunity for leadership, it will also be important to ensure

consistency with emerging consensus and the developing architecture for REDD+ at the national (US Federal) and international (UNFCCC) levels.

While REDD+ has potential to deliver robust emission reductions and to deliver significant social and environmental benefits, there are also risks particularly for Indigenous Peoples and other vulnerable groups, so ARB should ensure effective social and environmental standards and safeguards. I note that the PDR mentions (p.63) that ARB would only approve offset quantification methodologies for project types that address any public health, welfare, social, economic and energy effects and urge clearer guidance on this issue with adoption of effective social and environmental standards for REDD+ activities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 18:56:29

No Duplicates.

## **Comment 102 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Jacob

Email Address: tom.jacob@usa.dupont.com

Affiliation: DuPont Company

Subject: Cap & Trade PDR

Comment:

Attached please find DuPont's comments on the Preliminary Draft Regulation. Thank you. Tom Jacob

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/105-cat\\_comments\\_-\\_dupont\\_-\\_final.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/105-cat_comments_-_dupont_-_final.doc)

Original File Name: CAT Comments - DuPont - Final.doc

Date and Time Comment Was Submitted: 2010-01-11 19:42:54

No Duplicates.

## Comment 103 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.

First Name: Matthew

Last Name: Heberger

Email Address: mheberger@yahoo.com

Affiliation:

Subject: Comments on Cap & Trade Plan

Comment:

Thank you to the State of California and the Air Resources Board for leading the way to reduce greenhouse gas emissions, help stabilize carbon dioxide concentrations in our atmosphere, and, hopefully, avert some of the worst impacts of global warming. I am submitting comments simply as a concerned citizen.

First, the board should research, and the state should consider, "cap and dividend" as an alternative to "cap and trade" market mechanisms to reduce emissions over time. An increasing body of evidence points to this as a better, more fair and stable alternative.

Second, rights to pollute or "allowances" should be auctioned, and not given away for free. No polluter should be grandfathered in. Just because a particular industry or utility has been polluting the atmosphere in the past, they should not be given the right to consider doing so for free. I believe that setting up a blind "all-in" auction is also economically most efficient.

Third, offsets should not be considered as part of the plan. I understand the lure of the idea (why not pay for a re-forestation project in Borneo instead of making actual emissions reductions at power plants in California, especially when they are cheaper?), but offsets will delay the reductions at home (where Californians will enjoy substantial co-benefits such as reduced sulfur dioxide and nitrogen oxide pollution), and delay the technical innovation that California industries and scientists are uniquely capable of creating.

Fourth, the market in emissions allowances should be limited to polluters themselves. We cannot seriously consider allowing big banks and hedge funds to turn carbon into the next toxic asset. I have serious concerns when I read about the amount of lobbying being done by financial institutions. The state must guard against collusion, speculation, and the pursuit of short-term financial gain that will undermine the environmental goals of the program.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-11 19:00:47

No Duplicates.

## **Comment 104 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Bruce

Last Name: Ray

Email Address: bruce.ray@jm.com

Affiliation: Johns Manville

Subject: Johns Manville comments on proposed draft regulation

Comment:

Please see the attached comment letter. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/107-johns\\_manville\\_comments\\_on\\_ab-32\\_pdr\\_\\_1-11-10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/107-johns_manville_comments_on_ab-32_pdr__1-11-10.pdf)

Original File Name: Johns Manville comments on AB-32 PDR; 1-11-10.pdf

Date and Time Comment Was Submitted: 2010-01-11 19:41:02

No Duplicates.

## **Comment 105 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Roger

Last Name: Williams

Email Address: [rwilliams@bluesource.com](mailto:rwilliams@bluesource.com)

Affiliation: Carbon Offset Providers Coalition

Subject: COPC Comments on the PDR for a Cap-and-Trade Program

Comment:

Attached please find the comments of the Carbon Offset Providers Coalition on CARB's PDR for a Cap-and-Trade Program -- and in particular the inappropriately low 4% quantitative usage limit.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/108-copc\\_comments\\_on\\_carb\\_s\\_cap-and-trade\\_pdr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/108-copc_comments_on_carb_s_cap-and-trade_pdr.pdf)

Original File Name: COPC Comments on CARB\_s Cap-and-Trade PDR.PDF

Date and Time Comment Was Submitted: 2010-01-11 20:03:30

No Duplicates.

## **Comment 106 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 107 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Lily

Last Name: Mitchell

Email Address: lmitchell@hanmor.com

Affiliation: SCPPA

Subject: Comments of SCPPA on Preliminary Draft Regulation

Comment:

Please find attached the comments of the Southern California Public Power Authority on the Preliminary Draft Regulation for a California cap-and-trade program (dated November 24, 2009).

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/110-300226001nap01111001\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/110-300226001nap01111001_final.pdf)

Original File Name: 300226001nap01111001 Final.pdf

Date and Time Comment Was Submitted: 2010-01-11 20:42:17

No Duplicates.

## **Comment 108 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Kelly

Last Name: Keenan Aylward

Email Address: [kaylward@wcs.org](mailto:kaylward@wcs.org)

Affiliation: Wildlife Conservation Society

Subject: Wildlife Conservation Society comments - Cap & Trade PDR

Comment:

Please find attached WCS's comments on California's PDF Cap and Trade Regulation

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/111-wcs\\_comments\\_-\\_ca\\_draft\\_cap\\_\\_\\_trade\\_regs.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/111-wcs_comments_-_ca_draft_cap___trade_regs.doc)

Original File Name: WCS comments - CA draft cap & trade regs.doc

Date and Time Comment Was Submitted: 2010-01-11 20:39:48

No Duplicates.

## **Comment 109 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 110 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Michael

Last Name: Lovett

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: cap and trade

Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/113-112-a\\_few\\_weeks\\_ago\\_in\\_the\\_daily\\_journal.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/113-112-a_few_weeks_ago_in_the_daily_journal.doc)

Original File Name: 112-a\_few\_weeks\_ago\_in\_the\_daily\_journal.doc

Date and Time Comment Was Submitted: 2010-01-13 08:06:34

No Duplicates.

## **Comment 111 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Keith

Last Name: Adams

Email Address: ombcomm@arb.ca.gov

Affiliation: Air Products and Chemicals, Inc

Subject: RE: Comments regarding November 24th Preliminary Draft Regulation for a Cap & Trade  
Comment:

see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/114-air\\_products\\_comments\\_-\\_preliminary\\_draft\\_cap\\_and\\_trade\\_rule.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/114-air_products_comments_-_preliminary_draft_cap_and_trade_rule.pdf)

Original File Name: Air Products Comments - Preliminary Draft Cap and Trade Rule.pdf

Date and Time Comment Was Submitted: 2010-01-13 08:18:54

No Duplicates.

## **Comment 112 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Kyle

Last Name: Boudreaux

Email Address: ombcomm@arb.ca.gov

Affiliation: NextEra Energy

Subject: Comments Submitted by NextEra Energy Resources

Comment:

See attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/116-nextera\\_energy\\_comments\\_to\\_carb\\_pdr\\_01\\_11\\_2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/116-nextera_energy_comments_to_carb_pdr_01_11_2010.pdf)

Original File Name: NextEra Energy comments to CARB PDR 01\_11\_2010.pdf

Date and Time Comment Was Submitted: 2010-01-13 08:27:34

No Duplicates.

## **Comment 113 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Stephen

Last Name: Maguin

Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)

Affiliation: Los Angeles County Sanitation Districts

Subject: Comments for Preliminary Draft Cap-and-Trade Regulation

Comment:

see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/117-01\\_10\\_draft\\_pdr\\_comments\\_final\\_draft.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/117-01_10_draft_pdr_comments_final_draft.pdf)

Original File Name: 01\_10\_draft PDR Comments\_Final Draft.pdf

Date and Time Comment Was Submitted: 2010-01-13 08:32:10

No Duplicates.

## **Comment 114 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 115 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Tara

Last Name: Marchant

Email Address: ombcomm@arb.ca.gov

Affiliation: Greenlining Institute

Subject: The Greenlining Institute Comments on Carbon Pricing Mechanism

Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/119-20100111\\_gli\\_comment\\_ab32\\_capandtrade.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/119-20100111_gli_comment_ab32_capandtrade.pdf)

Original File Name: 20100111\_GLI\_Comment\_AB32\_CapandTrade.pdf

Date and Time Comment Was Submitted: 2010-01-13 08:40:29

No Duplicates.

## **Comment 116 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: JOHN W.

Last Name: BUSTERUD

Email Address: ombcomm@arb.ca.gov

Affiliation: PG&E

Subject: PG&E's Comments on the Air Resources Board's November 24, 2009 Preliminary Draft Reg  
Comment:

see attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/120-pgespdrcommentswithattachment.pdf>

Original File Name: PGEsPDRCommentsWithAttachment.pdf

Date and Time Comment Was Submitted: 2010-01-13 08:43:58

No Duplicates.

## **Comment 117 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Bob  
Last Name: Lucas  
Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)  
Affiliation: CCEEB

Subject: CCEEB's comment letter re 11/24/09 Preliminary Draft Regulation for A California Cap  
Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/121-cceeb\\_comment\\_ltr\\_re\\_11\\_24\\_09\\_preliminary\\_draft\\_reg.\\_for\\_cap\\_\\_\\_trade.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/121-cceeb_comment_ltr_re_11_24_09_preliminary_draft_reg._for_cap___trade.pdf)

Original File Name: CCEEBs Comment Ltr re 11\_24\_09 Preliminary Draft Reg. for Cap & Trade.pdf

Date and Time Comment Was Submitted: 2010-01-13 08:47:21

No Duplicates.

## **Comment 118 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Jamie

Last Name: Fine

Email Address: ombcomm@arb.ca.gov

Affiliation: Environmental Defense Fund

Subject: Re: Comments on AB32 Cap-and-trade Preliminary Draft Rule

Comment:

see attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/122-ab32captrade.pdr.edfcomments.pdf>

Original File Name: AB32captrade.PDR.EDFComments.pdf

Date and Time Comment Was Submitted: 2010-01-13 08:54:03

No Duplicates.

## **Comment 119 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Ralph  
Last Name: Moran  
Email Address: ombcomm@arb.ca.gov  
Affiliation: BP

Subject: BP's comments on the PDR

Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/123-bp\\_comment\\_ltr\\_on\\_carb\\_pdr\\_1\\_10.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/123-bp_comment_ltr_on_carb_pdr_1_10.zip)

Original File Name: BP comment ltr on CARB PDR 1 10.ZIP

Date and Time Comment Was Submitted: 2010-01-13 08:56:39

No Duplicates.

## **Comment 120 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Marc J.

Last Name: Meteyer

Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)

Affiliation: Compressed Gas Association, Inc.

Subject: The Compressed Gas Association's Comments regarding Preliminary Draft Regulation for  
Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/124-cga\\_response\\_to\\_carb.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/124-cga_response_to_carb.pdf)

Original File Name: CGA Response to CARB.pdf

Date and Time Comment Was Submitted: 2010-01-13 09:34:18

No Duplicates.

## **Comment 121 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Lisa

Last Name: Jacobson

Email Address: ombcomm@arb.ca.gov

Affiliation: Business Council for Sustainable Energy

Subject: BCSE Comments on the PDR for a California Cap-and-Trade Program

Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/125-bcse\\_comments\\_on\\_capdr\\_fnl\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/125-bcse_comments_on_capdr_fnl_.pdf)

Original File Name: BCSE Comments on CAPDR\_FNL\_.pdf

Date and Time Comment Was Submitted: 2010-01-13 11:04:26

No Duplicates.

## **Comment 122 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Clare

Last Name: Breidenich

Email Address: ombcomm@arb.ca.gov

Affiliation: Western Power Trading Forum

Subject: Comments of the Western Power Trading Forum On the California Air Resources Board's  
Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/126-1-\\_13-\\_09\\_wptf\\_comments\\_on\\_cap-and-trade\\_pdr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/126-1-_13-_09_wptf_comments_on_cap-and-trade_pdr.pdf)

Original File Name: 1- 13- 09 WPTF Comments on Cap-and-Trade PDR.pdf

Date and Time Comment Was Submitted: 2010-01-13 11:08:01

No Duplicates.

## **Comment 123 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Paul

Last Name: Buttner

Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)

Affiliation: California Rice Commission

Subject: Comments on Cap-and-Trade Preliminary Draft Regulation

Comment:

see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/127-crc\\_commentlett\\_cap\\_trade1\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/127-crc_commentlett_cap_trade1_.pdf)

Original File Name: CRC\_CommentLett(Cap&Trade1).pdf

Date and Time Comment Was Submitted: 2010-01-13 15:12:22

No Duplicates.

## **Comment 124 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: ombcomm@arb.ca.gov

Affiliation: The Nature Conservancy

Subject: Comments from The Nature Conservancy on the PDR

Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/128-tncpdrcommentsfinal01\\_11\\_10.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/128-tncpdrcommentsfinal01_11_10.doc)

Original File Name: TNCPDRCommentsFinal01\_11\_10.doc

Date and Time Comment Was Submitted: 2010-01-20 08:02:56

No Duplicates.

## **Comment 125 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Tomas  
Last Name: Garza  
Email Address: ombcomm@arb.ca.gov  
Affiliation: Covanta Energy

Subject: Covanta Energy California Cap-and-Trade Program Comments  
Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/129-cap\\_and\\_trade\\_comments\\_1-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/129-cap_and_trade_comments_1-11.pdf)

Original File Name: Cap and Trade Comments\_1-11.pdf

Date and Time Comment Was Submitted: 2010-01-20 08:08:23

No Duplicates.

## **Comment 126 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: William

Last Name: Barrett

Email Address: ombcomm@arb.ca.gov

Affiliation: American Lung Association

Subject: Public Health comments on cap and trade PDR

Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/130-public\\_health\\_comments\\_on\\_cap\\_and\\_trade\\_pdr\\_1.19.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/130-public_health_comments_on_cap_and_trade_pdr_1.19.pdf)

Original File Name: Public health comments on cap and trade PDR 1.19.pdf

Date and Time Comment Was Submitted: 2010-01-20 08:12:10

No Duplicates.

## **Comment 127 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: John

Last Name: McCaull

Email Address: ombcomm@arb.ca.gov

Affiliation: The Geothermal Energy Association

Subject: GEA Comments on Cap and Trade PDR

Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/131-gea\\_comments\\_on\\_pdr\\_ca\\_cap\\_and\\_trade\\_regs\\_01-11-10\\_final.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/131-gea_comments_on_pdr_ca_cap_and_trade_regs_01-11-10_final.doc)

Original File Name: GEA Comments on PDR CA Cap and Trade Regs 01-11-10 Final.doc

Date and Time Comment Was Submitted: 2010-01-25 13:56:09

No Duplicates.

## **Comment 128 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: gary

Last Name: siewert

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: Cap and trade

Comment:

Please do not implement cap and trade. It will kill most business in California. Global warning is a cult. The new diesel regulations have put several thousand truckers in just a week. You must see thru this and stop

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-25 13:56:09

No Duplicates.

## **Comment 129 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Rosita

Last Name: Hill

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: Comments on Cap and Trade PDR

Comment:

see attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/133-691979v1.pdf>

Original File Name: 691979v1.PDF

Date and Time Comment Was Submitted: 2010-01-28 09:50:23

No Duplicates.

## **Comment 130 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Haya

Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)

Affiliation: Energy and Resources Group

Subject: Comments on the offsets provisions in the CA cap and trade Preliminary Draft Reg

Comment:

see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/134-haya\\_comments\\_on\\_offsets\\_in\\_ab32\\_pdr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/134-haya_comments_on_offsets_in_ab32_pdr.pdf)

Original File Name: Haya comments on offsets in AB32 PDR.pdf

Date and Time Comment Was Submitted: 2010-01-28 09:50:23

No Duplicates.

## **Comment 131 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Randal  
Last Name: Friedman  
Email Address: ombcomm@arb.ca.gov  
Affiliation: Navy Region Southwest

Subject: RE: CAP AND TRADE COMMENTS

Comment:

See attachment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/135-dod\\_cmmnts\\_to\\_prelim\\_drft\\_cap\\_\\_trade\\_reg.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/135-dod_cmmnts_to_prelim_drft_cap__trade_reg.pdf)

Original File Name: DoD Cmmnts to Prelim Drft Cap & Trade Reg.PDF

Date and Time Comment Was Submitted: 2010-02-26 13:04:32

No Duplicates.

## **Comment 132 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Alice  
Last Name: Kaswan  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: comments on the PDR

Comment:

See attachment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/136-kaswan\\_pdr\\_comments.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/136-kaswan_pdr_comments.doc)

Original File Name: kaswan PDR comments.doc

Date and Time Comment Was Submitted: 2010-03-30 13:33:03

No Duplicates.

## **Comment 133 for Cap & Trade PDR (dec-14-pdr-ws) - 1st Workshop.**

First Name: Richard  
Last Name: Robinson  
Email Address: ombcomm@arb.ca.gov  
Affiliation: Stanislaus County

Subject: Comments on Cap-and-Trade PDR December 14  
Comment:

See attachment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/137-stanislaus\\_county\\_3\\_2\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/dec-14-pdr-ws/137-stanislaus_county_3_2_.pdf)

Original File Name: Stanislaus County (3) (2).pdf

Date and Time Comment Was Submitted: 2010-06-10 14:44:06

No Duplicates.

**There are no comments posted to Cap & Trade PDR (dec-14-pdr-ws) that were presented during the Workshop at this time.**