



August 11, 2014

VIA ELECTRONIC SUBMISSION

Clerk of the Board, Air Resources Board
1001 I Street, Sacramento, CA 95814

Re: Proposed Amendments to the California Cap on Greenhouse Gas Emissions and
Market-Based Compliance Mechanisms (hereinafter "Cap-and-Trade Program")

Roll Law Group P.C., on behalf of Paramount Farms International LLC ("Paramount Farms"), appreciates the opportunity to provide comments to the California Air Resources Board ("ARB") regarding the proposed amendments for the Cap-and-Trade Program.

Paramount Farms is the world's largest vertically integrated grower and processor of pistachios and almonds, representing approximately 60% of all pistachios processed in California and over 550 California pistachio growers. Collectively, we farm approximately 75,000 acres of pistachios and almonds across the Central Valley and deliver nearly 280 million pounds of pistachios and 140 million pounds of almonds to our customers annually.

ARB staff is proposing to modify section 95830(f)(1) to increase the length of time that entities will have for complying with the requirements to update information on corporate associations. Changes to the regulations would effectively extend the reporting requirements from a "quarterly" responsibility to "at least annually." We support the proposed amendment to section 95830(f)(1). Updating corporate association information quarterly would impose a significant regulatory burden. Annual updating of this information will serve the purposes intended by the regulation – ensuring transparency and preventing market manipulation – while reducing the regulatory burden on covered entities.

Paramount Farms recommends that ARB finalize the regulations with the proposed amendment to section 95830(f)(1). We appreciate the opportunity to provide our feedback and are available to discuss should staff require additional information.

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Respectfully Submitted,



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