

Comments ARB Proposed Cap-and-Trade Adaptive Management Process due 12.4.2015

ADAPTIVE MANAGEMENT does not appear in:

Article 5: CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS
Subarticle 2: Purpose and Definitions
§ 95802. Definitions.

Management appears in another form as *management activity*.

*(177) "Offset Project Commencement" means, unless otherwise specified in a Compliance Offset Protocol, the date of the beginning of construction, work, or installation for an offset project involving physical construction, other work at an offset project site, or installation of equipment or materials. For an offset project that involves the implementation of a **management activity**, "offset project commencement" means, unless otherwise specified in a Compliance Offset Protocol, the date on which such activity is first implemented.*

We question there is a clear and concise definition of *ADAPTIVE MANAGEMENT*. The appearance is that any baseline is replaced with scenarios. Reductions are not based in fact, or even monitoring.

You do not indicate the number of monitoring stations to be used or even the need to increase monitoring stations for more accurate data collection. The *ADAPTIVE MANAGEMENT* appears to be a trend process and not a point source mitigation. We see no attempt for monitoring at even individual facilities yet you indicate such monitoring. Analysis seems to be current year-to prior year only. Historic data is not used because there is no baseline. You plan to use data in the *aggregate*, again without point source identification and reduction.

It is not clear why health is being analyzed on such poor data for such a short period.

Cap-and-Trade is an offset process with monetary compensation.

In the Proposed Process Flowchart, you use:

Criteria Pollutant and Toxic Air Contaminant Inventory

This means that the so-called baseline may not be the sources of poor air quality, but only one criteria to satisfy a modeling or scenario.

Many state agencies are allocated Cap-and-Trade or Greenhouse Gas Reduction funding. We do not see how ADAPTIVE MANAGEMENT suffices for all the agencies.

Since other agencies, such as the State Water Resource Control Board is also applying ADAPTIVE MANAGEMENT, it become confusing without distinct definitions and actions involved.

You did not address the applicability of ADAPTIVE MANAGEMENT in the CEQA process. We understand that it cannot apply per court decisions. Please address.

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