

ELECTRONIC SUBMISSION

April 28, 2017

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

Re: U.S. Borax Comments on the Second 15-Day Amendment Text to Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation

Dear Chair Nichols and Members of the Board:

U.S. Borax, part of Rio Tinto Borates, is pleased to submit the following comments on the California Air Resources Board's Second 15-Day Amendment Text to the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation issued on April 13, 2017 ("Second 15-Day Amendment Text"). U.S. Borax has been an active participant in the Board's development and implementation of the California Cap-and-Trade Regulation.

With respect to the treatment of borate mining and manufacturing for purposes of industry assistance, U.S. Borax is supportive of the approach proposed in the Second 15-Day Amendment Text. In particular, U.S. Borax agrees with the decision to split the NAICS Sector Code 212391 into two activities: Mining and Manufacturing of Soda Ash and Related Products and Mining and Manufacturing of Borates, Proposed Table 9-1. U.S. Borax also supports the decision to provide industry assistance to borate miners and manufacturers under the product output-based allocation methodology and the proposed emissions efficiency benchmark for borate mining and manufacturing. Finally, U.S. Borax agrees with the proposed definition of "Boric Oxide Equivalent" and the "Method to Determine the Boric Oxide Equivalent in Borate Products." Proposed § 95802.

U.S. Borax commends the Board and its staff for the time and effort they have spent to understand the borate mining and manufacturing industry. We appreciate your consideration of these important issues.

Sincerely,



Nicol Gagstetter
Director External Affairs, Communities and Communications
Rio Tinto Borates
8051 E. Maplewood Ave., Building 4
Greenwood Village, CO 80111
Nicol.gagstetter@riotinto.com
(303) 713-5236