



The Climate Registry

September 1, 2015

California Air Resources Board
Sacramento, California

To Whom It May Concern:

The Climate Registry (TCR), a non-profit organization that helps hundreds of public and private organizations measure, report and reduce their greenhouse gas emissions with integrity and operates the only carbon footprint registry in North America supported by states, provinces, territories and tribes, would like to offer the following comments in response to the Air Resources Board's (ARB) Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan.

TCR applauds ARB's prioritization of laying the groundwork to support the ongoing transition toward a low-carbon economy post 2020. Investing in education and systems now to drive carbon reductions over the long term will support California's mid and long term climate targets and goals.

As part of this strategy, TCR encourages ARB to consider supporting programs that will help organizations measure and better understand their impacts on climate change in order to identify innovative approaches to reducing emissions. Providing these resources to businesses and sectors, such as small and medium sized business, who will not be subject to many of the state's direct regulations, will help drive complementary reductions to help California meet its climate targets.

TCR has seen proof that what gets measured gets managed within our own membership base. In a recent study of 50 organizations across a wide variety of sectors we saw an average GHG emission reduction of 20 percent over just 5 years of continued public, verified carbon footprint reporting. Continuous public reporting is an especially strong driver for ongoing emission reductions that require changes in behavior, as the impacts of that behavior are reviewed and publicly documented annually.

Multi-year subsidies to California-based organizations to participate in TCR and secure third party verification of their carbon footprints will enable more public and private organizations to find opportunities to reduce GHG emissions within their operations and in their supply chains. This ongoing support of public verified carbon footprint reporting is often needed to first educate organizations about their carbon footprints and then ingrain low-carbon behaviors in standard business operations.

We greatly appreciate this opportunity to provide feedback on the Concept Paper for the Cap-and Trade Auction Proceeds Second Investment Plan. Please do not hesitate to contact us if we can be of any additional assistance.

Sincerely,

David Rosenheim
Executive Director
The Climate Registry