July 5, 2018

RE: CAP-AND-TRADE REGULATION COMMENTS

California Air Resource Board and Staff,

Comite Civico del Valle would like to thank you for allowing us to offer input regarding the Potential Amendments to Cap-and-Trade Regulation Workshop, June 21, 2018.

It is CCV’s understanding, in accordance with AB 398, that the definition of a Direct Environmental Benefit project (DEBs) is *the reduction or avoidance of emissions of any air pollutant in the state or the reduction or avoidance of any pollutant that could have an adverse impact on waters of the state*. We further comprehend this requirement to be dichotomized as follows:

* Offset projects that, after satisfying CARB specified standards, generate a DEB. This would include water pollution reducing projects either located in California or adjacent to a body of water flowing into California.
* Offset projects that fail to fulfill DEBs requirements as specified per CARB’s standards. These projects can then be reviewed by CARB on an individual basis to uphold their case, a process that has yet to be defined by CARB.

Although this dichotomy is beneficial by establishing rules for inclusion and allowing potential projects to justify their case individually, it fails to specifically detail or limit the process in justifying a project as providing a DEB. Furthermore, DEBs, by this definition, are diverted to other states as opposed to disadvantaged communities in California.

It is our recommendation that direct environmental benefits to California air or water quality must be well defined, in detail, by CARB. We believe the process to argue each case individually must be determined and outlined as well. CCV understands the complexity of this dilemma to implement both the legislative intent of AB 398 and CARB’s regulations with respect to interstate commerce regulation. We believe this will be most beneficial to all communities of California, specifically our most disadvantaged.