

December 15, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814
Via web submission



Re: Inclusion of Cap-and-Trade beyond 2020

Thank you for the opportunity to provide these comments regarding the 2030 Target Scoping Plan Discussion Draft dated December 2, 2016.

Origin Climate is a California-based company whose mission is to combat climate change by bringing emission reduction projects to fruition. Over the past decade, we have worked with dozens of projects in sustainable agriculture to produce high-quality carbon offsets.

We believe that the 2030 Target Scoping Plan Scenario that includes Cap-and-Trade will be most beneficial for California residents and the only way to achieve the 2030 target while minimizing social costs. Further, we believe that ARB should not further restrict the use of offsets as a means to achieve reductions of criteria air pollutants. We provide the following reasons:

1. **Offset projects result in compelling environmental benefits** in rural and disadvantaged communities in California and across the United States. These benefits include GHG emission reductions but also impacts such as water conservation or improved water quality.
2. **GHG emissions are different than other air pollutants** and require separate regulatory tools for management. To the extent that local air pollutants continue to be problematic in certain areas, the appropriate response is to strengthen the programs that address those pollutants instead of driving up the cost of California's effort to reduce GHGs.
3. **Economic justice will be diminished** as the price of gasoline and electricity will rise further without the use of GHG cost control mechanisms like offsets. This would disproportionately impact lower-income households.
4. **Cap-and-Trade is working** to achieve direct emission reductions at large stationary sources in addition to other sources. Offsets only represent a small portion of the overall emission reductions that will be achieved while the annual cap on emissions continues to decline.

Thank you again for your ongoing work on the critical issue of addressing climate change, and for the opportunity to comment here.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Facciola'.

Nick Facciola
Director of Carbon Projects