



**California Council for Environmental and Economic Balance**

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March 24, 2016

The Honorable Mary Nichols  
Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Draft Aliso Canyon Methane Leak Climate Impacts Mitigation Program**

Dear Chair Nichols:

On behalf of the members of the California Council for Environmental and Economic Balance (CCEEB), we appreciate the opportunity to comment on the Draft Aliso Canyon Methane Leak Climate Impact Mitigation Program. CCEEB is a non-profit, non-partisan association of business, labor, and public leaders, which advances balanced policies for a strong economy and a healthy environment.

CCEEB is concerned with the ARB staff decision to use a 20-year time horizon for converting the methane emissions to CO<sub>2</sub>e rather than the 100-year time horizon currently used in Cap-and-Trade.

A 100-year global warming potential (GWP) value is the current internationally accepted standard used across myriad State and Federal regulatory regimes including the ARB's own Cap-and-Trade, Low Carbon Fuel Standard, and Greenhouse Gas (GHG) Inventory programs.

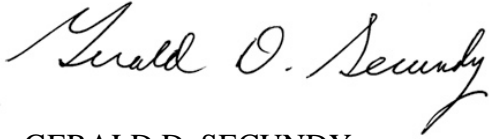
At the January 15, 2016 ARB workshop on the California GHG Inventory, staff explained that it currently uses GWP values from the Intergovernmental Panel on Climate Change's (IPCC) 4th Assessment Report as this is, "consistent with national and international organizations" (slide 8). The IPCC uses the 100-year GWP value. Divergence from national and international scientific norms should be pursued through a formal, deliberate and transparent rulemaking process.

CCEEB was pleased to see ARB's recommendation that the draft mitigation program focus on methane reduction. We support the consideration of opportunities for methane reduction projects, especially from the landfill, wastewater and agricultural sectors, which would readily meet the goals of the mitigation program and of the Short-Lived Climate Pollutant Reduction Strategy.

CCEEB thanks the ARB for considering our brief comments on the Draft Aliso Canyon Methane Leak Climate Impacts Mitigation Program. We hope that staff will consider maintaining consistency across the climate change policy and use the IPCC 4<sup>th</sup> assessment GWP values.

Please contact me or Jackson R. Gualco, Kendra Daijogo or Mikhael Skvarla, CCEEB's governmental relations representatives at The Gualco Group, Inc. at (916) 441-1392 should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Gerald D. Secundy". The signature is written in black ink and is positioned above the printed name and title.

GERALD D. SECUNDY  
President

cc: The Honorable Members of the Air Resources Board  
Mr. Richard Corey  
Ms. Edie Chang  
Dr. Steve Cliff  
Mr. Bill Quinn  
Ms. Janet Whittick  
The Gualco Group, Inc.