

Land O'Lakes, Inc

Dairy Foods

April 28, 2017

VIA ELECTRONIC SUBMISSION

Clerk of the Board, Air Resources Board
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WESTERN REGION

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RE: PROPOSED AMENDMENTS TO THE REGULATION FOR THE MANDATORY REPORTING OF GREENHOUSE GAS EMISSIONS (Second 15-day Modifications)

Land O'Lakes, Inc ("Land O'Lakes"), on behalf of its dairy production facility in Tulare, California, appreciates the opportunity to provide comments to the California Air Resources Board ("ARB") in regards to the proposed second 15-day modifications to proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions ("Proposed Modification"), which is posted on April 13, 2017 on ARB's website.

In general, Land O'Lakes would like to express genuine gratitude and appreciation to ARB staff for taking the comment of industry into consideration during this rule-making process. Although Land O'Lakes agrees with most of proposed modifications related to Dairy Product industry, we have a serious concern regarding the proposed changes to move the deadline to complete verification of the annual greenhouse (GHG) emission data reports earlier by approximately 22 calendar days from September 1 to August 10 each year.

Land O'Lakes is opposed to the proposed modification to the verification deadline because it will result in less amount of time available for reporting and verification entities to work together to complete the verification process. We sense that ARB is likely not taking into consideration other day-to-day compliance and other regulatory work activities that the reporting industry staff and verifiers perform while handling the verification project each year. The proposed earlier deadline will cause additional pressure and burden to both parties and may lead to a compromise in the data and verification work quality. As such, Land O'Lakes respectfully request that ARB leave the September 1 verification date, as stated in the current versions of the regulation.

Sincerely,



Douglas W Findley
Environmental Engineer - Land O'Lakes
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