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California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject:

Public Review Comments for 2013 Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms

Reference:

Revised Recycled Boxboard Manufacturing Benchmark, Table 9-1, Section 95891

Dear Members of the Board:

We are pleased with ARB staff decision to revise the benchmark for the Recycled Boxboard Manufacturing sector from 0.499 to 0.516. By incorporating an additional year in the benchmark calculation, the new benchmark is now a truer reflection of the greenhouse gas emissions from the boxboard process. As an energy-intensive, trade-exposed facility, the increase in the allocation from this benchmark will allow us to compete better in the marketplace. We face severe competition from China, North Korea, Mexico, and US facilities outside California, so this adjustment is very important to Graphic Packaging International and its ability to maintain a manufacturing presence in California. Should you have any questions regarding these comments or the revised benchmark, please call me at (770) 240-7922.

Sincerely,


Andrew H. Johnson

Copies:

William Buchan, Market Potential, Inc.