

CALIFORNIA CATTLEMEN'S ASSOCIATION

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8/11/2011

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

Dear Chairwoman Nichols,

The California Cattlemen's Association (CCA) appreciates the opportunity to comment on the 15 day changes being proposed to the greenhouse gas Mandatory Reporting Rule (MRR). CCA represents California ranchers and beef producers who manage nearly 32 million acres of California rangeland and produce safe and healthy beef for California, the United States and the growing population throughout the world.

CCA applauds the Air Resources Board (ARB) for including language in the MRR section (f)(7) that clarifies that emissions from livestock operations are not subject to the MRR provisions, and the alignment of the MRR with the federal mandatory reporting program will not apply to 40 Federal Code of Regulations Part 98, Subpart JJ. This clause is consistent with the fact that greenhouse gas emissions associated with livestock production both in California and at the national level are negligible. Almost all emissions associated with livestock production are biogenic and are the result of ruminant animals converting feed and forage to energy during digestion and therefore cannot be controlled.

CCA appreciates the opportunity to comment on the 15 day changes proposed to the MMR and would urge ARB to incorporate the suggestions noted above in the final regulations. If you have any additional questions, please don't hesitate to contact me directly.

Sincerely,

Justin Oldfield
Director of Government Relations



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