

Comment 1 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Melissa

Last Name: Poole

Email Address: melissap@paramountfarming.com

Affiliation:

Subject: Comments to Proposed Amendments in Section 95830

Comment:

Comments to ARB regarding the proposed amendments to Section 95830(f)(1) are attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-capandtrade14-VSVWNgFpWFQDZFU3.pdf'

Original File Name: PFI AB 32 Comments.pdf

Date and Time Comment Was Submitted: 2014-08-11 15:25:24

No Duplicates.

Comment 2 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Patrick

Last Name: Wood

Email Address: patrick@agmethaneadvisors.com

Affiliation: Ag Methane Advisors

Subject: Comments on COP Livestock Protocol 7.29.14 draft

Comment:

To whom it may concern, Thank you for the opportunity to submit comments regarding amendments to the Cap and Trade program. Attached please find Ag Methane Advisors comments which are focused on the 7.29.14 draft of the COP Livestock Protocol. Thank you,
Patrick

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-capandtrade14-UzJXNgNvAzVWJAJq.pdf'

Original File Name: AgMeth_CommentsRE_CARB_COP_Livestock_7.29.14 Draft v2.pdf

Date and Time Comment Was Submitted: 2014-08-26 10:53:32

No Duplicates.

Comment 3 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: greg

Last Name: forrester

Email Address: sierramm@sbcglobal.net

Affiliation: gasoline station owner

Subject: Native american owned gas station

Comment:

I was interested if our local indian tribe will have to follow Cap and Trade rules beginning at first of year. We have a gas station in our area owned by a local Indian tribe. It is named Eagle Feather Trading Post. It s located outside Porterville on HWY 190 in Tulare county. They import their fuel from Nevada. They admit they do not pay any excise or sales tax. They always have some of the cheapest gas in the state. Will they have to start purchasing fuel in the state. Your response will be greatly appreciated

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-08-27 17:42:42

No Duplicates.

Comment 4 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Ron
Last Name: Birchard
Email Address: ronbirchard@gmail.com
Affiliation:

Subject: capandtrade14
Comment:

I am writing to voice my opposition to the gas tax associated with the cap and trade the will be effective Jan. 1, 2015. This tax will do nothing but drag California back into the recession. You cannot take 2 billion dollars out of the economy and not expect huge economic repercussions. Such as business, closing, layoffs, home foreclosures. This tax will hit every person in the state and especially hurt the working person/family who are just now trying to work their way out of the recession.

This tax will force people to move out of state as they cannot afford to live here or their are no jobs to be had that they can get to support their families.

Their are parts of the state that are still experiencing high unemployment, such as the central valley and this will just knock the legs out from underneath whatever ground the people might have gained back.

The people will pay twice for this tax, first for their own vehicles and then in the form of higher prices for the items they have to have to survive (ie: food)

So please do the people of this state a favor and eliminate this tax as there is absolutely nothing good that come from it in the way of helping the people of Ca. to provide for their families.

Remember every dollar that comes out of the economy in the form of a tax is one less dollar that the people have in their pockets to save, or purchase items to continue to make the economy grow.

So, use common sense and eliminate this tax for the good of every working person and retired person in the state.

Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-09-03 16:23:39

No Duplicates.

Comment 5 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Jeff
Last Name: Cohen
Email Address: jcohen@eosclimate.com
Affiliation: EOS Climate, Inc.

Subject: Proposed ODS Offsets Protocol
Comment:

Comments attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-capandtrade14-UjdTOgR2VFgGbWnn.pdf'

Original File Name: EOS_ODS Protocol_Sept 2014.pdf

Date and Time Comment Was Submitted: 2014-09-04 21:03:20

No Duplicates.

Comment 6 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Derik

Last Name: Broekhoff

Email Address: derik@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: CAR Comments on Updated Compliance Offset Protocols

Comment:

The Climate Action Reserve respectfully submits the following comments and suggestions regarding the July 2014 proposed updates to the Livestock Project Compliance Offset Protocol and Ozone Depleting Substances Project Compliance Offset Protocol, as well as the proposed quantification methodology changes to the U.S. Forest Compliance Offset Protocol. We appreciate the Air Resources Board's efforts to improve the clarity, usability, and effectiveness of these protocols and we offer the following comments based on our own experience regarding their interpretation and application, including experience with similar protocols administered under the Climate Action Reserve's voluntary offset program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-capandtrade14-AmFVPwFpAjwGYQB0.pdf>'

Original File Name: Climate Action Reserve Comments on ARB Compliance Protocols (September 2014).pdf

Date and Time Comment Was Submitted: 2014-09-05 17:27:45

No Duplicates.

Comment 7 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: KEN

Last Name: BRILLIANT

Email Address: kenbrilliant49@gmail.com

Affiliation:

Subject: green house carbon emissions

Comment:

I hope you find my subject heading a bit humorous because I really don't know what the term means. The fact of the matter of why I am writing you this memo, is that I can't find the real science anywhere, that carbon or carbon dioxide is a pollutant. I feel this element and that compound have be re-defined as such by environmentalists who are propagating the greatest myth today -- global warming caused by man-made pollutants.

Please show me the science. I'm not convinced that California, or any state of the union for that matter, is under threat of pollution. My memory serves me well enough, that when I was just a youngster, growing up in the San Francisco East Bay Area, I could smell the morning smog emanating from the Martinez refineries and exhaust smog from the cars of that era. There was a real noticable sign of air pollution and that pollution came from obvious sources.

Although my lungs did not suffer by it, the smell was obvious and poor air quality was mildly annoying. That was then in the '70's. Since about mid 1980's and forward, the air has cleaned up significantly to the point I don't smell any car exhaust pollution lingering, and the oil refineries still in operation today are not longer belching out any obnoxiousness (to reinforce my recollection of how it was, I recall the jokes my brothers and I made that while driving up to Lake Tahoe while passing the martinez refineries on the way, we would laugh and joke "look, it's the booger factory!". That was the rotten egg-smell like odor which is an odor no longer present today).

Today, long after the EPA's successful achievement in controlling air pollution from "all angles", cars have cleaner exhaust, refineries have scrubbers, and the air quality is restored. No signs of pollution can be smelled in the air. Ever.

This is simply my own account of how at one time pollution in water and in air was an issue in this country. With the advent of the EPA, created by President Nixon, this agency has performed its function to a sense of completion.

Unfortunately, the EPA is not stopping, but going beyond the call of duty. How will the EPA effect the production of cheap energy...

... I don't know. I think we need to abolish the EPA. They were needed back in the days of Nixon, but now?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-09-06 06:16:29

No Duplicates.

Comment 8 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Roger
Last Name: Williams
Email Address: rwilliams@bluesource.com
Affiliation:

Subject: Blue Source comment letter regarding proposed changes to forest projects protocol
Comment:

Members of California Air Resources Board,

Please find attached a comment letter regarding the proposed changes to the Compliance Offset Protocol for U.S. Forest Projects.

Thank you for your consideration of the points articulated in this letter.

Roger Williams
President
Blue Source

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-capandtrade14-UTMAalYiAzUDWgNw.pdf'

Original File Name: Blue Source Comment Letter re ARB Forestry Protocol Changes 9 10 14.pdf

Date and Time Comment Was Submitted: 2014-09-10 21:15:09

No Duplicates.

Comment 9 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Kelle

Last Name: Vigeland

Email Address: kvigelan@wm.com

Affiliation: Wheelabrator Technologies, Inc

Subject: Comments on Proposed Cap and Trade Revision

Comment:

Please see attached Wheelabrator Technologies, Inc. comments.
Please disregard the previously submitted comments which addressed
GHG MRR revisions. I have re-submitted them using the correct
webpage.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-capandtrade14-VyBSPFUxAzUHbQhp.pdf'

Original File Name: Wheelabrator C and T Comments.pdf

Date and Time Comment Was Submitted: 2014-09-11 15:46:16

No Duplicates.

Comment 10 for Cap and Trade 2014 (capandtrade14) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 11 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Benjamin
Last Name: Hirokawa
Email Address: bhirokawa@reclim.com
Affiliation: Reclim, LLC.

Subject: Comments on Proposed Compliance Offset Protocol: Ozone Depleting Substances Projects

Comment:

Please find the attached comments on the proposed Compliance Offset Protocol: Ozone Depleting Substances Projects.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-capandtrade14-BTcANlJiB2BRZwc+.pdf'

Original File Name: 20140912 Comments on ODS Protocol.pdf

Date and Time Comment Was Submitted: 2014-09-12 13:14:48

No Duplicates.

Comment 12 for Cap and Trade 2014 (capandtrade14) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 13 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Janet

Last Name: Bell

Email Address: jbell@mwdh2o.com

Affiliation: Metropolitan Water District

Subject: Comments on Proposed Amendments to Regulations for C&T, MRR, and COI Fee
Comment:

Attached is Metropolitan's comment letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-capandtrade14-AGMBZgNwVmcAZVI9.pdf'

Original File Name: CARBcommentsltr_C&T_final_Jksign_Sept152014.pdf

Date and Time Comment Was Submitted: 2014-09-15 09:21:56

No Duplicates.

Comment 14 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Sean
Last Name: Carney
Email Address: scarney@finitecarbon.com
Affiliation:

Subject: Concerns Regarding Additionality and Proposed Common Practice Changes
Comment:

Please find attached a comment letter regarding the proposed changes to the Compliance Offset Protocol for U.S. Forest Projects.

Thank you for your consideration of the points articulated in this letter.

Sean Carney

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-capandtrade14-BmAHaFM8UGoGdFUw.pdf'

Original File Name: Finite Carbon ARB Public Comments 9-11-14.pdf

Date and Time Comment Was Submitted: 2014-09-15 10:08:01

No Duplicates.

Comment 15 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Catherine
Last Name: Reheis-Boyd
Email Address: joey@wspa.org
Affiliation: WSPA

Subject: WSPA COI MMR Comments
Comment:

Please see attached Western States Petroleum Association Comments on Proposed Changes to ARB Regulations: Mandatory Reporting Rule (MRR), Cost of Implementation Rule (COI), and Cap and Trade (C/T).

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-capandtrade14-AHdXIgd2VmRQCVAz.pdf'

Original File Name: WSPA Comments on COI MMR.pdf

Date and Time Comment Was Submitted: 2014-09-15 14:13:24

No Duplicates.

Comment 16 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Jason

Last Name: Armenta

Email Address: Jason.Armenta@calpine.com

Affiliation: Calpine Corporation

Subject: Comments on Proposed Amendments to the ODS Projects Compliance Offset Protocol
Comment:

Please find attached Calpine Corporation's comments on the Proposed Amendments to the Ozone Depleting Substances Projects Compliance Offset Protocol of the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-capandtrade14-UzBVMlM+WHsEa1I8.pdf'

Original File Name: Calpine Comments on Proposed ODS Protocol Amendments.pdf

Date and Time Comment Was Submitted: 2014-09-15 14:37:18

No Duplicates.

Comment 17 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Nick

Last Name: Facciola

Email Address: nick@OriginClimate.com

Affiliation: Compliance Offset Developers Association

Subject: Proposed Updates to Compliance Offset Protocols

Comment:

The Compliance Offset Developers Association (CODA) appreciates the opportunity to comment on the proposed updates to the Compliance Offset Protocols - specifically for Livestock Projects - as incorporated by reference in the proposed amendments to the California Cap-and-Trade Regulation as described in the draft dated July 29, 2014.

CODA is an association comprised of six of the leading developers of emission reduction projects designed for compliance in the California Cap-and-Trade program. CODA's membership has substantial experience in the implementation of projects designed to result in emission reduction offsets, and represents a majority of the projects listed as ARB-Early Action projects or ARB Compliance Projects.

Our comments are based on practical experience over the last five years in working to generate and qualify offsets from the project types included in ARBs program. Incorporating them would provide OPOs/APDs with greater clarity on how they should monitor and operate projects and remove unnecessary cost and complexity without compromising environmental integrity.

Please see the attached file for CODA's comments on the proposed updates to the protocol for Livestock Projects.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-capandtrade14-AGNVPF04U2FXDIIx.pdf>'

Original File Name: CODA Comments on Proposed Updates to Compliance Protocols.pdf

Date and Time Comment Was Submitted: 2014-09-15 14:50:46

No Duplicates.

Comment 18 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Cap-and-Trade Regulation Design

Comment:

Attached please find a memo from the members of the AB 32 Implementation Group asking the ARB to address design flaws in the cap-and-trade regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-capandtrade14-WjtSNIQKA2MBNQZZ.pdf'

Original File Name: AB 32 IG CT_DesignFlaws_9_15_14.pdf

Date and Time Comment Was Submitted: 2014-09-15 14:59:07

No Duplicates.

Comment 19 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Matthew

Last Name: Plummer

Email Address: m3pu@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: Pacific Gas and Electric Company's Comments on the Air Resources Board's Proposed Comment:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the Air Resources Board's (ARB) 45-Day amendments to the Cap-and-Trade Regulation.

Please contact me directly if you have any questions.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-capandtrade14-VCRUNV0DUWcAWVIX.pdf>'

Original File Name: PG&E Cap-and-Trade Comments 45-Day Amendments.pdf

Date and Time Comment Was Submitted: 2014-09-15 15:14:54

No Duplicates.

Comment 20 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Kyle

Last Name: Holland

Email Address: kholland@ecopartnersllc.com

Affiliation:

Subject: Comments on Proposed Changes to Compliance Offset Protocol U.S. Forest Projects
Comment:

Please see attached document, "ecoPartners - Comments on changes to COP.pdf".

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-capandtrade14-BmMFYAdpVXZVMgZ0.pdf'

Original File Name: ecoPartners - Comments on changes to COP.pdf

Date and Time Comment Was Submitted: 2014-09-15 15:17:00

No Duplicates.

Comment 21 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Steve

Last Name: Arita

Email Address: SteveArita@chevron.com

Affiliation:

Subject: Proposed 45-Day Amendments to the Cap and Trade Regulation, dated 7/29/14

Comment:

See attachments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-capandtrade14-BXUCdlQ6ByQAaVQn.zip'

Original File Name: Proposed 45-Day Amendments Cap & Trade Regulation.zip

Date and Time Comment Was Submitted: 2014-09-15 16:06:35

No Duplicates.

Comment 22 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Dorothy
Last Name: Rothrock
Email Address: drothrock@cmta.net
Affiliation: CMTA

Subject: CMTA Attachment A to Comments on cap and trade reg
Comment:

Please accept this attachment to CMTA comments on cap and trade regulation

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-capandtrade14-B2YGdFMmWWsGYwBo.pdf'

Original File Name: Attachment_Joint Industry Proposal FINAL.pdf

Date and Time Comment Was Submitted: 2014-09-15 16:50:06

No Duplicates.

Comment 23 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Dorothy
Last Name: Rothrock
Email Address: drothrock@cmta.net
Affiliation: CMTA

Subject: CMTA Comments on cap and trade reg
Comment:

Please accept these comments on the cap and trade regulation, along with the attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-capandtrade14-VTYHbARxU2FSCwVm.pdf'

Original File Name: CMTA Corp Disclosure Comments_Sept 15_FINAL.pdf

Date and Time Comment Was Submitted: 2014-09-15 16:54:18

No Duplicates.

Comment 24 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Zane

Last Name: Haxtema

Email Address: zhaxtema@scsglobalservices.com

Affiliation: SCS Global Services

Subject: Comments regarding Forest Offset Protocol proposed changes

Comment:

Comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-capandtrade14-VyRcOV0vUl5WMVMh.pdf'

Original File Name: SCS_ARB_ProtocolComments_091514.pdf

Date and Time Comment Was Submitted: 2014-09-15 16:58:13

No Duplicates.

Comment 25 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Amber

Last Name: Blixt

Email Address: amber@iepa.com

Affiliation: IEP

Subject: IEP Comments on Cap and Trade Proposed Amendments

Comment:

IEP Comments on Cap and Trade Proposed Amendments Attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-capandtrade14-VD0AY1AhVloCZ1Q7.pdf'

Original File Name: IEP comments on Proposed Cap and Trade Amendments FINAL 9-15-14.pdf

Date and Time Comment Was Submitted: 2014-09-15 16:45:51

No Duplicates.

Comment 26 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Brian
Last Name: Shillinglaw
Email Address: bshillinglaw@newforests-us.com
Affiliation: New Forests

Subject: New Forests -- Forest Protocol Comments September 2014
Comment:

Attached please find our comments on the changes to the Forest Protocol before the Board.

Brian Shillinglaw

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-capandtrade14-AmxdPgdxBAGHZ1I9.docx'

Original File Name: New Forests Comments - Forest Protocol Sept 2014.docx

Date and Time Comment Was Submitted: 2014-09-15 16:57:06

No Duplicates.

Comment 27 for Cap and Trade 2014 (capandtrade14) - 45 Day.

First Name: Rebecca

Last Name: Meiers-De Pastino

Email Address: rebecca.meiers-depastino@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments

Comment:

Attached please find SCE's comments on the ARB's 45-DAY modifications to the California Cap-and Trade mandatory reporting regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-ghg2014-VCcFYAZiAw9SNwFu.docx'

Original File Name: SCE Comments on 45-Day Changes to Cap and Trade Program.docx

Date and Time Comment Was Submitted: 2014-09-15 14:29:08

No Duplicates.

There are no comments posted to Cap and Trade 2014 (capandtrade14) that were presented during the Board Hearing at this time.

Comment 1 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Melissa

Last Name: Poole

Email Address: melissap@paramountfarming.com

Affiliation:

Subject: Paramount Farms Comments on 15-day Amendments to Cap-and-Trade Compliance Mechanisms

Comment:

Please refer to attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-capandtrade14-AXEHYABzUGIGbQJt.pdf>

Original File Name: Paramount Comments to ARB, 2014.pdf

Date and Time Comment Was Submitted: 2014-10-10 16:23:11

No Duplicates.

Comment 2 for Cap and Trade 2014 (capandtrade14) - 15-1.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 3 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Ralph

Last Name: Moran

Email Address: ralph.moran@bp.com

Affiliation:

Subject: BP Comments Cap and Trade 15-Day Package

Comment:

Comments of BP America, Inc

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-capandtrade14-UTNRJ1EPWWkGb1U4.pdf>

Original File Name: BP comment ltr CapnTrade 15 Day Package 10 16.pdf

Date and Time Comment Was Submitted: 2014-10-16 10:28:58

No Duplicates.

Comment 4 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Gerald
Last Name: Miller
Email Address: gerald_miller@praxair.com
Affiliation: Praxair, Inc.

Subject: Comments of Praxair, Inc. on 15-Day Cap-and-Trade Amendments
Comment:

Dear California Air Resources Board,

Please find attached Praxair, Inc.'s Comments on the October 2, 2014 Fifteen Day Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. Thank you.

Sincerely,

Gerald Miller
Vice President, West Region
Praxair, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-capandtrade14-VmdcalwCVzUCMgVa.pdf>

Original File Name: 10 16 14 PX Ltr CO2 Imports (00256535-2xBA8E1).pdf

Date and Time Comment Was Submitted: 2014-10-16 12:39:53

No Duplicates.

Comment 5 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Todd
Last Name: English
Email Address: tenglish@eosclimate.com
Affiliation:

Subject: EOS Climate Comments on 15-day Capandtrade14
Comment:

EOS Climate's comments on the 15-day proposed regulatory changes
(capandtrade14)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-capandtrade14-UDUGb1clUV0HMAA1.pdf>

Original File Name: EOS_15day_141017.pdf

Date and Time Comment Was Submitted: 2014-10-16 16:16:42

No Duplicates.

Comment 6 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Miles

Last Name: Heller

Email Address: miles.t.heller@tsocorp.com

Affiliation: Tesoro

Subject: Corporate Associations Clarification

Comment:

Tesoro appreciates the progress CARB has made addressing industry's concerns regarding corporate association reporting. We seek two additional clarifications based on the language in the 15-day package.

Tesoro understands that 95830 (c)(1)(H)(1) is created to allow registered entity to use an alternate reporting method for direct corporate association not registered in Cap-and-Trade and linked ETS programs. Alternative documents include SEC Form 10-K, FERC application, NFA application, Form 40 or 40S filed with CFTC, Part1A of Form ADV filed with SEC. Other than this alternative all information specified in 96833 (d)(1)-(2) must be reported. Tesoro understands the need to provide the information in 96833 (d)(1)-(2) for all direct and indirect corporate association. However, prior CARB guidance indicated that such information was not necessary for indirect corporate associations not registered in Cap and Trade or linked jurisdiction. This exception is not clear in the revised language. Tesoro proposes not to delete the "an unregistered entity" qualifier for indirect corporate associations in 95833 (d).

Secondly, please clarify which entities are referenced in the language below (see question in parenthesis):

Last sentence of 95830 (f) - If changes in information submitted pursuant to section 95830(c)(1)(H) are related to entities (direct, indirect, or both?) which are not registered in the Cap-and-Trade Program or in a GHG ETS to which California has linked pursuant to subarticle 12, and which are not involved in the line of direct or indirect corporate associations between two registered entities, the information must be updated within one year of the change at least annually, instead of within 30 calendar days of the change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-10-17 07:15:34

No Duplicates.

Comment 7 for Cap and Trade 2014 (capandtrade14) - 15-1.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 8 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Nico

Last Name: van Aelstyn

Email Address: nvanaelstyn@bdlaw.com

Affiliation: Beveridge & Diamond

Subject: ECC's Comments on 15-Day Changes to ODS Protocol

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-capandtrade14-BjRWYFRkAmVWfVJj.pdf>

Original File Name: 2014-10-17 ECC Comments Letter on Proposed 15-Day Changes to ODS Protocol.pdf

Date and Time Comment Was Submitted: 2014-10-17 14:44:02

No Duplicates.

Comment 9 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Patrick

Last Name: Wood

Email Address: patrick@agmethaneadvisors.com

Affiliation: Ag Methane Advisors, LLC

Subject: Comments Re: COP Livestock Protocol 10.2.14 draft

Comment:

Attached please find comments from Ag Methane Advisors regarding the 10.2.14 draft of the Compliance Offset Protocol Livestock Projects. Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-capandtrade14-AWBQMVE9UWcGdAFp.pdf>

Original File Name: AgMeth_CommentsRE_CARB_COP_Livestock_10.17.14.pdf

Date and Time Comment Was Submitted: 2014-10-17 14:51:58

No Duplicates.

Comment 10 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Gerald
Last Name: Secundy
Email Address: jerrys@cceeb.org
Affiliation:

Subject: CCEEB Comments
Comment:

Please see attachment for comments from California Council for Environmental and Economic Balance ("CCEEB").

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-capandtrade14-VjVTNlYyBDJWMIIN.pdf>

Original File Name: CCEEB 15 Day Comments_10-17.pdf

Date and Time Comment Was Submitted: 2014-10-17 15:49:26

No Duplicates.

Comment 11 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Katie
Last Name: Sullivan
Email Address: sullivan@ieta.org
Affiliation: IETA

Subject: IETA Comments - 15-Day Proposed Amendments to C&T Regulation and Protocols
Comment:

Dear ARB Team,

On behalf of IETA, we appreciate this opportunity to provide the attached comments to ARB during its 15-day period of proposed amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms.

Please contact me, if you have any questions or information requests related to IETA comments.

Best Regards,

Katie
Director, North American and Climate Finance
IETA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-capandtrade14-WjMFZlQhVWdXDgV2.pdf>

Original File Name: IETA Submission to ARB_15-Day Comment Period_17Oct2014.pdf

Date and Time Comment Was Submitted: 2014-10-17 15:53:08

No Duplicates.

Comment 12 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Catherine
Last Name: Reheis Boyd
Email Address: joey@wspa.org
Affiliation:

Subject: WSPA Cap and Trade Letter
Comment:

Please see attached WSPA Comments on Proposed 15-day changes to ARB Cap and Trade, MRR and COI Fee Regulations, and Ozone Depleting Offset Protocol. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-capandtrade14-AHdTJl0sAjAAWQV1.zip>

Original File Name: WSPA Proposed 15 day Cap and Trade Letter.zip

Date and Time Comment Was Submitted: 2014-10-17 16:19:06

No Duplicates.

Comment 13 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Michael

Last Name: Rubio

Email Address: MichaelRubio@chevron.com

Affiliation: Chevron Corporation

Subject: Comments on 15 day Amendments to CA Cap-and-Trade dated October 2, 2014

Comment:

Attached please find Chevron's comments on the 15 day amendments to the CA Cap-and-Trade Regulation dated Oct 2, 2014

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-capandtrade14-UTcFagNsV2UDaVIN.pdf>

Original File Name: Final Chevron Comments on 15 day Cap and Trade Amendments.pdf

Date and Time Comment Was Submitted: 2014-10-17 16:15:25

No Duplicates.

Comment 14 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Paul

Last Name: Harper

Email Address: pharper@bbwassociates.com

Affiliation:

Subject: Forest Offset Protocol revisions

Comment:

The revisions to the site class system in Appendix F are quite confusing. In particular, the definition of the Forest Service's 7 site class system and the table just below this description on page 114. It is unclear how the standard method of site index by species should be converted into the 7 classes. Will a project proponent have to calculate cubic foot annual growth? If so, at what stage of stand development or over what portion of the baseline projection? Is there a crosswalk that is approved for use? Also, the column header is "Basal Area Cubic feet/acre/acre". These are 2 different measurement so what does it mean?

Please make an effort to clarify this language or else I fear there will be a great deal of mis-interpretation on the part of the verifiers and project developers.

thank you,
Paul Harper

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-10-17 16:38:47

No Duplicates.

Comment 15 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Paul

Last Name: Harper

Email Address: pharper@bbwassociates.com

Affiliation:

Subject: Financial constraints in Forest Offset Protocol

Comment:

The current language in 6.2.1.3 does not result in a reasonable test of the financial viability of baseline modeling. It should allow comparison with harvest plans filed in the past on the same property that the carbon project is proposed. This is the best and most logical test of whether modeled timber harvesting is financially viable - that is it has happened before in that very same location.

In addition, when a comparison is made with a nearby THP, the language in 2.a. states that slopes cannot exceed slopes in the Project Area by MORE than 10%. However, it should say LESS because if a THP is viable on much steeper slopes, then it is certainly viable on gentler slopes, other things being equal.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-10-17 16:59:44

No Duplicates.

Comment 16 for Cap and Trade 2014 (capandtrade14) - 15-1.

First Name: Phillip

Last Name: Retallick

Email Address: retallick.phillip@cleanharbors.com

Affiliation: Clean Harbors Environmental Services, Inc

Subject: Comments Submission

Comment:

Please see attached comment letter from Clean Harbors Environmental Services. This is a resubmittal of 15-day comment number 7, which was received on October 17, 2014 at 1:35 PM. Due to a technical error, the attachment was not uploaded in the original comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-capandtrade14-VzZdKV0+Ul4CZ1M8.pdf>

Original File Name: ARB Comments 3664_001.pdf

Date and Time Comment Was Submitted: 2014-10-20 09:54:47

No Duplicates.