

**Form Letter 1 for Comment 72 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

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Affiliation:

Subject: Notice of Public Hearing to Consider Amendments to the California Cap on Greenhouse Gas Em

Comment:

On behalf of Save Our Peninsula Committee please find the following:

Save Our Peninsula Committee opposes the proposed amendment. I refer to research work undertaken by Danny Cullenwood and David Weiskopt in a recent Stanford Law School working paper. The paper shows that the Board's exemptions will permit rampant resource shuffling, which could result in leakage tht exceeds the cumulative mitigation required under the cap-and-trade market through 2020. Prior to consideration of proposed amendment, an EIR should be undertaken to assess the environmental impacts of the proposed amendment.

Thank you for consideration of this matter

Richard H. Rosenthal  
for Save Our Peninsula Committee

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-23 02:01:24