

November 30, 2018

Via Electronic Submittal

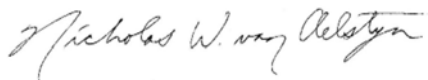
Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: IPRE's Comments on Proposed Amendments to Cap-and-Trade Regulation

Dear Chairwoman Nichols and Members of the Air Resources Board:

Thank you for the opportunity to comment on the California Air Resources Board's ("CARB") November 15 modified proposed amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (the "Cap-and-Trade Regulation"). The Indigenous Peoples Reducing Emissions ("IPRE") does not support the proposed amendments to Section 95989 regarding direct environmental benefits to the State ("DEBS"), and strongly urges the Board not to adopt the proposed changes. IPRE reiterates the points made in our previous comment letter¹ and encourages the Board instead to clarify the DEBS provision as suggested in that letter.

Sincerely,



Nicholas W. van Aelstyn

cc: Rajinder Sahota, Assistant Chief, Industrial Strategies Division (*via email*)
Jason Gray, Branch Chief, Cap-and-Trade Program (*via email*)

¹ November 5, 2018 IPRE Comments on Proposed Amendments to Cap-and-Trade Regulation, submitted electronically on November 5, 2018 (available at <https://www.arb.ca.gov/lists/com-attach/87-ct2018-VWcBN1RkVzxVfgU0.pdf>) and in person at the November 15, 2018 Board meeting (available at <https://www.arb.ca.gov/lists/com-attach/95-ct2018-AWhRJ1wvUmQDKwZ2.pdf>).