

**Comment 1 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Scott

Last Name: Trimingham

Email Address: evergreentea2000@yahoo.com

Affiliation:

Subject: Tailpipe exhaust filter reduces GHG emissions

Comment:

Please consider my invention that reduces tailpipe emissions from cars and light trucks. It is unique in that it does not affect the flow of exhaust from the vehicle.

Attachment: [www.arb.ca.gov/lists/com-attach/1-ab398offsetreport-ws-Wy9XNFUyUI5SeQZZ.jpg](http://www.arb.ca.gov/lists/com-attach/1-ab398offsetreport-ws-Wy9XNFUyUI5SeQZZ.jpg)

Original File Name: TEF - Schematic.jpg

Date and Time Comment Was Submitted: 2020-10-07 17:24:06

No Duplicates.

**Comment 2 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Mike

Last Name: Newman

Email Address: mike.newman@parhelionunderwriting.com

Affiliation: Parhelion Underwriting, Inc.

Subject: PROPOSAL Offset project developers should be allowed to submit an insurance policy as an a

Comment:

PROPOSAL

Offset project developers should be allowed to submit an insurance policy as an alternative to the CARB buffer pool.

Attachment: [www.arb.ca.gov/lists/com-attach/2-ab398offsetreport-ws-WioBdVM9ACMKYwNw.odt](http://www.arb.ca.gov/lists/com-attach/2-ab398offsetreport-ws-WioBdVM9ACMKYwNw.odt)

Original File Name: PROPOSAL CARB Forestry Offset Buffer Pool.odt

Date and Time Comment Was Submitted: 2020-10-29 14:26:22

No Duplicates.

**Comment 3 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Alejandra

Last Name: Parra Munoz

Email Address: ale.parra.munoz@gmail.com

Affiliation:

Subject: Comment

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/4-ab398offsetreport-ws-WjkAaVc7V2kLaANt.docx](http://www.arb.ca.gov/lists/com-attach/4-ab398offsetreport-ws-WjkAaVc7V2kLaANt.docx)

Original File Name: comment.docx

Date and Time Comment Was Submitted: 2020-11-03 14:36:13

No Duplicates.

## **Comment 4 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Bruce

Last Name: Burns

Email Address: ozonepingpong23@gmail.com

Affiliation:

Subject: economic growth

Comment:

Building an economic foundation from the top down is like building a bungalow on the beach at low tide.

For instance, scrap the bio-degradable plastic idea.

Make all plastic recyclable and pay the pittance required to get the poor to pick it up. This will not only clean up a lot of litter (and garbage) but give an added resource to those that subsist on the lowest economic level.

Third: opening new industries for properly processing all (recyclable) plastic, jobs, jobs, jobs.

Forth invite and jump-start plastic processing and manufacturing.

Less importing and more local economic growth.

Of course, if it was me I would look into revamping the entire system. Patchwork laws and rules to bolster a failing (out of your control) decrepit economy, but from the bottom up. This will take teamwork but if you really want control of your own future you might want to be open to alternatives.

Feel free to contact me.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-03 18:02:43

No Duplicates.

**Comment 5 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Livingston  
Email Address: adam@sequoiariverlands.org  
Affiliation: Sequoia Riverlands Trust

Subject: SRT Letter re Initial Draft Recommendations  
Comment:

Dear Chairman McCabe,

Please find attached a letter from Sequoia Riverlands Trust commenting on the Initial Draft Recommendations of the Compliance Offset Protocol Task Force. We appreciate your consideration, and would welcome the opportunity to discuss these issues further.

Best,

Adam Livingston

Attachment: [www.arb.ca.gov/lists/com-attach/6-ab398offsetreport-ws-AXIBdVYjAw8DaVM2.pdf](http://www.arb.ca.gov/lists/com-attach/6-ab398offsetreport-ws-AXIBdVYjAw8DaVM2.pdf)

Original File Name: SRT Letter re Initial Draft Recommendations of Compliance Offset Protocol Task Force (2020-11-05).pdf

Date and Time Comment Was Submitted: 2020-11-05 09:44:18

No Duplicates.

## **Comment 6 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Brandt

Last Name: Rousseaux

Email Address: brandt.rousseaux@pem-carbon.com

Affiliation: Planetary Emissions Management, Inc.

Subject: Comments on the Initial Draft Report of the AB 398 Compliance Offsets Protocol Task Force

Comment:

1) Each member of the Stakeholder Group should declare any conflict of interest, such as involvement in, or recipient of revenue generation from the CARB protocols, project development, project ownership, or employment by CARB. No such disclosure is identified in the COMPLIANCE OFFSETS PROTOCOL TASK FORCE INITIAL DRAFT RECOMMENDATIONS, October 7, 2020. Declaring conflicts of interest is a standard disclosure for committees that have the means to modify protocols that affect carbon market participants and commerce.

2) Forest carbon sequestration and storage is an active area of research with the potential to improve current CARB forest carbon protocols. The Task Force should provide a mechanism for collaboration with the forest carbon research community, including comparative studies of CARB protocols with direct measurement of CO2 in the forest, a widely employed method.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-05 10:11:35

No Duplicates.

**Comment 7 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Jaymee  
Last Name: Go  
Email Address: jaymee@priorityca.com  
Affiliation: Priority Strategies

Subject: CNPS Comments on Compliance Offsets Protocol Task Force Initial Draft Recommendations  
Comment:

Hello,

Thank you for your work in developing the Initial Draft Recommendations and providing an opportunity to submit comments. Attached below, please find a comment letter from the California Native Plant Society. Please feel free to reach out if you have any questions or additional information.

Best,  
Jaymee

Attachment: [www.arb.ca.gov/lists/com-attach/8-ab398offsetreport-ws-WzhSOIjUXEELwhn.pdf](http://www.arb.ca.gov/lists/com-attach/8-ab398offsetreport-ws-WzhSOIjUXEELwhn.pdf)

Original File Name: CNPS-Offsets Protocol Draft Recommendations Comment Letter (11-5-20).pdf

Date and Time Comment Was Submitted: 2020-11-05 13:53:22

No Duplicates.

**Comment 8 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Elise

Last Name: Miller

Email Address: emiller@actcommodities.com

Affiliation:

Subject: ACT Commodities OPTF Draft

Comment:

We thank you for your time and attention to the development of  
offset protocols as it pertains to California GHG regulations.  
Please reach out if you would like to discuss further.

Attachment: [www.arb.ca.gov/lists/com-attach/10-ab398offsetreport-ws-  
BWQFYAB1UV0CZ1U6.pdf](http://www.arb.ca.gov/lists/com-attach/10-ab398offsetreport-ws-BWQFYAB1UV0CZ1U6.pdf)

Original File Name: ACT Commodities OPTF Comments.pdf

Date and Time Comment Was Submitted: 2020-11-05 16:12:31

No Duplicates.



**Comment 9 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Aram

Last Name: Nadjarian

Email Address: aram@mozaicmc.com

Affiliation: Mozaic Media & Communications, Inc.

Subject: Comments on Compliance Offset Protocol Task Force draft report

Comment:

Attached, please find a public comment letter submitted on behalf of Chugach Alaska Corporation, Ahtna, Inc. & Sealaska Corporation.

Attachment: [www.arb.ca.gov/lists/com-attach/11-ab398offsetreport-ws-WjtQOFY0WFQEblcy.pdf](http://www.arb.ca.gov/lists/com-attach/11-ab398offsetreport-ws-WjtQOFY0WFQEblcy.pdf)

Original File Name: ANC Letter to Offset Taskforce (FINAL).pdf

Date and Time Comment Was Submitted: 2020-11-05 16:26:34

No Duplicates.

**Comment 10 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Edward

Last Name: Mann

Email Address: sequoia1910@gmail.com

Affiliation:

Subject: Initial Draft Report comments

Comment:

Attached please find my comments regarding the Initial draft  
Report.

Attachment: [www.arb.ca.gov/lists/com-attach/12-ab398offsetreport-ws-UDNdOgFyVGUDWlc6.docx](http://www.arb.ca.gov/lists/com-attach/12-ab398offsetreport-ws-UDNdOgFyVGUDWlc6.docx)

Original File Name: CARB memo 11.5.2020.docx

Date and Time Comment Was Submitted: 2020-11-06 07:08:14

No Duplicates.

**Comment 11 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Stacey  
Last Name: Sullivan  
Email Address: SSullivan@suscon.org  
Affiliation: Sustainable Conservation

Subject: Comments on the Initial Draft Report of the AB 398 Compliance Offsets Protocol Task Force

Comment:

Dear Task Force:

Please find Sustainable Conservation's comment letter on the Initial Draft Report of the AB 398 Compliance Offsets Protocol Task Force attached.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/13-ab398offsetreport-ws-BnUBcl0vWX5RNjR.pdf](http://www.arb.ca.gov/lists/com-attach/13-ab398offsetreport-ws-BnUBcl0vWX5RNjR.pdf)

Original File Name: Sustainable Conservation Comment Letter.pdf

Date and Time Comment Was Submitted: 2020-11-06 09:16:19

No Duplicates.

**Comment 12 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Mark

Last Name: van Nieuwland

Email Address: mark.nieuwland-van@dsm.com

Affiliation:

Subject: Comments initial draft of AB398 compliance offset taskforce

Comment:

Attached letter highlights our support of the proposal and recommendations for refinement.

Attachment: [www.arb.ca.gov/lists/com-attach/14-ab398offsetreport-ws-VGZda1JhWDsANwEw.pdf](http://www.arb.ca.gov/lists/com-attach/14-ab398offsetreport-ws-VGZda1JhWDsANwEw.pdf)

Original File Name: 20201105 DSM Comments CARB offset taskforce.pdf

Date and Time Comment Was Submitted: 2020-11-06 09:19:13

No Duplicates.

**Comment 13 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Robert

Last Name: Lee

Email Address: rzlee@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: Climate Action Reserve comments to Compliance Offsets Protocol Task Force  
Comment:

Comments from the Climate Action Reserve on the Initial Draft Report of the AB 398 Compliance Offsets Protocol Task Force can be found in the attached letter. Thank you for your consideration.

Robert Lee

Climate Action Reserve

Attachment: [www.arb.ca.gov/lists/com-attach/15-ab398offsetreport-ws-UzxVNVw7WHgCYVMn.pdf](http://www.arb.ca.gov/lists/com-attach/15-ab398offsetreport-ws-UzxVNVw7WHgCYVMn.pdf)

Original File Name: Offset Task Force Initial Draft Report - Reserve Public Comments FINAL.pdf

Date and Time Comment Was Submitted: 2020-11-06 10:08:35

No Duplicates.

**Comment 14 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Max

Last Name: DuBuisson

Email Address: mdubuisson@indigoag.com

Affiliation:

Subject: Support for pursuit of broad agricultural offset protocols

Comment:

Indigo Ag commends CARB and the Task Force for their efforts to consider new opportunities for compliance offset protocols to incentivize GHG benefits from the agriculture sector. We encourage CARB to take a different conceptual view of cropland management practice changes, focusing on overall performance rather than individual practices. This will involve adoption of new approaches to project definitions, quantification, and aggregation. Please see the attached comments for further details.

Thank you,

Max DuBuisson

Head of Carbon Policy

Indigo Ag

Attachment: [www.arb.ca.gov/lists/com-attach/16-ab398offsetreport-ws-B25VPVA1AzlXNgFu.pdf](http://www.arb.ca.gov/lists/com-attach/16-ab398offsetreport-ws-B25VPVA1AzlXNgFu.pdf)

Original File Name: Indigo\_COPTF report\_CARB\_29Oct2020.pdf

Date and Time Comment Was Submitted: 2020-11-06 10:16:17

No Duplicates.

**Comment 15 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Simmons

Email Address: matt@wildcalifornia.org

Affiliation: Environmental Protection Information Ctr

Subject: EPIC's Comments on the Avoided Wildfire Emissions Protocol  
Comment:

Please see the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/17-ab398offsetreport-ws-BWRUJANtVmwCYAZj.docx](http://www.arb.ca.gov/lists/com-attach/17-ab398offsetreport-ws-BWRUJANtVmwCYAZj.docx)

Original File Name: Avoided Wildfire Emissions Protocol Comment Letter.docx

Date and Time Comment Was Submitted: 2020-11-06 11:24:17

No Duplicates.

**Comment 16 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: William

Last Name: Anderegg

Email Address: anderegg@utah.edu

Affiliation: University of Utah

Subject: Comment on Initial Draft Report of Compliance Offsets Protocol Task Force  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/18-ab398offsetreport-ws-VjVTNFAjBTQAWVA2.pdf](http://www.arb.ca.gov/lists/com-attach/18-ab398offsetreport-ws-VjVTNFAjBTQAWVA2.pdf)

Original File Name: CARB\_ForestOffsetsTaskForce\_ScienceComment\_11-6-2020\_Final.pdf

Date and Time Comment Was Submitted: 2020-11-06 12:02:42

No Duplicates.



**Comment 17 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Dairy Cares

Subject: Comments on Initial Draft Report of AB 398 Compliance Offsets Protocol Task Force  
Comment:

Please see our attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/19-ab398offsetreport-ws-UDQBZIU9V3ZQLwRb.pdf](http://www.arb.ca.gov/lists/com-attach/19-ab398offsetreport-ws-UDQBZIU9V3ZQLwRb.pdf)

Original File Name: Dairy Cares comments on draft report Offeset Protocols Task Force.FINAL.pdf

Date and Time Comment Was Submitted: 2020-11-06 12:05:24

No Duplicates.

**Comment 18 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Carrie

Last Name: Gombos

Email Address: cgombos@finitecarbon.com

Affiliation: Finite Carbon

Subject: FC Comments on the Compliance Offset Protocol Task Force Report

Comment:

Finite Carbon's comments on the Compliance Offset Protocol Task Force's initial report can be found in the attached letter. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/20-ab398offsetreport-ws-Uj1RMQNkU3MLaFcj.pdf](http://www.arb.ca.gov/lists/com-attach/20-ab398offsetreport-ws-Uj1RMQNkU3MLaFcj.pdf)

Original File Name: Offset Protocol Task Force\_FC letter\_11-6-20.pdf

Date and Time Comment Was Submitted: 2020-11-06 12:30:00

No Duplicates.

**Comment 19 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Wood

Email Address: patrick@agmethaneadvisors.com

Affiliation: Ag Methane Advisors

Subject: Comment on Compliance Offset Protocol Task Force Draft Recommendations

Comment:

Please find out comments in the attachment. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/21-ab398offsetreport-ws-UTBQMVU5VWNXJQVt.pdf](http://www.arb.ca.gov/lists/com-attach/21-ab398offsetreport-ws-UTBQMVU5VWNXJQVt.pdf)

Original File Name: AgMethane\_Comments to Compliance Offset Protocol Task Force 11.6.20.pdf

Date and Time Comment Was Submitted: 2020-11-06 13:32:09

No Duplicates.

**Comment 20 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Michael

Last Name: Smith

Email Address: msmith@renewwest.com

Affiliation: Managing Partner, RenewWest

Subject: Comments from RenewWest

Comment:

To whom it may concern:

Please see the attached memorandum of comments from RenewWest on the Initial Draft Recommendations of the Compliance Offsets Protocol Task Force (second attempt). If there are questions or concerns, please do not hesitate to reach out.

Warm regards,  
Mike Smith

Attachment: [www.arb.ca.gov/lists/com-attach/23-ab398offsetreport-ws-VyVRMIY5UWdXJlQj.pdf](http://www.arb.ca.gov/lists/com-attach/23-ab398offsetreport-ws-VyVRMIY5UWdXJlQj.pdf)

Original File Name: RenewWest\_comments.pdf

Date and Time Comment Was Submitted: 2020-11-06 13:51:25

No Duplicates.

**Comment 21 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Tony

Last Name: Brunello

Email Address: tbrunello@calstrat.com

Affiliation: California Forest Carbon Coalition

Subject: CFCC comments

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/24-ab398offsetreport-ws-AGNUMwdqWGJRMQBv.pdf](http://www.arb.ca.gov/lists/com-attach/24-ab398offsetreport-ws-AGNUMwdqWGJRMQBv.pdf)

Original File Name: California Forest Carbon Coalition comments on CARB Task Force  
11.6.20.pdf

Date and Time Comment Was Submitted: 2020-11-06 13:58:12

No Duplicates.

**Comment 22 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Margaret

Last Name: Williams

Email Address: Margaret.Williams@winrock.org

Affiliation: The American Carbon Registry

Subject: Public Comments Initial Draft Report of the AB 398 Compliance Offsets Protocol Task Force

Comment:

Please find comments from The American Carbon Registry. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/25-ab398offsetreport-ws-BWoFdwZhBAGAYlQm.pdf](http://www.arb.ca.gov/lists/com-attach/25-ab398offsetreport-ws-BWoFdwZhBAGAYlQm.pdf)

Original File Name: OTF Draft\_Public Comments\_ACR\_2020.11.06.pdf

Date and Time Comment Was Submitted: 2020-11-06 14:35:31

No Duplicates.

**Comment 23 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: John

Last Name: Leslie

Email Address: heather.karlstad@dentons.com

Affiliation:

Subject: Comments of Shell Energy North America (US), L.P.

Comment:

Attached are the comments of Shell Energy North America (US), L.P.  
on the Initial Draft Report of the Offset Protocol Task Force.

Heather Karlstad, Legal Secretary to

John Leslie, Attorneys for  
Shell Energy North America (US), L.P

Attachment: [www.arb.ca.gov/lists/com-attach/26-ab398offsetreport-ws-AHMFa1YyAD8LYQRb.pdf](http://www.arb.ca.gov/lists/com-attach/26-ab398offsetreport-ws-AHMFa1YyAD8LYQRb.pdf)

Original File Name: Shell Energy North America (US), L.P. Comments on IDR on Offset  
Protocol Task Force.pdf

Date and Time Comment Was Submitted: 2020-11-06 14:36:57

No Duplicates.

**Comment 24 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: William

Last Name: Stewart

Email Address: billstewart@berkeley.edu

Affiliation: University of California Berkeley

Subject: technical issues with reforestation and forestry BMPs in draft

Comment:

Please see the attached letter addressing limitations in how reforestation and forestry BMPs are addressed in current offset protocols and task force recommendation to simply expand current projects for more users.

Attachment: [www.arb.ca.gov/lists/com-attach/27-ab398offsetreport-ws-VyBQP1c6Um1XOFc2.pdf](http://www.arb.ca.gov/lists/com-attach/27-ab398offsetreport-ws-VyBQP1c6Um1XOFc2.pdf)

Original File Name: William Stewart comments on draft ab398 offset task report.pdf

Date and Time Comment Was Submitted: 2020-11-06 15:19:50

No Duplicates.



**Comment 25 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Amy

Last Name: Hughes

Email Address: amhughes@edf.org

Affiliation: EDF

Subject: EDF Comments: Task Force Subgroup C/D Draft Recommendations

Comment:

Attached please find EDF's comments on the initial draft report of the AB 398 Compliance Offsets Protocol Task Force. Our feedback focuses primarily on the recommendations of subgroup C/D: Livestock, Agriculture and Rangelands.

Kind regards,  
Amy Hughes

Attachment: [www.arb.ca.gov/lists/com-attach/28-ab398offsetreport-ws-UzZWNANkVFhXMlc4.docx](http://www.arb.ca.gov/lists/com-attach/28-ab398offsetreport-ws-UzZWNANkVFhXMlc4.docx)

Original File Name: EDF Comment\_CARB\_Compliance Offsets Protocol Task Force Initial Draft Recommendations\_6Nov2020\_Final.docx

Date and Time Comment Was Submitted: 2020-11-06 15:22:25

No Duplicates.

**Comment 26 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Peter

Last Name: Weisberg

Email Address: pweisberg@3degrees.com

Affiliation:

Subject: 3Degrees comments on the draft OPTF report

Comment:

Our comments on the October 7th, 2020 draft of the Compliance  
Offsets Protocol Task Force Initial Draft Recommendations are  
attached. Thanks!

Attachment: [www.arb.ca.gov/lists/com-attach/29-ab398offsetreport-ws-  
W2hdPwRgAzdWIght.pdf](http://www.arb.ca.gov/lists/com-attach/29-ab398offsetreport-ws-W2hdPwRgAzdWIght.pdf)

Original File Name: 3Degrees OPTF 11-6-2020.pdf

Date and Time Comment Was Submitted: 2020-11-06 15:23:27

No Duplicates.

**Comment 27 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Danny

Last Name: Cullenward

Email Address: danny@carbonplan.org

Affiliation:

Subject: Comment on draft report

Comment:

Please find my comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/30-ab398offsetreport-ws-VmRQZgAzAmFQewMy.pdf](http://www.arb.ca.gov/lists/com-attach/30-ab398offsetreport-ws-VmRQZgAzAmFQewMy.pdf)

Original File Name: 2020-11-06 ARB offset task force.pdf

Date and Time Comment Was Submitted: 2020-11-06 16:46:10

No Duplicates.

**Comment 28 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

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

**Comment 29 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Kathleen

Last Name: McAfee

Email Address: kmcafee@sfsu.edu

Affiliation: San Francisco State University

Subject: These proposals are not based on sound argument or evidence

Comment:

Please post my comment, attached.

Attachment: [www.arb.ca.gov/lists/com-attach/32-ab398offsetreport-ws-UTwCZwBgUmcEZ1M2.pdf](http://www.arb.ca.gov/lists/com-attach/32-ab398offsetreport-ws-UTwCZwBgUmcEZ1M2.pdf)

Original File Name: McAfee comment Offsets Taks Force CARB 11 2020.pdf

Date and Time Comment Was Submitted: 2020-11-06 17:00:08

No Duplicates.

**Comment 30 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Javier

Last Name: Kinney

Email Address: jkinney@yuroktribe.nsn.us

Affiliation: Yurok Tribe

Subject: Yurok Tribe comments regarding Task Force Interim report

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/33-ab398offsetreport-ws-AHkFdwQrUW1RMVUz.pdf](http://www.arb.ca.gov/lists/com-attach/33-ab398offsetreport-ws-AHkFdwQrUW1RMVUz.pdf)

Original File Name: YT.OffsetReport.11.2.20.signed.pdf

Date and Time Comment Was Submitted: 2020-11-09 08:21:15

No Duplicates.

**Comment 31 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Mari Rose

Last Name: Taruc

Email Address: marirose@caleja.org

Affiliation:

Subject: Reject the Initial Draft Recommendations of Compliance Offsets Protocol Task Force  
Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/com-attach/34-ab398offsetreport-ws-AnAGZQBrAjQCZwdz.pdf](http://www.arb.ca.gov/lists/com-attach/34-ab398offsetreport-ws-AnAGZQBrAjQCZwdz.pdf)

Original File Name: Reject Offsets Taskforce Recs Letter 11-6-20.pdf

Date and Time Comment Was Submitted: 2020-11-09 08:21:15

No Duplicates.

**Comment 32 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Clayton

Last Name: Munnings

Email Address: munnings@ieta.org

Affiliation: IETA

Subject: IETA Comments on OPTF Initial Report

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/38-ab398offsetreport-ws-UDIUN1YjUGIELAV1.pdf](http://www.arb.ca.gov/lists/com-attach/38-ab398offsetreport-ws-UDIUN1YjUGIELAV1.pdf)

Original File Name: ieta.pdf

Date and Time Comment Was Submitted: 2020-11-09 09:09:13

No Duplicates.



**Comment 33 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Sydney  
Last Name: Chamberlin  
Email Address: s.j.chamberlin@TNC.ORG  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/39-ab398offsetreport-ws-VDcCZQZ1UmMHXgdo.pdf](http://www.arb.ca.gov/lists/com-attach/39-ab398offsetreport-ws-VDcCZQZ1UmMHXgdo.pdf)

Original File Name: CARB\_OffsetProtocolTaskForce\_11\_9.pdf

Date and Time Comment Was Submitted: 2020-11-09 09:27:28

No Duplicates.

**Comment 34 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@carbon-direct.com

Affiliation:

Subject: Comments

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/40-ab398offsetreport-ws-BXBWM1cJV2ZVNgd1.pdf](http://www.arb.ca.gov/lists/com-attach/40-ab398offsetreport-ws-BXBWM1cJV2ZVNgd1.pdf)

Original File Name: UC Berkeley researcher comments on COPT draft report.pdf

Date and Time Comment Was Submitted: 2020-11-10 08:04:25

No Duplicates.

**Comment 35 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Will  
Last Name: Charlton  
Email Address: will@digesterdoc.com  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/41-ab398offsetreport-ws-AGYBblQ7UWMLYQIW.docx](http://www.arb.ca.gov/lists/com-attach/41-ab398offsetreport-ws-AGYBblQ7UWMLYQIW.docx)

Original File Name: Final CARB Cap and Trade Letter .docx

Date and Time Comment Was Submitted: 2020-11-10 08:08:44

No Duplicates.

**Comment 36 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 1st Workshop.**

First Name: Josiah

Last Name: Hunt

Email Address: [josiah@pacificbiochar.com](mailto:josiah@pacificbiochar.com)

Affiliation:

Subject: Biochar may be worth another look

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/43-ab398offsetreport-ws-WjwHdgdZAAwLbwVs.zip](http://www.arb.ca.gov/lists/com-attach/43-ab398offsetreport-ws-WjwHdgdZAAwLbwVs.zip)

Original File Name: Fw\_\_Biochar\_may\_be\_worth\_another\_look.zip

Date and Time Comment Was Submitted: 2020-12-09 09:00:03

No Duplicates.

**Comment 37 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Michael

Last Name: Siminitus

Email Address: michael@wastebusters.info

Affiliation:

Subject: Compost on Rangelands - Supporting info

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/46-ab398offsetreport-ws-AmEFYlAjBzZRCAJu.pdf](http://www.arb.ca.gov/lists/com-attach/46-ab398offsetreport-ws-AmEFYlAjBzZRCAJu.pdf)

Original File Name: CARB letter 2.pdf

Date and Time Comment Was Submitted: 2021-02-09 21:01:28

No Duplicates.

**Comment 38 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Daniel

Last Name: Chandler

Email Address: dwchndl@suddenlink.net

Affiliation:

Subject: Comment for Compliance Offset Protocol Task Force

Comment:

Comment attached.

Attachment: [www.arb.ca.gov/lists/com-attach/50-ab398offsetreport-ws-VzQCa1Q4V2lQMwln.pdf](http://www.arb.ca.gov/lists/com-attach/50-ab398offsetreport-ws-VzQCa1Q4V2lQMwln.pdf)

Original File Name: Comment for Compliance Offset Protocol Task Force.pdf

Date and Time Comment Was Submitted: 2021-02-16 19:41:56

No Duplicates.

**Comment 39 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

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

**Comment 40 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Max

Last Name: DuBuisson

Email Address: mdubuisson@indigoag.com

Affiliation:

Subject: Support for pursuit of broad agricultural offset protocols

Comment:

Thank you for the opportunity to provide comments on this draft report. Indigo Ag applauds the work of CARB and the Task Force and urges you to consider pursuing new approaches to broad, rigorous offset protocols for agricultural land management. There are millions of acres of cropland across California and the U.S. which would benefit from the transition to climate-smart agricultural practices.

Thank you,  
Max DuBuisson  
Indigo Ag

Attachment: [www.arb.ca.gov/lists/com-attach/52-ab398offsetreport-ws-WjNdNQBIWGJWN1U6.pdf](http://www.arb.ca.gov/lists/com-attach/52-ab398offsetreport-ws-WjNdNQBIWGJWN1U6.pdf)

Original File Name: Indigo\_COPTF report\_CARB\_022223.pdf

Date and Time Comment Was Submitted: 2021-02-23 09:46:37

No Duplicates.



**Comment 41 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Misti

Last Name: Schmidt

Email Address: mschmidt@conservationpartners.com

Affiliation: California Council of Land Trusts

Subject: Support for offsets and draft Final Recommendations

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/53-ab398offsetreport-ws-UjFcOQRpVXICWwBs.pdf](http://www.arb.ca.gov/lists/com-attach/53-ab398offsetreport-ws-UjFcOQRpVXICWwBs.pdf)

Original File Name: CCLT Letter for ARB (2021-02-22).pdf

Date and Time Comment Was Submitted: 2021-02-23 10:07:43

No Duplicates.

**Comment 42 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Jon

Last Name: Costantino

Email Address: jon@tradesmanadvisors.com

Affiliation: VERA

Subject: VERA OPTF Comments

Comment:

See attached comment letter

Attachment: [www.arb.ca.gov/lists/com-attach/54-ab398offsetreport-ws-B3EBYgd0UGILUIU6.pdf](http://www.arb.ca.gov/lists/com-attach/54-ab398offsetreport-ws-B3EBYgd0UGILUIU6.pdf)

Original File Name: VERA OPTF draft final report comment letter - final.pdf

Date and Time Comment Was Submitted: 2021-02-23 11:25:11

No Duplicates.

**Comment 43 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: EDWARD

Last Name: MANN

Email Address: sequoia1910@gmail.com

Affiliation:

Subject: Initial Draft Report comments

Comment:

Regarding the even-aged management update and the new rules for variable harvest unit sizes: even 50 BA can be considered a shelterwood in most of our temperate forest ecosystems. Shelterwoods tend to promote shade tolerant, 'climax' species-like hemlock and cedar and discriminate against the early seral species-like Douglas-fir and redwood. Climax species are not as resilient as early seral species and with climate change becoming a more critical variable, this is an important distinction that needs to be recognized. There needs to be more distinct guidelines and differentiation between regeneration and stand improvement treatments with even-aged silviculture. Not all treatments are regeneration.

Secondly, there is an absence of guidelines for uneven-aged management and specifically patch size for regeneration in this silviculture system. The three Indian Tribes I have worked for in the Pacific northwest dictate that patch size is not to exceed 3-5 acres with certain exceptions made for particular forest types-like lodgepole pine and upper elevation forest types.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-02-23 13:15:16

No Duplicates.

**Comment 44 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Gary

Last Name: Hughes

Email Address: garyhughes.bfw@gmail.com

Affiliation: Biofuelwatch

Subject: Offsets Task Force and Crisis of Forest Governance

Comment:

Attached is a comment letter from Biofuelwatch.

Attachment: [www.arb.ca.gov/lists/com-attach/56-ab398offsetreport-ws-B2gCYgdgVnYBYlcj.pdf](http://www.arb.ca.gov/lists/com-attach/56-ab398offsetreport-ws-B2gCYgdgVnYBYlcj.pdf)

Original File Name: OffsetsTaskForce\_Comment\_Biofuelwatch\_23Feb2021.pdf

Date and Time Comment Was Submitted: 2021-02-23 14:07:17

No Duplicates.

**Comment 45 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Ryan

Last Name: Andre

Email Address: lawclerk@williamsonlawpolicy.com

Affiliation:

Subject: Comments of A-Gas Americas on Task Force Recommendations

Comment:

Comments of A-Gas Americas attached.

Attachment: [www.arb.ca.gov/lists/com-attach/57-ab398offsetreport-ws-AGEHLAFnVWcAdVIN.pdf](http://www.arb.ca.gov/lists/com-attach/57-ab398offsetreport-ws-AGEHLAFnVWcAdVIN.pdf)

Original File Name: A-Gas Americas Comments CARB Task Force Final  
Recommendations\_signed.pdf

Date and Time Comment Was Submitted: 2021-02-23 14:27:05

No Duplicates.

**Comment 46 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Aram

Last Name: Nadjarian

Email Address: aram@mozaicmc.com

Affiliation: Mozaic Media & Communications, Inc.

Subject: Comments on Compliance Offset Protocol Task Force (Final Draft Report)

Comment:

Attached please find a public comment letter submitted on behalf of  
Chugach Alaska Corporation, Ahtna Inc. and Sealaska Corporation  
(all three are Alaska Native Corporations).

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/58-ab398offsetreport-ws-UTBcNFAyVVkBNVQ6.pdf](http://www.arb.ca.gov/lists/com-attach/58-ab398offsetreport-ws-UTBcNFAyVVkBNVQ6.pdf)

Original File Name: ANC 2nd Comment Letter to Offset Taskforce (2\_23\_21).pdf

Date and Time Comment Was Submitted: 2021-02-23 16:02:09

No Duplicates.

**Comment 47 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Kevin

Last Name: Hagen

Email Address: kevin.hagen@ironmountain.com

Affiliation: Iron Mountain Corporation

Subject: February 2021 Comments to CARB Task Force Re: Halon ODS Eligibility  
Comment:

Thank you for your consideration of these comments. We are looking forward to the March 2, 2021 CARB Task Force Meeting.

Best regards,

Kevin Hagen

Attachment: [www.arb.ca.gov/lists/com-attach/59-ab398offsetreport-ws-UjtQJFA+VWhXDgNu.pdf](http://www.arb.ca.gov/lists/com-attach/59-ab398offsetreport-ws-UjtQJFA+VWhXDgNu.pdf)

Original File Name: Iron Mountain and Wesco Comments to CARB Task Force Re Halon ODS Eligibility.pdf

Date and Time Comment Was Submitted: 2021-02-23 16:35:06

No Duplicates.

**Comment 48 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Clayton

Last Name: Munnings

Email Address: munnings@ieta.org

Affiliation:

Subject: IETA Comments OPTF Report

Comment:

Please find IETA's comment attached.

Attachment: [www.arb.ca.gov/lists/com-attach/60-ab398offsetreport-ws-AGkBYIAIUGIKUwJt.pdf](http://www.arb.ca.gov/lists/com-attach/60-ab398offsetreport-ws-AGkBYIAIUGIKUwJt.pdf)

Original File Name: ieta\_optf\_comment\_final.pdf

Date and Time Comment Was Submitted: 2021-02-23 16:17:26

No Duplicates.



**Comment 49 for Comments on initial draft report of the AB 398 Compliance Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Thomas

Last Name: Cortina

Email Address: cortinaec@comcast.net

Affiliation: Halon Recycling Corporation

Subject: Halon Recycling Corporation comment for Compliance Offset Protocol Task Force  
Comment:

See comment attached.

Attachment: [www.arb.ca.gov/lists/com-attach/62-ab398offsetreport-ws-UTIXI1IwVlpVPAhu.pdf](http://www.arb.ca.gov/lists/com-attach/62-ab398offsetreport-ws-UTIXI1IwVlpVPAhu.pdf)

Original File Name: HRC Offset comment 2 and ODS IA\_workshop slides.pdf

Date and Time Comment Was Submitted: 2021-02-23 16:38:24

No Duplicates.

**Comment 50 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Tony

Last Name: Brunello

Email Address: tbrunello@calstrat.com

Affiliation:

Subject: California Forest Carbon Coalition comment

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/67-ab398offsetreport-ws-BmUHYABtAjgHZ1Q7.pdf](http://www.arb.ca.gov/lists/com-attach/67-ab398offsetreport-ws-BmUHYABtAjgHZ1Q7.pdf)

Original File Name: California Forest Carbon Coalition comment\_2.23.21.pdf

Date and Time Comment Was Submitted: 2021-02-25 20:19:06

No Duplicates.

**Comment 51 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Kristen

Last Name: Taddonio

Email Address: ktaddonio@igsd.org

Affiliation:

Subject: Comment from IGSD

Comment:

IGSD STRONGLY SUPPORTS and is GLAD TO SEE the proposed Modification(s) to Ozone Depleting Substances (ODS) protocol adding R-22, R-134a, R-125, R-32, and R-143a as eligible.

We also strongly suggest that the protocol be clarified that avoided emissions--such as avoided annual/operational R-22 leakage from supermarkets not yet required by regulation to switch--be eligible under the protocol.

Our read of the existing protocol suggests that this might already be the case, since the protocol includes "reductions in "Emissions of ODS from leaks and servicing through continued operation of equipment." However, additional clarity on that point could be very helpful.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-02-28 09:44:34

No Duplicates.

**Comment 52 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Brandt

Last Name: Rousseaux

Email Address: brandt.rousseaux@pem-carbon.com

Affiliation: Planetary Emissions Management Inc

Subject: Planetary Emissions Management comment

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/75-ab398offsetreport-ws-BWZQOVU5BDpXNAdp.pdf](http://www.arb.ca.gov/lists/com-attach/75-ab398offsetreport-ws-BWZQOVU5BDpXNAdp.pdf)

Original File Name: Comment from Planetary Emissions Management.pdf

Date and Time Comment Was Submitted: 2021-03-01 20:55:06

No Duplicates.

**Comment 53 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws) - 2nd Workshop.**

First Name: Bruno

Last Name: Marino

Email Address: bruno.marino@pem-carbon.com

Affiliation: Planetary Emissions Management Inc

Subject: Planetary Emissions Management comment #2

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/76-ab398offsetreport-ws-VzRTOlQ4V2kLaAVr.pdf](http://www.arb.ca.gov/lists/com-attach/76-ab398offsetreport-ws-VzRTOlQ4V2kLaAVr.pdf)

Original File Name: Comment 2 from Planetary Emissions Management.pdf

Date and Time Comment Was Submitted: 2021-03-01 21:04:31

No Duplicates.

**Comment 1 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws). (At Workshop)**

First Name: Michael

Last Name: Siminitus

Email Address: Michael@wastebusters.info

Affiliation:

Subject: Public comments

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/42-ab398offsetreport-ws-WjlQN1AjU2IAWVMw.pdf](http://www.arb.ca.gov/lists/com-attach/42-ab398offsetreport-ws-WjlQN1AjU2IAWVMw.pdf)

Original File Name: CARB carbon farming Letter.pdf

Date and Time Comment Was Submitted: 2020-12-04 08:14:17

No Duplicates.

**Comment 2 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws). (At Workshop)**

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

**Comment 3 for Comments on initial draft report of the AB 398 Compliance  
Offsets Protocol Task Force (ab398offsetreport-ws). (At Workshop)**

First Name: Timothy

Last Name: Robards

Email Address: cal4str@gmail.com

Affiliation: California Society of American Foresters

Subject: California Society of American Foresters comment

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/78-ab398offsetreport-ws-BmUCa1Q4BzkHZFU7.pdf](http://www.arb.ca.gov/lists/com-attach/78-ab398offsetreport-ws-BmUCa1Q4BzkHZFU7.pdf)

Original File Name: Comment Letter California SAF.pdf

Date and Time Comment Was Submitted: 2021-03-03 21:00:05

No Duplicates.