

May 8, 2018

To: Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, California 95814

Online Submission: https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=ct-4-26-18-wkshp-ws&comm_period=1

Element Markets understands that the American Carbon Registry (ACR) methodology “**Transition to Advanced Formulation Blowing Agents in Foam Manufacturing Use, Version 2.0**” has been recommended to be added to the list of approved methodologies for the creation of Air Resources Board Offset Credits (ARBOCs). Element Markets supports this methodology and the recommendation that ARB members consider and approve this methodology in their upcoming rulemaking proceedings.

The benefits of this methodology include the following:

- The potential volume of offsets that can be generated is significant. To date, two projects have already registered over 100,000 voluntary offsets
- As this is a manufacturing-based methodology, there is the opportunity for foam manufacturing businesses located in CA to create emission reductions in lower income and distressed communities.
- The methodology addresses the reduction of fluorinated gases which are short-lived climate pollutants (SLCPs).

In addition, the adoption of more high-quality ARB offset protocols is an important part of the process to continually improve the effectiveness of AB-32 and assist with the goal of meeting the 2030 GHG reduction targets set by the state of California.

Respectfully,



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