To Whom it may concern:

My name is Joe Stockdale and I am the “Industry Relations Manager” for the Accella Corporation, division of Carlisle Construction Materials.

We do substantial business in California and have numerous employees living there, as well as a large nationwide presence. Please consider our position below:

We understand that an offset methodology adopted by the American Carbon Registry (ACR) has been recommended to be added to the list of approved methodologies for the creation of Air Resources Board Offset Credits. I recommend that ARB members consider and approve the methodology in their upcoming rulemaking proceedings.

The methodology is listed on the ACR site as “Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions from the Transition to Advanced Formulation Blowing Agents in Foam Manufacturing Use, Version 2.0.” This methodology would apply to several end-uses[1] where low-GWP blowing agents can be employed. Our company is interested in using this carbon offset credit methodology as an incentive to undertake such changes in our manufacturing process for spray PUF insulation. The benefits from credits arising from the use of low-GWP blowing agents in these end uses will have a direct environmental benefit on California.

Many thanks for your attention, and please call with any questions,