

November 6, 2020

Mr. Gavin McCabe
Chair
Offsets Protocol Task Force
Via web submission

RE: Comments in response to Compliance Offsets Protocol Task Force Initial Draft Recommendations on October 7, 2020

Dear Mr. Gavin McCabe

3Degrees Group, Inc. (“3Degrees”) appreciates this opportunity to provide comments to the Offsets Protocol Task Force in response to the *Compliance Offsets Protocol Task Force Initial Draft Recommendations* published on October 7, 2020. 3Degrees is an offset project developer based in San Francisco and has been working with dozens of domestic livestock offset projects to issue credits into ARB’s Cap-and-Trade program. 3Degrees strongly supports the continued development of two sectors in particular that are promoted by the report:

1. Diversion of manure storage from anaerobic systems (“alternative manure management”)

As is well articulated by the report, 3Degrees believes the existing Livestock Protocol provides a rigorous quantification framework, which has already been reviewed and approved by ARB, for estimating emissions changes from the implementation of alternative manure management practices. To adapt this protocol, 3Degrees believes the primary challenge will be writing a performance standard to establish which alternative manure practices are considered additional. The scale of the potential methane avoidance from alternative manure management projects, particularly within the state of California, and their viability as offset projects, justifies the development of this performance standard.

With the support of voluntary carbon markets, 3Degrees is developing viable carbon offset projects across a variety of technology types. 3Degrees is currently developing “advanced solid separation” projects that remove 80% or more of the volatile solids from manure before sending it to a lagoon. 3Degrees is crediting these projects under the Clean Development Mechanism’s *AMS-III.Y: Methane avoidance through separation of solids from wastewater or manure treatment systems*. Our first project is undergoing validation under the Verified Carbon Standard, and there is a robust pipeline of other “advanced solid separation” projects behind it. Given the increase in value and dependability, compliance eligibility will scale this sector quickly while enabling the viability of methane avoidance projects at smaller dairies. 3Degrees therefore wants to voice strong support for the development alternative manure management protocol.

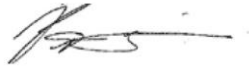
2. Restoration of California Deltaic and Coastal Wetlands Methodology.

3Degrees also strongly supports the recommended American Carbon Registry’s Restoration of California Deltaic and Coastal Wetlands methodology. The report provides a good overview of

current projects in development for the voluntary market and the way that compliance pricing could greatly increase the adoption of wetland and rice conversion in California.

Thank you for your consideration and we look forward to continued discussion on the opportunity presented by these protocols.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Weisberg', with a horizontal line extending to the right.

Peter Weisberg
Director, Carbon Markets
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