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March 23, 2017

To: Clerk of the Board
Air Resources Board
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Online Submission: <https://www.arb.ca.gov/lispub/comm/bclist.php>

**COMMENTS OF THE AMERICAN CARBON REGISTRY TO BE PRESENTED
MARCH 23 AT ARB MEETING ON THE SHORT-LIVED CLIMATE STRATEGY**

These comments are submitted on behalf of the American Carbon Registry with respect to the proposed Short Lived Climate Pollutant (SLCP) Strategy before the Board for adoption today.

We commend ARB for taking an aggressive approach to the problem of short lived climate pollutants. However, we are concerned that ARB is not taking advantage of a very key tool in their pollution reduction toolbox – the use of offsets through the adoption of new protocols into AB32. Offsets created through the reduction of GHGs from privately funded projects are able to achieve greater pollution reductions at a lower cost to the public than government funded programs or typical "command and control" regulations. Moreover, because the inclusion of offsets in a pollution reduction strategy provides incentives for businesses to act and promotes innovation, reductions occur more quickly than if ARB is forced to go through regulatory requirements before taking action.

As noted by the final SLCP report, ARB cannot achieve its 40% reduction target for these pollutants, and especially for HFCs, through the application of existing EPA or promised international program reductions only. More will be required.

We urge the Board to consider adding offsets methodologies to address SLCPs. ACR has adopted, and is developing, several such methodologies expressly for SLCPs, including:

- Conversion of High Bleed Pneumatic Controllers in Oil & Natural Gas Systems
- Transition to Advanced Formulation Blowing Agents in Foam Manufacturing and Use
- Use of Certified Reclaimed HFC Refrigerants and Advanced Refrigeration Systems, and
- Landfill Gas Destruction and Beneficial Use

Consider a few highlights for these methods, most of which can be applied in urban, EJ areas, to reduce GHG emissions locally, as well as globally. The Advanced Refrigeration methodology could provide significant experience to ARB to help guide the adoption of a more comprehensive HFC reduction strategy by 2030. The methodology incentivizes the use of low GWP refrigeration systems through a carbon offset granted for the installation of a new or retrofit of an existing system. Not only could this drive investment and jobs in the urban, built environment, but lower energy costs would directly benefit local businesses in these communities.

The methodology for Advanced Formulation Blowing Agent in Foam Manufacturing and Use reduces emissions, while allowing businesses to make a successful transition to new blowing agents, without the costs and risks to retrofit their equipment. Such manufacturing exists in urban areas, and some manufacturers in California are using these new blowing agents.

We are also enhancing ARB's current ODS destruction methodology to include new ODS sources such as HCFC-22 and halons, incentivize destruction of high-GWP foam insulation, and introduce new destruction technologies. It should be noted that with ODS, the emission reductions begin with the collection of old equipment and material, which may be sitting in auto body shops, old appliances, refrigerant recovery facilities, or other places within a community. By removing this equipment and material, the risk of an accidental release is avoided. Furthermore, the offset market has multiplied the value of used refrigerants, allowing local businesses to realize additional revenue by capturing and selling these gases.

We urge the Board to accelerate the reduction of SLCPs by incorporating the adoption of new offset protocols into AB32 as part of the Strategy.