

May 10, 2018

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

Re: Offset Protocol for Low-GWP Foam Blowing Agents

To Whom It May Concern:

First Environment of California 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). First Environment 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 with ACR.
- As this is a manufacturing-based methodology, there is the opportunity for foam manufacturing businesses located in California to create emission reductions in lower income 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.

Sincerely,

FIRST ENVIRONMENT OF CALIFORNIA, INC.



Michael M. Carim  
Senior Associate

New Jersey

California

Georgia

Illinois

Mississippi

New York

Puerto Rico

Canada

