



June 3, 2016
American Carbon Registry
980 Ninth Street, Suite 2060
Sacramento, California 95814

Via: ACR@winrock.org

Re: Comments to Proposed “Emission Reduction Measurement and Monitoring Methodology of Ozone Depleting Substances and High-GWP Foam” American Carbon Registry Version 1.0 April 2016.

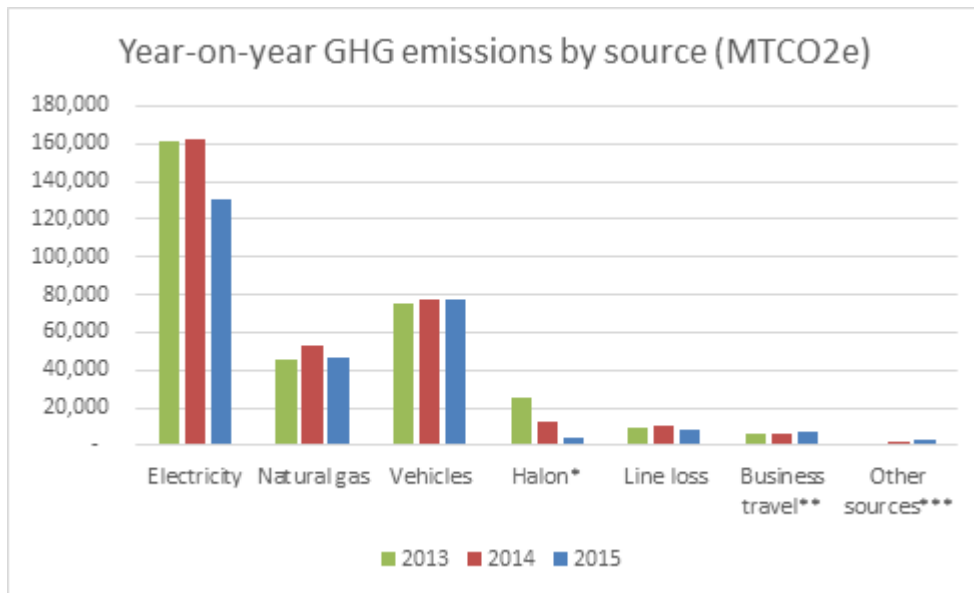
Greetings,

Thank you for the opportunity to provide commentary on the proposed Methodology.

Iron Mountain Incorporated (NYSE: IRM) is the global leader for storage and information management services. Trusted by more than 220,000 organizations around the world, Iron Mountain boasts a real estate network of more than 80 million square feet across more than 1,350 facilities in 45 countries dedicated to protecting and preserving what matters most for our customers. Founded in 1951, Iron Mountain stores and protects billions of information assets, including critical business documents, electronic information, medical data and cultural and historical artifacts.

As part of our portfolio of asset protection facilities, Iron Mountain operates hundreds of data vaults protected by pressurized gas fire suppression systems, the majority of which employ Halon 1301. These systems represent an opportunity for retrofit and we have successfully tested environmentally benign alternatives to Halon.

We are committed to reducing our Greenhouse Gas footprint and transparent, public reporting of our progress. We have identified our Halon 1301 as a priority for transition because, despite efforts to limit releases, actual fires or false alarms triggering system discharges represents an important component of our GHG inventory.



Our transition to better alternatives is hampered by the cost of conversion including replacement gas and the fact that reselling the Halon would mean its future release resulting in both Ozone and Climate damaging pollution. We believe that with modifications, this protocol could offer the key to an economically viable transition path by creating market mechanisms that incentivize replacements with a <1 GWP alternative. Iron Mountain alone is set to eliminate 1 million tons of GHG's. This is material.

Recommendations

We are encouraged to see the addition of Halon 1301 in the draft ODS Methodology. Unfortunately, there are several details in the methodology that are a barrier to a successful transition scenario. We specifically see the need for modifications that consider the following:

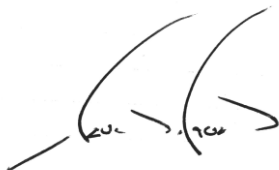
1. Align with imminent regulatory requirements for the complete destruction of ODS Fire Suppressants. [NFPA, SNAP, Canada, US Climate Action Plan and regulatory harmonization for Carbon Markets.]
2. Insure that the destruction emission credit methodologies adequately reflect a total flooding event as Business as usual. Currently, the methodology relies solely upon leak rate factors that may not represent the more realistic total flooding event. The risk to the atmosphere is primarily reflected when the total volume of Halon is released. The emission factor calculations need to reflect this and account for the value of eliminating this eventuality.
3. Insure that the calculation considers replace options in ways that incent alternatives with GWP less than 1. The draft methodology assumes replacement with an average of current market share replacement options, including HFC products which under leverages the potential impact of this change.

Thank you for your consideration of these issues. Iron Mountain is committed to providing technical, policy and administrative support to the ongoing methodology development. We

look forward to participating throughout the process and supporting our mutual goals of market mechanisms facilitating the reduction of Ozone impact and GHG's in our atmosphere.

Please feel free to contact me for additional information and/or any inquiries.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Hagen', with a stylized flourish extending from the end.

Kevin Hagen
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CC William Meaney Chief Executive Officer
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