



1315 K STREET
MODESTO, CALIFORNIA 95354-0917
TELEPHONE (209) 527-6453
FAX (209) 527-0630

July 25, 2008

Linda Adams, Chair
California Climate Action Registry
515 South Flower Street
Los Angeles, CA 90071

Re: Manure Management Project Reporting Protocol

Dear Ms. Adams:

Western United Dairymen (WUD) is the largest dairy farmer trade association in California representing approximately 1,100 families who produce 60% of California's milk. WUD assists members with milk pricing, animal welfare, environmental quality, and labor issues, and is a primary source for dairy information.

Through a grant from the California Energy Commission, WUD has been involved in providing financial assistance to dairymen interested in installing anaerobic digesters on farms. These systems provide many benefits, including a reduction in greenhouse gas emissions. Capturing the economic benefits of these reductions will enhance the adoption of these systems and lead to greater overall reductions in greenhouse gas emissions. However, recently these dairymen have been experiencing significant obstacles in permitting their projects. We want to make you aware that these hurdles could stymie the development of these projects, use of the protocol, and reductions in greenhouse gas emissions.

Western United Dairymen was involved in the process of developing this protocol, providing comments and insight on how the protocol might work on a California dairy. As the protocol was taken out to dairies and used, those who were using it found ways in which it could be improved. WUD would like to applaud CCAR for considering the comments of those using the protocol and using those comments to improve the protocol.

We do have one comment on the arrangement for flow meters. The required arrangement for biogas flow meters is illustrated in Figure 2 on page 25 of the reporting protocol. This seems to be a new requirement for this specific arrangement. This arrangement appears to require excessive meters as one flow meter could be removed from this arrangement and still provide all of the required information. The requirement for flow meters should be left flexible. The requirement should be to have adequate gas meters to measure the total biogas produced as well as how much was combusted in each device.

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We continue to look forward to working with the Registry in developing other protocols in the future as other practices on dairy farms that will reduce emissions of greenhouse gases are developed and better quantified and can be incorporated in the protocol.

With the exception of the comment on flow meters, Western United Dairymen supports this revision to the Manure Management Project Reporting Protocol.

Very truly yours,



Michael L. H. Marsh, CPA
Chief Executive Officer

MM/kmr

cc: Paul Sousa
Paul Martin