



ENVIRONMENTAL DEFENSE

finding the ways that work

November 15, 2007

Derek Markolf
Senior Policy Manager
California Climate Action Registry
523 West 6th. Street, Suite 428
Los Angeles, CA 90014

Re: Public Comment on Proposed Landfill Project Protocol

Dear Mr. Markolf,

Thank you for your ongoing efforts to create a protocol to estimate emission reductions from landfill methane control projects. As the need for projects to control greenhouse gas emissions expands, the need for accurate and defensible protocols to quantify emissions reductions will also grow. Environmental Defense therefore appreciates this opportunity to comment on the protocol and thanks you for considering comments from stakeholders.

Environmental Defense supports offset protocols that recognize emissions reductions meeting established criteria in the areas of baseline, additionality, verification, permanence, and leakage. In addition to other goals, these criteria attempt to ensure that project emissions reductions are calculated accurately, are greater than business as usual, have public confidence, and last for long periods of time. The current draft of the offset protocol does a nice job of meeting these criteria and we support those characteristics that do this. Namely, we support the protocol's sound calculation methods, the requirement for third party verification, and the requirement of future organic waste diversion programs to prevent baseline inflation. Also, the draft protocol takes a strong stance on additionality by requiring the additionality test to be met every year, rather than providing a guarantee of project credits for the life of an emissions reduction project.

As emissions estimation methodology for landfills improves, (particularly with respect to fugitive emissions estimations) Environmental Defense asks CCAR to consider new approaches and methods for calculating project emissions. One example of the emerging thinking on emissions reductions is available via a new manual published by the Nicholas Institute for Environmental Policy Solutions with scientists from Environmental Defense titled, "Harnessing Farms and Forests in the Low-Carbon Economy." This manual presents what we call the Duke Standard, a comprehensive method on "How to Create, Measure, and Verify Greenhouse Gas Offsets."

Once again, thank you for your hard work in preparing this thoughtful and accurate protocol and for considering our public input. Please feel free to contact me with questions or concerns.

Sincerely,

Timothy O'Connor
Climate Change Policy Analyst
Environmental Defense