



September 9, 2009

Gary Gero, President
Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014

Dear Mr. Gero,

The Dublin San Ramon Services District (DSRSD) has reviewed the current draft of the proposed Organic Waste Digestion (OWD) Project Protocol. Although your "Requested Public Feedback" states you are asking for comments on only two specific issues, we have serious concerns regarding another critically important aspect of the proposed protocol.

Section 3.2 "Project start date" states that only projects that began in 2001 or later will be eligible for consideration under this protocol. This limitation will effectively ignore the proactive and often capital intensive efforts made by agencies prior to this arbitrary cut-off date. For example, DSRSD has operated a cogeneration facility since the 1980's, which utilizes digester gas (methane) as a primary fuel source for producing heat and electricity, which is then used for treatment at the Regional wastewater facility. These cogeneration facilities have been continually upgraded and expanded over the years as the flow of wastewater increased due to population growth, and also as BAAQMD emissions limits have become more and more strict. To ignore this effort and this considerable regional investment would skew the GHG data that is collected, and it would effectively penalize the District's customers for making improvements prior to the establishment of this arbitrary cut-off date. We request that the "Project Start Date" be revised to 1980, at the earliest.

We feel that the proposed change is worthy of further study and discussion prior to adoption. We appreciate your consideration in allowing the District to comment on the draft OWD Project Protocol. If you have any questions, please feel free to contact myself or Sue Stephenson at (925) 828-0515.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Gallagher", is written over the word "Sincerely,".

Daniel P. Gallagher
Operations Manager

cc: Bert Michalczyk, General Manager
Sue Stephenson, Community Affairs Supervisor
Levi Fuller, Operations Supervisor