



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

August 26, 2010

RE: AgRefresh Comment Regarding Version 3.0 of the Livestock Protocol

Dear Climate Action Reserve Policy Team,

Thank you for the opportunity to provide comment on Version 3.0 of the Livestock Project Protocol.

We appreciate your efforts to reduce the costs of utilizing the Livestock Protocol, and your acknowledgement of the unique challenges that small-scale livestock anaerobic digestion projects face.

The proposed options regarding the reporting period and verification cycle appear to strike an appropriate balance between reducing some of the costs of compliance and maintaining the need for rigorous monitoring.

Developing an aggregation option for livestock projects was suggested by multiple stakeholders throughout 2010 anticipating a revision to the Livestock Protocol. Such an option for smaller scale projects would facilitate adoption of the protocol by more projects and therefore allow those projects to benefit from selling CRTs. The additional revenue stream would contribute to the economic viability of anaerobic digestion as a manure management technology. We believe that an aggregation mechanism for the Livestock Protocol would create a win-win solution to further reduce the costs of compliance and make the CAR program more accessible to livestock anaerobic digestion projects.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Wood".

Patrick Wood
Chief Environmental Accountant