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June 2, 2011

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

**RE: Public Comments on Proposed Landfill Project Protocol 4.0**

Ladies and Gentlemen:

Thank you for the opportunity to comment on the proposed Criteria B (Size Threshold) and Criteria C (Renewable Energy Certificate/Green Power Exclusion) in the Proposed Landfill Project Protocol 4.0. These comments are in addition to other comments filed on our behalf by our attorneys.

Coffee County, Alabama, owns and operates a Subtitle D landfill, which is located in southeast Alabama. Funded by the sale of GHG credits based on CAR's Landfill Gas Protocol, we have installed a landfill gas collection and destruction system utilizing a flare. The Coffee County Landfill Project is registered as Project Number 467 with CAR and was one of the first landfill gas collection and destruction projects registered with CAR. We have been verifying GHG credits with CAR since 2009, and selling these credits to fund development and operation of our system. No laws or regulations require the installation of our system. Without the revenue generated by the sale of the GHG credits, Coffee County would not have installed the system. Coffee County's decision to install the system was purely voluntary, made with the realization that the sale of GHG credits would allow us to install a system which was otherwise not economically justified. This project is truly additional and has fulfilled the goals of CAR with greenhouse gas destruction.

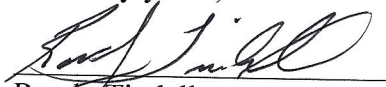
Coffee County has been exploring the addition of an electricity generation system with an independent third party developer in order to further utilize the resources of the landfill gas by not only destroying the methane, but as well as generating electricity. By generating electricity with the methane, this resource is not "wasted" by simply burning it with the flare. While methane is destroyed either way, generation of electricity creates a further environmental benefit by displacing the use of other fossil fuels.

Electricity prices in many areas of the United States, including southeast Alabama, are low compared to prices in other parts of the country, particularly in the northeast and in California. Coffee County worked for years trying to encourage a developer to install a landfill gas to energy system, and finding no takers made the decision to use GHG credits verified through CAR's protocol to fund our collection and destruction system. Simply put, we fear that the sale of electricity alone will not provide sufficient incentive for a developer to install the electricity generation facilities. We are concerned that without the additional revenue which could be generated with REC's (when a market for and the sale of REC's may develop for an Alabama project in the future), the installation of an Electricity Development Project may not be economically feasible.

Our concern with the proposed Criteria B (Size Threshold) and Criteria C (Renewable Energy Certificate/Green Power Exclusion) is that by excluding landfills over a certain size which use the energy, and/or excluding GHG Credits from projects which result in the issuance of REC's, CAR will discourage the installation of projects which use energy from alternative sources, such as those utilizing landfill gas. Thus the proposed Protocol 4.0 encourages waste of the methane resource, and in fact harms the environment by discouraging the displacement of other fossil fuels.

We respectfully urge the removal of Criteria B and C.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Randy Tindell", written over a horizontal line.

Randy Tindell  
Coffee County Engineer  
For Coffee County, Alabama