

University of California's comments to Climate Action Reserve's Livestock Protocol
Version 4 for Public Comment:

In the *first* paragraph of section 3.4.1, the proposed requirement that the 5 year period occur "immediately" prior to the start date is inconsistent with the definition of start date since the start date is the start of operations and not the start of construction. Ample time should be allowed for construction prior to the project's start date. It may be beneficial to define start of construction as another recognized milestone and to use start of construction in the protocol. For example, the wording may be revised to read "...developers of livestock projects must demonstrate an uncontrolled anaerobic manure management system was in place for the a period of five years immediately prior to the start of construction for the project's start date. Alternatively, if the start of construction is not used as a project milestone, at a minimum consider deleting the word "immediately" before "prior to" in the first paragraph.

Similarly, in the *second* paragraph of section 3.4.1, the proposed requirement that the uncontrolled anaerobic manure management system be in place "at all times" prior to the start date is inconsistent with the definition of start date. For example, the wording may be revised to read "...developers of livestock projects must demonstrate that an uncontrolled anaerobic manure management system was in place at all times up until start of construction for the project's start date.

It should also be noted that paragraph 3.4.1 appears to have an error in the first sentence which is probably intended to read "For livestock facilities that have been in operation for more than five ~~two~~ years, developers..."