



May 27, 2022

Climate Action Reserve  
818 W 7<sup>th</sup> St, Suite 710  
Los Angeles, CA 90017  
*Submitted via email*

Re: Draft U.S. Landfill Protocol Version 6.0

Dear Reserve staff:

Element Markets (EM) is pleased to submit comments on the draft U.S. Landfill Protocol that was released on May 16, 2022. We recognize the care taken by the Reserve in revising its existing project protocols and appreciate the opportunity to provide input in the public comment process.

EM supports the introduction of a third crediting period option for landfill projects that meet the additionality criteria and monitoring requirements in the latest version of the protocol. Under version 6.0, landfill projects will be granted the much-needed opportunity to continue reporting their voluntary methane emission reductions, resulting in significant climate benefits.

### Suggested Revision:

EM requests the Reserve's consideration of the following revision to language in section 6.1 on "periods when not all destruction devices measured under a single flow meter are operational." We are proposing an alternative for project developers to demonstrate whether the remaining active devices could destroy methane at a flowrate above the nameplate capacity without a marked decrease in efficiency. The suggested addition is in red below:

3. For any period where one or more destruction devices within this arrangement is not operational, it must be documented that the remaining operational devices have the capacity to destroy the maximum gas flow recorded during the period **or are designed in such a manner that it is physically impossible for gas to pass through at a lower destruction efficiency**. For devices other than flares, it must be shown that the output corresponds to the flow of gas.

Thank you for opening the Landfill Project Protocol for public comment and the thoughtful work done to expand its scope while maintaining the Reserve's trademark high integrity.