



February 8, 2024

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: “The State of California’s Draft Priority Climate Action Plan” - COMMENTS

Dear Air Resources Board Staff,

California Environmental Voters commends the Air Resources Board for its thorough Priority Climate Action Plan (PCAP) that showcases a multi-sector approach to mitigate emissions. Many of these measures reflect the Climate Pollution Reduction Grant program’s intent to fund ambitious strategies, a necessary tool in realizing immediate benefits to the climate crisis. Furthermore, low-income communities and communities of color have been disproportionately impacted by the impacts of global warming and air quality issues. Consideration of how to best uplift equity for these groups is crucial in making comprehensive plans addressing climate change.

As such, we request the removal of **Agriculture Measure 2: Reduce Methane Emissions by expanding California’s Existing Dairy Digester Research and Development Program (DDRDP)**. The measure states that these projects have previously been sited in low-income and disadvantaged communities, and bolstering the existing program’s research and demonstration projects would be beneficial to the local economy and environment. This intent is contradictory to the accounts of residents who live in areas proximate to digesters. Dairy digesters are a known source of odor, air quality, and water quality issues to neighboring households¹, many of which are environmental justice communities².

Moreover, biogas as feedstock for hydrogen is not renewable, nor clean. Moving toward a zero-emission future demands a departure from combustion fuels, including biogas. The carbon reduction benefits of biogas as fuel source are overinflated³. As a state, we must be strategic with resources and ensure these are utilized for solutions we know are needed, not actions that have clear detriments to local air and water quality.

We would like to highlight several measures that stand out as particularly critical, and would yield profound benefits if they were catalyzed via CPRG funding:

Transportation Measures:

1. Create a Holistic, Heavy-Duty Zero-Emission Vehicle Buydown Program

¹ Spector, Rebecca. “The Dairy Digester Dilemma: A False Climate Solution” *Center for Food Safety* (2021).

<https://www.centerforfoodsafety.org/blog/6457/the-dairy-digester-dilemma-a-false-climate-solution>

² Merchant, Emma Foehringer. “A Battle Is Underway Over California’s Lucrative Dairy Biogas Market.” *Inside Climate News* (2023). <https://insideclimatenews.org/news/28122023/milking-it-battle-underway-california-dairy-biogas-market/>

³ McKenna, Phil. “Is California Overstating the Climate Benefit of Dairy Manure Methane Digesters?” *Inside Climate News* (2023). <https://insideclimatenews.org/news/30122023/milking-it-california-overstating-climate-benefit-dairy-manure-methane-digesters/>

3. Bolster the State's Sustainable Port and Freight Infrastructure Program
4. Install Truck Charging to Support Zero Emissions Goods Movement at California Ports and Warehouse Districts
5. Allow for local deployment of ZEVs & ZEV infrastructure
6. Support Mobility Projects Uplifted by Communities

Industrial Measures:

1. Accelerate Industrial Decarbonization by expanding the existing Industrial Decarbonization and Improvement to Grid Operations Program (INDIGO)

Energy Measures:

1. Expand Decarbonization through the Energy Conservation Assistance Act
5. Enable Renewable Microgrids for Rural Communities and Tribes

Agriculture Measures:

1. Expand California's Healthy Soils Practices

Natural and Working Lands Measures:

1. Bolster California's Forest Health Program
2. Expand Urban and Community Forest Projects
3. Expand the State's Wetland Restoration Program

These measures, if implemented, would have a slew of overlapping and complementary impacts for the state. Californians would see greater access to transit options and ZEVs, increased grid resilience, progress towards the state's 30 x 30 goals, and overwhelmingly, emissions reductions across multiple sectors. To ensure a comprehensive package of climate strategies, we urge Air Resources Board staff to strike **Agriculture Measure 2** from the state's PCAP to avoid heightened risk to environmental justice communities.

Sincerely,



Gracyna Mohabir
Clean Air and Energy Regulatory Advocate
California Environmental Voters