



October 22, 2024

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on August 22nd Dairy Sector Workshop

Dear CARB Staff,

EnviroVoters is appreciative of the opportunity to provide comments regarding the Dairy Sector Workshop held August 22nd in Fresno. The management of short-lived climate pollutants, methane especially, is a priority due to the significant and immediate impacts that mitigation can have on warming and to communities adjacent to methane sources. We remain committed to championing feasible, legitimate, and equity-centered methane management solutions.

As asserted in staff's workshop presentation, we know that methane from dairy livestock makes up almost half of the state's methane inventory. To have 1 in 5 of the nation's dairy cows residing in California understandably yields an extreme amount of methane from this source alone. When assessing how we manage the state's overall methane emissions, landfills and oil & gas have been addressed through regulations. These rules act on the severe warming power we know methane can have in the short term (over 80 times greater than carbon dioxide during a 20-year period¹). California has expressed its commitment to addressing methane in the short term as exhibited by our global partnerships in the newly established Subnational Methane Action Coalition.

"In addition, our efforts will require global solutions, bold ideas, and international partnerships to achieve the maximum reductions needed to accomplish our shared climate change goals," said Karen Ross, California Secretary for the Department of Food and Agriculture.

(Press Release December 3, 2023²)

We commend the state's pledge to address methane, yet we remain disappointed that CARB staff have delayed adoption of the regulations required by state law and have relied on insufficient calculations as a basis to demonstrate progress toward meeting methane reduction goals. We urge reconsideration of crediting voluntary herd size decreases toward the reduction

¹ Myhre, G., D. Shindell, et al. "Anthropogenic and Natural Radiative Forcing. In: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change ." Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. 2013. https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf

² California Air Resources Board. "California launches methane-cutting effort with subnational governments at COP28". Title of the publisher/website. December 2, 2023. <https://www2.arb.ca.gov/news/california-launches-methane-cutting-effort-subnational-governments-cop28>. Press release

requirement since there is no legal requirement that would otherwise limit the number of cows in California. This approach fails to achieve methane reductions toward the SB 1383 target. There has been insufficient progress made by the dairy methane sector to reach our emission goals as indicated by staff's presentation. The 2030 deadline to reach this target is only six years away. It is imperative that CARB pivots from an incentive-based approach and adopt the regulations required by SB 1383.

A digester-centric approach will limit progress toward "maximum reductions needed". We cannot keep the state tied to funding high-cost incentives for the dairy industry's methane capture infrastructure. For instance, digesters are an expensive investment, and many incentive-based programs for new technologies are intended to decline over time. We cannot keep funneling more money into these technologies as our only means of methane mitigation. This will deplete us of significant funds year-to-year as we maintain old digesters and support new construction efforts in an attempt to reach our ambitious 2030 target. The financial viability of digesters has yet to be determined, and the long-term solution should not be indefinite subsidization, especially when the Legislature already rejected that approach by mandating the adoption of regulations. Moreover, impacted communities have raised concerns that this incentive model has had adverse impacts on herd size and how livestock waste is managed.

CARB has authority to regulate the dairy sector beginning on January 1, 2024. As such, the Board should be capitalizing on the opportunity to broaden our suite of manure methane mitigation strategies.

Oil & gas and landfills are subject to thorough monitoring, reporting, and remediation timelines, which appropriately reflect the urgency of methane's substantial warming ability. There is no reason to keep treating the dairy industry more favorably and paying them to reduce emissions. No other industry receives such special treatment. Furthermore, as a component of a shift to a comprehensive regulatory approach, CARB must begin a thorough dairy methane monitoring program. The monitoring technology available to us can detect high concentrations of methane, which is important for the responsible facility's ability to mitigate their methane emissions in a timely manner. It is nonsensical to exempt the largest contributing sector from the necessary and rigorous requirements to act on methane that reaches this scale.

As California serves as the largest producer of dairy products, the Central Valley represents 94.9% of California's total milk production³. This concentrated mass production makes the Central Valley, along with the oil and gas sector, as one of the regions with the largest methane emissions. Additionally, dairy operations emit various air pollutants, exacerbating public health issues, including cardiovascular and respiratory diseases, particularly in already vulnerable communities.

Considering CARB's obligation to regulate the dairy sector and meet air quality standards, we appreciate the efforts of the Board to address community concerns regarding the impacts of dairy operations and dairy digesters. We look forward to a stringent regulation on dairy emissions that will provide a runway for the other appropriate bodies like local air districts and water boards to address these linked issues. Our communities should not be left behind as the state strives to meet its climate goals. We need a stronger commitment to long-term solutions that protect both the environment and the health of Central Valley residents. We look forward to

³ California Department of Food and Agriculture. "California's Top 10 Milk Producing Counties, Percent Share of California Milk Production, January-December 2013 ". *California Dairy Review*, Volume 18, Issue 3. March 2014.
<https://www.cdfa.ca.gov/dairy/uploader/docs/CDR%20MAR.pdf>

thorough and actionable next steps from staff to address the shortcomings of our dairy methane strategy and implement regulations required by Senate Bill 1383.

Regards,

Pa Houa Lee, Central Valley Regional
Organizer
California Environmental Voters

Gracyna Mohabir, Clean Air & Energy
Regulatory Advocate
California Environmental Voters