

CALIFORNIA CATTLEMEN'S ASSOCIATION

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October 29, 2015

Mrs. Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: DRAFT SHORT-LIVED CLIMATE POLLUTANT REDUCTION STRATEGY

Dear Chair Nichols,

The California Cattlemen's Association (CCA) is pleased to submit comments on the Draft Short-Lived Climate Pollutant Reduction Strategy (Strategy) offered by the California Air Resources Board (ARB) for review. CCA is a statewide trade organization that represents California beef producers and each segment of the beef industry.

In order to fulfill the requirements of SB 605 (Lara), ARB has proposed a series of regulatory and non-regulatory emission reduction strategies to reduce short-lived climate pollutants. Livestock are implicated as a source of methane through entire fermentation and manure management.

The majority of California's beef cows are raised on 40 million acres of private and public land. Ranchers that finish cattle in confinement manage solid manure which is removed from feedlot corrals, composted and sold to farmers.

Cattle finished in confinement are fed a total mixed ration to improve feed efficiency and thus produce less methane through enteric fermentation. Beef producers strive to increase an animals' efficiency whenever feasible so long as it is consistent with maintaining the highest standards of animal health and welfare.

The Strategy seeks to adopt voluntary and measureable objectives to reduce enteric fermentation by 25 percent by 2030. The Strategy references a report published by the dairy industry that outlines a national target to reduce emissions from enteric fermentation by 25 percent. This report does not fully reflect the efficiencies of milk production in California and does not reflect the beef industry at all. Although voluntary, it would be inappropriate to establish measurable objectives to reduce methane emissions from enteric fermentation based on the 2008 report published by the dairy industry.

Ranchers that raise cattle in confinement already feed ionophores to improve feed efficiency. No additional measures currently exist that are cost effective or feasible. Without practicable measures to reduce emissions of methane from enteric fermentation, ARB should not include any voluntary or regulatory objectives without first identifying actual management practices. As such, CCA respectfully requests any measureable objectives be removed from the draft strategy for enteric fermentation.

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CCA would also like to associate our comments with those submitted by Dairy CARES. CCA appreciates the opportunity to comment on the draft strategy and we respectfully request our comments be incorporated in the final document.

Sincerely,

A handwritten signature in black ink that reads "Justin Oldfield". The signature is written in a cursive, flowing style.

Justin Oldfield
Vice President, Government Relations