



November 6, 2020

The Honorable Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento CA 95814

Dear Chair Nichols:

Sustainable Conservation appreciates the opportunity to provide comments on the proposed Compliance Offsets Protocol Task Force's (Task Force) recommendations for compliance offset protocols. Sustainable Conservation is a conservation organization that takes a pragmatic, results-oriented approach to achieving environmental goals in ways that are just and make economic sense, based on solid science and real collaboration with private- and public-sector partners.

For 20 years, we have worked to reduce greenhouse gas emissions and water quality impacts from dairies through improved manure management. In the past five years we have engaged with CARB and other stakeholders to inform the dairy methane section of California's Short-Lived Climate Pollutant Strategy (SLCP) by providing written and oral comments and meeting with CARB staff. We then served as co-chair for the SB 1383 subgroup "Fostering Markets for Non-Digester Projects," or Alternative Manure Management Program (AMMP) projects. The subgroup evaluated carbon credits as part of its work and one of six final recommendations was to continue pursuing viability of carbon credits. We have also continued to actively engage with CDFA and other stakeholders to support and improve the efficacy of CDFA's AMMP to support dairies implementing projects that reduce the amount of methane emissions from manure management.

AMMP projects are a vital tool for reducing dairy methane emissions – and for achieving the 40% reduction goal in SB 1383 – in part because they are operationally-viable for most California dairies. Importantly, they also provide multiple environmental and community co-benefits, including reduced nitrate leaching to groundwater which is an urgent need in certain areas of the state to ensure access to clean drinking water. AMMP projects keep more of the manure nitrogen in solid form. That nitrogen then can be more easily converted into compost and other products which can be exported off the dairy and put to beneficial use elsewhere. As reported in the [2019 Summary Representative Monitoring Report](#) produced by the Central Valley Dairy Representative Monitoring Program, exporting excess manure is critical to help dairies come into total farm nitrogen balance, reducing the excess nitrogen available to pollute groundwater.

Due to the co-benefits to both methane reduction and water quality, Sustainable Conservation supports prioritizing AMMP projects for further consideration and analysis by CARB. The Task Force's recommendation paragraph on page 146 of their report clearly articulates the interest that

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we have directly heard from dairy producers in garnering grant or other incentive funding to support their implementation of AMMP projects.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Stacey Sullivan", with a long horizontal flourish extending to the right.

J. Stacey Sullivan
Policy Director