

Comments on Draft Short-Lived Climate Pollutants Reduction Strategy May 19, 2016

My name is Sandra Lupien. I live in Oakland, where I work for Food & Water Watch, a national advocacy organization with about 170,000 supporters in California. Thank you for your work on the Short-Lived Climate Pollution Reduction Strategy and for the opportunity to comment on the draft.

First, we applaud the California Air Resources Board's move to make California the first state to require factory farms to reduce their emissions of methane and other short-lived climate pollutants. Mandating such reductions is an important first step toward making polluters accountable for protecting the climate and the health of Californians. Food & Water Watch and many other public health and social justice organizations asked the Air Board to include such mandated reductions in the short-lived climate pollution reduction strategy, and we are pleased you agree this approach is necessary. Thank you.

However, we are very concerned that the proposed strategy relies heavily on the use of methane digesters, which are not an effective long-term solution to methane emissions from factory dairies. This expensive technology frequently results in leaked methane and other greenhouse gases like carbon dioxide and nitrogen oxide, which cause smog and public health issues like asthma. Furthermore, methane digesters fail to address the root cause of methane pollution from factory dairies, which is, of course, too many animals producing an unmanageable quantity of manure-based and enteric methane. As the Air Board moves toward implementing the proposed strategy in 2017, we hope it will eliminate digesters as an approach to mitigating methane, and instead work collaboratively with appropriate state agencies to craft policies that reduce methane emissions by promoting sustainable dairy operations in California that emphasize pasture-based methods and appropriate herd sizes.

Finally, we are pleased that by mandating methane reductions by factory dairy farms, the strategy would, if implemented, ensure that such reductions are truly additional by eliminating new projects from eligibility as offsets to be sold in the state's cap-and-trade market. In order to

ensure that the strategy achieves its targets, we urge the Air Board to also remove *existing* projects from the state's cap-and-trade program instead of allowing them to generate offsets for up to 10 years of operation. Likewise, we do not support any generation of Low Carbon Fuel Standard credits for any of these projects.

Again, thank you for the opportunity to weigh in on the Short-Lived Climate Pollution Reduction Strategy. Once the strategy is finalized, we look forward to working with you to develop and implement a regulation that will achieve the targets for methane reductions from dairies while protecting communities.