

# WESTERN UNITED DAIRIES

June 23, 2022

Liane Randolph  
Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Regarding: **Draft 2022 Scoping Plan**

Dear Ms. Randolph:

Western United Dairies (WUD) appreciates the opportunity to provide comments regarding the Draft 2022 Scoping Plan. WUD is the largest dairy farmer trade organization in California spanning the entirety of the state from Del Norte to San Diego Counties. The organization represents the diversity of dairy production in the state from organic, conventional, and grass-fed farming practices. WUD has been engaged on the issue of dairy methane emission reductions since the inception of discussions in California, including during the discussions around achieving the 40% reduction in manure methane emissions by 2030 contemplated in SB 1383 (Lara) in 2016. Our staff co-chaired subgroup #3 (Research Needs, Including Enteric Fermentation) of the SB 1383 Dairy and Livestock Greenhouse Gas Emissions Working Group. We are committed to helping the dairy industry meet the goals of SB 1383 while protecting the viability of our dairy families here in California.

WUD would like to thank the Air Resources Board (ARB) for the work that went into this Draft Scoping Plan. The plan mentions that California can serve as a model for other partners around the world in how to best move forward with achieving the reductions that are needed while maintaining a robust economy. This is how California will achieve meaningful global greenhouse gas (GHG) emissions reductions by being a successful laboratory of innovation while at the same time supporting our economy. This is a model that others can follow to expand California's successes beyond our borders. As such, ARB has selected a Proposed Scenario that best achieves the balance of cost-effectiveness, health benefits, and technological feasibility. Implementing this plan will be a big lift, but it is a better option than selecting an alternative that is not achievable and would unreasonably impact the California economy.

California dairy families have made tremendous progress toward the 2030 goals spelled out in SB 1383 for manure methane emissions. This shows that with the correct motivation progress can be made in emissions reductions while still supporting the rural economy. That motivation has come in the form of incentives to reduce emissions and create renewable energy that displaces fossil fuels. California dairies are very sensitive to leakage, so it is important that the

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motivation to move forward considers that and is tailored to minimize leakage as prescribed in SB 1383. With that type of motivation, California dairy families can continue to build on the incredible work that has already been accomplished. It is important that ARB continue this path to achieve the necessary emissions reductions and not just export them outside of California. The Proposed Scenario is what the science is telling us is the best option for climate change and we commend ARB for following that path. There are those that are trying to use our climate goals to further their own agenda of moving dairies out of California. But that agenda goes against the science of reducing global GHG emissions, addressing climate change, and complying with California legislation. It is important that California continue to follow the science to be that example for others.

The Draft Scoping Plan lists strategies for achieving success in dairy and livestock methane emissions reductions. Included on that list are enteric fermentation strategies. WUD has previously commented on ARB's misinterpretation of SB 1383 to include non-manure livestock methane sources under ARB's regulatory authority. WUD garnered a Legislative Counsel Opinion clarifying that ARB does not have legislative authority over enteric emissions from livestock. That Legislative Counsel Opinion has been included in comments to ARB previously. ARB mentions providing financial incentives for these strategies as needed. It is important that enteric strategies are maintained in the voluntary incentive-based realm as ARB does not have the authority from the legislature to require these emission reductions. If ARB wishes to mandate these reductions it must go back to the legislature to get this authority.

The Draft Scoping Plan also lists accelerating demand for dairy and livestock products substitutes such as plant-based or cell-cultured products. This strategy is counter to the governor's proposals on health and nutrition. It is important that ARB consider the nutritional impact of this strategy, especially on children. Evidence continues to show that dairy foods like milk, yogurt and cheese offer a unique and essential package of nutrients that work together to provide multiple health benefits, including optimal growth and development in children and reduced risk of developing chronic diseases such as type 2 diabetes and heart disease. The wide variety of milk and dairy foods available provides many options to meet personal needs, tastes, and preferences. Children who do not meet the daily recommended servings of dairy milk, yogurt, and cheese may have inadequate intakes of important nutrients and protein necessary for optimal growth and development. Likewise, beef is an authentic source of high-quality protein with numerous nutritional benefits. A 4-ounce serving of 93% lean ground beef has 10 essential nutrients at 10% or higher than their respective daily values per serving, including zinc, iron, and B vitamins all in about 170 calories, providing overall fewer calories, fat, saturated fat, and sodium (and more protein) than alternatives.

For many students school meals are an important source of nutrition to prepare students for learning and general nutrition. It is critically important that California follow science-based nutrition policies that help Californian's thrive, especially children. California should not pursue policies that limit schools' abilities to follow USDA Nutrition Standards to provide access to healthy meals in schools. Fluid milk and other dairy foods offered as part of school meals are top dietary sources of calcium, potassium, and vitamin D, nutrients the Dietary Guidelines for

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Americans (DGA) Scientific Report stated are nutrients of public health concern due to low intake. Ensuring California students continue to have access to dairy milk is critical for meeting adolescents' needs for calcium and vitamin D to support the accrual of bone mass. The DGA Scientific Report also identified iron as a nutrient of public health concern for adolescents. Animal-based foods with iron contain heme iron, a highly bioavailable form of iron. Plant-based foods with iron contain non-heme iron, which is much less bioavailable. For many California students, school meals constitute their primary source for protein and more traditionally expensive nutrients. While some plant-based alternatives contain the same amount of protein as their animal-based counterpart, the quality of the protein is not the same. Limiting sources of high-quality animal protein is likely to have an unintended, negative impact on students' health and worsen inequalities and undernutrition, which can have life-long consequences on health and wellbeing.

Sincerely,



Anja Raudabaugh, CEO  
Western United Dairies