



Comments of Dairy Cares
on the DRAFT Aliso Canyon
Methane Leak Climate Impacts
Mitigation Program

Air Resources Board
1001 I Street
Sacramento, CA

Posted
March 24, 2016

Dairy Cares appreciates this opportunity to submit comments on the Aliso Canyon Draft Mitigation Program (hereafter Mitigation Program). Dairy Cares is a coalition of California's dairy producer and processor organizations, including the state's largest producer trade associations (Western United Dairymen, California Dairy Campaign, Milk Producers Council and California Farm Bureau Federation) and the largest milk processing companies and cooperatives (including California Dairies, Inc., Dairy Farmers of America-Western Area Council, Hilmar Cheese Company, and Land O' Lakes, Inc.). Formed in 2001, Dairy Cares is dedicated to promoting the long-term sustainability of California dairies.

Dairy Cares supports the draft mitigation program generally, and the recommendation that the program generate significant and quantifiable reductions in the dairy and waste sectors. We concur fully that the mitigation program provides a unique and opportune vehicle to stimulate substantial emission reductions through projects that capture and destroy methane from dairy operations in California. Mitigation through dairy methane reduction will also help to catalyze substantial additional reductions in emissions of SLCPs over the near-and longer terms by fostering and providing momentum to an emerging industry.

Dairy manure methane reduction projects can meet and exceed each of the core principles outlined in the mitigation program and the identified project criteria, including:

- Constructing projects within the state;
- Complementing existing ongoing efforts of federal, state and local agency efforts to combat global warming, reduce air pollution and protect public health, safety and the environment;
- Easily and effectively address and exceed the global warming impacts of the Aliso Canyon methane leak;
- Provide highly specific actions, such as development of additional dairy digesters, which can be easily quantified and verified using the existing ARB certified dairy digester protocol; and
- Yield real, verifiable, permanent and additional GHG emission reductions.

In conclusion, the mitigation program provides a tremendous opportunity for much-needed investments in dairy methane reduction projects. These projects provide a highly efficient and cost-effective method to achieve the desired methane mitigation, decrease reliance on fossil fuels, enhance sustainability of the state's energy infrastructure, and provide significant and demonstrable environmental, economic and public health co-benefits for disadvantaged communities in the state. Mitigation through dairy methane reduction projects is also fully consistent with federal, state and regional GHG reduction objectives and will further multiple state goals, including reduction of short-lived climate pollutants, sustainable freight and clean energy, and low carbon transportation alternatives.

Dairy Cares looks forward to finalization and implementation of the mitigation program and the state's dairy farms stand ready to provide ideal mitigation opportunities to address the Aliso Canyon climate impacts.