

Comments Re: Analysis of Progress toward Achieving the 2030 Dairy and Livestock Sector Methane Emissions Target

July 14, 2021

To Whom It May Concern:

Thank you for the opportunity to provide comments related to the June 2021 DRAFT report on *Analysis of Progress toward Achieving the 2030 Dairy and Livestock Sector Methane Emissions Target*. We appreciate the detailed research, extensive discussion, and thorough report provided by CARB staff.

Ag Methane Advisors supports dairies in California and around the country and in reducing their methane emissions, including many projects that participate in CARB's Low Carbon Fuels Standard program, and Compliance Offset program.

We concur with the reports general theme that progress in reducing dairy and livestock sector methane emissions to date has been driven by incentives (i.e. CARB offsets and LCFS credits) which make building and operating dairy digester projects economically viable. We support the reports recommendation to strengthen these incentives and we support expansion of these programs (e.g. LCFS for thermal purposes). Refinements to the programs can provide stability in the environmental credit markets. As an example LCFS provides a significant incentive to larger projects and we fully support it but some smaller dairies have chosen to focus on the stability of BioMAT instead in order to mitigate potential risk of LCFS price fluctuations.

Following the recommendations of the CARB Offset Protocol task Force the Livestock Offset Protocol could be expanded to include Alternative Manure Management Projects (AMMP) to create methane reductions on dairies where digesters may not be practical or viable. Similarly an offset protocol for enteric methane reductions would help achieve the targeted emissions reductions if the market price of offsets under the Cap and Trade program were high enough. At current C&T market prices the cost of available feed additives may exceed the potential revenue from incentives like offsets. Strengthening the C&T program in a way that causes the value of allowances and in turn offsets to rise would provide stronger incentives for the adoption of management practices and methodologies that reduce methane emissions.

CARB could also implement a Payments for Ecosystem Services (PES) program that streamlines the process of getting incentives to farms which adopt emissions reducing projects and standardizes the payments across the sector making adoption of emissions reducing projects viable for smaller farms and sectors of the dairy and livestock industry which have not been able to access currently available incentives. Integrating a PES program with the 2045 carbon neutrality scoping plan process could be a venue to achieve reductions before 2030 and

beyond from segments of the California agriculture industry that need incentives to reduce emissions.

Thank you for your consideration of these comments. Please feel free to reach out with any questions.

A handwritten signature in black ink, appearing to read 'Patrick Wood', written in a cursive style.

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