Dairy Cares Comments on the 2022 Scoping Plan Update –
Initial Air Quality & Health Impacts and Economic Analyses Results.

May 3, 2022

Dairy Cares[1] appreciates the opportunity to provide the following comments on the California Air Resources Board's ("CARB") April 20, 2022 Scoping Plan Workshop ("the Workshop"). Dairy Cares supports CARB staff's proposed adoption of Scoping Plan Scenario Alternative 3, which uses a broad portfolio of existing and emerging fossil fuel alternatives and other greenhouse gas strategies to meet a 2045 carbon neutrality target. As demonstrated by UC Irvine's air quality modeling presented at the Workshop, *all* of the Scoping Plan Scenario Alternatives would provide significant environmental benefits within the socially and economically disadvantaged communities in California that are most impacted by, and vulnerable to, degraded air quality.[2] However, the economic impacts of the various scenarios vary significantly. While there are important policy objectives such as greater funding for enteric emissions reductions that are outlined in other scenarios, on the whole, Alternative 3 best balances the costs and benefits of the various carbon policies.

In earlier comments in this Scoping Plan cycle, Dairy Cares discussed the value of near-term reductions in short-lived climate pollutants in mitigating the near-term effects of climate change.[3] It is critical for the State to maintain its focus on, and efforts toward, achieving much-needed methane reductions by the deadlines established by SB 1383. In order to meet these targets in the dairy and livestock sector, California's dairy farming families must be supported in the adoption and expansion of known and technologically feasible emission reduction solutions. Alternative 3 best achieves the various statutory objectives governing the Scoping Plan process.

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[1] Dairy Cares represents the California dairy sector, including dairy producer organizations, leading cooperatives, and major dairy processors. For more information about Dairy Cares, please visit www.dairycares.com.

[2] See for example, NO_x Emissions Analysis in UC Irvine's Presentation (April 20, 2022), slide 6, available here.

[3] See previous 2022 Scoping Plan Update comments from Dairy Cares here and here.

Through support provided by the California Department of Food and Agriculture ("CDFA") and CARB, the dairy sector has already made and will continue to make significant progress toward achieving SB 1383's target for manure emissions. This has been documented by analyses and reporting performed by both CARB and the CDFA.[4] However, cost-effective enteric reduction strategies that protect the health of both beef and dairy cows are still necessary. SB 1383 requires that enteric strategies be commercially available, cost-effective, safe for animals, and accepted by consumers.

As recent CARB studies and reports have documented, a number of promising feed additives are in development and should be available in time to meet the State's 2030 targets.[5] According to a recent United Nations Global Methane Assessment, artificial supplements given to dairy cows may reduce methane production from enteric fermentation by 30 percent with no adverse effects on milk production, while the addition of certain seaweeds to cow feed has been found to greatly reduce methane production from enteric fermentation, with decreases of up to 99 percent in cows.[6] This evidence indicates that investment in enteric emission reduction strategies through offset development and research should be a core strategy in the 2022 Scoping Plan Update. Dairy Cares supports additional research into enteric strategies and solutions, and we are confident that enteric solutions can be implemented quickly in livestock herds once they are tested and approved for commercial use.

Greater financial support for research and development, as well as voluntary emission reduction measures (e.g., compliance offset protocols), are necessary to realize the potential of enteric emissions reduction strategies. Dairy Cares encourages CARB to recognize the importance of this strategy in mitigating the near-term impacts of climate change. The Scoping Plan should call on policy leaders to provide greater financial support for incentivizing enteric emission reduction strategies. The Scoping Plan should also discuss the need to continue to expand the responsible deployment of digesters through the Low Carbon Fuel Standard program and other incentive programs. Greater focus on these measures will maximize environmental benefits in local communities and avoid adverse impacts on local economies.

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[4] See California Climate Investments 2021 Annual Report, available here; CDFA's 2021 California Agriculture: *The Focus is Forward* report, available here; and CARB's Final Analysis of Progress toward Achieving the 2030 Dairy and Livestock Sector Methane Emissions Target (March 2022), available here.

[5] See CARB's Final Analysis of Progress toward Achieving the 2030 Dairy and Livestock Sector Methane Emissions Target (March 2022), at p. 28, available here.

[6] United Nations Environment Programme and Climate and Clean Air Coalition (2021). Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions. Nairobi: United Nations Environment Programme, at p. 103, available here. Note: Dairy Cares' projection is consistent with a reduction in methane production from enteric fermentation of up to 80 percent with the addition of seaweeds to cow feed.

CONCLUSION

There is much work still to be done toward the achievement of both the SB 1383 methane reduction targets and the broader AB 32 Scoping Plan goals. Dairy Cares looks forward to working with CARB on doing this work in a way that protects local communities and state and local economies.

Respectfully Submitted,

/s/
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