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Submitted via email to climate@cdfa.ca.gov

November 21, 2025

The Honorable Karen Ross
Secretary, California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

Re: Climate Resilience Strategy for California Agriculture

The California Cattlemen's Association appreciates the opportunity to provide feedback regarding the California Department of Food and Agriculture's Climate Resilience Strategy for California Agriculture. CCA is a statewide trade association representing more than 1,700 cattle producers who pride themselves on their good stewardship of the state's land, water, and wildlife resources and as such have a vital role to play in advancing the Strategy's purpose of ensuring that "California agriculture not only thrives in the face of climate change but is part of the solution."

CCA is largely supportive of the strategies and actions proposed in the draft Climate Resilience Strategy. Below, we provide additional recommendations which we believe will further improve the Strategy as the Department works to finalize it. Given that CCA represents California cattle ranchers, our feedback is primarily confined to Chapter 11 of the Strategy regarding ranching sustainability and rangeland management.

Chapter 4: Protect Animal Health

Strategy 4.1.3 – Prepare for emergency situations with state agency coordinated procedures and infrastructure

Protecting animal health is absolutely of paramount importance to California's cattle producers, and CCA appreciates the Climate Resilience Strategy's continued prioritization of animal health in the fact of a changing climate.

Near the end of Strategy 4.1.3, the Climate Resilience Strategy makes reference to rendering's role in "the safe handling of…deceased animals" and, in a section about "Addressing Animal Mortality Emergencies," to "alternate disposal options such as carcass composting." Given the recent passage of AB 411 (Papan), **CCA suggests that this section be revised to include the role of composting in safely disposing of routine livestock mortalities**, as well. Reference to carcass composting may also be prudent in the document's sections concerning soil health.

Chapter 11: Improving Ranching Sustainability and Rangeland Management

Strategy 11.1 – Promote multi-benefit rangeland management

Under the "Wildfire Mitigation" subheading, CCA appreciates the Climate Resilience Strategy's recognition that "Livestock grazing can reduce fire fuels," and we appreciate the document's citations to Ratcliff *et al.* (2022) and Rao (2020) in footnotes 266 and 267.

However, CCA believes that this section could be improved by recognizing not only the fire fuels reduction benefits of livestock grazing, but also the attendant GHG emissions reduction benefits of such fire fuels reductions – particularly given the Climate Resilience Strategy's focus elsewhere on mitigating GHG emissions.

A 2023 study noted that, "After accounting for the production of methane and nitrous oxide emitted by cattle consuming…forage, there is a modest reduction in [carbon dioxide equivalents] associated with grazing in grasslands that burn."[1] Given that "Grazing and associated ranch management practices…can slow or stop shrub encroachment into grasslands," the long-term GHG emissions-reduction benefits of livestock grazing may be even greater, as burned grasslands result in lower GHG emissions than burned shrublands.[2] **CCA respectfully requests that these GHG emission reductions associated with wildfire fuels reductions be reflected in the Climate Resilience Strategy.**

Action 11.1.1 - Facilitate grazing on public lands for ecological health and fuel load reduction

CCA appreciates the Strategy's recognition of the role that grazing plays in enhancing the ecological health of lands stewarded by the California Department of Fish and Wildlife and CalFire. However, we believe that the document's strategy for facilitating grazing on public lands is under-developed and that facilitation of grazing should be considered on public lands beyond those administered by CDFW and CalFire.

As part of its Climate Resilience Strategy, CDFA should also work with the California Department of Parks and Recreation to facilitate additional grazing on State Parks land for purposes of ecological health and fuel load reduction. California State Parks manages 1.59 million acres of land across roughly 280 parks but administers only seven grazing leases across nine park units totaling roughly 36,200 acres of grazed land.[3] In recent years, insufficiently-managed fuel loads on State Parks have contributed to the spread of catastrophic wildfires, including the 2020 SCU Lighting Complex Fire, which burned through Henry Coe State Park, and this year's Palisades Fire, which burned through Topanga State Park. By expanding livestock grazing on suitable lands within its inventory, California State Parks can avail itself of the wildfire mitigation benefits of grazing outlined in the Strategy, ensuring that State Parks are more resilient to wildfire.

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[1] Felix Ratcliff et al., *Cattle Grazing Moderates Greenhouse Gas and Particulate Matter Emissions from California Grassland Wildfires*, SUSTAINABILITY 11 (2023).

[2] *Id.* at 1, 11-12.

[3] ASSEMBLY COMMITTEE ON WATER, PARKS & WILDLIFE, ANALYSIS OF AB 434 (ROBERT RIVAS) – AS AMENDED APRIL 7, 2021 at 4.

Similarly, CDFA could work with the State Lands Commission (SLC) to facilitate grazing leases on lands within that agency's portfolio. As of 2021, the State Lands Commission treated just 18,200 acres of its 4-million acre portfolio with livestock grazing.[4] While SLC-managed lands may generally be less suitable for grazing than State Parks lands, there are likely additional opportunities for SLC lands to benefit from the stewardship provided by livestock grazing.

Finally, several localities utilize livestock grazing to enhance ecological conditions on public lands, including Santa Clara County, Sonoma County, and the East Bay Regional Park District (serving Contra Costa and Alameda counties). CDFA ought to work with other local governments to facilitate managed livestock grazing for resource enhancement and wildfire resilience, where appropriate. This is consistent with other areas of the Strategy (*e.g.,* action/strategy 6.1.2, which recognizes the need to "Build local government capacity…") and with the document's recognition that "more adoption is always needed" for "community…contracting for grazing to assist with vegetation management."

CCA suggests that the Climate Resilience Strategy be amended to recognize the potential for "Facilitat[ing] grazing on public lands" managed by State Parks, SLC, and local governments "for ecological health and fuel load reduction," and that the implementation table be updated to include these entities as lead or supporting agencies. To be clear, while CCA represents cattle ranchers, we recognize that other livestock, such as sheep and goats, may be more appropriate for certain parcels. CCA's primary focus is on ecological health and wildfire resilience – not merely forage availability for cattle.

Strategy 11.3 – Reduce enteric methane from grazing livestock

Citations Should be Specific Enough for Readers to Find the Authority Cited

In the first sentence of this section, CDFA states that "11 percent of California's methane emissions are attributable to non-dairy livestock." Authority for this figure is ostensibly provided in Footnote 259 of the Climate Resilience Strategy, which reads in full: "California Air Resources Board. (2024). *2000-2022 GHG Inventory (2024 Edition)*. GHG Current California Emission Inventory Data. https://ww2.arb.ca.gov/ghg-inventory-data." Unfortunately, that web address does not lead to a specific document, but rather to CARB's main landing page for "Current California GHG Emission Inventory Data." The landing page itself does not contain information supporting the assertion that "11 percent of California's methane emissions are attributable to non-dairy livestock." Moreover, there is no document linked on the landing page titled "2000-2022 GHG Inventory (2024 Edition)" – the closest match is a document titled "2000-2022 Inventory Updates Documentation (2024 Edition)," which likewise omits any assertion that non-dairy livestock contribute 11% of the state's methane emissions. Indeed, reviewing the linked webpage itself and various documents linked at that page, CCA is unable to identify the source of the Strategy's claim. **CCA suggests that CDFA revise the strategy to directly link to the source material for this claim and/or to provide a pin citation specifying which pages, tables, or graphs contain the assertion.** Other footnotes in the Climate Resilience Strategy lacking direct links or footnotes ought to similarly be revised.

[4] *Id.*

According to CARB's 2022 Scoping Plan, the non-dairy livestock sector is the source of 10% of the state's methane emissions.[5] Should CDFA not be able to provide a direct link or pin citation for the 11% figure, CCA suggests using the Scoping Plan figure of 10%.

The Climate Resilience Strategy Misstates the Requirements of SB 1383 (Lara, 2016)

The Climate Resilience Strategy states that "California has set a target to *reduce methane emissions from dairy and livestock sectors* 40 percent below 2013 levels by 2030 as mandated by Senate Bill 1383 (Lara, 2016)."

This misstates the scope of SB 1383's mandate. SB 1383 provides that "The [California Air Resources Board], in consultation with the [California Department of Food and Agriculture], shall adopt regulations to reduce methane emissions from livestock manure management operations and dairy manure management operations…by up to 40% below the dairy sector's and livestock sector's 2013 levels by 2030."[6] It is clear from the context of the statute that the relevant "2013 levels" are not the overall methane emissions attributable to the dairy and livestock sectors, but rather the levels of "methane emissions *from livestock manure management operations and dairy manure management operations*," (*emphasis added*). This intent is underscored by the legislation's recognition that reductions outside of "livestock manure management operations and dairy manure management operations," such as via enteric methane emissions reductions, present unique and persistent challenges.[7]

Legislators, regulators, and the public frequently misunderstand the intent and scope of SB 1383, requiring significant outreach and education by CCA and others in the livestock and dairy sectors to correct such misunderstandings. To avoid perpetuating misunderstanding of SB 1383, **CCA requests that the Climate Resilience Strategy be revised to clarify its statement of the intent and scope of SB 1383**.

Importantly, this clarification need not diminish or otherwise impact the Climate Resilience Strategy's strategies and actions for reducing the livestock industry's methane emissions, including enteric methane emissions. **CCA wholeheartedly support's the Department's proposal to "Research and promote novel enteric methane mitigating practices for grazing livestock,"** for instance. The Department and California livestock producers should appropriately strive to diminish their greenhouse gas emissions beyond what is legally mandated, but it is nevertheless important to accurately state those legal mandates.

Conclusion

CCA appreciates the opportunity to provide feedback on the Department's draft Climate Resilience Strategy for California Agriculture and we strongly support the Strategy's purpose of ensuring that "California agriculture not only thrives in the face of climate change but is part of the solution."

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[5] CALIFORNIA AIR RESOURCES BOARD, 2022 SCOPING PLAN FOR ACHIEVING CARBON NEUTRALITY 226 fig.4-12 (2022), *available online at* https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.

[6] CAL. HEALTH & SAFETY CODE § 39730.7(b)(1).

[7] *See, e.g., id.* at § 39730.7(f), (prohibiting regulation of enteric methane emissions until "a cost-effective…and scientifically proven method of reducing enteric emissions is available …that…would not damage animal health, public health, or consumer acceptance").

While we are largely supportive of the draft as-written, we are hopeful that CDFA will adopt the recommendations above to further improve the Climate Resilience Strategy ahead of its finalization.

Sincerely,

Kirk Wilbur
Vice President of Government Affairs