

Comments Received and CDFA Responses on the CDFA Alternative Manure Management Program (AMMP)

Comment Period: December 10, 2019 - December 24, 2019

Comment	Response
<p>New practices review process should be held by Dairy Methane Technical Advisory Committee (TAC) public meetings. CDFA should include other dairy methane experts in the new practice review process, including those familiar with pasture-based systems in addition to traditional confinement operations.</p>	<p>New practices submission, review and selection process will be conducted through public meetings led by CDFA.</p>
<p>All of the TAC meetings should become public, including all the typical Bagley-Keene Act notifications of those meetings and posting of TAC membership</p>	<p>TAC meetings regarding programmatic framework development and new practices evaluation will be public.</p>
<p>CDFA should reconsider the funding split on the Dairy Methane programs so that a greater number of producers can be reached with AMMP funds. We seek at least 50 percent of the Dairy Methane dollars to go towards AMMP projects.</p>	<p>CDFA evaluates funding split each year based on available funds and will continue to do so in the future.</p>
<p>In the draft RGA for the AMMP Demonstration Projects (Farmer-to-Farmer) there are two project funding levels listed. We support \$250,000 as a project cap. This will allow project coordinators to reach dairy and livestock producers across county lines to bring them to AMMP demonstration sites as well as do other necessary outreach activities over diverse and large regions of the state.</p>	<p>Maximum grant amount for AMMP Demonstration Projects APFF will be \$150,000.</p>
<p>Require annual reporting, not quarterly reporting for Demonstration Projects.</p>	<p>Quarterly reporting on Demonstration Projects allow CDFA to efficiently track expenditure of funds and provides a high level of government accountability. Unlike individuals farmers and ranchers, who may be burdened by quarterly reporting, Demonstration Projects recipients are expected to have capacity and expertise to meet CDFA's reporting requirements. Staff time is an allowable cost in the budget</p>

	for AMMP Demonstration Projects - Advancing Practices Farmer-to-Farmer.
CDFA should allow year-round Technical Assistance under the program.	GGRF appropriations that support AMMP and the AB 2377 mandated Climate Smart Agriculture Technical Assistance Grants Program are not continuous. The amount of funding each year is not guaranteed, therefore, CDFA cannot commit future funding for current rounds of the program.
PAM Polymer Enhanced Treatment Methodologies should be an eligible practice under AMMP.	Practices that eligible to AMMP must have a CARB approved quantification methodology (QM) associated with them. PAM enhanced Treatment methodologies do not currently have such a GHG QM available. CDFA anticipates conducting a public process to evaluate the inclusion of new practices under the AMMP in 2020. Interested stakeholders are encouraged to submit a proposal through this process.