

**California Department of Food and Agriculture**  
**2022 Alternative Manure Management Program**  
**Responses to Public Comments Received between November 30, 2021- December 21, 2021**  
Updated 2/14/22

Commenter (similar comments were grouped)	Program*	Summarized Comment	Response
CalCAN, CAFF, WFA, CFS; California Dairy Campaign	AMMP	Support many of the proposed changes in RGA, including addition of new solid separation technologies, clarifying that projects must be located in CA, and more.	Thank you for your comment.
CalCAN, CAFF, WFA, CFS; California Dairy Campaign	AMMP	Would like to see Technical Advisory Committee meetings be held publicly and under Bagley-Keene Act requirements for notification and posting of membership. Also request CDFA to include on TAC those familiar with pasture-based systems in addition to traditional confinement options.	Technical Advisory Committee (TAC) meetings are closed meetings as they may include discussion of sensitive financial and farm-specific information that should not be made public (e.g., dairy herd size which is considered proprietary information). The TAC membership is posted on the AMMP webpage.
CalCAN, CAFF, WFA, CFS; California Dairy Campaign	AMMP	Ensure ongoing reporting of AMMP applications and outcomes, including publicly posting all (funded and not funded) AMMP applications with their project summaries and funding requests the program website and restoring the language currently struck out about reporting of program outcomes.	Although the Program is removing some CCI and CARB specific language and references surrounding timeframes for posting information about applications received and outcome reporting due to a change in funding source, the intent is to maintain similar standards for posting received application information and requiring outcome reporting under CDFA.
CalCAN, CAFF, WFA, CFS; California Dairy Campaign; Michael Griffin	AMMP	Clarify the Critical Project Review process and what project milestones may be; support ability of producers who have grant agreement terminated to seek an appeal to be reviewed by the Secretary of Food and Agriculture.	CDFA has removed this language from the AMMP draft RGA, Critical Project Review section.
CalCAN, CAFF, WFA, CFS	AMMP	Request CDFA to invest no less than 50% of FY 2021-22 funds for dairy methane into AMMP projects, and for the funding allocation for the program be specified in RGA.	SB 170 made available \$32,000,000 for Livestock Methane Reduction, with priority given to the Alternative Manure Management Program. For FY 21-22, CDFA will aim to make 60% of award funds available to DDRDP and 40% available to AMMP. This funding ratio will prioritize AMMP by allowing a greater number of awarded projects than DDRDP and increasing the fund ratio available to AMMP compared to previous years, while maintaining the critical effort to achieve the target set by SB 1383 for manure methane emissions reduction in the dairy and livestock industry.
CalCAN, CAFF, WFA, CFS; California Dairy Campaign	AMMP	Urges CDFA to re-consider the current measure of impact across programs when considering how to divide the \$32 million in available funding for dairy methane projects, such as taking into account reductions per project life, cost effectiveness, geographic impact.	CDFA evaluates the funding split each year based on funds available and the potential of GHG reductions achievable through the various types of digester and non-digester practices relative to meeting SB 1383's methane reduction target; this year, prioritization of AMMP was also taken into consideration in alignment with the language in SB 170.
CalCAN, CAFF, WFA, CFS	AMMP	Incentivize improved, methane-reducing pasture-based systems by offering the option to fund a combination of pasture-based management plan development and related infrastructure (watering stations, fencing, lanes). These may include extending time animals are on pasture, but also related management that can improve access to high-quality forage, making it possible to extend time animals are pasture-fed and not collecting manure in lagoons.	Current eligible practices already include extending time animals on pasture for operations that are pasture-based, and converting a non-pasture operation to pasture based. Reasonable infrastructure expenses necessary to achieve implementation that follow program allowable costs would be considered as part of the project proposal. Funding assistance for development of plans (including Grazing Management Plans) is incentivized under the CDFA Conservation Agriculture Planning Grants Program.

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CalCAN, CAFF, WFA, CFS; California Dairy Campaign	AMMP	While article links on issues like following best management practices for compost bedded pack barns are helpful, suggest CDFA offer outreach and education, such as webinars. Fully support the improved implementation of this practice.	Thank you for your comment.
CalCAN, CAFF, WFA, CFS; California Dairy Campaign; Bianchi Dairy; Michael Griffin	AMMP	Request a 90-day application period due to complexity of projects and benefits from good discussion between applicants and TA providers to strengthen AMMP proposals.	Solicitation timelines, including application period duration, are determined by several factors, including grant funding encumbrance and liquidation deadlines, number of applicants, and programmatic workloads. Extending the application period by allowing a 90-day application period could have the consequence of further extending the time between application preparation and project start where rising project costs already present an issue. CDFA will provide a 60-day application period for the 2022 AMMP and DDRDP solicitations.
California Dairy Campaign	AMMP	Support the draft RGA recommendations to prioritize disadvantaged communities for AMMP grant fund awards, and CDFA's effort to ensure CDFA incentive programs are committed to maximizing benefits to DAC, low-income communities and low-income households.	Thank you for your comment.
Western United Dairies; Dairy Cares	DDRDP and AMMP	Supports CDFA's implementation of AMMP and DDRDP and the RGAs for both programs, in particular the inclusion of additional technologies into the AMMP RGA, and the focus of both program RGAs on benefitting priority populations.	Thank you for your comment.
McIssac Dairy; Bianchi Dairy; Robert McClelland Dairy; Michael Griffin	AMMP	Urges CDFA to include information on how AMMP will be prioritized and how much money will be available to AMMP when application period opens, as submitting an application takes a lot of time and money and the amount available will help producers decide whether to invest.	SB 170 made available \$32,000,000 for Livestock Methane Reduction, with priority given to the Alternative Manure Management Program. For FY 21-22, CDFA will aim to make 60% of award funds available to DDRDP and 40% available to AMMP. This funding ratio will prioritize AMMP by allowing a greater number of awarded projects than DDRDP and increasing the fund ratio available to AMMP compared to previous years, while maintaining the critical effort to achieve the target set by SB 1383 for manure methane emissions reduction in the dairy and livestock industry.
Bianchi Dairy	AMMP	Do applications have to meet a certain score to get funded? If not, what method is used?	Applications do not need to meet a minimum score to be funded, but are evaluated during the review process against the total scores of other submitted applications. Scores reflect a project's quality, feasibility, likelihood of long-term success, potential for greenhouse gas reductions from handling manure, and co-benefits. The highest scoring projects that result in permanent annual greenhouse gas reductions from handling manure and maximizing project co-benefits will be funded. Additional information on the Review Process and Detailed Scoring Criteria can be found in the RGA (page 36).
Bianchi Dairy	AMMP	We are concerned about the cost of projects going up in the time between grant and the actual start on construction of the project.	Thank you for your comment. CDFA acknowledges the concern, however, due to considerations of application period duration, maintaining a multi-stage review process, and time necessary to process new grant agreements, the time between application and start of the project may not be possible to shorten significantly.
Biofiltro	DDRDP and AMMP	CARB Benefits Calculator Tool for DDRDP should include the effect of anaerobic digestion on production of direct and indirect N2O emissions. AMMP GHG analysis additional benefits only considers air pollutants, but should also include effects of proposed practice on production of N2O.	CDFA DDRDP and AMMP are programs focused on methane reductions and not other greenhouse gases. Other greenhouse gases may be considered if there is adequate quantification methodology to support the reductions in future solicitations.

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Biofiltro	AMMP	It is not clear if the program in 2022 will offer Demonstration Projects. We feel Demonstration projects are an important tool to add visibility to practices and can be used to optimize GHG emissions reductions and assessment of additional benefits.	Given the reduction in funding and lack of competitive demonstration projects, CDFA will not fund Demonstration Projects through the 2022 AMMP. CDFA may re-evaluate this option if more funds are appropriated in the future.
Biofiltro	AMMP	The maximum funding (\$750,000) allowed for each project is too small, especially when DDRDP projects have up to \$2 million available. Meaningful financial support on a full-scale vermifiltration system would require a larger budget.	Given the reduced amount of funding for this solicitation compared to previous solicitations, CDFA will not be increasing the AMMP maximum funding per project.
Biofiltro	AMMP	For vermifiltration practice, RGA states that the practice must be implemented in conjunction with a primary mechanical separator. Could CDFA clarify if an existing baseline separator would be sufficient?	During the new practices process, CDFA took into consideration recommendations that a sufficient existing separator could be used to fulfill the requirement for primary (coarse) mechanical separator when implementing an advanced solid-liquid separation or vermifiltration system. The applicant will need to evaluate if the existing separator can adequately address the short and long-term needs of the vermifiltration system. Further clarifications on using existing and new primary mechanical separators will be added to page 7 of the RGA.
Biofiltro	AMMP	Vermifiltration is a solid-liquid separation system that simultaneously treats the separated solids. In the RGA, vermicomposting of separated solids inside the vermifilter are not included as a manure treatment and/or storage practice; in the AMMP GHG quantification tool, it is not clear how emissions during this treatment are quantified. MCF relative to composting in windrows suggested.	While vermicomposting may be considered a built-in part of the newly added vermifilter solid-separation process, it is not currently included as eligible as a standalone manure treatment and/or storage practice. The manure treatment and/or storage emissions when vermifiltration is selected uses the composting in windrows MCF.
Biofiltro	AMMP	It is not clear why AMMP funds can be used to treat manure before digesters (exclusively on digesters not funded by DDRDP) but not digesters' effluents. Can it be assumed that ALL digestate is used aerobically and does not ever produce CH4?	The wording in the draft RGA was in error and should have read "Dairy and livestock operations with existing non-DDRDP funded digesters may apply for AMMP funds to reduce methane emissions from manure not being treated in the digester system. AMMP funds can only be used to implement management practices that reduce methane from manure and cannot be used to treat manure digestate, i.e., digested manure material resulting from an anaerobic digestion process," which is unchanged from the previous versions of the RGA. Thank you for alerting CDFA.
Biofiltro	AMMP	GHG reduction per animal produced by the operation is required. Is "animal" exclusively milking cows? There is a large difference in the contribution of the different livestock categories to the manure-produced CH4. A dairy with a large replacement population would be penalized compared to a dairy with a large population of milking cows.	The GHG summary values from the completed GHG calculator are included as application fields. Animal refers to all livestock included in the project boundary. However, for dairies with milking cows, the value of GHG reduction per energy-corrected milk is used for scoring to help to account for differences in milk production rates and cow breeds among dairies. For other livestock operations or those without milking cows, the value of GHG reduction per animal is used for scoring.
Biofiltro	AMMP	Vermifiltration will produce a larger amount of soil amendment than composting. Treated VS are mixed with wood chips (the vermifilter bed material) and earthworm castings. Is the quantification tool able to express the additional volume of soil amendment generated by the vermifiltration practice?	The calculation for compost production is standardized across all GGRF programs and applicable benefits calculator tools using the CCI Soil Health and Conservation co-benefit assessment methodologies ( <a href="https://ww2.arb.ca.gov/resources/documents/cci-methodologies">https://ww2.arb.ca.gov/resources/documents/cci-methodologies</a> ), a modification would not be allowed at this time.

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Michael Griffin	AMMP	For compost pack barns especially, there is no guidance to make sure it is a compost pack barn, and not just a bedding pack, with no reduction associated - suggestions include C:N testing of finished product, recording turning days and temperatures?	The program relies on technical reviewers to assess the feasibility and appropriate design of projects such as those that include compost bedded pack barns. To help improve proper design and management awareness, resource links have been included in the draft RGA and additional efforts will be considered for applicant and awardee training and outreach. CDFA-funded Technical Assistance Providers are also available to provide guidance.
Dairy Cares	DDRDP and AMMP	Given the limited funding for 2021-2022, encourages CDFA to not seek additional program changes at this time that will limit funding for the core program goals of reducing methane from manure management.	Thank you for your comment.
Dairy Cares	DDRDP and AMMP	Supports continued funding within similar ratios between the programs. Funding ratio utilized to date by CDFA strikes an appropriate balance between digester and non-digester strategies and provides appropriate prioritization of AMMP program funding as directed by the legislature.	SB 170 made available \$32,000,000 for Livestock Methane Reduction, with priority given to the Alternative Manure Management Program. For FY 21-22, CDFA will aim to make 60% of award funds available to DDRDP and 40% available to AMMP. This funding ratio will prioritize AMMP by allowing a greater number of awarded projects than DDRDP and increasing the fund ratio available to AMMP compared to previous years, while maintaining the critical effort to achieve the target set by SB 1383 for manure methane emissions reduction in the dairy and livestock industry.

\*Some comments or letters were directed to both dairy methane reduction programs (Dairy Digester Research and Development Program, Alternative Manure Management Program)