

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
California Bioenergy (CalBio)	DDRDP	CDFA should consider revising the language <b>from</b> "Change ownership of the dairy and/or partnership entities. Should the grantee sell the dairy operation that was the subject of a grant award, the grant agreement will be canceled, and all grant monies awarded shall be returned to the CDFA." <b>to</b> "(a) that should an ownership change within the family, the grant would not terminate and (b) that other situations, CDFA has the ability, but not the obligation, to terminate the grant."	CDFA has considered your comment and modified the RGA language to allow greater flexibility in transferring grants during a change in ownership.
California Bioenergy (CalBio)	DDRDP	CDFA should consider revising the statement to "Additionally, grant applicants are also required to demonstrate progress within <b>eighteen (18)</b> months by securing matching funding, ordering <b>at least one</b> related supplies/equipment, submitting <b>at least one invoice</b> to CDFA for reimbursement, providing proof of matching costs expenditures, obtaining all necessary <b>planning</b> permits, and getting the dairy operation ground ready for the implementation of the project. Failure to demonstrate progress in the activities mentioned above may result in termination of the grant agreement."	CDFA believes that 12 months is an adequate timeframe to demonstrate performance based on past successful projects. Identifying unsuccessful projects early allows CDFA the opportunity to reallocate funding before its legislatively determined encumbrance deadline. CDFA has clarified that the grantee needs to show progress on one or more axes within 12 months.
Leadership Counsel for Justice and Accountability (LCJA)	DDRDP	"CDFA proposes to fund digesters on dairies that have received AMMP funding. Public funds have already paid for interventions aimed at methane reductions and sustainable and environmental herd management practices. CDFA must not encourage these facilities to maintain wet manure storage, which produces methane emissions and pollutes groundwater. These layered investments disproportionately benefit the largest dairies that can afford and accommodate both AMMP and DDRDP projects."	Previous recipients of the AMMP have the potential to further diminish GHG emissions from their operations through participation in the DDRDP. The DDRDP has demonstrated significant strides towards the reduction of methane emissions originating from dairy manure. In addition to methane reduction, this program also yields numerous environmental co-benefits. These include the enhancement of air quality through the reduction of odor and other significant air pollutants such as Nitrogen Oxides (NOx), Reactive Organic Gases (ROG), and Diesel Particulate Matter (Diesel PM). It also contributes to the improvement of water quality by mandating double-lined lagoons or above-ground tanks for anaerobic digestion. The program facilitates the production of renewable energy, clean fuels, and electricity, and manages nutrients which can be utilized as fertilizer and soil amendments. Furthermore, it fosters job creation within local communities. The CDFA does not advocate for dairy facilities to maintain wet manure storage, as the program does not stipulate that applicants must select a covered lagoon digester or similar equipment. Applicants have the liberty to install various types and models of anaerobic digesters, inclusive of those capable of handling solid (less liquid) manure, as observed in other states and internationally, provided that the technology is commercially available.
Leadership Counsel for Justice and Accountability (LCJA)	DDRDP	Raised issue in 2019 as stated "The DDRDP is based on a false premise that by capturing methane from cow manure produced by large, industrial dairies with extremely expensive technology, the State will curb greenhouse gas emissions and help dairy farmers remain in business, all while benefiting local communities. Unfortunately, this premise is misleading and taking California down the wrong path."	DDRDP has shown progress toward methane emissions reductions from dairy manure. In addition to the reduction of methane, this program also delivers many other environmental co-benefits such as improving air quality by reducing odor and other important air pollutants such as NOx, ROG, and Diesel PM, improving water quality by ensuring double-lined lagoons or above-ground tanks for anaerobic digestion, producing renewable energy and clean fuels and electricity, managing nutrients which can be used as fertilizer, soil amendments, and producing jobs in the local communities.
Biofiltro	DDRDP	CDFA states "the DDRDP will support the implementation of dairy digester projects on California dairy operations that result in permanent, annual, and measurable GHG emission reductions" <b>and consider as a</b> "measurable GHG emission reduction" would be the net effect of a project on both CH4 and N2O emissions. However, currently, DDRDP and its quantification tool don't include N2O impacts.	CDFA DDRDP program focuses on the reduction of manure methane emissions through the implementation of anaerobic dairy digesters. Other greenhouse gases such as N <sub>2</sub> O may be incorporated into the CA Air Resources Board quantification methodology for DDRDP in future solicitations but will not be included in the current solicitation.
Sustainable Conservation	DDRDP	"Attachment 7 (Environmental Performance Template) should include a requirement for a whole-farm nutrient balance plan associated with the project."	CDFA lacks the resources and expertise to create a whole-farm nutrient balance plan for applicants and additionally lacks the enforcement authority to monitor the implementation of a plan post-award. Therefore, this requirement will not be included in the RGA at this time.

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
Sustainable Conservation	DDRDP	"Water quality impacts should be more explicitly cited in Attachment 7, and should be a separate scoring category in Appendix E.	CDFA modified language in both Attachment 7 (Environmental Performance Template) and Appendix E (Detailed Scoring Criteria) to more clearly denote a Water Quality and Other Co-Benefits section and to prompt applicants to be more specific about the water quality impacts of their proposed DDRDP projects.
Biofiltro	AMMP	The current statement that "once a project has been awarded funds, the project may not change or alter the proposed manure management practice to be implemented as it may change the GHG estimates" contradicts the potential for Dairy Plus and DDRDP practice additions.	CDFA will update the RGA language to clarify that this restriction only applies to the time between award notification and project close-out, and it is not in perpetuity. Only closed-out AMMP projects are eligible for a DDRDP or Dairy Plus project, and should build on, not replace or discontinue the use of the AMMP project components and their estimated GHG reductions.
Biofiltro	AMMP	The co-benefits considered in the quantification tool and AMMP program should also include other GHGs the project impacts, such as N <sub>2</sub> O, as well as ammonia and nutrients.	The AMMP program focuses on the reduction of manure methane emissions through the implementation of non-digester practices and technologies. Other greenhouse gases and co-benefits may be considered in future solicitations if there is adequate quantification methodology to support the reductions. AMMP applicants can currently use the Environmental Co-Benefits section to describe anticipated benefits beyond those quantified in the co-benefits tab of the AMMP Benefits Calculator Tool and/or protections beyond what is required for air and water quality permitting.
Biofiltro	AMMP	The manure treatment and/or storage practice should include vermicomposting of separated solids inside the vermifilter.	CDFA AMMP included a Manure Treatment and/or Storage Practices option specific to Vermifiltration practice in the RGA under the Eligible Project Types to better align with the AMMP Benefits Calculator Tool.
Biofiltro	AMMP	Is the difference in eligible weeping walls between programs (for AMMP must have 2 cells, for Dairy Plus Program 3 cells) real?	The minimum of 3 cells for a weeping wall covered by the Dairy Plus Program was initially considered as a way to differentiate it in scale and impact compared to a traditional AMMP project, where a minimum of 2 cells is required. However, as the AMMP Benefits Calculator Tool does not support differences based on cell number, Dairy Plus RGA will be updated to similarly require a minimum of 2 cells for a weeping wall project.
Biofiltro	AMMP	Vermifiltration is a high-efficiency solid separation practice. In the AMMP RGA, it is described as a solid separation practice. However, in the quantification tool, it is considered as a manure collection system that would be used as an alternative to flushing, which is incorrect.	CARB is the agency responsible for developing and maintaining the Benefits Calculator Tool for AMMP. CDFA will request that CARB consider this correction in future tool updates, however, this change will not be implemented at this time.
Biofiltro	AMMP	Could you clarify if the language in the Detailed Scoring Criteria, Estimated Greenhouse Gas Emissions Reduction, means that a dairy would use the energy-corrected milk data and different livestock operations would use the reduction per animal data?	Yes, this is correct. The dairy operations are scored in part by GHG reduction per unit of energy-corrected milk (along with the total project emissions reductions and the GHG reduction per dollar of AMMP grant money requested); operations without lactating dairy cattle (such as heifer raising facilities) or that raise other types of livestock are scored by GHG reduction per animal instead of per unit of energy-corrected milk.
Biofiltro	AMMP	Vermifiltration systems can offer similar GHG emission reduction of digesters and can't access the compliance carbon market or the low carbon fuel standard (LCFS) used when gas is used as a transportation fuel. Also, the program requires vermifilters to include a separator that the AMMP has historically financed for \$750,000. Therefore, vermifiltration should have access to an amount larger than what is available for other AMMP practices and similar to digesters.	AMMP supports a range of practice types and scopes that may vary significantly in cost within and between categories, and aims to distribute limited incentive funding across a wide distribution of individual operations. Therefore, CDFA will not be increasing AMMP award sizes at this time but may revisit award sizes in the future based on factors such as available funding, inflation, and changes in technology.

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
CalCAN-CAFF-WFA-CFS	AMMP	<p>Under the current AMMP, DDRDP and Dairy Plus draft RGAs, \$20.9 million of the total \$123 million available from state and federal funding sources is specified for AMMP projects with an unknown percentage of funds going to AMMP projects under Dairy Plus. As we have in the past, we support no less than 50 percent (or \$61.5 million) of the dairy methane funds going to AMMP projects given the high producer demand for the program and the multiple environmental and public health co-benefits of the projects.</p>	<p>Currently, CDFA is making at least 50% of the shared \$48 million State Budget appropriation for livestock methane reduction available for the AMMP. The Legislature has also appropriated an additional \$20 million to AMMP from the Greenhouse Gas Reduction Fund. CDFA is splitting the state appropriations for both AMMP and DDRDP across two solicitations and two years to provide continuous and consistent funding opportunities. The federally funded Dairy Plus Program has overarching federal project requirements and timelines that are independent of AMMP and DDRDP. CDFA and the California Dairy Research Foundation (CDRF) are committed to fully expending all awarded funds for Dairy Plus to benefit the CA dairy community while achieving targets set in the agreement with USDA, which includes GHG reductions of 450,000 metric tons of CO<sub>2</sub>e annually, award for at least 60 producers to adopt advanced manure management practices in their farms, mitigating the methane emissions of up of 100,000 dairy cows, and contribution of \$27,800,000 in matching funds from State Funding and participating producers to the Dairy Plus Program. To meet these objectives, CDFA and CDRF will not divide available funding across multiple solicitations and instead will award qualified projects using the process described below until funding is fully liquidated. CDRF and CDFA will convene the technical review panel, which will consist of public and private experts in dairy methane and nutrient management. The technical review panel will make funding recommendations to the California Secretary of Food and Agriculture according to the following two possible scenarios:</p> <p>Scenario 1 - Low application pressure:</p> <p>There is enough funding to cover all Dairy Plus requests for funding during this solicitation. All projects that pass administrative review, meet minimum scoring criteria for the technical review, and contribute sufficiently to a program-wide trajectory toward meeting USDA GHG reduction targets, will be recommended for funding. The technical review panel will set the minimum scoring criteria prior to commencing the review.</p> <p>Scenario 2 - High application pressure:</p> <p>There is not enough funding to cover all Dairy Plus requests for funding during this solicitation. The technical review panel will rank projects according to the review criteria provided in Appendix E of the RGA. The technical review panel will make funding recommendations considering application ranking, geography, dairy size, practice diversity, underserved producer status, and program-wide requirements to meet USDA GHG reduction targets.</p>
CalCAN-CAFF-WFA-CFS	AMMP	<p>We also want to reiterate our ongoing request that the meetings of the Dairy Methane related Technical Advisory Committees be held publicly. We ask that this change in 2023 with all of the TAC meetings becoming public, including all the typical Bagley-Keene Act notifications of those meetings and posting of TAC membership. We also ask that CDFA include on the TAC those familiar with pasture-based systems in addition to traditional confinement operations.</p>	<p>In the current grant application review process, there are two groups that contribute to the overall technical review - 1. subject matter experts in manure management, methane reduction, anaerobic digestion, bioengineering, and more from universities and academic institutions, and 2. the Technical Advisory Committee (TAC), which consists of individuals from state agencies with knowledge around manure management, methane reduction measures, environmental impacts and permitting in California. The AMMP TAC's role has evolved over time, initially providing feedback on the program framework and development, but now only meeting to help with a portion of the application review. All TAC members are required to file Statements of Economic Interests (Form 700), and are present to provide neutral, science-based input. Membership is posted to the AMMP webpage. These are closed meetings, as grant applications may contain sensitive financial and farm-specific information which should not be disclosed publicly.</p> <p>CDFA is exploring ways to solicit more public input on program evolution for AMMP and DDRDP when significant changes or updates are needed. CDFA will also explore including technical reviewers with more pasture-based system knowledge, but this may be more appropriate in the university and academic institution group rather than the TAC.</p>

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
CalCAN-CAFF-WFA-CFS	AMMP	We support the increased project duration from 24 to 30 months, giving producers a realistic amount of time to prepare for and implement their projects in the face of uncertain supply chain delays and contractor availability.	Thank you for your comment.
CalCAN-CAFF-WFA-CFS	AMMP	We encourage CDFA to consider including maintenance expenses as eligible costs in AMMP applications. This could be done by allowing for the inclusion of spare parts or covering the cost of vendor service agreements for the first five years of operation.	Currently, the goal of AMMP funds is to reduce the barrier of the high initial cost of installation, with the expectation that producers have the financial foundation to maintain practices beyond the lifetime of the grant. Funding spare parts and vendor service agreements are not in alignment with the expectation of longevity of these practices beyond the grant term. Additionally, all expenditures must occur within the grant term to be reimbursable.
CalCAN-CAFF-WFA-CFS	AMMP	To better address the needs of dairies and livestock operations that include pasture in their management, we suggest that CDFA offer the option to fund a pasture-based management plan and related infrastructure, which supports improved management to reduce methane emissions. CDFA and CARB should also include in the QM for the program the carbon sequestration benefits of improved pasture-management.	Reasonable infrastructure expenses directly related to and necessary to achieve pasture-based management project implementation that follows program allowable costs may already be included in AMMP. Technical assistance providers funded by CDFA are already available to those applicants that would like to develop a grazing management plan for their AMMP application. Additionally, funding assistance for the development of plans (including Grazing Management Plans) is incentivized under the CDFA Conservation Agriculture Planning Grants Program. Quantification of carbon sequestration benefits is outside of the current scope and purpose of the AMMP Benefits Calculator Tool; CDFA may forward this suggestion to the California Air Resources Board.
CalCAN-CAFF-WFA-CFS	AMMP	Support best management practices for compost bedded pack barns so that they remain viable well beyond the five-year term — while the article links on these issues are helpful, we think it is more likely that producers will be aware of and able to follow BMPs for the compost bedded pack barns if CDFA offers outreach and education on these issues, such as hosting a webinar on compost bedded pack barns and related BMPs for past and current AMMP applicants.	CDFA supports this suggestion and will explore opportunities to use our partnerships with technical assistance providers and our technical assistance funding to offer these types of opportunities.
CalCAN-CAFF-WFA-CFS	AMMP	Allow for 90-day application period.	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 could have the consequence of further extending the time between application preparation and project start where rising project costs already present an issue. If unexpectedly low numbers of applications are being submitted, CDFA will consider increasing the application window.
Western United Dairies	Dairy Plus	I would like to thank the CDFA and the California Dairy Research Foundation (CDRF) for your hard work in making the Dairy Plus Program possible. California dairy families are facing unprecedented challenges, which include meeting strict environmental mandates. This funding allows California dairy families to rise to the challenge and meet our goals to both reduce GHG emissions and protect water quality. That dual purpose of addressing both methane emissions and nutrient surplus is the shining star of this program.	Thank you for your comment.
Western United Dairies	Dairy Plus	There are other advanced manure management practices included in AMMP and CARB Benefits Calculator Tool that could be easily included in the Dairy Plus Program, such as conversion from flush to scrape and centrifuge. For these practices to meet standards, there could be a minimum limits set, e.g., on what percentage of the flushed manure must be collected through scraping/vacuuming.	Manure management practices, such as conversion from flush to scrape and centrifuge, are important AMMP practices, but do not currently qualify as advanced manure management practices because they don't address both methane emissions and nutrient surplus reduction. Additionally, these practices are less expensive and are usually fully supported by the \$750k provided by AMMP.

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
Western United Dairies	Dairy Plus	On page 6 of the Dairy Plus RGA one of the eligible project components is "Advanced solid-liquid separation assisted by flocculants. . ." However, on page 9 in the first row of the table the word "polymer" appears before the word flocculant. There are various types of flocculants other than polymer based and I wonder if those other flocculants would be eligible for funding under this program.	Thank you for bringing this error to our attention. To clarify, the program is open to various types of flocculants, not just polymer-based ones. CDFA will update the RGA to ensure that this information is clear.
Western United Dairies	Dairy Plus	One of the project readiness criteria is to obtain any necessary permits so that if, awarded funding, the project will be ready to commence. This is straightforward with air district and county build permits, but not as straightforward with water board permits. CDFA should confer with the water boards on what the expectations of the program are and the water board's ability to deliver something that meets the needs of the program before releasing the solicitation so that applicants have a clear path to satisfying that requirement.	CDFA acknowledges the challenge/complexity regarding obtaining all permits necessary for the implementation of a practice incentivized by the Dairy Plus Program. CDFA is consulting with the State Water Resources Control Board to discuss a collaboration between agencies with the goal of making the permit process clearer for Dairy Plus applicants, and ultimately to help producers to obtain their required permits with the Water Boards. The Dairy Plus Program incentivizes producers to proactively apply for the permits and/or communicate with the regulatory agencies they deem necessary prior to the application submission, but they are not required to do so in order to be awarded. Once awarded, recipients will be required to provide CDFA a copy of all the permits necessary for the implementation of the project before the project close-out.
Western United Dairies	Dairy Plus	It is still not clear the distinction between an application to AMMP and to Dairy Plus, and where there is overlap or separate requirements. It is important that before the solicitation opens, it is clear what needs to be completed if a dairy is applying for AMMP only, and what else is needed if they are also applying for Dairy Plus. For example: Will the applications be submitted to the same webpage, or each to its own? The fact that the attachment numbers do not correspond between the two programs may be a source of confusion. Specifically, attachment 5 in AMMP is the GHG calculator, but that attachment is number 4 in Dairy Plus. I understand why there is a difference, but if there was a way to align the attachments it would help remove confusion.	Thank you for the feedback. CDFA will work to improve the clarity of the program requirements and how to apply before releasing the final RGA as well as share examples, conduct workshops, and offer "Questions and Answers" rounds to assist potential applicants to the Dairy Plus Program. The RGA now contains the following language: "The online application for Dairy Plus is not a standalone application submission portal, but instead integrated as an option within the AMMP and the DDRDP application submission portals. For example, a current applicant for AMMP or a previous AMMP recipient applying for the Dairy Plus Program to further enhance their AMMP manure management system would use the AMMP application submission portal to select the type of application (AMMP only, AMMP and Dairy Plus, Dairy Plus only for past AMMP recipients) and complete their Dairy Plus Program project proposal. Similarly, new or previous DDRDP applicants applying to Dairy Plus to further enhance their DDRDP manure management system would use the DDRDP application submission portal to select the type of application (DDRDP only, DDRDP and Dairy Plus, Dairy Plus only for past DDRDP recipients) and complete their Dairy Plus Program project proposal". CDFA has also modified the identification of the attachments from numbers to letters, to help applicants submitting applications to different programs to avoid possible mistakes.
Leadership Counsel for Justice and Accountability (LCJA)	Dairy Plus	New Dairy Plus program would provide federal investments to reduce nitrate and methane pollution, however the funding model CDFA proposes is questionable. California dairies already have an existing regulatory mandate to stop polluting groundwater with nitrates. California dairies already have the ability to stop causing and contributing to nitrate contamination through improved management practices, bringing herd sizes into balance with available cropland on which to dispose resulting nitrogen, lining lagoons and corral areas, denitrification through vermifiltration and other methods, and by reducing nitrogen applications to cropland such that applications to not exceed the crop's ability to remove the nitrogen. While the draft Dairy Plus guidelines propose to incentivize some of the management practices, there is no need to incentivize pollution control activities that are already required under applicable waste discharge requirements issued and enforced by the Central Valley Regional Water Quality Control Board.	CDFA understands your concerns regarding the funding model and the existing regulatory mandates for California dairies. The Dairy Plus Program is designed to incentivize and support dairy farmers in implementing advanced manure management practices that go above and beyond what is currently required by regulations. While some of these practices may already be required under existing regulations, the Dairy Plus Program provides additional funding and resources to help farmers implement these practices more efficiently and effectively. We believe that this program will help to accelerate the adoption of advanced manure management practices and reduce nitrate and methane pollution in California.

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
Biofiltro	Dairy Plus	We are happy that the program will address not only the CH4 emissions but also the excess nitrogen that generates additional GHG emissions that should be addressed when assessing the effects and benefits of state-funded projects aiming to reduce CH4 emissions. Reducing CH4 emissions without considering the effects of the proposed practices on NH3 and N2O emissions and excess nutrients is reductive.	Thank you for your comment.
Biofiltro	Dairy Plus	The Request for application state that "Practices projects must go beyond the usual GHG emission reduction and benefits already provided by the AMMP and DDRDP programs (Page 1)". However, the AMMP already includes some practices eligible for the Dairy Plus program (for example, vermifiltration).	The Dairy Plus Program is designed to provide additional funding to dairy farmers who are interested in implementing advanced manure management practices that go beyond those already included in the AMMP and DDRDP programs. While some practices, such as vermifiltration, may be eligible for both AMMP and Dairy Plus programs, the Dairy Plus Program is seeking to award projects that go beyond the usual GHG emission reduction and benefits that are already provided by these programs. For instance, when submitting a proposal for a vermifiltration system under the Dairy Plus Program, applicants are required to provide a comprehensive description of their proposed project. This should not only demonstrate the potential for GHG emission reductions, but also illustrate how the system will enhance the overall nutrient management of the farm, improve water quality, and ensure that byproducts are appropriately exported from the farm, among other benefits.
Biofiltro	Dairy Plus	In the eligibility criteria, on page 3, previous AMMP recipients from 2017 to 2022 are eligible. However, it is unlikely that 2022 recipients will have a completed project (projects started in January 2023). We understand that changing the proposed practice and adding additional equipment can be difficult when a project is under development. However, this would not be true for AMMP projects proposing practices now included in the Dairy Plus program. Could this scenario be added to the eligible 2022 projects?	Projects that have not yet been closed-out with CDFA, independently of what year they were funded, will not be eligible for Dairy Plus Program. Allowing active grant recipients to apply for Dairy Plus funding would complicate existing grant agreements and, in some cases, create the need for grant extensions that CDFA cannot accommodate with legislatively determined liquidation and encumbrance deadlines for funding. However, Dairy Plus Program anticipates offering several years of funding, so the opportunity for currently in-progress AMMP or DDRDP projects to apply once they are close-out may still be an option.
Biofiltro	Dairy Plus	If the project has/plans an AMMP separator and will install a second separator with the vermifilter. The second separator is designed to add efficacy to the vermifilter, and its effects are beyond the standard AMMP project. Can this second separator be eligible for the Dairy Plus program?	CDFA is unable to provide an answer based on the limited amount of information provided in the inquiry. More information would be needed about the second separator in this scenario. The practices/technologies currently eligible for Dairy Plus Program funding are listed under Eligibility and Exclusions of the RGA. Additionally, please check for the sections "Allowable Costs" and "Unallowable Costs" in the Dairy Plus Program RGA.
Biofiltro	Dairy Plus	It is unclear whether the proponents will apply for AMMP/DDRDP and Dairy Plus by submitting a common narrative, budgets, and project plans for the state and Dairy Plus funds. Or if all these documents will be duplicated and address only the portion covered by the different funds. Can the narrative be in common for the state and federal parts?	The AMMP/DDRDP and Dairy Plus applications are intended to be kept as distinct as possible to accommodate the need for a clear accounting of federal and state funds, project benefits, and review processes. Different sets of application documents focusing primarily on the portion covered by the AMMP/DDRDP or Dairy Plus Program funds will need to be submitted as described in the respective program RGAs. For clarity, the Dairy Plus Program has added language on the RGA to say: "The online application for Dairy Plus is not a standalone application submission portal, but instead integrated as an option within the AMMP and the DDRDP application submission portals. For example, a current applicant for AMMP or a previous AMMP recipient applying for the Dairy Plus Program to further enhance their AMMP manure management system would use the AMMP application submission portal to select the type of application (AMMP only, AMMP and Dairy Plus, Dairy Plus only for past AMMP recipients) and complete their Dairy Plus Program project proposal. Similarly, new or previous DDRDP applicants applying to Dairy Plus to further enhance their DDRDP manure management system would use the DDRDP application submission portal to select the type of application (DDRDP only, DDRDP and Dairy Plus, Dairy Plus only for past DDRDP recipients) and complete their Dairy Plus Program project proposal".

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
Biofiltro	Dairy Plus	Scoring criteria. It is not clear if Dairy Plus projects will be prioritized and scored using the additional GHG reduction and the excess N removal they will provide. Alternatively, if projects that will document an additional GHG emission and excess N removal will be ranked on other parameters, independently of the size of the extra GHG/N benefits offered.	The Dairy Plus Program uses the existing AMMP/DDRDP Benefits Calculator Tools to help estimate and account for the additional GHG reduction benefits; it is not able to quantify nitrogen benefits at this time. As such, a ranked metric (such as that used in AMMP/DDRDP) will not be utilized for scoring based on the magnitude of GHG/N benefits. However, the program will evaluate the accurate completion of the calculator to show the additional GHG reductions or co-benefits, as well as the associated description of the proposed technology and its benefits for GHG reduction and excess nitrogen removal. The evaluation will focus on the thoroughness of the proposal, the system as a whole, anticipated benefits, and data that can support those anticipated benefits.
Biofiltro	Dairy Plus	Language should be carefully chosen to describe the extra GHG methane benefit assigned to AMMP + Dairy Plus projects. The AMMP already included the Dairy Plus practices of vermifiltration and solid-liquid separation assisted by flocculants and/or bead filters. Maybe the proponents could assign activities that are exclusively eligible for the Dairy Plus program to this program and assign the residual activities to the AMMP.	While it's important to note that there is some overlap between the practices covered by the Dairy Plus Program and those already included in the AMMP, due to restrictions from the USDA grant funding, applicants must submit distinctly separate funding requests for the AMMP and Dairy Plus components. Furthermore, applicants should describe the difference in benefits between the two programs, highlighting the specific benefits that would result from the Dairy Plus practices.
Biofiltro	Dairy Plus	Can the program confirm the difference in weeping walls eligibility among programs? Weeping walls eligible for AMMP must have 2 cells, for Dairy plus program 3 cells. Also, are weeping walls mechanical separators? If not, they can't be considered as the separator required by vermifiltration systems or solid-liquid separation assisted by flocculants and/or bead filters (page 3 a and c).	The minimum of 3 cells for a weeping wall covered by the Dairy Plus Program was initially considered as a way to differentiate it in scale and impact compared to an AMMP project, where a minimum of 2 cells is required. However, as the Benefits Calculator Tool does not support differences based on cell number, Dairy Plus will be updated to similarly require a minimum of 2 cells for a weeping wall. Weeping walls are considered non-mechanical separators. The Benefits Calculator Tool for AMMP was not modeled for a scenario of the use of a weeping wall as primary coarse solid separation before a vermifilter or advanced solid-liquid separation system. If CDFA and stakeholders deem this practice as likely to be implemented, CDFA will communicate with CARB and work together to add such practice in the next update of the Benefits Calculator Tool.
CalCAN	Dairy Plus	We are in general support of the program goal of achieving improvements in both methane emissions and nutrient management. We are also pleased that the program provides new resources for the dairy industry to support a transition towards greater economic viability as well as meaningful and sustainable environmental stewardship.	Thank you for your comment.

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
CalCAN	Dairy Plus	<p>Tiered prioritization of projects — We recommend the following prioritization of funding, in this order:</p> <ol style="list-style-type: none"> <li>1. New 2023 AMMP project + Dairy Plus Program project — The AMMP program to date has reached only approximately 13% of the state’s dairies, and is consistently oversubscribed by two to three times the available funding. These producers should be put at the front of the line.</li> <li>2. Previous AMMP recipient proposing a Dairy Plus Program project — Producers cannot re-apply to AMMP, so Dairy Plus provides a source of funding for those who have additional opportunities available on their operations to achieve additional methane emissions reductions and improve nutrient management. Further, we recommend removing the 50/50 cost share for these projects – unlike digesters, AMMP projects have few if any sources of revenue available to offset the expense of installing the equipment.</li> <li>3. Previous DDRDP recipient proposing a Dairy Plus Program project — This project type should be the lowest priority for Dairy Plus funding. Dairies that have already installed digesters may have methane emissions and nutrient management problems associated with the digestate that can cause air and water quality impacts on neighboring communities, and this funding can help mitigate these harms.</li> </ol> <p>We urge you to remove the following projects from the eligibility list. Given the numerous other sources of funding for digesters, we believe these projects should not be eligible for this additional source of public investment:</p> <ul style="list-style-type: none"> <li>• New 2023 DDRDP project + Dairy Plus Program project</li> <li>• Previous AMMP recipient with a new 2023 DDRDP project + Dairy Plus Program project — This option in particular is problematic since it could result in one producer receiving three separate grants while the majority of small and medium-sized producers have had no resources available to them to reduce methane emissions.</li> </ul>	<p>CDFA is committed to funding high-quality, impactful methane reduction and nutrient management projects and to encumbering and expending all available funding within the required timelines. Therefore, CDFA will keep eligibility open for all types and combinations of AMMP, DDRDP and Dairy Plus projects outlined in the draft RGA to ensure a quality applicant pool. The objective of the Dairy Plus Program, which is directly funded by the US Department of Agriculture under the Partnerships for Climate-Smart Commodities program, is to incentivize all dairy producers/ the dairy sector as a whole to adopt advanced climate-smart manure management practices that result in further GHG emission reduction and addresses nutrient surplus. This grant was awarded to the CA Dairy Research Foundation, where CDFA is a collaborator, with the primary goal of increasing the sustainability of the milk production chain while achieving targets set in the agreement with USDA, which includes GHG reductions of 450,000 metric tons of CO<sub>2</sub>e annually, award for at least 60 producers to adopt advanced manure management practices in their farms, mitigating the methane emissions of up of 100,000 dairy cows, and contribution of \$27,800,000 in matching funds from State Funding and participating producers to the Dairy Plus Program. To meet these objectives, CDFA and CDRF will not divide available funding across multiple solicitations and instead will award qualified projects using the process described below until funding is fully liquidated. CDRF and CDFA will convene the technical review panel, which will consist of public and private experts in dairy methane and nutrient management. The technical review panel will make funding recommendations to the California Secretary of Agriculture according to the following two possible scenarios:</p> <p style="padding-left: 40px;">Scenario 1 - Low application pressure:</p> <p style="padding-left: 40px;">There is enough funding to cover all Dairy Plus requests for funding during this solicitation. All projects that pass administrative review, meet minimum scoring criteria for the technical review, and contribute sufficiently to a program-wide trajectory toward meeting USDA GHG reduction targets, will be recommended for funding. The technical review panel will set the minimum scoring criteria prior to commencing the review.</p> <p style="padding-left: 40px;">Scenario 2 - High application pressure:</p> <p style="padding-left: 40px;">There is not enough funding to cover all Dairy Plus requests for funding during this solicitation. The technical review panel will rank projects according to the review criteria provided in Appendix E of the RGA. The technical review panel will make funding recommendations considering application ranking, geography, dairy size, practice diversity, underserved producer status and program-wide requirements to meet USDA GHG reduction targets. Additionally, the Dairy Plus Program is carving out \$7.5M to SDFR and/or historically underrepresented producers, it is essential that it reaches all the California dairy farms independent of their types, size, and location. Finally, the Dairy Plus Program cannot and will not fund the implementation or maintenance of, including but not limited to, anaerobic digesters, biogas cleanup equipment, biogas upgrading equipment, pipelines, electricity generators, and all systems related to anaerobic digestion and biogas end-use.</p>
CalCAN	Dairy Plus	<p>Broaden eligible solid separation practice — We are unclear on the rationale for including only weeping walls as an eligible practice in Dairy Plus. Weeping walls are typically used as a primary solid separation method. Instead of restricting the options to only weeping walls, we recommend including "Addition of a secondary solid separation technology" that could be added to any eligible AMMP-funded project.</p>	<p>CDFA is currently following the original practices that were present in the USDA Partnership for Climate-Smart Commodities Program (PCSC) proposal from CDRF. CDFA and CDRF were subsequently limited to make a subset of the originally proposed practices available for Dairy Plus Program funding since these practices are either listed as an NRCS practice and/or available at the CARB Benefits Calculator Tool for AMMP and/or DDRDP. However, CDFA is exploring options for expanding the eligible practices in future solicitations, by releasing a call for proposals for new technologies during the Summer of 2023.</p> <p>Dairy Plus Program also incentivizes advanced manure management practices that address both methane emissions and nutrient surplus reduction and not all secondary solid separation technologies have the potential to address nutrient surplus reduction.</p>



**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Commenter	Program	Comment	Response
CalCAN	Dairy Plus	Reduce the cap — We recommend a reduction of the \$1.25 million to \$1 million or less to improve the competitive odds for producers with dairy sizes smaller than the state average.	The PCSC grant proposal drafted by CDRF has committed to providing up to \$750 per cow for a maximum of \$1.25 million per grant. This type of incentive was structured to allow an equitable approach to serve large and small dairies compared to an alternative such as acreage, and to most directly address the source of methane emissions - individual cows. This cap was also set per producer to allow for an appropriate number of participating producers over the course of the grant, currently targeted at 60.
CalCAN	Dairy Plus	Amendment to prohibitions on changes to the operation — In order to clarify that the farmer is not agreeing to forgo changes to their operation in perpetuity, we ask you to make the following edit (in italics) to the section in the middle of page 4: "Once a project has been awarded funds, for a period of five years, the project may not..."	This section of the RGA has been amended to inform applicants and potential recipients that alterations that impact the baseline GHG emissions such as increasing herd size, or the estimated project GHG reductions (mainly, if it led to a lower reduction) during the project term are not permitted once a project has been awarded. CDFA will update the RGA language to clarify this applies to the time between award notification and project close-out, and not in perpetuity.
Bennett Environmental	Dairy Plus	We appreciate that CDFA is helping to support the implementation of advanced manure management practices that address both methane emissions and nutrient surplus, particularly in light of recent groundwater regulation and potential disruption and challenges presented to land application and nutrient utilization systems that depend on irrigation water supply.	Thank you for your comment.
Bennett Environmental	Dairy Plus	We have identified commercially available technologies that have established design and installation procedures and practices, and that should be considered for funding by CDFA and USDA. What are the requirements for qualifying additional technologies for funding? What is the timeline and process? We understand that candidate technologies must be supported in the CARB Benefits Calculator Tools. What data is necessary to facilitate incorporation into the tools?	CDFA is preparing to release a call for future advanced manure management practices to be added to the CARB Benefits Calculator Tool for AMMP and/or DDRDP in the summer of 2023. Information regarding the requirements for qualifying technologies will be available at that time, however, all qualifying technologies should result in both GHG emission reduction and improve nutrient management.

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
Maas Energy Works	Dairy Plus	<p>The existing list of eligible project types for a Dairy Plus application submitted in conjunction with a past or current DDRDP project is currently limited to treating digester effluent with two relatively rare technologies: either vermifiltration, or dissolved air flotation with flocculent or bead separation. We recommend that CDFA expand the list of eligible project types to include other proven manure digester effluent technologies for reducing greenhouse gases and repurposing nutrients. One such technology is the use of centrifuge equipment to separate solids from liquids in manure digester effluent. Centrifuge separation would remove volatile solids from digester effluent before the effluent pond. The separated centrifuge solids are a concentrated, organic manure nutrient that can be transported and deployed where most needed, which would also result in less volatile solids ending up in manure effluent pond leading to reduced greenhouse gas emissions. We recommend adding centrifuge separation of digester effluent solids as an explicitly eligible project type for a DDRDP + Dairy Plus application...</p> <p>... The most powerful solutions for a Dairy Plus application would be to combine a hybrid of one or more of the above post-digester separation technologies with an effluent pond cover, which is an NRCS recognized practice (practice 367 and others). The use of a post-digester nutrient removal system (centrifuge or other technology listed above) that subsequently sends the resulting non-separated liquid effluent to a covered storage lagoon would achieve near total GHG emissions reduction. We recommend CDFA also consider adding this hybrid approach as an eligible practice under the Dairy Plus program.</p>	<p>CDFA is currently following the original practices that were included in the original USDA Partnership for Climate-Smart Commodities Program (PCSC) proposal from CDRF. CDFA and CDRF were able to make a subset of the originally proposed practices available at the Dairy Plus Program since these practices are either listed as an NRCS practice or available at the CARB Benefits Calculator Tool for AMMP and/or DDRDP. Practices that were not originally proposed in the USDA PCSC or are not an NRCS-listed practice and/or available at the CARB Benefits Calculator Tool for AMMP and/or DDRDP cannot be considered for this first solicitation round. While centrifuge separators are already a practice available at the CARB Benefits Calculator Tool as a primary/secondary solid-liquid separation, and provide significant GHG emission reduction, it is unclear how centrifuges would provide direct benefits to water quality and enhance nutrient management in dairy farms. CDFA welcomes scientific literature and data that demonstrate the positive effect of centrifuge equipment regarding its benefits to nutrient management/water quality in California dairy farms.</p>
Maas Energy Works	Dairy Plus	<p>Other commercial technologies exist that could also concentrate manure nutrients for beneficial use, while also reducing volatile solids in the digester effluent pond—thus reducing greenhouse gas emissions. Although the CARB DDRDP calculator does not specifically include them, the CARB LCFS Tier 1 Calculator for Dairy and Swine digestion (<a href="https://ww2.arb.ca.gov/resources/documents/lcfs-life-cycle-analysis-models-and-documentation">https://ww2.arb.ca.gov/resources/documents/lcfs-life-cycle-analysis-models-and-documentation</a>) does include VS reduction for technologies including Roller Drums, and Belt Press/Screen. We believe the following solids removal technologies could also be added post-digester and should therefore be considered for eligibility under the Dairy Plus program to increase program participation and technology diversity:</p> <ul style="list-style-type: none"> <li>-Dissolved air flotation (without necessarily using a flocculent)</li> <li>-Coagulation with clarifiers</li> <li>-Aeration tanks (if nutrients are captured)</li> <li>-Advanced filtration including membranes</li> <li>-Reverse osmosis membranes</li> </ul>	<p>CDFA is currently following the original practices that were present in the original USDA Partnership for Climate-Smart Commodities Program (PCSC) proposal from CDRF. CDFA and CDRF were able to make a subset of the originally proposed practices available at the Dairy Plus Program since these practices are either listed as an NRCS practice or available at the CARB Benefits Calculator Tool for AMMP and/or DDRDP. Practices that were not originally proposed in the USDA PCSC or are not an NRCS-listed practice and/or available at the CARB Benefits Calculator Tool for AMMP and/or DDRDP cannot be considered for this first solicitation round. CDFA is preparing to release a call for future advanced manure management practices to be added to the CARB Benefits Calculator Tool for AMMP and/or DDRDP in the summer of 2023. Information regarding the requirements for qualifying technologies will be available at that time, however, all qualifying technologies should result in both GHG emission reduction and improve nutrient management.</p>

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Commenter	Program	Comment	Response
Dairy Cares	Dairy Plus	<p>We particularly appreciate CDFA's willingness to partner with the U.S. Department of Agriculture, the California Dairy Research Foundation, and many other groups across the dairy industry to produce a robust program that considers how best to achieve multiple environmental and economic benefits in a thoughtful way that considers the entire food chain, from farm to consumer. We strongly support this program.</p>	<p align="center">Thank you for your comment.</p>
Dairy Cares	Dairy Plus	<p>We are commenting today in hopes of achieving some minor modifications in the scoring criteria for this program. Specifically, we are concerned that the scoring rubric in Appendix E allocates 15 of 50 possible points for a proposed project's "estimated greenhouse gas reduction," while placing what appears to be comparatively less emphasis on water quality outcomes. The "Project Description" section also includes 15 points, but they are divided across 11 different criteria, only two of which appear to be linked directly to water quality, sections (g) and (h). This structure suggests the possibility that less points and emphasis are being awarded for water quality benefits than for GHG benefits. We suggest CDFA reconsider this scoring system to award more points and/or place additional emphasis and priority on water quality benefits from proposed projects.</p> <p>Suggestions for CDFA to consider:</p> <ul style="list-style-type: none"> <li>a) Carving out at least 10 points specifically for water quality benefits considerations, and</li> <li>b) Awarding additional points to projects that provide water quality benefits and are located within active Nitrate Management Zones within the San Joaquin Valley or elsewhere in the Central Valley, as these are particularly sensitive areas for water quality and projects that by definition "will positively impact both local communities and environmental conditions.</li> </ul>	<p>CDFA has made changes to the Dairy Plus Program scoring criteria by better redistributing the 50 available points. This will place greater emphasis on the potential impact of proposed projects on water quality benefits and improved nutrient management. To reflect this, an additional section has been added to the scoring criteria of the program. CDFA is unable to provide direct points to farms located in a specific area of the State.</p>

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
California Dairy Campaign, California Farmers Union	Dairy Plus	<p>To further enhance the Dairy Plus Program's impact, we recommend prioritizing funding for those dairy farmers who are applying for the AMMP and past AMMP grant recipients. We urge the elimination of the Dairy Plus cost-share requirement for past AMMP recipients to ensure that economic challenges do not hinder participation.</p>	<p>CDFA is committed to funding high-quality, impactful methane reduction and nutrient management projects and to encumbering and expending all available funding within the required timelines. Therefore, CDFA will keep eligibility open for all types and combinations of AMMP, DDRDP, and Dairy Plus projects outlined in the draft RGA to ensure a quality applicant pool. The objective of the Dairy Plus Program, which is directly funded by the US Department of Agriculture under the Partnerships for Climate-Smart Commodities program, is to incentivize all dairy producers/ the dairy sector as a whole to adopt advanced climate-smart manure management practices that result in further GHG emission reduction and addresses nutrient surplus. This grant was awarded to the CA Dairy Research Foundation, where CDFA is a collaborator, with the primary goal of increasing the sustainability of the milk production chain while achieving targets set in the agreement with USDA, which includes GHG reductions of 450,000 metric tons of CO<sub>2</sub>e annually, award for at least 60 producers to adopt advanced manure management practices in their farms, mitigating the methane emissions of up of 100,000 dairy cows, and contribution of \$27,800,000 in matching funds from State Funding and participating producers to the Dairy Plus Program. To meet these objectives, CDFA and CDRF will not divide available funding across multiple solicitations and instead will award qualified projects using the process described below until funding is fully liquidated. CDRF and CDFA will convene the technical review panel, which will consist of public and private experts in dairy methane and nutrient management. The technical review panel will make funding recommendations to the California Secretary of Agriculture according to the following two possible scenarios: Scenario 1 - Low application pressure: There is enough funding to cover all Dairy Plus requests for funding during this solicitation. All projects that pass administrative review, meet minimum scoring criteria for the technical review, and contribute sufficiently to a program-wide trajectory toward meeting USDA GHG reduction targets, will be recommended for funding. The technical review panel will set the minimum scoring criteria prior to commencing the review. Scenario 2 - High application pressure: There is not enough funding to cover all Dairy Plus requests for funding during this solicitation. The technical review panel will rank projects according to the review criteria provided in Appendix E of the RGA. The technical review panel will make funding recommendations considering application ranking, geography, dairy size, practice diversity, underserved producer status, and program-wide requirements to meet USDA GHG reduction targets. Additionally, the Dairy Plus Program is carving out \$7.5M to SDFR and/or historically underrepresented producers, it is essential that it reaches all the California dairy farms independent of their types, size, and location. Finally, the Dairy Plus Program cannot and will not fund the implementation or maintenance of, including but not limited to, anaerobic digesters, biogas cleanup equipment, biogas upgrading equipment, pipelines, electricity generators, and all systems related to anaerobic digestion and biogas end-use. Regarding the cost-share requirement for past AMMP recipients, CDFA has lowered the cost-share requirement of \$1M to a maximum of \$750,000.</p>
California Dairy Campaign, California Farmers Union	Dairy Plus	<p>To broaden the scope of eligible practices, we advocate including secondary solid separation technologies.</p>	<p>CDFA is currently following the original practices that were present in the USDA Partnership for Climate-Smart Commodities Program (PCSC) proposal from CDRF. CDFA and CDRF were subsequently limited to make a subset of the originally proposed practices available for Dairy Plus Program funding since these practices are either listed as an NRCS practice or available at the CARB Benefits Calculator Tool for AMMP and/or DDRDP, but are exploring options for expanding the eligible practices in future solicitations. Dairy Plus Program also incentivizes advanced manure management practices that address both methane emissions and nutrient surplus reduction, and not all secondary solid separation technologies address nutrient surplus reduction.</p>

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Committer	Program	Comment	Response
California Dairy Campaign, California Farmers Union	Dairy Plus	The Dairy Plus Program is an important initiative for California dairy farmers to enhance their manure management practices, which can decrease GHG emissions and improve water quality. Importantly given the challenges in the dairy marketplace today, this program also enables dairy farmers to earn extra income by adopting advanced climate-smart practices on their farms and selling their products in the market	Thank you for your comment.
Sustainable Conservation	Dairy Plus	Sustainable Conservation applauds the Department of Food and Agriculture for its work in administering the Dairy Plus Program, which will prove to be a valuable tool in addressing nitrate contamination and greenhouse gas emissions through the funding of advanced manure management projects. We support the Department's efforts in overseeing this funding, as well as the programs that Dairy Plus will supplement, the AMMP and the DDRDP.	Thank you for your comment.
Sustainable Conservation	Dairy Plus	The GHG benefits calculator tool used for this draft RGA and others does not adequately reflect the benefits gained from projects that reduce other GHG emissions, such as nitrous oxide, a highly potent GHG for which manure represents a substantial portion of the state's inventory. While we do not recommend any changes related to the calculator tool used in the Draft RGA at this time, we encourage the OEFI to consider as part of the guidelines for any future funding programs eligibility for projects that conduct research to further gauge the benefits of projects that reduce greenhouse gas emissions beyond methane. In addition, we recommend that the CARB develop GHG calculator tools that quantify benefits of reductions in nitrous oxide and other additional greenhouse gases.	CDFA will share this comment with CARB regarding the Benefits Calculator Tools. CDRF is working closely with the University of California to further investigate the potential of the incentivized advanced manure management practices by the Dairy Plus Program, and accompanying practices (i.e., SDI) in reducing methane, nitrous oxide, several criteria air pollutants. This data may will be shared with CARB, and hopefully, it may help to further expand the Benefits Calculator Tool's capabilities in estimating several GHGs from manure management practices in CA conditions.
Sustainable Conservation	Dairy Plus	We do recommend that the Draft RGA be revised to allow eligibility for standalone subsurface drip irrigation (SDI) projects. We ask that CDFA continue its practices of encouraging SDI projects by decoupling SDI from other eligible practices, and revising the Draft RGA to allow standalone projects to receive funding.	Although CDFA has provided incentives for the implementation of subsurface drip irrigation (SDI) standalone projects in our sister incentive program (i.e., State Water Efficiency & Enhancement Program - SWEEP), and it is a helpful tool for reducing GHG when accompanied by a manure management practice, by itself, the practice does not qualify as an advanced manure management practice (that is, one that addresses both GHG reduction and nutrient surplus). CDFA welcomes scientific literature and data that demonstrate the potential for SDI to be considered an advanced manure management practice when used as a standalone practice in California dairy farms.
Sustainable Conservation	Dairy Plus	Additionally, we recommend that other advanced practices such as algae raceways and evaporative liquid waste processing systems that were included in the Climate Smart Commodities proposal be eligible for funding as standalone Dairy Plus projects.	CDFA is currently following the original practices that were present in the original USDA Partnership for Climate-Smart Commodities Program (PCSC) proposal from CDRF. CDFA and CDRF were able to make a subset of the originally proposed practices available at the Dairy Plus Program since these practices are either listed as an NRCS practice or available at the CARB Benefits Calculator Tool for AMMP and/or DDRDP. Practices that were not originally proposed in the USDA PCSC or are not an NRCS-listed practice and/or available at the CARB Benefits Calculator Tool for AMMP and/or DDRDP cannot be considered for this first solicitation round. CDFA is preparing to release a call for future advanced manure management practices to be added to the CARB Benefits Calculator Tool for AMMP and/or DDRDP in the summer of 2023.
Sustainable Conservation	Dairy Plus	We also recommend revising Appendix E to include a category in the scoring criteria that addresses equity. An additional dimension of priority should be added to the scoring criteria to allow for socially disadvantaged farmers and ranchers and those from disadvantaged communities to have fair access to the application process	The USDA Partnership for Climate Smart Commodity producer incentive funding (administered through the Dairy Plus Program) includes a carve-out of \$7.5M (10%) to small and/or historically underrepresented producers, with the intention of reaching all California dairy farms independent of their types, size, and location. However, it is important to note that due to state prohibitions on affirmative action (Proposition 209), the CDFA is unable to directly award points to socially disadvantaged farmers and ranchers, small, and other underrepresented producers.

**CDFA Answers to the Public Comments Received on the Methane Reduction Programs Draft RGAs - DDRDP, AMMP, and Dairy Plus**  
**Comment Period: May 12, 2023 - May 23, 2023**

Commenter	Program	Comment	Response
Sustainable Conservation	Dairy Plus	It is also essential that this prioritization be paired with adequate technical assistance for applicants, including through technical assistance programs provided by CDFA and other state agencies. Special effort should be made to ensure that outreach on this program and technical assistance is targeted to reach those that may not have the networks and/or resources to know about and apply for this funding, in line with findings and recommendations in CDFA's Farmer Equity Report.	In the USDA Partnership for Climate-Smart Commodities Program (PCSC) proposal, California Dairy Quality Assurance Program (CDQAP) is going to be the main lead in providing robust technical assistance, outreach, and training support to interested CA dairy producers and partners not only at the application phase but also throughout the entire project. CDFA will also participate in all the training and application assistance webinars and workshops.