

California Department of Food and Agriculture
2022 Dairy Digester Research and Development Program
Responses to Public Comments Received between November 30, 2021- December 21, 2021
Updated on 02/14/2022

Commenter (similar comments were grouped)	Program*	Summarized Comment	Response
Oberon Fuels, Biofiltro	DDRDP	CDFA should include in the Request for Grant Applications (RGA) a "DDRDP Demonstration Projects" component comparable to what was present in the 2019 DDRDP Demonstration Projects RGA (released on Dec 28, 2018). In addition, the terminology to be used for any demonstration project program component needs to be clarified, i.e., this program pertains to "pilot (emphasis ours) and demonstration projects", as the term "demonstration projects" could be misconstrued to imply a specific technology readiness level.	Given the reduction in funding and lack of competitive demonstration projects, CDFA will not fund DDRDP Demonstration Projects through the 2022 DDRDP. CDFA may re-evaluate this option if more funds are appropriated in the future.
Oberon Fuels	DDRDP	A minimum of \$2 million should be made available for "pilot and demonstration projects" solicitation.	Given the reduction in funding and lack of competitive demonstration projects, CDFA will not fund DDRDP Demonstration Projects through the 2022 DDRDP. CDFA may re-evaluate this option if more funds are appropriated in the future.
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.
Maas Energy Works	DDRDP	CDFA should reduce the maximum grant amount under DDRDP from \$2,000,000 to \$1,500,000. This should allow the limited funding to be spread across more projects to further the environmental and economic impact of the program.	CDFA has reduced the maximum grant amount under DDRDP from \$2,000,000 to \$1,600,000, given the reduction in total funding for the program for FY 21-22.
Biofiltro	DDRDP and AMMP	CARB Benefits Calculator Tool for DDRDP should include the effect of anaerobic digestion on the production of direct and indirect N ₂ O emissions. AMMP GHG analysis additional benefits only consider air pollutants but should also include effects of proposed practice on the production of N ₂ O.	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.
Biofiltro	DDRDP	CDFA should reconsider the statement "Projects may propose to include nutrient management technologies, such as those to help manage excess nitrogen in addition to the anaerobic digesters eligible under the DDRDP" to allow implementation of stand-alone nutrient management technologies under DDRDP without the implementation of a digester. Vermifiltration should be included under DDRDP as an option to treat the effluent of an existing digester.	The DDRDP is a program focused on methane reduction through the installation of dairy digesters and therefore cannot establish a standalone option for nutrient management. The DDRDP does allow for a nutrient management system to be included and reimbursed with grant funds with the installation of a dairy digester.
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.

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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.
Dairy Cares	DDRDP	Dairy Cares requests that the language on Regulatory Compliance (page 4 and 8 of DDRDP draft RGA) to be clarified, specifically to ensure that minor infractions or violations that are in the process of being corrected do not subject an applicant or recipient to disqualification, and to recognize that where there are properly adopted time schedules and an applicant is following such a schedule, that this is the equivalent of meeting pollution control standards and requirements. We recommend that CDFA work with regional water quality and air quality authorities to clarify this language to allow for differentiation between minor, correctable violations such as what might turn up in a routine dairy inspection, from more serious issues that might result in civil or administrative civil liabilities, fines, or be subject to other enforcement orders that may be adopted by the applicable governing body. In addition, Dairy Cares is concerned that the new language regarding compliance only appears in the DDRDP RGA, and not in the AMMP RGA, as this would appear to set a different standard for dairies in each program. Dairy Cares believes both the AMMP and the DDRDP should hold dairies to similar requirements.	CDFA will change the language from "must" to "expected" to say "Applicant dairy operations are expected to comply with all applicable state and federal regulations and requirements during the application submission, and through the project grant term if awarded." on page 8 of the draft RGA. CDFA will remove the new language regarding compliance status as part of progress reports and project readiness on pages 4, 28, and 39 of the draft RGA.
Dairy Cares	DDRDP	Dairy Cares strongly urge CDFA to remove the unnecessary penalty for cancellations as proposed in the RGA (i.e., deduct three points (-3) if a Submitting Organization requested cancellation of two or more projects that had incurred grant costs).	CDFA has removed the scoring penalty for returning Submitting Organizations. CDFA would like to clarify the process of past performance further and has included the following language on page 21 of the draft RGA. "CDFA will take applicants' past grant performance into consideration when determining awards of new projects in consultation with Secretary and TAC. Past performance may include, but is not limited to, timely completion of projects, submission of all required documentation and data during and after project completion, cancelation of projects by CDFA due to lack of progress, and cancelation of projects by the recipient that had incurred grant costs and have not returned the funds to CDFA."
California Dairy Campaign	DDRDP	California Dairy Campaign requests that one percent of the DDRDP budget be set aside to accommodate the special needs of smaller-scale dairy producers, including but not limited to a market assessment and the development of a dairy farmer cooperative designed to provide access to all phases of the CDFA DDRDP and marketing opportunities for smaller-scale dairy producers.	CDFA does not have a definition for what would involve a small dairy operation, and therefore it would be difficult to implement this initiative. At this time, grant funding for the DDRDP is focused on methane reductions and does not include market-based initiatives.
California Dairy Campaign	DDRDP	California Dairy Campaign urges CDFA to award smaller grant amounts for DDRDP projects so the program can establish dairy digesters on dairy operations of varying sizes across the state.	CDFA has reduced the maximum grant amount under DDRDP from \$2,000,000 to \$1,600,000, given the reduction in total funding for the program for FY 21-22.

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California Dairy Campaign	DDRDP	California Dairy Campaign urges CDFA to continue the practice of publicly posting all funded and not funded DDRDP applications with their project summaries and funding requests on the program website.	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.

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