



May 29, 2026

Dr. Steven Cliff,  
Executive Officer  
California Air Resources  
Board

Eric Oppenheimer,  
Executive Director  
California State Water  
Resources Control Board

Karen Ross,  
Secretary  
California Department of Food  
and Agriculture

Re: Information Solicitation Re: Dairy and Livestock Methane Provisions of SB 1383

Dear Dr. Cliff, Director Oppenheimer, and Secretary Ross:

The undersigned organizations and stakeholders submit the following comments in response to the California Air Resources Board's ("CARB") SB 1383 Information Solicitation.

SB 1383 provides critical direction to CARB to improve environmental outcomes and advance environmental justice by regulating and reducing factory farm pollution. To that end, regulations adopted pursuant to SB 1383's mandate to reduce dairy and livestock methane emissions must:

- **Center environmental justice outcomes** by creating a regulation that prioritizes methane reductions along with air and water pollution reduction in the San Joaquin Valley, where the vast majority of dairy cows reside and large dairy farms operate.
- **Focus on mandatory direct emissions reductions** and phase out expensive and ineffective subsidies that cost Californians through both their pocketbooks and their health and well-being.
- **Ensure actual emissions reductions and prevent any double-counting** of methane emissions reduction.

## **Advance Environmental Justice and Public Health Alongside Effective Climate Mitigation**

More than ninety percent of California’s milk cows reside in the San Joaquin Valley where most of the state’s large dairy operations are now located.<sup>1</sup> The vast majority of large-scale dairies choose heavily polluting manure management methods, *i.e.* liquifying and storing manure in lagoons and subsequently applying the manure to fields. The result is that larger dairies subject the disproportionately lower income and Latino/a/e San Joaquin Valley to noxious odors that betray the presence of invisible air pollution and polluted drinking water. Additionally, the very act of liquifying manure creates more manure methane than other forms of manure management and is the primary cause of the emissions CARB must reduce under SB 1383.

An effective rule must advance environmental justice and public health goals such as improved groundwater quality and improved air quality alongside methane emissions reductions. Additionally, CARB should prioritize regulating the largest, most polluting facilities first.

### **Focus on Mandatory Emissions Reductions and Phase Out Costly Subsidies**

SB 1383’s mandate is clear: CARB must adopt regulations that require dairy and livestock operations to reduce methane emissions. CARB has delayed rulemaking for far too long already, instead relying on costly subsidies that fail to achieve necessary methane emissions reductions, take hard-earned money from Californians to pay dairies for their pollution, and lead to increased environmental and public health harm by encouraging the production of manure and methane.

Californians have already paid well over a billion dollars to foot the bill for dairies and fuel producers to turn intentionally created manure methane into “biogas,” including through their taxes, utility fees, and their use of transportation fuel. Without an effective and fair rule that prioritizes the environment and cost-effectiveness for all Californians, the state and its residents will continue to subsidize the production of climate intensive gas at large-scale dairies, along with myriad other pollutants that necessarily accompany biogas production. Without a course correction, the dairy and biogas industries will continue to rely on consumers and taxpayers to subsidize their polluting practices.

Absent effective regulations that put the burden of mitigation on polluters themselves, Californians will continue to fork out hundreds of millions—if not billions of dollars—to help livestock operations to continue to produce methane intentionally and for profit. CARB must focus on regulations that require direct and permanent emissions reductions and consider the costs of mitigation strategies for all Californians.

### **Ensure that SB 1383 Emissions Reductions Are Real**

CARB must ensure that it accurately accounts for dairy and livestock sector emissions and accurately assesses progress toward the SB 1383 target. Two critical components of this include

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<sup>1</sup> U.S. Dept. Of Agric., 2022 CENSUS OF AGRICULTURE: CALIFORNIA STATE AND COUNTY DATA 370 *et seq.*, Tbl. 11.

(1) requiring facility level monitoring and reporting of emissions and (2) ensuring that emissions reductions counted toward the SB 1383 target do not count toward emissions reductions in any other program or sector. For instance, any emission reductions attributable to meeting the SB 1383 target cannot also count for emissions reductions in the transportation sector through the LCFS or qualify for offsets through the Cap and Invest program.

### **Conclusion**

We are counting on CARB to approach this rulemaking with the urgency it demands and with a commitment to addressing the fundamental environmental, environmental justice, and economic justice challenges large-scale dairies and their pollution present. We look forward to working with you throughout this rulemaking process.

**Sincerely,**

Christian Suarez, Animal Legal Defense Fund

Tyler Lobdell, Food and Water Watch

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\* *Yale affiliation provided for identification purposes; position not endorsed by Yale University or Yale Law School*