

# California Dairy Digesters and Low Carbon Fuel Standard Program: Myths and Facts

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## Opponent Arguments

**“Methane digesters are the most cost-effective approach to reducing methane emissions.”**

The California Air Resources Board (CARB) and other agencies double count, sometimes triple count, methane emission reductions from dairy digesters by attributing the same reductions to multiple state subsidies. For example, the Dairy Digester Research and Development Program (DDRDP), funded through the Greenhouse Gas Reduction Fund (GGRF), takes credit for the same emission reductions as the LCFS. Hundreds of millions of dollars in taxpayer and ratepayer subsidies to dairy digesters from the DDRDP program, CPUC and CEC programs, and the Aliso Canyon settlement along with subsidies from the federal renewable fuel standard are paying for the same methane reductions as LCFS credits are. It’s easy to appear the most cost effective when several subsidy programs - all of which call themselves “the most cost effective” - claim the same reductions.



**“Without the Low Carbon Fuel Standard (LCFS) program, methane emissions would pollute the atmosphere, contributing to climate change. Thus, LCFS is a win for the environment.”**

First, this bill does not exclude factory farm gas from the LCFS. It simply fixes problems with the program and begins to address environmental justice impacts. Second, the dairy and gas industries claim that massive manure pits are an inevitable outcome of animal agriculture. Neither is true. There are ways to raise animals and manage manure that do not concentrate and liquify manure and thus would create less methane in the first place. For example, operations can shift away from wet manure storage, where methane is created, to dry manure handling and storage where manure is composted or otherwise dried and avoids more than 90 percent of methane emissions.



**“Herd consolidation is already a trend, LCFS is not driving it.”**

While it’s true that dairy industry herds were consolidating before LCFS, the facts suggest what common sense dictates: the program incentivizes these massive, heavily polluting dairy factories to continue growing larger to capture program payments. While herd data is largely kept a secret from the public—a problem SB 709 would help address—the data the public does have access to shows that dairies that engage with the LCFS often expand. Paying these factory farms to maintain and even expand their size is a major step backwards from our climate goals, and only increases the industry’s extensive air and water pollution.



**“Dairy industry cow herd concentration is good because it’s efficient and better for the environment.”**

People living near massive and expanding dairies, facing their odor, pollution, and contamination, dispute the benefit of larger and larger operations. The dairy industry’s intensive concentration into massive herds over the past several decades has caused

severe air and water pollution. Industrial dairy operations are the largest source of ammonia in the San Joaquin Valley. A 2,000-cow industrial dairy produces approximately the same amount of fecal waste as a city of one million people—and dairy factories throughout San Joaquin Valley are often 3 to 5 times that size. Manure applied to fields contaminates groundwater and drinking water. More manure concentrated in one place, means more groundwater pollution. Concentrated dairy factories also generate immense amounts of ozone-depleting nitrous oxide when their waste is disposed of on area fields. There is nothing “efficient” about an industry that generates some of the nation’s worst air and water pollution, harming the environment and communities already overburdened with pollution.



**“No other fuel has this expansive of a lifecycle analysis. Why should this gas be treated differently?”**

Unlike other fuels in the program, CARB has failed to do an adequate lifecycle analysis of all of the greenhouse gas emissions associated with the large dairies participating in the LCFS program, including enteric fermentation (ie, cow belches), crop production, trucking of fuels, and emission from the manure after going through the digester to name just a few sources. As a consequence, the true climate impact of digester-related fuels has not been adequately assessed. Additionally, other fuels in the LCFS, like ethanol, are subject to a more expansive and accurate lifecycle analysis.



**“The LCFS and digesters are good for the environment.”**

Studies show that digesters may increase ammonia emissions, a dangerous pm2.5 precursor and nitrous oxide emissions. Digesters don’t do anything to address pollution from manure applied to fields which is responsible for about 94% of groundwater pollution from dairies. Digestate leaches its constituent pollutants to groundwater just like raw manure does.

