

Draft prepared by Tom Frantz on March 25, 2016. This draft will be considered at the April 4, 2016 EJAC meeting and does NOT represent any formal position of the EJAC.

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This is a request to the EJAC to make an immediate recommendation to CARB, at the April 4, 2016 meeting in Brawley, in regard to the development of the Short-Lived Climate Pollutant Reduction Strategy. The recommendation is below.

According to SB 605 (Lara, Chapter 523, Statutes of 2014) CARB must make a plan for short-lived climate pollutants such as methane to be reduced in line with the overall plan to reduce GHG emissions in California to 40% below 1990 levels. This plan may be submitted to the board for approval as early as May of 2016.

There is no controversy over the fact that industrial sized dairies, many of which emit well over 25,000 pounds of CO₂e GHG emissions in the form of methane annually, should be doing their part in reaching this goal. Smaller dairies also must do their part proportionally.

However, the voluntary approach has been tried for several years with almost no results. It is unfair to other major sources to have mandatory reductions and not these dairies which are already regulated under the clean air act as major sources of criteria air pollutants. If the voluntary approach is continued, it is apparent that other major sources of GHG pollutants in the state will have to do more than their share in order to get to the 40% average reduction target.

There are many potential co-benefits for environmental justice communities, especially those in the San Joaquin Valley which exist close to these large dairies, if these reductions were to take place in a mandated manner leading up to 2030. Among the benefits are potential corresponding reductions in VOC emissions and ammonia emissions. Both of these contribute greatly to the severe air quality problem in the San Joaquin Valley. There are also co-benefits of reductions in nitrate contamination of local ground water because many dairies would choose to get the mandated methane reductions by eliminating their lagoon systems and going to dry scraping and handling of manure. There are the co-benefits of manure, which still contains its nutrients if handled properly, being composted and applied to fields for growing crops which in turn would reduce the need for imported fertilizer and the subsequent N₂O emissions which are another strong GHG pollutant. This can mean an increase as well in carbon sequestration in soils. Finally, there are several known methods in the diets of cows which can reduce enteric emissions substantially, including dietary supplements and an increase in allowing cows to graze on carefully managed pasture.

The technologies and methodologies are available today to greatly decrease methane emissions from dairies. A declining schedule of emission reductions leading to a 40% reduction by 2030 is reasonable and allows time for the reductions to be implemented cost effectively with several pathways chosen by the dairies themselves on how they will get the needed reductions including bio-digesters. The 40% target must apply to all methane emissions from dairies, not just the half of emissions due to manure handling.

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Based on the statements above, and the many recommendations CARB has already received by entities such as CALCAN on methods to effectively reduce methane emissions at dairies, and due to the uncertainty of getting any kind of substantial reductions with a continuance of the present voluntary method, the EJAC hereby makes a recommendation to CARB to mandate a 40% methane reduction from dairies by the year 2030.