



Dairy Digester Products do not belong
in the LCFS program.

We concede that LCFS is a critical program that has allowed clean fuel innovation to flourish and support California's drive for clean energy .

We also recognize the need to capture unavoidably produced methane created by organic waste disposal that is inextricably tied to our food and water systems. Water treatment plants, and landfills tied to food waste have used the combination of regulation and LCFS to significantly avoid and reduce methane. Those industries have developed strategies that avoided producing as much methane as possible, before having to use what's left in the cleanest way possible, considering that includes combustion.

The idea then was to treat all these industries equally. The legislature even created a short-term exemption so the animal husbandry industry could get caught up.

Instead, some there built a revenue driver. Not one that equitably benefits its workers or even the majority of dairy farmers. It mostly ignored the "avoided" or



prevention approach and decided to relaunch existing technology (digesters) as somehow innovative, isolated it from the rest of the operation's waste stream as a corporate entity, and created a product that used only as transportation fuel, is without LCFS, not profitable. In the first year after 1383 implementation and with aggressive advocacy by the dairy digester corporations, CDFA allocated \$4million for AMMP and over \$100m for digesters. We know some dairy farmers have and continue to implement prevention programs successfully and yet, we continue to reward those who don't with what is essentially a 26 year "pass" to continue.

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A handwritten signature in black ink, appearing to read "K. D. Hamilton", is written over a light blue horizontal line.

Kevin D Hamilton, RRT,ACS

Executive Director: Central California Asthma Collaborative