

## **Form Letter 1 for Comment 4 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Tamara  
Last Name: Szabo  
Email Address: tamarafalke@gmail.com  
Affiliation: Citizens' Climate Lobby

Subject: Please Stop Incentivizing Factory Farm Gas  
Comment:

Dear Governor Newsom and Members of the California Air Resources Board,

I am writing to express my deep concern about the current state of California's Low Carbon Fuel Standard and to implore you to take immediate action to address the environmental injustices embedded in the program.

Including factory farm gas in the LCFS:

1. Incentivizes more corporate factory farms, harming family farmers, rural communities, and our environment.
2. Creates additional overproduction of commodities, pork and milk, increasing supply and further pushing down market prices paid to independent family farms.
3. Pays foreign multinational meatpackers, like Chinese-owned Smithfield and Brazilian-owned JBS, for their pollution.
4. Commoditizes methane production, which would fuel more methane producing practices.

The LCFS has been manipulated by powerful corporations, particularly Big Ag and Big Oil. It has become the nation's largest and most lucrative pollution trading scheme for factory farm biogas, perpetuating harmful practices rather than serving its environmental objectives. It is driving the construction of more factory farms and factory farm biogas projects in states far from California, causing severe harm to our air, water, public health, rural economies, and overall quality of life.

Please consider and prioritize the following reforms to the LCFS:

1. Eliminate "avoided methane crediting" in 2024.
2. Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.
3. Remove the 10-year "grace period" for factory farm gas producers.
4. Stop double counting by allowing factory farm gas projects paid for and claimed by other programs to sell LCFS credits as well.

CARB holds a pivotal opportunity this year to adopt new rules that align the LCFS with California's environmental justice commitments. Environmental justice, zero emission, and climate advocates have presented a clear alternative to the current policies that heap lavish rewards on the biggest polluters through the Comprehensive EJ Scenario. CARB should adopt those recommendations to stop moving

California climate policy in the wrong direction.

Please lead the charge in demanding a future free from the clutches of Big Oil and Big Ag. By prioritizing the well-being of Californians over corporate profits, we can reform the LCFS to protect communities most affected by its current flaws. Your decisive action in this critical matter would demonstrate a commitment to bold climate action rooted in justice. Please stop exporting your bad policy to our front doors.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-19 03:23:53

## **Form Letter 2 for Comment 4 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Alex  
Last Name: Cerussi  
Email Address: alexc@mercyforanimals.org  
Affiliation:

Subject: LCFS Public Comment  
Comment:

Dear Governor Newsom and Members of the California Air Resources Board (CARB),

Mercy For Animals is a nonprofit organization dedicated to constructing a just and sustainable food system, with approximately 24,000 supporters in California. We are writing to express concern about the current state of California's Low Carbon Fuel Standard (LCFS) and to implore you to take immediate action to address the environmental injustices embedded in the program.

Originally intended as a tool to combat climate pollution in the transportation sector, the LCFS has been manipulated by powerful corporations, particularly Big Ag and Big Oil. It has become the nation's largest and most lucrative pollution trading scheme for factory farm biogas, perpetuating harmful practices rather than serving its environmental objectives. It is driving the construction of more factory farms and factory farm biogas projects in states far from California, causing severe harm to air, water, public health, rural economies, and overall quality of life.

The current flaws in the LCFS, such as "avoided methane crediting" and inaccurate life cycle assessments, not only enable pollution but disproportionately harm low-income communities and communities of color. Factory farms, predominantly situated in these marginalized areas, inflict severe damage on air, water, public health, rural economies, and overall quality of life.

I urge you to consider and prioritize the following reforms to the LCFS:

1. Eliminate "avoided methane crediting" in 2024.
2. Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.
3. Remove the 10-year "grace period" for factory farm gas producers.
4. Stop double counting by allowing factory farm gas projects paid for and claimed by other programs to sell LCFS credits as well.

CARB holds a pivotal opportunity this year to adopt new rules that align the LCFS with California's environmental justice commitments. Environmental justice, zero emission, and climate advocates have presented a clear alternative to the current policies that heap lavish rewards on the biggest polluters through the Comprehensive EJ Scenario. CARB should adopt those recommendations to stop moving

California climate policy in the wrong direction.

Mercy For Animals implores you to lead the charge in demanding a future free from the clutches of Big Oil and Big Ag. By prioritizing the well-being of Californians over corporate profits, we can reform the LCFS to protect communities most affected by its current flaws. Your decisive action in this critical matter would demonstrate a commitment to bold climate action rooted in justice. Please stop exporting your bad policy to our front doors.

Sincerely,  
Mercy For Animals

Alex Cerussi  
Senior State Policy Manager  
alex@mercyforanimals.org  
631.479.9005

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-19 13:02:40

**Form Letter Log for Comment 4 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

There are 1719 non-docket system comments associated with this item.