

## **Form Letter 1 for Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - .**

First Name: jeanne  
Last Name: mclelland  
Email Address: jmclella@msn.com  
Affiliation:

Subject: please reform LCFS  
Comment:

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

I am writing to you personally to express deep 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:

Eliminate "avoided methane crediting" in 2024.  
Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.  
Remove the 10-year "grace period" for factory farm gas producers.  
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.

I implore 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.

thank you,  
JEANNE MCLELLAND

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 05:17:44

## **Form Letter 2 for Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - .**

First Name: Connie

Last Name: Key

Email Address: keyviewfarms@gmail.com

Affiliation:

Subject: Concerns about LCFS2024

Comment:

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

I am writing to you personally to express deep 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:

- Eliminate "avoided methane crediting" in 2024.

- Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.

- Remove the 10-year "grace period" for factory farm gas producers.

- 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.

I implore 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.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 11:35:12

## **Form Letter 3 for Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Pamela

Last Name: Gross

Email Address: pamelag@rockisland.com

Affiliation:

Subject: California's Low Carbon Fuel Standard (LCFS)

Comment:

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

My family and I have strong concerns about the current state of California's Low Carbon Fuel Standard (LCFS) and urge you to take immediate action to address the more degradation of the environment that are 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.

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. Prioritize the well-being of Californians over corporate profits. In this way, we can reform the LCFS to protect communities most affected by its current flaws.

Your decisive action in this serious matter would demonstrate a commitment to bold climate action rooted in justice.

Thank you.  
Sincerely,  
Pamela Gross & family

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 11:59:14

## **Form Letter 4 for Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - .**

First Name: Julia

Last Name: Lenhardt

Email Address: lenhardt.julia@gmail.com

Affiliation:

Subject: California's Low Carbon Fuel Standard

Comment:

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

I am writing to you personally to express deep 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:

Eliminate "avoided methane crediting" in 2024.

Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.

Remove the 10-year "grace period" for factory farm gas producers.

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.

I implore 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.

Thank you,  
Julia Lenhardt  
Mother and Climate Scientist

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-13 10:06:47

## **Form Letter 5 for Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Haley

Last Name: Staudmyer

Email Address: haley.staudmyer@gmail.com

Affiliation:

Subject: On California's Low Carbon Fuel Standard

Comment:

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

I am writing to you personally to express deep 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:

Eliminate "avoided methane crediting" in 2024.

Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.

Remove the 10-year "grace period" for factory farm gas producers.

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.

I implore 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.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-13 10:51:47

## **Form Letter 6 for Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - .**

First Name: Robert

Last Name: Garcia

Email Address: robertjgarciaphd@gmail.com

Affiliation:

Subject: Reform of the Low Carbon Fuel Standard

Comment:

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

I am writing to you personally to express deep 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.

I implore 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,  
Robert Garcia, Ph.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-13 14:55:13

## **Form Letter 7 for Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Christopher  
Last Name: Lish  
Email Address: lishchris@yahoo.com  
Affiliation:

Subject: Please reform the Low Carbon Fuel Standard -- Proposed Low Carbon Fuel Standard Amendments

Comment:

Tuesday, February 20, 2024

Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Subject: Please reform the Low Carbon Fuel Standard -- Proposed Low Carbon Fuel Standard Amendments

To Governor Gavin Newsom, CARB Chair Liane M. Randolph, and CARB Board Members:

I'm greatly concerned about the current inadequate and unjust 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.

Your proposed amendments to California's LCFS are a climate policy failure that backslides on the state's role as a climate leader. The program subsidizes combustion fuels to the tune of billions of dollars per year and has no place in our toolkit of climate policies for the 2020s. There is too much on the line for our climate to get this critical program so wrong.

Governor Newsom's budget proposes significant delays and cuts of hundreds of millions of dollars to vital zero-emission transportation programs, which makes it all the more urgent to use the LCFS to more fully support zero-emissions transportation. Historically, California has thrown good money after bad, and devoted 80% of the LCFS's \$3 to 4 billion each and every year to combustion technology. It would be unconscionable to allow these funds to continue to languish on the climate sidelines, instead of anchoring our transition to a zero-emissions future.

The LCFS requires California oil refiners to evolve toward less carbon-intensive fuels, playing a pivotal role in determining the types of fuels our state transitions to, imports, and prioritizes. Unfortunately, the LCFS is drowning in a flood of diesel made from soybean oil and is in need of immediate reform. The unprecedented expansion and magnitude of soybean oil-based diesel used in California is harming people, accelerating tropical deforestation, and undermining the state's climate policies. California's

consumption of diesel made from vegetable oil has outstripped sustainable sources of waste oils and fats. As a response, our fuel is increasingly produced from soybean oil--some of it imported directly from South America. This shift raises critical concerns about the environmental and ethical implications of our fuel sources.

As California consumes more soybean oil, palm oil cultivation is expanding rapidly to replace what we import. This year, California consumption for soybean oil for fuel is on track to reach 1.3 million metric tons, more than 10 percent of global trade in soybean oil. Luckily, meaningful safeguards can help ensure that California stops fueling its trucks with imported soybean oil in a misguided effort to meet our state's climate targets.

The world has changed a lot since the implementation of the LCFS in 2009. Unlike the 2000s, we have a north star goal for our climate and the air we breathe: zero emissions transportation. Continuing to invest the billions in revenue from the LCFS into harmful and polluting biofuels that end up combusted, instead of electric vehicles powered by clean energy, hampers our efforts to fight the climate crisis while enriching oil companies and industrial agriculture. CARB can mitigate the impact of California's fuel consumption on sensitive ecosystems and align our climate action with sustainable practices by capping soybean oil-based diesel and refocusing the LCFS on electric vehicles.

I urge you to correct your course and modernize the program by reflecting your consensus that the only way to meet air quality standards is through eliminating combustion altogether, not piling on billions of dollars in lavish incentives for combustion each and every year. By focusing on real air pollution solutions, you could add a clean air multiplier to the credits system, especially for public fleets that transport many people at once, would deliver major benefits for California's air quality and throw a lifeline to cash-strapped transit agencies that low-income Californians depend on for mobility.

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.

CARB has 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.

I urge you to correct your course and modernize the program by reflecting your consensus that the only way to meet air quality standards is through eliminating combustion altogether, not piling on billions of dollars in lavish incentives for combustion each and every year. By focusing on real air pollution solutions, you could add a clean air multiplier to the credits system, especially for public fleets that transport many people at once, would deliver major benefits for California's air quality and throw a lifeline to cash-strapped transit agencies that low-income Californians depend on for mobility.

California cannot meet our clean air and climate goals without harnessing the power of the Low Carbon Fuel Standard and overhauling this multibillion-dollar program for our zero emissions future. 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. Californians deserve no less. Please act expeditiously to reform the program to achieve our state's ambitious goals.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 17:27:26