

Form Letter 1 for Comment 10 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.

First Name: John

Last Name: Oda

Email Address: Jandjoda@aol.com

Affiliation:

Subject: Fix low carbon fuel program

Comment:

The proposal to remove credits for hydrogen produced from fossil fuels is a positive step. But delaying implementation of this measure until 2030 means production of hydrogen from fossil fuels will continue to receive financial rewards for another five-plus years, thus incentivizing the harm we should be preventing.

* Biofuels produced from virgin soy or canola oil have major negative consequences, including deforestation, and incentivizing industrial agriculture that generates large amounts of greenhouse gas and other pollution, and drives up food prices. The proposed revision acknowledges such problems, but continues to provide credits for the production of biofuels that include up to 20 percent from these destructive sources. And even this weak restraint will not take effect until 2028. Environmental justice advocates have repeatedly called instead for caps on vegetable-oil based biofuels.

* The proposed draft continues to provide credits for industrial dairy "biogas." This financial support continues to incentivize the expansion of large-scale factory dairy farms, causing serious harm to the health of surrounding communities, increasing the greenhouse gases and pollution generated by the production of feed for cows confined to barns; concentrated methane emitted by pools of waste; the inevitable leakage of methane during storage and transportation; and greenhouse gas emissions produced by combustion of the product. We urge CARB to phase out support for biomethane as rapidly as possible.

* Unlike previous versions of the LCFS, the new proposal does not require airlines to take any responsibility for the combustion of fossil jet fuel, even for intrastate travel. This is a step backward, excluding a major source of greenhouse gases and pollution from fossil fuel combustion.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-20 01:01:55

Form Letter 2 for Comment 10 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.

First Name: Mary

Last Name: Flanagan

Email Address: tomaryflanagan@gmail.com

Affiliation:

Subject: Reform the Low Carbon Fuel Standard

Comment:

The California Air Resources Board's proposed update to the Low Carbon Fuel Standard doesn't go far enough. Despite persistent opposition from the environmental justice community, it continues those parts of the program that provide financial support for harmful practices, such as biofuel produced from virgin soy and canola oil, and factory farm production of "biomethane."

* The proposal to remove credits for hydrogen produced from fossil fuels is a positive step. But delaying implementation of this measure until 2030 means production of hydrogen from fossil fuels will continue to receive financial rewards for another five-plus years, thus incentivizing the harm we should be preventing.

* Biofuels produced from virgin soy or canola oil have major negative consequences, including deforestation, and incentivizing industrial agriculture that generates large amounts of greenhouse gas and other pollution, and drives up food prices. The proposed revision acknowledges such problems, but continues to provide credits for the production of biofuels that include up to 20 percent from these destructive sources. And even this weak restraint will not take effect until 2028. Environmental justice advocates have repeatedly called instead for caps on vegetable-oil based biofuels.

* The proposed draft continues to provide credits for industrial dairy "biogas." This financial support continues to incentivize the expansion of large-scale factory dairy farms, causing serious harm to the health of surrounding communities, increasing the greenhouse gases and pollution generated by the production of feed for cows confined to barns; concentrated methane emitted by pools of waste; the inevitable leakage of methane during storage and transportation; and greenhouse gas emissions produced by combustion of the product. We urge CARB to phase out support for biomethane as rapidly as possible.

* Unlike previous versions of the LCFS, the new proposal does not require airlines to take any responsibility for the combustion of fossil jet fuel, even for intrastate travel. This is a step backward, excluding a major source of greenhouse gases and pollution from fossil fuel combustion.

In short, the Low Carbon Fuel Standards need to be further revised.

Sincerely,

Mary Flanagan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-21 17:02:13