COMMENTS ON LCSF PROPOSED DRAFTS FROM DECEMBER 19, 2023 – February 20, 2024

To Whom it might concern,

I appreciate the auto acceleration to increase the CI stringency and support no Board approval for consecutive auto acceleration events unless they are further strengthened.

Electrification needs to be the focus. Regarding equity measures in impacted communities, the credits should first be directed to providing clean electric public buses and school buses, along with the necessary charging infrastructure. Impacted communities should have a say in where the equity dollars are spent.

There has been an explosion of logistic facilities (warehouses) especially in communities that already are impacted by pollution and often currently don’t meet the Clean Air Standards. Please encourage our State legislators to pass moratoriums on these centers until some priority system is established for who gets the funding, i.e., trucks at ports.

There has been an explosion of increasing sizes of dairies into industry size numbers and negative community health impacts. We must move away more quickly from combustion period. There should be a cap on the number and location of dairies in relationship to where people live. There needs to be better measurement of leakage and methods moved away from a wet to a dry process for manure.

I’d like to have access to the amount of methane leaking from landfills in our communities. We have a closed landfill in our county that still leaks and receives violations and fines.

Just as we need to move away from corporate one-crop farming, we need to move away from consolidation of dairy cows just to make it more economical to purchase expensive bio-digestors to capture methane, which it looks like will be with us for a long time. First this report stated that biomethane will be used for injection into our natural gas pipeline system. Let’s call it what it is – FOSSIL GAS. Then you want to use the FOSSIL GAS for hydrogen. With 80% of credits going to a combustion source in one way or the other, there is harm to health regardless of the name.

From past experience I’ve known real estate developers who buy land for a development and hold it for 20 years and then say the project can build using the old regulations. Look at CAL GEM. Petroleum/Energy companies take out permits on extraction projects and sit with the permits. Any time there is an announcement of no more permits as of (pick a date), the numbers of permits skyrockets.

This “Phase Out” of methane crediting needs a major rollback on the proposed deadlines and extensions. After all, ethanol was first introduced as an additive in automobiles in 1910, and it’s still with us. The credits have lasted for years.

It’s a good idea to discontinue the credits for forklifts and move those funds to something else that needs electrification.

I support verification requirements for electricity credits that all participants generating credits from EV go through annual independent verifications.

As originally proposed hydrogen still needs more pilot programs and strict safety requirements from federal and State laws. Hydrogen should be focused only on hard to decarb industries. The only hydrogen used should be “green” electrolytic, not blue, or some other way to reuse fossil fuels.

In the original LCFS bill the leg analysis states, “Create air monitoring and mitigation plan. Avoid any significant impact on residents in communities affected by high-cumulative exposure burden.” This applies to biodigesters. Refining biofuels, and hydrogen projects, et al.

Remember to calculate the use of energy needed to create the outcomes. Pipes leak whether above the ground, underground, or under water.

While I appreciate the stated no palm oil use for biofuels, guardrails and caps need to be put in place. I have a cousin living in Iowa and I hear about the pushback from farmer’s pressured by imminent domain to be bought out because of these credits for biofuels.

We need healthy soil and incentives in the Federal Farm Bill to protect smaller farmer and encourage farmers to stay in business to feed America. Food prices have increased faster than incomes and many people are only feeding their families with Food Banks, school meals, and SNAP programs.

There needs to be more awareness around the harm of viruses from birds and animals too closely habituated and fed grains.

I appreciate that CARB works with Natural Resources and Transportations and hope there is a holistic approach also with Water, since so many of these energy producing facilities negatively impact our water supplies.

I support the elimination exemption for Intrastate FF jet fuel.

I don’t support allowing hydrogen production facilities directly to the refineries to implement eligible GHG reduction projects as it is written in the draft LCFS. We know that hydrogen is a secondary source of energy. Most hydrogen today is by steam reforming natural gas (Methane, fossil gas). There are already enough dangers at our local refineries. I think there needs to be more specificity in the draft proposal. There has been excessive flaring at Chevron in Richmond since they installed the new hydrogen plant in 2012.

I have attended the last 4 CARB workshops on LCFS. I have listened to the public, EJAC. Presenters, and members of CARB Board and staff. I think the allocation of the different pieces used to meet the Statewide goals needs to be looked at. At the August 25 meeting I heard 380 more digesters were needed to meet the LCFS goals. The current dairy digester method shouldn’t be increased when the amount we already have is causing such harm in our communities.

We should honestly be looking to promote consuming less beef and dairy products. If not, we need to move incentives to smaller farms with natural land and diverse products. Less close habitation reduces viruses that wipe out large numbers of animals, similar to the chickens that had to be killed in large numbers recently. It reduces trucking products long distances.

Great strides are being made in insulating electrical wires with lighter material that do not weigh down power lines and contribute to more fires, and allow more electrical transmissions on the same existing lines and infrastructure. Just because LCFS as it was created 15 years ago does not mean it has to last until 2045. Let’s look at a clean air economy through holistic eyes. Who benefits and who is harmed from each of these programs.

Jan Warren at 3202 Primrose Lane, Walnut Creek, CA 94598 – 925.818.6530