



**MISSOURI  
RURAL CRISIS  
CENTER**

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Cheryl Laskowski  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Comments on LCFS Rulemaking Workshop; CARB Should Grant the LCFS Rulemaking Petition**

Missouri Rural Crisis Center urges the Air Resources Board to grant the Petition for Rulemaking to Exclude All Fuels Derived from Biomethane from Dairy and Swine Manure from the Low Carbon Fuel Standard and initiate an immediate rulemaking to restore integrity to the LCFS. Missouri Rural Crisis Center is a statewide farm and rural membership organization representing thousands of farm families in hundreds of rural communities. Our mission is to preserve family farms, promote stewardship of the land and environmental integrity and strive for economic and social justice by building unity and mutual understanding among diverse groups, both rural and urban.

Missouri family farmers and rural communities have been displaced, hollowed-out, and depopulated as a result of the corporate consolidation in, and control of, our food system, specifically by way of corporate industrial livestock operations. Smithfield Foods Inc., a wholly foreign-owned Chinese corporation, and Roeslein Alternative Energy have partnered to produce biomethane – factory farm gas – for sale into the California Low Carbon Fuel Standard marketplace. Smithfield has severely injured Missouri family farms, residents and our land and air (and our climate), and supporting their use of biogas sets a bad precedent for current and potential future corporate livestock operations moving into Missouri.

The negative carbon intensity for factory farm gas has enriched Smithfield and Roeslein, rewarding them for Smithfield's extraction and exploitation of our land, air, water and climate. The Air Resources Board's current LCFS entrenches Smithfield's pollution in our communities and further tilts the scales against family farmers struggling to hold onto what meager share of the livestock market they have left. And it further rewards a corporation that sacrificed meat processing workers during the COVID-19 pandemic while dramatically increasing its profits.

Missouri farmers – not multinational corporations – support a return to family farm-based traditional farming where farmers and communities flourish. Shifting manure management from liquefied hog waste in methane-spewing impoundments to hogs raised by independent family farms reduces methane without the greenwashed extraction and exploitation the LCFS has allowed Smithfield to inflict.

On behalf of our 5,000+ family farm members, we ask that you reform this pollution trading scheme that inflicts harm on our communities. We urge you to grant the petition and then exclude all fuels derived from factory farm gas.

Thank you for your time and please let me know if you have any questions.

Sincerely,

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