



**MISSOURI  
RURAL CRISIS  
CENTER**

1906 Monroe St. ♦ Columbia, MO 65201 ♦ (573) 449-1336 ♦ Fax (573) 442-5716

March 15<sup>th</sup>, 2023

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Comments for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard**

Missouri Rural Crisis Center appreciates the opportunity to offer these comments following the February 22, 2023 “Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard”. 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.*

MRCC urges the California Air Resources Board to exclude all fuels derived from biomethane from dairy and swine manure from the Low Carbon Fuel Standard.

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 – that we fear will be included in 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.

California should not be rewarding Smithfield Foods and Roeslein Alternative Energy for their extraction and exploitation of our land, air, water and climate. The Air Resources Board should not further entrench Smithfield’s pollution in our communities and further tilt the scales against family farmers struggling to hold onto what meager share of the livestock market they have left.

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 reform the LCFS to exclude all fuels derived from factory farm gas.

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

Sincerely,

Tim Gibbons  
Missouri Rural Crisis Center  
1906 Monroe St., Columbia, MO 65201 [tingibbons@morural.org](mailto:tingibbons@morural.org);  
(573) 449-1336