



**MISSOURI
RURAL CRISIS
CENTER**

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February 20, 2024

California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Re: Comments for Public Hearing to Consider Proposed Low Carbon Fuel Standard Amendments (lcfs2024)

Missouri Rural Crisis Center appreciates the opportunity to offer these comments to the California Air Resources Board (CARB) for the “Public Hearing to Consider Proposed Low Carbon Fuel Standard Amendments (lcfs2024)”.

Missouri Rural Crisis Center is a nearly 40-year old 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.*

We previously submitted comments in January 2022, following a December 2021 workshop regarding the Low Carbon Fuel Standard and urged CARB 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.

We also submitted comments in April 2022 for the March 29, 2022 “Workshop on Methane, Dairies and Livestock, and Renewable Natural Gas in California”.

Because it’s illogical, counterintuitive and harmful, we continue to oppose corporate factory farm gas as a solution to climate change, and we vehemently support LCFS amendments to exclude all fuels derived from dairy and swine factory farm gas from the Low Carbon Fuel Standard.

CARB should not continue to implement a bad and misguided proposal that would allow corporate factory farm dairy and hog operations (anywhere in the country) to sell the methane created in their operations into this system. Specifically, including factory farm gas as a “solution” toward your Low Carbon Fuel Standard Goals would:

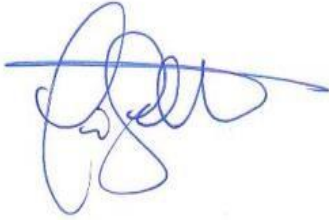
- Incentivize more corporate factory farms, harming family farmers, rural communities, and our environment, including increased water and air pollution.
- Create more corporate consolidation in the U.S. livestock industry.
- Commoditize methane production, which would fuel more methane producing practices, creating more destructive greenhouse gases.
- Create additional overproduction of commodities, pork and milk, increasing supply and further pushing down market prices paid to independent family farms.
- Pay foreign multinational meatpackers, like Chinese-owned Smithfield and Brazilian-owned JBS, for their pollution.

- Create incentives for the public (taxpayer dollars through government subsidies) to fund anaerobic digesters to capture factory farm gas.

On behalf of our 5,000+ 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,

A handwritten signature in blue ink, appearing to read 'Tim Gibbons', with a horizontal line drawn through the middle of the signature.

Tim Gibbons
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