

From: advocacy-noreply@mg.gospringboard.io on behalf of [On-behalf of Shane Snow](#)
To: [ARB Clerk of the Board](#)
Subject: Stop Dirty Factory Farm Gas in the LCFS
Date: Saturday, August 24, 2024 7:26:12 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear California Air Resources Board,

I'm writing to express deep concern about the current state of California's Low Carbon Fuel Standard (LCFS) and to implore you to take immediate action to address the environmental injustices embedded in the program.

Originally intended as a tool to combat climate pollution in the transportation sector, the LCFS has been manipulated by powerful industries, particularly Big Ag and Big Oil. It has become the nation's largest and most lucrative pollution trading scheme for factory farm biogas, perpetuating harmful practices rather than serving its environmental objectives.

The current flaws in the LCFS, such as "avoided methane crediting" and inaccurate life cycle assessments, not only enable pollution but disproportionately harm low-income communities and communities of color. Factory farms, predominantly situated in these marginalized areas, inflict severe damage on air, water, public health, rural economies, and overall quality of life.

I urge you to consider and prioritize the following reforms to the LCFS:

1. Eliminate "avoided methane crediting" in 2024.
2. Address inaccuracies in the Life Cycle Assessment that ignore associated up- and downstream greenhouse gas emissions from factory farm gas production.
3. Remove the 10-year "grace period" for factory farm gas producers.

CARB has a pivotal opportunity this year to adopt new rules that align the LCFS with California's environmental justice commitments. Environmental justice, zero emission, and climate advocates have presented a clear alternative to the current policies that heap lavish rewards on the biggest polluters through the Comprehensive EJ Scenario. CARB should adopt those recommendations to stop moving California climate policy in the wrong direction.

Please lead the charge in demanding a future free from the clutches of Big Oil and Big Ag. By prioritizing the well-being of Californians over corporate profits, we can reform the LCFS to protect communities most affected by its current flaws. Your decisive action in this critical matter would demonstrate a commitment to bold climate action rooted in justice. Californians deserve no less.

Sincerely,

Shane Snow
1965 E Linda Vista Ave
Ventura CA, 93001-2315