



October 16, 2024

The Honorable Liane M. Randolph, Chair

California Air Resources Board

P.O. Box 2815

Sacramento, California 95812

RE: California Farm Bureau's Comments Relating to the Proposed Low Carbon Fuel Standard Amendments Second 15-Day Period

Dear Chair Randolph and members of the Air Resources Board,

We appreciate this opportunity to provide feedback on the proposed amendments to the Low Carbon Fuel Standard second 15-day comment period published on October 1, 2024. We understand this is a complex subject and because of the implications, we appreciate CARB's attempts to get this right.

California Farm Bureau (CAFB) and family farmers have been long-time partners in helping California meet its climate goals and reducing emissions. We appreciate CARB's work to better understand our industry, including but not limited to engaging in the Dairy Workshop in Fresno in August.

We also appreciate CARB staff's work with our industry to encourage reductions where possible, and push our industry to be cutting edge, and do more to not only meet, but exceed our goals.

One area where California Farm Bureau remains adamant is regarding the continuation of the crediting for avoided methane. Dairy families and dairy families have been doing their piece, thanks in part to state investment into proven technologies like digesters, and AMMP to reduce emissions of critically important methane. Not only are dairy families meeting emissions goals, but exceeding them. The data shows, and is backed up by CARB's CADD data, that dairies are already heavily regulated, and remain regulated in terms of air quality and water quality. A pending Water Board general order regarding dairies will continue this and ensure that dairies remain stewards of the land, their neighbors, and community members.

Time and time again, dairy families are on the receiving end of mistruths from activists. Backed up by independent data, academic research, and CARB's own data, dairies do not worsen air quality and digesters do not increase the growth of dairies.



We ask that CARB continue its incentive-based approach, for the sole fact that it is working. At this time, there is no need to regulate dairies and doing so will 1) hurt hardworking community members and dairy families who already struggle to make a living in California, and 2) cause leakage to other less regulated states of emissions by moving dairy herds out of state. We appreciate the realization that regulating digester projects started prior to 2030 would be harmful to the market and reduce investment in future projects.

We thank CARB for extending its proposed deadline for credit generation for hydrogen produced fossil gas from 2030 to 2035. It is crucial that we keep all the tools in our toolbox and these extra years are crucial to ramp up the supply of hydrogen and make it into a viable economy.

The 2nd 15-day notice is an improvement from the 1st 15-day notice, however CAFB remains concerned about the limits applied to credit generation from agricultural lipid feedstocks. We've asked that all decisions be science based and CARB has traditionally been very strong in this category. However, when it comes to the feedstocks, the reasoning is void of technical or scientific reason for needing a limit or the proposed timeline. We feel strongly that the Carbon Intensity be the driving factor in making decisions. By limiting the use of certain fuels credit applications, CARB may be supporting the continued use of dirtier fuels and in turn, increased pollutants.

We thank CARB for aligning the description of biomass waste with local, state and Federal requirements.

We support a new CI for low-CI electricity produced by fuel cell from biomethane. It is crucial that as technology advances, we will be facing different and increased opportunities in the coming years than we see today. It is critical that we not tie our hands tomorrow in any decisions made today.

Sincerely,

A handwritten signature in black ink that reads 'Steven Fenaroli'. The signature is written in a cursive, flowing style.

Steven Fenaroli

Political Affairs Director, California Farm Bureau