

Verbal Comments at LCFS Board Hearing 11-8-2024

My name is Dr. James Duffy, former LCFS branch chief.

I am urging the Board to vote No on these amendments and direct staff to start over next year with a proposal that addresses Board Member and environmental community concerns about biofuels and includes a robust discussion of strategies for reducing program costs for lower-income consumers of gasoline.

If, however, you intend to approve these amendments, I ask you to make one key change as part of a post-approval 15-day Notice, and then come back with further amendments as soon as possible.

For those volumes of renewable diesel exceeding the twenty percent threshold, I ask you to assign the fossil diesel carbon intensity instead of the benchmark CI. This simple change, which is sufficiently related to the proposed amendments, will put some real teeth into that provision.

As I said to the Board over a year ago, CARB's own land use change modeling shows that the diversion of food crops to produce biofuels results in tropical deforestation and less food consumption by the most food insecure populations. And this reduced food consumption is part of the emission reductions being counted by the program. **The fact that California is making the choice to mitigate the climate problem by reducing the amount of food consumed by the poorest people in the world very much troubled me as a CARB employee and continues to keep me awake at night today.**

It is long-past time for California to stop contributing to tropical deforestation and world hunger and say no to further increases of crop-based and lipid biofuels.

Thank you for considering my comments.