



**MISSOURI  
RURAL CRISIS  
CENTER**

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April 24<sup>th</sup>, 2024

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Public Comment, April 10<sup>th</sup>, 2024 California Low Carbon Fuel Standard Workshop**

Missouri Rural Crisis Center appreciates the opportunity to offer these comments following and in response to the April 10<sup>th</sup>, 2024 California Low Carbon Fuel Standard Workshop.

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 strongly urges the California Air Resources Board to exclude all fuels derived from biomethane from dairy and swine concentrated animal feeding operations (CAFOs) from California's 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 their control of, our food system and U.S. livestock markets, specifically by way of corporate industrial livestock operations.

There are many negative consequences that come from this counterintuitive proposal, and here are two of the big ones:

- By commoditizing factory farm pollution in California's "Low Carbon Fuel Standard" policy, California would be incentivizing factory farm corporations to continue, and even increase, their methane production causing MORE methane and greenhouse gases, MORE factory farm expansion, MORE water and air pollution, and MORE corporate consolidation.
- This proposal would create additional overproduction of pork and dairy, pushing market prices even further down for independent family farms. Currently and over the last 3 decades, corporate overproduction of pork and dairy have resulted in consistently low farm gate prices that have been devastating for independent family farm livestock producers and put hundreds of thousands of U.S. family farm livestock producers out of business.

Furthermore, including factory farm gas in California's Low Carbon Fuel Standard would:

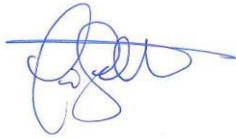
- Pay foreign multinational meatpackers, like Chinese-owned Smithfield and Brazilian-owned JBS, for their pollution.
- Create incentives for the public (taxpayer dollars through government subsidies) to fund anaerobic digesters for multinational extractive corporations to capture factory farm gas.

The Air Resources Board should not further entrench CAFO 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,



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