



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

November 01, 2024

Ms. Liane M. Randolph
Chair, California Air Resources Board
1001 I Street
Sacramento, California 95814

Sent via certified mail and emailed to: helpline@arb.ca.gov and cotb@arb.ca.gov

RE: Proposed Low Carbon Fuel Standard Amendments

Dear Chair Randolph:

I write with great concern on behalf of Missouri's farmers and producers regarding the California Air Resources Board's (CARB) recently proposed amendments to your state's Low Carbon Fuels Standard (LCFS). As the Attorney General of the State of Missouri, in which agriculture is the backbone of our economy, CARB's proposed amendments stand to inflict great harm on Missouri's corn and soybean farmers and our robust biofuels industry.

Missouri agriculture is a \$93.7 billion industry. We are home to nearly 88,000 farms, the vast majority of them owned and operated by family farmers. Our state ranks seventh nationally in soybean production and ninth in corn production. Missouri's seven biodiesel plants and six ethanol plants provide an essential market for our state's top crops.

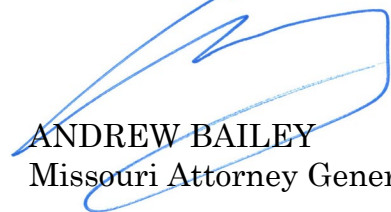
CARB's proposed amendments, singularly focused on biofuels, will present serious risks to Missouri farmers and biofuel producers. I take particular issue with your agency's assertion that the biofuels industry is in a period of "rapid expansion of production and feedstock demand," which simply does not match the present depressed market conditions facing our farmers. Through this proposal, CARB plans to prevent Missouri-made biofuels from entering the California market by setting an arbitrary 20 percent cap on soybean oil allowed to generate credits under its LCFS program; use of an outdated model to score indirect land use change (ILUC); and enforcing stringent sustainability reporting requirements that will extend to the farm

gate, including the requirement for our farmers to submit potentially sensitive information about their operations through deforestation-free attestations.

To make matters worse, CARB has proposed these devastating changes without conducting public workshops and a formal rulemaking. Equally troubling is your agency's plan to allow the Executive Officer the ability to assign more conservative ILUC values based on land cover, crop yield and emissions data without buy-in from America's farmers and producers. Americans impacted by these draconian policies deserve the chance to be heard.

Missouri farmers have a long history of environmental stewardship and should be viewed as a key part of improving air quality in California and throughout the country. On their behalf, I strongly urge CARB to halt its proposed LCFS amendments and convene an expert working group to promote policies that will achieve the agency's goals without causing economic harm to our state's agriculture industry.

Respectfully,



ANDREW BAILEY
Missouri Attorney General

C: Honorable Governor Gavin Newsom
Honorable Steven Cliff, CARB Executive Officer