

## DEBORAH GANDOLFO

I am writing to urge you to fix the Clean Fuel Standard program and eliminate avoided methane emissions from livestock manure in its calculation of carbon intensity under the program.

Under its current structure, CFS allows concentrated animal feeding operations (CAFOs), or factory farms, to generate credits from installing and operating anaerobic digesters that turn manure into methane gas. The factory farm gas can then be sold for highly valuable credits through the CFS to companies to offset their pollution. This ultimately encourages CAFO operators to generate as much methane — and therefore as much manure — as possible to capitalize on these hefty incentives the program provides. As a result, CFS exacerbates existing pollution in underserved communities and fails to mitigate animal agriculture's climate impacts by driving the growth of both factory farms and factory farm gas production.