

Chad Young

My name is Chad Young and I live in Albuquerque, New Mexico. I am an engineer and a returned peace corps volunteer. I also have a masters in natural resources and work as a Planner in the federal government. I am writing to urge the EIB to eliminate the loophole in the proposed carbon intensity standard that would allow a fuel supplier to transfer carbon intensity values from operations in other states to the New Mexico program.

After working years as an engineer I returned to graduate school because I was concerned about what we as a society are doing to nature and biodiversity. Human caused climate change is one of the biggest threats to biodiversity and this is evident in the current era of mass extinction, as documented in the scientific literature, we are currently witnessing.

Fighting climate change requires serious solutions that effectively work towards reducing greenhouse gas emissions. I oppose carbon credit schemes that give the appearance of offsetting an unnecessary emission that produces a fuel whose supply is already over saturated in the world market. But I even less support perverse incentives provided by erroneously drafted policies that do nothing to reduce GHG emissions and provide windfalls to the industries who arguably were the architects behind the current anthropogenic climate crisis we are having to deal with on behalf of future generations.

The incredibly flawed California LCFS carbon intensity policy can only be described as something invented by oil and gas lobbyists to provide them with another revenue stream and is currently considered unsettled policy as the issue works its way through the California state courts. Any rational court will clearly undo this mistake.

It is for this reason the Clean Transportation Fuel Program should not allow for carbon intensity values determined by other states' flawed and disputed policies on avoided methane crediting in New Mexico. This loophole allows for multi-state factory farm biogas producers with operations in our state to circumvent the more conservative New Mexico approach for determining carbon intensity values. Instead of perversely incentivizing industries to emit GHG, we need to embrace policies that move to phase out all fossil fuels in our society. And by not embracing this flawed California policy is one step towards avoiding a mistake that reverses the advances New Mexico has made towards reducing GHG emissions.

I respectfully ask you to remove the loophole in the proposed carbon intensity standard that would allow a fuel supplier to transfer carbon intensity values from operations in other states to the New Mexico program.