

Farm Power Northwest LLC

We await the draft rules associated with the workshop update introducing "Proposal: Pre-2023 projects would have their avoided methane credits phased out over time, with older projects receiving fewer credits." We want to remind Ecology that there are currently more non-operational anaerobic manure digesters in Washington state than there are operational ones. CFS credit revenue could help restart the non-operational digesters, which would create an additional environmental benefit, but only if the rules recognize the value of restarted older projects. Manure digesters are expensive to operate; if the rules primarily incentivize post-2022 projects, eventually all of the digesters built in the 2003-2013 first generation will shut down--even though infrastructure and cows (and methane-emitting manure) remain.