

August 1, 2025

Department of Ecology  
Climate Pollution Reduction Program  
Adam Saul  
PO BOX 47600  
Olympia, WA 98504-7600  
Submitted Electronically

RE: Chapter 173-424 WAC, CR 102 Clean Fuels Program Rule

Dear Mr. Saul:

My brother Jeff and I grew up on our family dairies in the Yakima Valley – Maple Grove Dairy near Sunnyside and Spring Canyon Dairy near Granger. We took over management of the dairies from our father John, raised our families in the Sunnyside community, and have grown children who want to continue dairying in the area. We also built Sage Hollow Ranch dairy near Boardman, Oregon in 2009.

Unfortunately, dairying in the Yakima Valley has become untenable for many farmers. Anti-dairy / animal rights advocates have targeted dairies in the community with lawsuits and enlisted enough regulators to drive a number of dairies out of state or out of business. Spending millions at each dairy to expand and line lagoons, monitor and report nutrient application rates and soil nitrogen levels, and comply with increasingly rigorous regulatory requirements has not been enough to appease these advocates. They continue to attack the dairies with ruinously expensive lawsuits and are using public processes, including the CFS Rule, in their campaign to eliminate dairies.

At its peak in 2020, Yakima County had 110,000 dairy cows, almost 40% of the cows in Washington State. Just in the last year or two, we've seen several dairies, comprising over 20,000 cows, leave the state or go out of business. The family, cultural, and economic impacts of the exodus, which is only growing, will be devastating. The loss of a single large dairy eliminates over a hundred direct jobs and hundreds of millions of economic value to the community.

Although we pride ourselves on being clean, efficient, rule-following dairy operators, and have invested millions in lining lagoons, installing soil and groundwater monitoring sensors, and abiding by strict dairy nutrient management plans, we decided to shutter both of our Yakima Valley dairies in 2017. We moved our cows to our Sage Hollow dairy in OR and started a new dairy in South Dakota.

Our next generation would like to reopen our Washington dairies, *if* conditions improve. One of the improvements could be adding an anaerobic digester to our manure management to significantly reduce air emissions and our overall environmental footprint, and to profitably produce the lowest carbon intensity electricity available. The new Clean Fuels Program in WA could help make this option a reality, *if* it provides the kind of incentives for dairy participation that are part of the California Low Carbon Fuels Standard (LCFS) program and Oregon's Clean Fuels Program. We are currently under contract with a digester developer and in the design phase of a digester at our Sage Hollow dairy.


To make Washington's Clean Fuels Program Rule workable and effective, we would like to join the Washington State Dairy Federation and other dairy interests in urging Ecology to:

1. Follow the science and provide at least 20-year crediting for real and measurable avoided dairy methane emissions.

2. Coordinate with CA and OR on rules and standards for a common low carbon fuels market in West Coast states for greater stability and efficiency.
3. Allow for the free flow of low carbon fuels within the common market (using book and claim accounting) and flexibility for new technologies.

Thank you for your consideration of our comments. Please feel free to contact Jeff or me if you have any questions or would like to discuss any of the points raised above. We look forward to working with Ecology to stand up the Clean Fuels Program in a way that supports both reduced GHG emissions and sustainable food production.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Bosma", with a long horizontal flourish extending to the right.

Brian Bosma, Co-owner

Maple Grove Dairy  
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