

July 25, 2025

WA State Dept. of Ecology 300 Desmond Drive, SE Lacey, WA 98503

Dear WA Ecology,

Friends of Toppenish Creek is a 501(C)(3) non-profit group in Yakima County with a mission to protect the natural environment.

Friends of Toppenish Creek is dedicated to protecting the rights of rural communities and improving oversight of industrial agriculture. FOTC operates under the simple principle that all people deserve clean air, clean water and protection from abuse that results when profit is favored over people. FOTC works through public education, citizen investigations, research, legislation, special events, and direct action.

Please consider our further comments regarding rulemaking for WAC 174-424, specifically with respect to carbon intensity scoring for manure biomethane.

The Friends of Toppenish Creek are, in many respects, simple people. We value family and friends. We find pleasure in walks along the Yakima River, or hikes along trails in the shrub steppe. We garden and fish. We love the land.

In efforts at civic engagement, FOTC studies the Washington Administrative Code. When we look at WAC 173-424, the Clean Fuels Program Rule, we try to understand WA GREET and the volumes of information from California. This is complicated stuff. At some point it seems easier to simply trust that the experts who write our laws know what they are doing; that they act in good faith.

But before we give up trying to understand complex processes, we look at carbon intensity scoring and a huge elephant steps into sight. Over and over, we have studied Table 8 in WAC 173-424-900 that breaks down carbon intensities for various components of ethanol,

biodiesel, renewable diesel, biomethane natural gas, hydrogen, alternative jet fuel, and substitute fuel feedstock combinations. Even simple people cannot miss the obvious. The glaring outlier never goes away.

CI scores for Washington's Temporary Fuel Pathway Codes range from 45 to slightly over 100, almost . . .

Only one fuel has a negative CI score and that score is quite large at minus 150.

Biomethane natural gas produced from dairy or swine manure has a CI score of -150. FOTC wants to know why and we expect that others do as well. What is so special about methane produced from manure that justifies giving this fuel special treatment?

As noted by experts, cows and swine do not emit this methane when kept in a natural state. This methane is only generated when manure is stored in anaerobic lagoons. What is so special about manure methane that is intentionally produced?

The Friends of Toppenish Creek respectfully, but firmly, ask Washington policy makers to explain why this large negative CI score for dairy and swine manure is anything other than a giveaway to animal agriculture.

Sincerely,

Executive Director, Friends of Toppenish Creek

3142 Signal Peak Road White Swan, WA 98952

Jean Mendoza

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Table 8. Washington Temporary Fuel Pathway Codes

	Table 8. Washingt		er ratiiway codes	•
Fuel	Feedstock	Process	FPC	CLIGCO
		Energy		CI (gCO _{2e/MJ)}
Ethanol	Corn	Grid electricity, natural gas, and/or renewables	WAETH100T	907
	Sorghum	Grid electricity, natural gas, and/or renewables	WAETH101T	95 ⁸
	Sugarcane and Molasses	Bagasse and straw only, no grid electricity	WAETH102T	55
	Any other starch or sugar feedstock	Any	WAETH103T	98.93 ¹
	Any cellulosic biomass including Corn Stover, Wheat Straw, or Sugarcane Straw	As specified in WA-GREET	WAETH104T	50
Biodiesel	Any feedstock derived from animal fats, corn oil, or a waste stream	Grid electricity, natural gas, and/or renewables	WABIOD200T	45
	Any feedstock derived from plant oils except for Palm-derived oils	Grid electricity, natural gas, and/or renewables	WABIOD201T	65
	Any feedstock	Any	WABIOD202T	100.11 ²
Renewable Diesel	Any feedstock derived from animal fats, corn oil, or a waste stream	Grid electricity, natural gas, and/or renewables	WARNWD300T	45
	Any feedstock derived from plant oils except for Palm- derived oils	Grid electricity, natural gas, and/or renewables	WARNWD301T	65
	Any other feedstock	Any	WARNWD302T	100.11 ³

Biomethane CNG	Landfill or Digester Gas	Grid electricity, natural gas, and/or renewables	WACNG500T	70
	Municipal Wastewater sludge, Food Waste, Green Waste, or Other Organic Waste	Grid electricity, natural gas, and/or parasitic load	WACNG501T	45
Biomethane LNG	Landfill or Digester Gas	Grid electricity, natural gas, and/or renewables	WALNG501T	85
	Municipal Wastewater sludge, Food Waste, Green Waste, or Other Organic Waste	Grid electricity, natural gas, and/or parasitic load	WALNG502T	60
Biomethane L- CNG	Landfill or Digester Gas	Grid electricity, natural gas, and/or renewables	WALCNG502T	90
	Municipal Wastewater sludge, Food Waste, Green Waste, or Other Organic	Grid electricity, natural gas, and/or parasitic load	WALCNG503T	65
	Waste			
Biomethane CNG, LNG, L- CNG	Dairy and Swine Manure	Grid electricity, natural gas, and/or parasitic load	WALCNG504T	-150
Hydrogen	Centralized	Grid electricity,	WAHYG601T	185
	SMR of fossil natural gas or LNG	natural gas, and/or renewables		
Renewable LPG	Fats, Oils, and Grease residues	Grid electricity, natural gas, and/or renewables	WARNWP400T	45
	Any feedstock derived from plant oils (excluding palm and palm derivatives)	Grid electricity, natural gas, and/or renewables	WARNWP401T	65

Alternative let	Apy foodstock	Crid alactricity	WAAJF701T	50
Alternative Jet	Any feedstock derived from	Grid electricity,	WAAJF/UTT	50
Fuel		natural gas, and/or		
	animal fats,	renewables		
	corn oil, or a	renewables		
	waste stream			
	Any feedstock	Grid electricity,	WAJF702T	70
	derived from	natural gas,		
	plant oils	and/or		
	(excluding	renewables		
	palm oil and			
	palm			
	derivatives, as			
	a sole			
	feedstock or			
	blended with			
	other			
	feedstocks)			
	Any other	Grid electricity,	WAAJF703T	100.11
	feedstock	natural gas,		
		and/or		
		renewables		
Any Gasoline	Any	Any	WASG800T	98.93 ⁴
Substitute	-			
Feedstock- Fuel				
Combination				
Not Included				
Above				
Any Diesel	Any	Any	WASD801T	100.11 ⁵
Substitute				
Feedstock- Fuel				
Combination				
not Included				
Above				
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From WAC 173-424-900 at Chapter 173-424 WAC: