

Farm Power

**Farm Power Northwest LLC
PO Box 1228
Mount Vernon, WA 98273**

Adam Saul
Climate Pollution Reduction Program
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

August 1, 2025

RE: Washington Clean Fuels Program – Draft Rule CR-102

Dear Adam--

Farm Power is a developer, owner, and operator of farm-based anaerobic digesters in the Pacific Northwest. Since our first project went online in 2009, we have become a small but important element in preserving animal agriculture in a difficult environment. The dairy farms we partner with—although not compensated for their environmental efforts—maintain grass-based forage systems that provide wildlife habitat and sequester carbon in the soil. We hope to continue operating our anaerobic digesters as long as the dairies remain in the region. Unlike dairy farms, however, we must be compensated for our environmental efforts to remain in business, so we submit these comments on the Washington Clean Fuels Program.

Fifteen years ago, when most of the anaerobic digesters in Washington State were being developed and built, the cost of energy had just gone through several huge spikes, and there was optimism around a potential nationwide price on carbon. We believed that our electricity produced by our projects would become steadily more valuable in the future, and we expected that destroying manure methane would provide increasing revenue. The reality in the 2020s has turned out much differently: wholesale electricity prices are persistently low, while the market for methane reduction remains fragmented and of limited value.

The handful of manure digesters that remain operational in Washington State have held on in hopes of finally moving their electricity—produced by capturing methane that would otherwise naturally rise from manure lagoons—into electric vehicles. Unfortunately, this Draft Rule has already eliminated most of the eligibility of existing digesters by limiting methane crediting to only 15 years. If existing digesters cannot benefit from providing clean fuels to transportation markets, they will inevitably shut down—as several in the state already have—and stop capturing any manure methane at all. California, which has led the way on clean-fuel policy, allowed 30 years of methane crediting until very recently. Even today, California still allows 20 years of methane crediting to projects belatedly joining its much-more-mature clean-fuel program. Washington should follow California's lead with our still-nascent program and allow 30 years of crediting, at least until our clean-fuel market stabilizes. Persisting with a 15-year limit on methane crediting will ultimately cause more emissions from manure rather than less, as digesters unlucky enough to have been built too early shut down.

Our digesters constantly incur costs while making biogas to convert into electricity, each operating and maintaining dozens of pumps, sensors, and meters to safely handle manure. Our projects have thirty-year useful lives, so we want to continue providing benefits well into the future. The dairy farmers cannot afford to subsidize our operations, so we must be able to cover our costs

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based on the value of what we produce. We urge the Department of Ecology to allow anaerobic digesters to seek the highest value for their electricity over the coming decades—as a transportation fuel, displacing fossil fuels with methane captured before it could contribute to climate change. Feel free to contact me at kevin@farmpower.com if have any questions or if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin", is positioned above a horizontal dashed line.

Kevin Maas
President
Farm Power Northwest LLC