

Friends of the Earth (Molly Armus) Anonymous Anonymous

My name is Molly Armus and I'm representing Friends of the Earth, a national environmental and social justice organization. On behalf of our members and supporters here in Washington, we echo a lot of what 350 Yakima Climate Action said and urge you to eliminate avoided methane credits for manure based biomethane production.

We are Very much concerned about the intensification of large-scale polluting manure management practices. We definitely see this as a penalty for sustainable small-scale livestock farms that are managing manure through practices that actually avoid methane creation.

I also do want to address Ecology's assertion that there's little evidence of avoided methane credits causing an increase in herd sizes in California. California does not maintain accurate data on dairy herd sizes. CAFOs and California report varying herd sizes across county data, across federal data, state permits, as well as part of LCFS pathway applications, and as part of the California Dairy and Livestock Database CAD, which was put together by the California Air Resources Board.

Based on all of those different sources, all of this data is self-reported with no substantive oversight.

Anecdotally, several California dairies with digestors have increased their herd sizes and exacerbate their pollution, and there is evidence that dairies with anaerobic digesters are more likely to increase their herd sizes relative to similar sized dairies without digesters.

In light of the gaps and inconsistencies in herd sizes self reported by the dairies across California, Ecology's assertion that LCFS has not incentivized capo growth is not only questionable, but does also directly conflict with the lived experiences of communities on the ground near these operations.

Simply because you know something is renewable does not make it sustainable or climate friendly.

We urge Washington not to follow California's lead.

Resist incentivizing methyl methane emissions from CAFO's, and I really urge you to remove the voided methane credits from the proposed rule.

Thank you.