Anonymous Anonymous

am writing to urge you to fix the Clean Fuel Standard program and eliminate avoided methane emissions from livestock manure in its calculation of carbon intensity under the program.

Under its current structure, CFS allows concentrated animal feeding operations (CAFOs), or factory farms, to generate credits from installing and operating anaerobic digesters that turn manure into methane gas. The factory farm gas can then be sold for highly valuable credits through the CFS to companies to offset their pollution. This ultimately encourages CAFO operators to generate as much methane — and therefore as much manure — as possible to capitalize on these hefty incentives the program provides. As a result, CFS exacerbates existing pollution in underserved communities and fails to mitigate animal agriculture's climate impacts by driving the growth of both factory farms and factory farm gas production.

Moreover, the receipt of credits under CFS should be conditioned on facilities having an updated Nutrient Management Plan that accounts for their digested waste as well as compliance with federal, state, and local environmental and public health laws and regulations. This will help ensure the program does not exacerbate pollution and environmental injustice for communities living near CAFOs. To achieve Washington's environmental, public health, climate, and environmental justice objectives, Ecology must cease the excess incentives for factory farm gas and stop paying these industrial polluters to capture deliberately generated methane emissions in an ineffective approach to address the climate crisis.

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