Patricia Levan

I am writing to object to language in the updated CFS that encourages factory farm biogas, a dirty energy source that could pollute our water and worsen climate change. I oppose the express inclusion of “avoided methane crediting” and related provisions that increase incentives for factory farm gas, and to the provisions encouraging hydrogen produced from or in association with factory farm gas.

Washington should learn from the mistakes of California’s LCFS, which included avoided methane crediting. The LCFS kicked off a manure gold rush that has enriched the largest factory farms at the expense of people already severely impacted by factory farm pollution. The LCFS is mired in controversy, is currently the subject of numerous lawsuits, and is causing more harm than good when it comes to factory farm’s impact on the climate.

Avoided methane crediting perversely incentivizes factory farms to get bigger and pollute more to cash in on the policy, as opposed to simply polluting less in the first place. It prioritizes dirty fuels produced from factory farm pollution over truly clean energy like solar, wind, and EV charging infrastructure. This turns the CFS on its head and is bad for Washington and the climate.

It's important to note that Washington factory farms already have a terrible track record of environmental destruction and disregard for public health. Avoided methane crediting would turn Washington’s Clean Fuel Program into a massive payout for the worst of these polluters while increasing harms on environmental justice communities in our state.

As Washington aims to develop hydrogen that is green and environmentally friendly, encouraging hydrogen produced with factory farm pollution is moving in the wrong direction and will undermine any hope of achieving Washington’s climate goals.

Factory farm pollution must be aggressively regulated, not rewarded through loopholes in a climate program like the CFS. Please remove avoided methane crediting from Washington's CFS!