

Pamela Gross

Reform Washington's Clean Fuel Standard (CFS)
Submitted online via DOE Public Comment Form 7/31/25
Washington State Department of Ecology
Climate Pollution Reduction Program

Dear Casey Sixkiller, Department of Ecology Staff, and Adam Saul,

My family and I are in full support for real and true Clean Fuel Standards that take into account improvements to safe water, clean air, healthy soils and a thriving quality of life for all. A real climate pollution reduction program that understands the big picture and long-term consequences.

With an overarching guideline for a healthy Washington, we are strongly opposed to continued incentives for factory farm gas in the CFS. Washington factory farms already have a terrible track record of environmental destruction and disregard for public health.

Washington should not follow California's flawed Low Carbon Fuel Standard, which rewards factory farms for pollution. The Department of Ecology should never have begun to incentivize methane emissions from factory farms and we urge you to use this opportunity to cease the incentives to factory farms altogether. Regardless of how much the industry stands to lose.

The corporations involved in factory farm gas schemes are not interested in protecting, preserving or enhancing Washington's environment.

They do not share DOE's vision to "protect and sustain healthy land, air and water."

They are not good neighbors. Good neighbors don't pollute our air or water. Instead, DOE can boldly advance real climate solutions that care about and protect public health and the environment.

The CFS allows factory farms to earn lucrative credits for capturing methane emissions created by storing manure in giant lagoons. This policy wrongly assumes that such methane is an unavoidable byproduct of livestock production.

In reality, it's a deliberate, harmful manure management choice that could be avoided by using alternative strategies that naturally emit little to no methane emissions. But agribusiness is not regulated fairly and does not receive incentives to properly treat animal waste. It's unfair and wrong that now, these companies are touting a fake and expensive solution to a rapidly warming climate.

The more manure produced, the more money the business stands to make. Please recognize that this creates a perverse incentive to pollute. This mere fact should be utterly unacceptable by an agency that seeks "to protect and sustain healthy, land, air and water." It's incongruent.

Factory farms are an ecological, environmental and public-health disaster. Further incentivizing

them as a source of energy is a false and an impossibly cruel solution.

Ecology claims this proposal incentivizes "new and additional methane capture." In reality, it's encouraging new and additional methane creation.

Factory farms harm rural communities in Washington. Factory farms are responsible for polluting the air, contaminating drinking water, ground water, rivers and streams. They are a real cause of immense distress and a degraded quality of life. Do not reward factory farms for polluting.

In its current form, the CFS worsens the situation. There will be increased production of ammonia pollution from anaerobic digestion, higher concentrations of nutrients in digestate that contribute to yet more water pollution, increased disruption and pollution from new pipelines and trucks to transport animal waste through communities, and more toxic air pollution from biogas processing.

Biodigestors are hazardous to the health of workers and communities who live near them.

- At Seaboard Triumph Foods in Sioux City, Iowa, toxic sulfur dioxide, one of many harmful byproduct of biodigestion, has been streaming into the air, causing severe health issues to workers and to the surrounding community. This is blatantly incongruent with Washington's DOE mission "to protect, preserve, and enhance Washington's environment for current and future generations."
- The sobering consequences of factory farms on the Cherokee nation in Oklahoma is captured in a film called Common Enemy by Adam Peditto. Neighboring factory farms are polluting the region, destroying the Illinois River ecosystem. A diverse group of Oklahoma residents are pushing back against industrialized animal agriculture to demand accountability and repair.

Factory farms are not good neighbors anywhere and attempts to incentivize this industry is wrought with harms. Washington factory farms already have a terrible track record of environmental destruction and disregard for public health.

Methane gas from manure is not a clean or carbon-negative fuel. Ecology's accounting mistakenly leaves out other inputs and outputs to the factory farm business model. For the full picture, you must include for example, the environmental cost of mono-cropping for feed production with vast reliance on chemicals, fertilizers and pesticides that poison the water, the air and the soil. The vast amounts of water and energy required to produce these products. Managing the heavy chemicals and residue in digester waste is another real problem as is biogas combustion.

Anaerobic digestors do not avoid or reduce emissions because they rely on the ongoing generation of greenhouse gas emissions. Anaerobic digestors do not avoid or reduce emissions because they rely on the ongoing generation of greenhouse gas emissions. Anaerobic digestors are not a positive climate solution. Methane gas is a combustion fuel and necessitates fossil fuel infrastructure.

Sustainable and proper manure management alternatives emit far less methane but livestock operations that manage their manure this way receive no benefit through the CFS. That is truly unfair and makes it so much harder for real family farms. Consider how to reward the businesses that are responsibly reducing their emissions. Not the ones who want to create more emissions.

Factory farms are incentivized to grow herd sizes and maintain/expand their polluting practices (e.g., manure lagoons) to maximize credits. Facilities are explicitly permitted to expand and claim a new 15-year credit period, without limitation. This contributes to consolidation, a major issue within the livestock industry, as well as intensifying environmental pollution from additional animals, manure and related biomethane infrastructure.

Factory farms are an ecological, environmental and public-health disaster. Further incentivizing them as a source of energy is a false and an impossibly cruel solution.

Ecology claims that herd sizes aren't increasing in California due to the Low Carbon Fuel Standard, but both Washington and California lack consistent and accurate herd size data to support such an assertion.

This also directly conflicts with the actual experiences of the communities that live close to factory farms.

The LCFS in California is mired in controversy. It 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.

In Conclusion and With Recommendations:

- Washington should not greenwash factory farm pollution as climate action.
- 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 the environment in our state.
- Factory farms are an ecological, environmental and public-health disaster. Further incentivizing them as a source of energy is not a solution to a warming climate.
- We urge you to make the right choice to "protect, preserve, and enhance Washington's environment for current and future generations" by eliminating avoided methane credits from the CFS.

Thank you for taking the time to consider and understand why, despite the huge financial investments made by the industry in methane digestors, and despite the fact that some of these people may be your friends, DOE needs to support a just policy for the majority of all Washingtonians and eliminate avoided methane credits.

Sincerely,

Pamela Gross & family