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Department of Ecology's proposal creates disincentives, rather than encouraging projects, it discourages investment in greenhouse gas reduction and renewable energy projects on dairies. In California, just over 2% of carbon reduction dollars were spent on projects providing more than 29% of carbon reductions. Our Legislature studied this great result and began funding similar projects in Washington State. Ecology's proposed rules undermine legislative intent and progress toward significant GhG reduction projects.

Dairies provide the greatest opportunity to help meet state goals of greenhouse gas reduction and renewable energy sources. Additional benefits include food waste recycling, air and water quality improvements, improved soil health on dairy and neighboring farms, and much more.

Ecology should ensure credit is provided for a longer period of time for ALL on-farm environmental projects so we can work with the State on shared environmental projects and outcomes such as GhG reduction, renewable energy production and food waste recycling.

We need at least 2, 10-year renewable crediting periods for dairy methane emission reduction projects (not 2, 7.5 yrs) (We are not sure why there is any limitation at all on these projects?)

Washington policies should provide the same or better economic incentives for projects than California provides.

Don't discriminate against dairy-derived renewable power.

Extend power generation efficiency incentives for fuel cells to linear generators, as both are super-clean, efficient "non-combustion" technologies