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Please give strong consideration to fixing the Clean Fuel Standard program and eliminating avoided methane emissions from livestock manure in its calculation of carbon intensity under the program.

CFS allows concentrated animal feeding operations (CAFOs), also known as factory farms, to generate credits by installing and operating anaerobic digesters that convert manure into methane gas. The factory farm gas can then be sold for highly valuable credits through the CFS to companies to offset their greenhouse gas emissions. This ultimately encourages CAFO operators to generate as much methane — and therefore as much manure — as possible to capitalize on the large 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 contingent upon 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 providing excess incentives for factory farm gas and stop paying these industrial polluters to capture deliberately generated methane emissions, an ineffective approach to addressing the climate crisis. Please consider the greenhouse effect on our rivers and ocean, raising the temperatures and killing off the fish.

Thank you for your consideration."