

Colleen Anderson

I've lived in Washington for 32 years and in Yakima for 10. I'm a climate activist with 350 Yakima Climate Action and I speak today on behalf of my organization and as a mother, grandmother and great grandmother deeply concerned about the impacts of industrial agriculture on our communities and climate.

I urge you to eliminate avoided methane credits for CAFOs, concentrated animal feeding operations that produce biogas through anaerobic digesters under the Clean Fuel Standard. These digesters are often promoted as climate solutions, but in reality they incentivize larger herds, leading to more methane pollution and consolidation of factory farms, hurting small farms in the process. They divert resources from truly sustainable solutions like regenerative agriculture and dry manure management, and they expose rural communities like the lower Yakima Valley to toxic pollutants like ammonia and hydrogen sulfide.

My son has suffered from asthma most of his life. Watching your child struggle to breathe is terrifying, and I know we are not the only family in Yakima County living with these impacts. Let's be clear, manure does not naturally produce high levels of methane. It's the giant lagoons used by cathodes that create it.

Digesters capture this methane, but the problem is these lagoons shouldn't exist in the first place. By rewarding digesters, we're encouraging farms to create more waste and pollution just to generate profit. The artificially low carbon intensity scores that biomethane will receive under the Clean Fuel Standard only encourages more manure and more emissions, the opposite of what we want. Small sustainable dairies can't compete and earn these credits and communities pay the price.

Washington should not greenwash factory farm pollution. As climate progress, we have the opportunity to lead where states like California have fallen short if ecology decides to move forward with the avoided methane credits. Alternatively, we urge you to include these guardrails.

- Prohibit herd size increases during the 15-year crediting period
- Close loopholes that allow farms to expand gas production and re-qualify for a new credit period
- Require updated nutrient management plans to account for digester waste and revoke credits for any CAFOs that violate environmental laws.

If Washington is serious about environmental justice and real climate action, it must stop rewarding pollution and start investing in climate resilient, sustainable transformation. Thank you.