



Jean Mendoza >

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Oct 6, 2022 at 3:52 AM

Request for Agenda Item

Dear YRCAA Board of Directors:

Investment groups see an opportunity to capitalize on Washington's recently adopted Climate Commitment Act (CCA) Cap and Invest Program by building Renewable Natural Gas (RNG) facilities in the Lower Yakima Valley (LYV) that would refine methane from cow manure into natural gas that could be pumped into the nearby Northwest Pipeline.

Friends of Toppenish Creek (FOTC) has studied reporting protocols to learn how much methane is emitted in the LYV from concentrated animal feeding operation (CAFO) dairies, how much can be captured, and how much will still be emitted into the atmosphere if RNG projects are approved. According to FOTC calculations methane emissions from animal agriculture in the LYV are over 29,000 metric tons per year or about 0.737 million metric tons (MMT) of CO₂ equivalents per year. Be aware that manure digestion converts nitrogen in the manure to ammonia, an undesirable addition to the already high ammonia levels in the LYV.

Methane is created when manure is stored under anaerobic conditions in large manure lagoons. An alternative solution to the methane problem is not to create it in the first place by moving dairies toward dry manure management systems that do not involve lagoon manure storage.

Recent legislation requires WA agencies to engage overburdened communities such as the LYV when the agencies address sources of pollution. This is a challenge because people in overburdened communities such as the LYV often have limited education and limited English proficiency. The WA State Environmental Policy Act (SEPA) also requires community participation in regulatory decision making. FOTC submits that early discussion of the potential impacts at the local level, along with careful implementation of the SEPA are the best ways to ensure thoughtful permitting and policy making with respect to RNG.

FOTC respectfully asks the YRCAA Board of Directors to discuss manure digestion to produce renewable natural gas at your October Board Meeting. We ask the board to instruct YRCAA to estimate the amounts of hazardous air pollutants and greenhouse gasses produced by Yakima County dairy cows and describe potential health and environmental impacts from manure digestion. This description should include upstream and downstream emissions.

Thank you.

Jean Mendoza

Executive Director, Friends of Toppenish Creek.