



January 14, 2021

To: Pennsylvania Environmental Quality Board

Re: Comments on draft CO2 Budget Trading Program

The five organizations and 44 Pennsylvania residents (listed below) are in support of the Pennsylvania Environmental Quality Board's (EQB) proposal for Pennsylvania to take part in the Regional Greenhouse Gas Initiative (RGGI) to reduce climate change pollution from electric power plants. Pennsylvania's power sector, currently the fifth dirtiest in the nation, could achieve significant emission reductions through RGGI while creating value in myriad ways by driving investment in renewable energy, energy efficiency, and climate change mitigation and carbon capture activities on the ground.

These organizations and residents support the three offset categories listed in the draft CO2 Budget Trading Program Chapter 145 preliminary regulations – landfill methane reduction; tree planting, forest management and avoided forest conversion; and agricultural methane reduction. We also believe the agricultural offsets should be expanded to include additional cost-effective agricultural practices that reduce CO2 emissions and sequester carbon.

Nationwide, agricultural production is responsible for almost 10% of total U.S. emissions (U.S. EPA. "Inventory of U.S. Greenhouse Gas Emissions and Sinks." 2017). The recent surge in activity across states to promote and fund soil health practices is a response to soil loss and soil productivity loss, farm foreclosures, water quality and air quality impairment, climate change, and increased frequency and damage from flooding and drought, driven by climate change.

Seven states have adopted healthy soils bills, and Pennsylvania partners are developing a program as well. Many of the practices recognized as improving soil health also reduce carbon emissions and, in some cases, sequester atmospheric carbon in soil. These practices include no-till or reduced tillage; cover crops and diversified crop rotations; rotational grazing; reduced pesticide and fertilizer use; agroforestry practices such as silvopasture, windbreaks, hedgerows and riparian forest buffers; and soil amendments like manure, compost and biochar.

Healthy soils improve water quality by keeping more sediment and nutrients from washing into streams and improve air quality by keeping soil from blowing away into the air. Healthy soils require fewer fertilizers, pesticides, and fungicides, which in turn lower costs of inputs that help farmers economically.

Many states are passing soil health legislation to incentivize farmers to adopt practices more quickly to address climate change. Pennsylvania partners, including Pasa, are working on a soil health roadmap to outline the best way to fund and promote healthy soil practices in PA. A CO2 Budget Trading Program under the auspices of the RGGI would be an ideal and logical place to incorporate and help fund these practices.

Agriculture is uniquely positioned to utilize funds from RGGI to increase carbon capture, increase renewable energy, and increase efficiency. Agriculture provides a diverse menu of options for investment like biodigesters, renewable energy deployment, soil carbon storage, plant carbon storage (trees, hemp, etc.), fleet/equipment electrification, and building energy efficiency.

The very same practices that can reduce greenhouse gas emissions and improve water quality also provide benefits such as farm resilience in the face of extreme weather and overall increases in farm profitability. Farms can be a larger part of the greenhouse gas solution, if given more incentives, technical support and funding. We urge that the agricultural offsets in the CO2 Budget Trading Program be expanded to include additional cost-effective agricultural practices that reduce CO2 emissions and sequester carbon.

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Additional Comments:

Being a farmer I have seen the benefit of no till and methods that keep more carbon in the ground, including using charcoal or biochar that can sequester carbon for thousands of years.

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Additional Comments:

Agriculture can destroy the atmosphere and soil or benefit it

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Additional Comments:

The RGGI is a vitally important step to reducing CO2 and mitigating climate change. Our Pennsylvania elected officials should support it for many reasons, not only environmental. It will help to transition and grow our economy and provide jobs. Sincerely, Jane Bollinger (Wayne County PA resident)

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Additional Comments:

Agriculture has a huge potential to sequester atmospheric carbon. It is important that these soil health practices are part of the conversation and that farmers are compensated for their efforts.

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Additional Comments:

As part of our Watershed Implementation Plan for York County, we are promoting all these practices for nutrient removal and stormwater management. These are also carbon sequestration practices. It is a win-win-win. Please include these in the RGGI.

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Additional Comments:

Please include additional cost-effective agricultural practices that reduce CO2 emissions and sequester carbon in the CO2 Budget Trading Program. Thanks.

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Additional Comments:

I support with strongly enforced laws the agricultural practices that protect our water, support healthy soils, and fight climate change. Pennsylvania must, however include additional cost-effective practices that sequester carbon and reduce CO2 emissions in the CO2 Budget Trading Program. Please enable farms to be able to take a larger role in combatting climate change by giving them the incentives, the technical support and the funding they need to fully adopt climate-friendly agricultural practices. Thank You.

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