



C-AGG Comments on Proposed Guidance from the White House Council on Environmental Quality (CEQ) on Considering Climate Change in National Environmental Policy Act (NEPA) Reviews and Conducting Programmatic NEPA Reviews

C-AGG Background

The Coalition on Agricultural Greenhouse Gases (C-AGG) is a multi-stakeholder coalition of agricultural producers, scientists, methodology experts and developers, carbon investors, environmental ngoø, and project developers that promotes the development and adoption of science-based policies, programs, methodologies, protocols and tools for greenhouse gas (GHG) emissions reductions and carbon sequestration from the agricultural sector. C-AGG's primary objective is to incentivize voluntary GHG emissions reductions opportunities for agricultural producers that enhance productivity and income generation opportunities while benefiting society.

C-AGG Comments

On December 18, 2014, The White House Council on Environmental Quality (CEQ) circulated for comment proposed draft guidance for federal agencies on how to consider the effects of greenhouse gas (GHG) emissions and climate change in their evaluation of all proposed Federal actions in accordance with the National Environmental Policy Act (NEPA) and CEQ Regulations Implementing the Procedural Provisions of NEPA (CEQ Regulations).

C-AGG submits these comments in support of the proposed guidance, and agrees that the intent to better inform Federal decisions regarding GHG emissions and the effects of climate change is consistent with NEPA principles, and further, that focused and effective consideration of climate change in NEPA reviews will allow agencies to improve the quality of their decisions.

As summarized in the guidance document, the changes in our climate caused by increased concentrations of atmospheric GHG emissions endanger public health and welfare. C-AGG notes that agricultural productivity and sustainability, and by extension, food security, are particularly at risk from the effects of climate change observed to date and predicted to occur in the future. These effects include more frequent and intense heat waves, more severe wildfires, degraded air quality, more heavy downpours and flooding, increased drought, more intense storms, and harm to water resources and to wildlife and ecosystems.

In the course of C-AGG's work supporting policies and actions to incentivize GHG emissions reductions and increased sequestration from the agricultural sector, we have observed and noted that many activities that help to reduce GHG emissions or increase sequestration in the agricultural sector have multiple ancillary benefits and impacts, including positive environmental, ecosystem, and societal impacts as well as economic benefits for the sector.

Among the former, enhanced resilience and adaptation to the impacts of climate change are notable, as are improved natural resource utilization, improved air and water quality impacts, and biodiversity and wildlife habitat preservation and conservation. These impacts are attained through improved management systems and activities that enhance the efficient use of nutrients, water, energy, and other inputs within agricultural operations aimed at reducing GHG. Successful demonstration of increased soil carbon storage on rangelands, more efficient utilization of chemical inputs, and reduced methane emissions from improved rice management and methane digesters that utilize animal wastes and other organic feedstocks are a few of the activities that agricultural operations are adopting that help mitigate GHG emissions.

Enhanced nutrient utilization and reduced nutrient leaching also improve air and water quality from agricultural operations, benefiting agricultural producers and society. And more efficient nutrient and input utilization, as well as enhanced resilience to climate impacts, help improve agricultural producers' bottom lines, thus achieving multiple benefits simultaneously.

A recent report described in detail the farm-level adoption costs and break-even prices of 20 technologies and production practices that farmers could implement to mitigate GHG emissions from crop and animal production systems and land retirement systems¹. While the report was not comprehensive in its assessment due to certain data and information limitations, it concluded that significant GHG emissions reductions can be achieved from the agricultural sector, but that the potential varies by region, type of animal and crop production, and price signals necessary for producers to recover mitigation costs.

C-AGG particularly supports market-based approaches that can help to incentivize the adoption of these and other GHG mitigation practices from the agricultural sector, including carbon markets and ecosystem markets that can additionally capture water quality and associated environmental benefits based on beneficial practice changes and improved environmental outcomes.

The growth in approved agricultural methodologies and protocols for conservation programs² and voluntary and compliance markets over the past five years has been significant³, and while investments in developing the protocols and methodologies and implementing projects and practices continues to rise, demand still lags, largely due to attributes associated with this area still being largely in a demonstration phase that has not scaled up to a great extent. This, coupled with policy uncertainty and the ensuing risk of investment, continues to limit the demand for these high-impact credits.

¹ Greenhouse Gas Mitigation Options and Costs for Agricultural Land and Animal Production within the United States, ICF International, February 2013; accessed 1-22-2015 at http://www.usda.gov/oce/climate_change/mitigation_technologies/GHG_Mitigation_Options.pdf

² Eve, M., D. Pape, M. Flugge, R. Steele, D. Man, M. Riley-Gilbert, and S. Biggar (Eds), 2014. Quantifying Greenhouse Gas Fluxes in Agriculture and Forestry: Methods for Entity-Scale Inventory. Technical Bulletin Number 1939. Office of the Chief Economist, U.S. Department of Agriculture, Washington, DC. 606 pages. July 2014.

³ See C-AGG's website for a complete list and description of Agricultural Protocols and Methodologies in Voluntary and Mandatory Carbon Markets, at http://c-agg.org/pages/related_initiatives/; and Greenhouse Gas Mitigation Options and Costs for Agricultural Land and Animal Production within the United States.

Demand for agricultural and ecosystem credits will, however, help overcome these limitations and help further demonstrate the ability of these projects to scale up and to achieve demonstrable GHG and ecosystem service benefits.

In keeping with this, C-AGG specifically supports the guidance on **Mitigation** (Section III.F), defined as “considering the avoidance of the impacts, minimizing them by limiting them, rectifying the impact, reducing or eliminating the impacts over time, or compensating for them.” The guidance allows for alternatives for mitigation, including “carbon capture, carbon sequestration (e.g., forest and coastal habitat restoration), sustainable land management practices, and capturing or beneficially using fugitive GHG emissions such as methane.” It is C-AGG’s belief that this guidance will create additional demand for voluntary market carbon credits from the agricultural sector, which is highly desirable at this stage of development of these high quality projects and credits, and which can lead to increased investor confidence, and greater scale and impact.

Conclusion

C-AGG supports the premise and the guidance provided by CEQ in this document, and believes that the recommendations and approach will add transparency and promote beneficial actions and outcomes on behalf of Federal agencies as it pertains to climate change mitigation and adaptation. Furthermore, by identifying some of the relevant mitigation activities that the agricultural sector can contribute to, we believe that the guidance can continue to build on the excellent progress made to date by the public and the private sector in developing the tools, methodologies and knowledge necessary to scale up beneficial agricultural sector GHG mitigation activities.