

**Committee on Agriculture  
U.S. House of Representatives  
Biographical Form**

**Name**

Glenn English

**Organization(s) you represent**

The National Rural Electric Cooperative Association (NRECA) is a not-for-profit national service organization representing 930 not-for-profit, electric cooperative utilities, owned by the consumers they serve. Electric cooperatives serve more than 42 million end-use electric consumers in 47 states. NRECA's membership includes both distribution cooperatives that deliver electricity to the consumer and generation and transmission cooperatives that generate and transmit electricity to distribution co-ops. Electric co-ops are small businesses that provide at-cost electric service. NRECA is an advocate for its members on energy and operational issues as well as rural community and economic development issues.

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**If you are responding on behalf of an organization, please list the capacity in which you are representing that organization, including any office or elected position you hold or if you are a volunteer.**

Glenn English is the Chief Executive Officer of NRECA.

## Part I: Carbon Reduction Program Design

- 1) Members of Congress have introduced numerous bills to address the wide spectrum of climate change issues. Do you think Congress should enact a program that uses carbon taxes/fees, a cap-and-trade program, or a hybrid of these two approaches? Why?

*Please respond in 600 words or less.*

A successful mandatory climate change program should achieve real greenhouse gas reductions for the least cost with minimal economic disruption. A well-designed carbon tax or cap-and-trade program can meet these objectives, whereas a poor design of either a carbon tax or cap-and-trade program would be economically devastating and politically unsustainable. For example, a cap-and-trade program that reduces emissions too quickly in the early years without available cost-effective, commercial climate technologies and a method to adjust allowance prices will result in unsustainably high costs. But a cap-and-trade program that has emission reduction targets aligned with expected technology availability and a safety valve to limit the cost of allowances will yield a smooth, steady path of emission reductions over the long term.

Either approach will result in distributional effects based on income and geography. Policies that provide financial assistance to low- and mid-income consumers to increase efficiency and reduce energy costs, and recycle revenue back to them in a timely fashion—not once a year in the form of a tax credit—will be needed to keep consumers whole. Geographic regions more heavily dependent on coal for electric generation such as the South, Midwest, and Great Plains will experience greater price increases. Climate change policy must be structured to reduce these regional distributional effects.

- 2) Should the agriculture and forestry sectors be covered under a carbon reduction program? Why or why not?

*Please respond in 300 words or less.*

In general, a carbon tax or cap-and-trade program is most effective/workable when there are accurate estimates of greenhouse gas emissions and fewer sources to regulate. Agriculture's emissions come from thousands of small sources, making it unsuited to regulation. Likewise, the Forest Landowners Association counts over 10 million private forest landowners in the US with most of these lands sequestering carbon. Therefore, NRECA supports de minimis exclusion for small sources, such as agriculture and forestry producers, from covered sectors under a mandatory greenhouse gas reduction program.

The agriculture and forestry sectors offer significant opportunities to reduce greenhouse gas emissions through cultural practices that could be included in a domestic offset program.

- 3) If a cap-and-trade program is chosen, how should emission allowances be distributed? For example, should they be at no cost, auctioned, or a combination of both? How should Congress prioritize the

distribution of available allowances? Should allowances for the agricultural and forestry sectors be allocated at no cost, if so, should there be a limit on the number of no-cost allowances?

*Please respond in 600 words or less.*

The introduction of a price on carbon emissions will be regressive, disproportionately affecting those least able to pay. The auction of allowances will favor those entities that can afford to pay more such as large, for-profit national and multi-national corporations. Businesses with small margins, faced with high auction prices, will soon be uncompetitive in the new economy.

As small, not-for-profit, consumer-owned utilities, electric cooperatives operate at cost. The cost of buying emission allowances at auction would be passed directly to our consumers, while the costs avoided through a free allocation would result in direct savings to our consumers. The additional costs of an auction would disadvantage electric cooperatives and the regions of the country that they serve. Therefore, NRECA recommends that allowances be freely allocated to rural electric cooperatives, so that the impacts of a cap-and-trade program are minimized to electric cooperative consumers. The free allocation of emission allowances will minimize the cost of the program and ease the transition of electric cooperative consumers, including agriculture and forestry producers, to a low-carbon economy.

- 4) Should a cap-and-trade program or a carbon tax/fee program be linked to existing or emerging U.S. regional or other carbon reduction programs (i.e. RGGI or individual state programs)? If so, which programs and why?

*Please respond in 600 words or less.*

A single, comprehensive federal program to reduce emissions of greenhouse gases is the most cost-effective and efficient climate policy. A patchwork of state and regional programs, each with different reduction requirements, emission permits, and other compliance obligations, in addition to a federal program, would be overly burdensome without providing a clear environmental benefit. A federal cap-and-trade program or a carbon tax/fee program should preempt existing and emerging regional, state, and local carbon reduction programs. NRECA supports a single, integrated, comprehensive federal program.

Additionally, new climate change legislation must become the sole federal legislation governing CO<sub>2</sub> and greenhouse gas emissions. New federal legislation must not simply be layered on top of existing law that has the potential to affect greenhouse gas emissions. As such, new legislation should prevent the Clean Air Act, Endangered Species Act, and other existing legislation from being used to require any form of emission limitations for greenhouse gases.

- 5) If a cap-and-trade program is established, should an existing government agency regulate it or should a new agency be created? Please explain.

*Please respond in 300 words or less.*

If a cap-and-trade program is established, it will require the cooperation and expertise of existing federal agencies including the U.S. Environmental Protection Agency and the Departments of Agriculture, Energy, and the Treasury. NRECA does not believe that it will be necessary to create a new agency.

- 6) If a derivatives or futures market in carbon reduction arises in the wake of the creation of a cap-and-trade program, should the Commodity Futures Trading Commission (CFTC) continue its role as the regulator of this derivative carbon market, or should there be a different regulator? Please explain.

*Please respond in 300 words or less.*

If a derivatives or futures market in carbon reduction arises, the Commodity Futures Trading Commission (CFTC) should be the regulator of this market. With over 30 years of experience in regulating futures and options, the CFTC has the experience and expertise to regulate a derivatives market for carbon allowances and offsets. Reinventing the wheel by creating a new agency appears to be unnecessary and counterproductive. Seeking to implement this new regulatory authority, that will need to be sensitive to the nature of derivatives, into the existing regulatory structures of either the Federal Energy Regulatory Commission or the Securities Exchange Commission seems to be an uncomfortable merger at best—physical markets and securities should not be regulated in similar fashion.

- 7) Currently, derivatives of energy-based commodities can be traded through: a) highly structured instruments on regulated, transparent futures markets accessible to anybody and anyone; b) flexible instruments on lightly regulated, transparent derivative markets accessible to only major market participants, or; c) flexible instruments on unregulated, opaque over-the-counter markets accessible only to major market participants.

Should derivatives markets in carbon reduction arising in the wake of the creation of a cap-and-trade program also be permitted to develop under similar options as for energy-based commodities?

*Please respond in 600 words or less.*

Under a cap-and-trade system, the nation's rural electric cooperatives will require a regulatory framework for the carbon allowance and offset spot and derivatives markets that prevents market manipulation, excessive speculation, and price bubbles, while providing adequate liquidity and the opportunity for our members to manage their carbon price risk through both futures markets and over-the-counter (OTC) bilateral markets. By having the flexibility to transact in both futures markets and OTC markets, cooperatives will have more options to execute at best possible prices, manage counterparty risk, manage cash requirements, and transact in both standard and non-standard products. Accordingly, NRECA recommends:

- (1) CFTC should have jurisdiction over the carbon allowances derivatives markets; and

(2) In addition to the current regulatory structure for derivatives traded on exchanges, regulation of carbon derivatives traded on OTC markets should be developed that:

- (a) Strongly encourage centralized clearing and reporting requirements sufficient to protect the integrity of these markets, while ensuring any clearing requirements (which will not work for non-standardized OTC transactions) do not prevent regulated entities, like rural electric cooperatives, from hedging their carbon allowance risks in OTC markets and do not adversely affect liquidity by preventing them from finding counterparties in these markets. By allowing both futures markets and OTC markets to develop, cooperatives will have better tools to manage carbon price risk. There will likely be instances when a rural electric cooperative needs to hedge a highly specific carbon price risk based on its particular carbon mitigation policy (for instance, when it can build a carbon capture and sequestration plant). For this reason, flexible OTC markets need to develop in exposure to energy commodity price volatility. It is expected that the need to use both futures markets and OTC derivatives markets to manage price risks under a climate bill would greatly expand. Furthermore, these new regulations should not impede the ability to transact cost-effectively.
- (b) Increases regulation, such as position limits, when derivatives trades are found to be serving a price discovery function.

8) Will enactment of a carbon reduction program have negative impacts for regions or populations whose welfare is of special interest to the agriculture community? Such groups could include: residents of rural areas; populations served by USDA nutrition programs; agricultural producers and forest landowners; or input, transportation, and processing sectors of agriculture and forest products.

*Please respond in 600 words or less.*

Yes. A carbon reduction program will increase the cost of electricity, with disproportionate impacts to lower-income households (Burtraw, et. al, 2008; Eisenberg, 2007). In 2005, low-income households spent about 15 percent of income on energy in contrast to just 3 percent for non-low-income households. A carbon fee will exacerbate this disparity, with a deepening impact on low-income consumers. Electricity may no longer be affordable for our low- and fixed-income consumers.

Rural areas that are more heavily dependent on coal for electric generation in the South, Midwest, and Great Plains will experience greater price increases. Preliminary analyses by NRECA show that monthly residential electricity bills for electric cooperative consumers in 25 states will rise from 15 to 28 percent for every \$20 cost per metric tonne of CO<sub>2</sub>, depending partly on how emission allowances are distributed. Various economic analyses have pegged the cost of emission allowances at between \$20 and \$60 per metric tonne in the initial years of the program, and rising after that.

Housing quality is also a concern, with energy inefficient, manufactured homes accounting for nearly 20 percent of rural housing. This adds considerably to the challenge of managing household electricity demand and costs.

Finally, agriculture is an energy-intensive industry with energy accounting for about 15 percent of production expenses. Increasing electricity prices will have a significant impact on the production costs of crops (Doane Advisory Services, 2008). Perhaps more importantly, under a climate regime in which the electric power sector is forced to switch generation from coal to natural gas because of a lack of alternative low-carbon generation technologies, Doane Advisory Services estimated that per acre production costs for corn and rice will rise \$80 and \$150, respectively. The impact on agriculture will be substantial, reverberating throughout the agricultural and food sectors.

As higher electricity and energy prices flow through the economy, they will increase the cost of necessities and burden those least able to afford it. This is why we believe it is critical that emission allowances be freely allocated and any revenue raised under the program gets returned to consumers to help them with the higher costs.

References:

- Burtraw, D., R. Sweeney, and M. Walls. 2008. The incidence of U.S. climate policy: Where you stand depends on where you sit. Washington, DC: Resources for the Future.
- Doane Advisory Services. 2008. An analysis of the relationship between energy prices and crop production costs. St. Louis, MO: Doane.
- Eisenberg, J.F. 2007. Short and long-term perspectives: The impact on low-income consumers of forecasted energy price increases in 2008 and a cap-and-trade carbon policy in 2030. Oak Ridge, TN: Oak Ridge National Laboratory. Report No.: ORNL/CON-503. Contract No.: DE-AC05-00OR22725. Supported by the U.S. Department of Energy.

- 9) How might revenue generated under a carbon reduction program be best used to offset any negative impacts?

*Please respond in 300 words or less.*

NRECA believes that climate policy should not be used as a method of raising additional revenue for the federal government beyond what is needed for the climate policy. However, if the government uses a cap-and-trade or carbon tax program to raise revenue, NRECA believes that funds generated under a carbon reduction program must be used to reduce costs to consumers in such a way that mitigates the economic impacts of the carbon policy on individuals in regions commensurate with the impact the carbon policy has on the region. Such a policy must also not turn into a wealth transfer program that takes revenue from consumers and highly energy intensive industries (such as agriculture) and regions (such as the Plains, Midwest, and South) and transfer it to consumers in less energy-intensive regions.

- 10) Should businesses that are affected (either indirectly or directly) by higher overall costs due to a carbon reduction program receive transitional assistance?

*Please respond in 300 words or less.*

Electric cooperatives face high costs for new low-carbon generation. Funding to accelerate the research, development, demonstration, and deployment of new technologies such as carbon capture and sequestration and smart grid will help to lower the cost of new generation, reduce demand, and more effectively manage existing resources. By keeping the cost of electricity low as cooperatives add low-carbon generation and consumers increase their energy efficiency, the transition to a low-carbon economy will cause less economic disruption.

Some believe that providing emission allowances for free for a limited period of time can be used as “transition assistance.” NRECA believes that emission allowances should be allocated for free to electric cooperatives for the duration of any cap-and-trade plan as the best way to shield electric cooperative consumers from unnecessarily high costs. Consumers will pay the ever increasing cost of reducing emissions from our current projected emissions (the baseline) down to the level of whatever cap is enacted into law. However, consumers should not be required to pay for emissions that are legally authorized under the cap. An auction forces consumers to pay for those legal emissions, and yet does not provide any additional environmental benefit.

Energy intensive industries competing in international markets with those unaffected by the high costs of compliance with a carbon reduction program should receive transitional assistance.

- 11) What role should public lands play in helping to sequester carbon and/or reduce greenhouse gas emissions?

*Please respond in 300 words or less.*

Maintaining and restoring the health of our nation’s forests and rangelands will sequester carbon and reduce greenhouse gas emissions. NRECA supports federal healthy forest initiatives that promptly salvage logs, restore land affected by catastrophic wildfires, and preserve the economic and aesthetic value of public lands. Projects on federal lands should qualify for the domestic offsets program.

- 12) Should carbon prices be determined exclusively by market forces or should limits on carbon prices be established? Please explain.

*Please respond in 600 words or less.*

The best method of assuring cost certainty is the inclusion of an economic safety valve. A safety valve limits the potential impacts of a cap-and-trade program on energy prices through the sale of additional allowances at a “safety-valve” price. If the safety valve is triggered, the emissions cap is relaxed. The safety valve price increases each year by a fixed amount, providing cost certainty and emission reductions. A safety valve should be included in any cap-and-trade legislation, at least for the initial 10-15 years of the program.

A critical element of any carbon reduction program is the need to provide regulated entities with cost certainty—particularly in the case of capital-intensive industries like the electric utility sector. A U.S. cap-and-trade program is forecast to expand today's world carbon markets from about \$118 billion in 2008 to \$1-3 trillion by 2020. In a cap-and-trade program open to all players and expanding so rapidly, no one knows with certainty what the cost of compliance will be. The uncertainty in the market invites conflicts of interest, speculation and gaming, similar to what we have seen recently with oil prices and subprime mortgages. Introducing that kind of volatility to electricity prices—and ultimately all consumer goods and food prices—would soon undermine the political will needed to sustain a carbon reduction program over the long term. Given that we are talking about a regulatory compliance regime in which the costs and risks will be passed on to our consumers, electric cooperatives support cost certainty and limits on carbon prices.

- 13) What, if any, lessons can be learned from the European Union's Emission Trading System (ETS) or any other carbon reduction program already underway or being developed? Do any international carbon reduction programs currently exist for agriculture and forestry?

*Please respond in 600 words or less.*

The European Union's ETS is notorious in that it provided allowances to its utilities at no cost and then the utilities charged their consumers for the cost of the allowances. The European Union's utilities reaped the value of the CO<sub>2</sub> allowances twice. This gave rise to concerns in the U.S. with giving industry a "windfall profit" at the expense of consumers and calls for full auctions of allowances.

In the case of not-for-profit, consumer-owned electric cooperatives, we cannot reap any windfall or other profit by definition. Cooperatives operate at cost, and any additional costs (such as buying allowances at auction) get passed directly on to consumers, while any costs avoided result in direct savings to our consumers. These additional costs will accrue to regions of the country experiencing the most impacts from a carbon reduction program and most in need of help as they transition to a low-carbon economy. To reduce additional costs, NRECA recommends that allowances be allocated to electric cooperatives in such a manner that the impacts of any auctions are minimized on electric cooperative consumers.

## **Part II: Carbon Reduction Program Administration and Implementation**

The administration and implementation of an offset or allowance program will be a major topic during any potential climate change discussion. Please answer the following questions regarding the scale, scope, and limitations of any program as part of the larger carbon reduction debate.

- 14) What options or combination of options would be most effective for agriculture and forestry sectors in a carbon reduction program: a voluntary offset program, bonus allowances for selected agriculture and forestry activities, or agreed upon performance standards for segments of the agriculture and forestry sectors?

*Please respond in 600 words or less.*

The most effective options for agriculture and forestry in a carbon reduction program are a voluntary offset program and bonus allowances for selected agriculture and forestry activities. Both options provide producers the flexibility needed to accommodate the wide range of ecological and economic circumstances found throughout the country.

- 15) Should the total number of offsets issued annually by the government be limited? If so, how much?  
*Please respond in 300 words or less.*

NRECA believes that it is not necessary for the government to limit the total number of offsets issued annually. The number of voluntary participants and the verification process itself will limit the size of the domestic offset program. Not every landowner will want to participate. However, for those that do, a robust offset program will provide a cost-effective compliance option for covered entities and revenue to landowners.

- 16) How should Congress prioritize the distribution of available offsets (who gets them and how much)?  
*Please respond in 600 words or less.*

Domestic offsets from different sources that meet program requirements should be treated equally. As to the distribution of available offsets between domestic and international sources, NRECA supports the inclusion of both. Qualifying international offset credits should be awarded based on methods, protocols, and standards as stringent as the methods, protocols, and standards applicable to domestic offsets. Again, NRECA recommends that there be no limitation on the use of offsets in a carbon reduction program.

- 17) What should the criteria be for measuring (quantification, verification, and monitoring) and accounting for the legitimacy of offsets under the program?  
*Please respond in 600 words or less.*

The common criteria for measuring and accounting for offsets are that they are real, additional, verified, registered, and permanent (or of contracted duration). Some protocols are so restricted, burdensome, or costly as to prevent an offset market from ever emerging. The trick is developing a practical, workable system that will result in real emission reductions and a robust offset market. Performance standards and technology benchmarks in place of high cost project-specific measurements may be a good compromise.

- 18) What should be the criteria for assessing offset projects?  
*Please respond in 300 words or less.*

The criteria for measuring and accounting for offset projects should be that they are real, additional, verified, registered, and permanent (or of contracted duration).

- 19) How should Congress design a system for verifying offset projects?

*Please respond in 300 words or less.*

Congress should set a framework for verifying offset projects with the U.S. Department of Agriculture setting standards. USDA-certified, independent agents or USDA employees could perform verification services.

- 20) Should Congress establish a standards-based approach with pre-calculated values or a project-based approach that measures field results for establishing eligible offsets under the program?

*Please respond in 600 words or less.*

Both standards-based approaches and project-based approaches have roles in quantifying offset projects. For example, a manure digester project may have accurate sampling of the methane produced and combusted. In contrast, the high spatial variability of soil carbon would lend itself more to practice standards or multi-year measurement intervals.

- 21) What should be the relationship between offsets and allowances?

*Please respond in 600 words or less.*

An offset is of most value to covered entities when an offset credit is equivalent to an allowance, that is, a buyer is fully protected from any project-specific offset risk. A well-designed offset program that manages any project-specific risk behind the registry so that buyers are fully protected is preferable.

- 22) Describe the most important factors in establishing the permanence and duration of offsets under the program, including contract length and flexibility?

*Please respond in 300 words or less.*

As stated in 21 above, an offset program that manages risks associated with the permanence and duration of the offset credit so that the buyer is fully protected is preferable. One way to do this is to create a risk pool. When offset credits are registered, the project owner will pay a modest fee to fund a risk pool. Replacement offset credits from new projects can be bought with pool proceeds in the event of a fire or other disaster. The offset registry is always backed up. Likewise, contract length and flexibility can be managed within the registry.

- 23) How should Congress address existing offset projects or credits established through a voluntary market or system (e.g., the Chicago Climate Exchange or an emission registry)?

*Please respond in 600 words or less.*

NRECA supports credit for early action. Electric cooperatives that have voluntarily reduced their emissions should not be penalized in a future carbon reduction program. Offset projects or credits that can be verified should be recognized in a climate policy. Examples of eligible programs include the U.S. Department of Energy's Section 1605(b) Voluntary Reporting of Greenhouse Gases Program, the Environmental Protection

Agency's SF<sub>6</sub> Emission Reduction Partnership for Electric Power Systems, and the Chicago Climate Exchange, among others.

- 24) The terms "additionality" and "stackability" are often used when discussing the details of an offset program. How should producers and forest landowners who may have been early-actors and already undertaken activities that sequester carbon or reduce greenhouse gas emissions be treated? Should activities undertaken to reduce carbon emissions also be allowed to count towards other environmental market activities, such as water quality or wildlife habitat creation, therefore allowing landowners to "stack" credits?  
*Please respond in 600 words or less.*

Producers and forest landowners who have been early actors and have already undertaken activities that sequester carbon or reduce greenhouse gas emissions should be recognized in a future climate policy provided the offsets can be verified.

In this instance stackability is justified. Activities undertaken to reduce carbon emissions should be allowed to count toward other environmental market activities. For example, the Environmental Quality Incentives Program and the Conservation Security Program can incorporate a carbon sequestration component as an additional ecosystem service payment. If the producer holds the right to the carbon, then payments under a program should not preclude his participation in a carbon offsets market.

- 25) How should activities that may have been paid for in part by assistance from Federal or state government programs (i.e. cost share, technical assistance) be treated? How should those activities be treated if the practice was not specifically implemented to address carbon sequestration or greenhouse gas emission reduction?  
*Please respond in 300 words or less.*

See 24.

- 26) Should a producer be required to return revenue or be held liable if an offset project does not sequester carbon or reduce greenhouse gas emissions? How about in the event of a natural disaster or another event uncontrolled by the producer and/or landowner?  
*Please respond in 300 words or less.*

See 21 and 22.

- 27) Should the protocols and procedures for the offset program be detailed in legislation, or should authority be delegated to the appropriate government agency to develop regulations? If so, which agency or agencies should be responsible for devising protocols and procedures?  
*Please respond in 300 words or less.*

Legislation should provide a strong framework for an offset program with fine details such as the development of regulations for protocols and procedures for domestic offsets delegated to the U.S. Department of Agriculture. USDA can then integrate the offset program into the U.S. Environmental Protection Agency's program.

28) What are the obstacles faced by agricultural producers and landowners to implement practices and technologies?

*Please respond in 600 words or less.*

The largest obstacles to producers and landowners are: (1) the development of a workable offset program that balances quantification, verification, and monitoring needs of an offset program with feasible recordkeeping and minimal transaction costs for landowners; (2) the establishment of a net benefit to the landowner; and (3) a system that provides incentives for landowners to benefit from continuing to implement best management practices.

29) Do existing conservation and forestry programs provide sufficient incentives to encourage the adoption and implementation of practices that mitigate climate change impacts, sequester carbon and/or reduce greenhouse gas emissions? If not, what might Congress consider offering as additional financial incentives and technical assistance to speed up adoption/implementation?

*Please respond in 300 words or less.*

Existing conservation and forestry programs such as the Rural Energy for America Program, the Conservation Reserve Program, and the Forest Stewardship Program provide federal incentives for implementing practices that reduce greenhouse gas emissions. More can and should be done. A well-designed domestic offset program, as part of a mandatory carbon reduction program, will provide additional incentives for landowners to sequester carbon. Additional education, outreach, and demonstrations of agricultural and forestry emission reductions, avoidance, and sequestration, will accelerate adoption of low-carbon practices. USDA extension and education programs, workshops, conferences, and outreach efforts will accelerate implementation. NRECA will look for opportunities to work with USDA to disseminate information under its memoranda of understanding on climate change and energy efficiency. Also see 24.

### **Part III: Carbon Reduction Program Additional Thoughts**

**Please use the next 1000 words to provide additional comments on subjects which may not be covered by the questionnaire, such as a low-carbon fuel standard, life-cycle analysis, leakage, or biofuel incentives.**

| Please list specific types of <i>forestry practices</i> that should be available as offsets, and then use the terms provided to evaluate the practices. |   |  |   |  |
|---|---|--|---|--|
| Type of Practice  | Effectiveness at sequestering carbon or reducing GHG emissions ( <i>Excellent, Good, Moderate</i> ) | Ability to verify carbon sequestration or GHG emission reductions ( <i>Excellent, Good, Moderate</i> ) | Cost for agricultural producers and private forestland owners to implement ( <i>High, Medium, Low</i> ) | Capacity of agricultural producers and private forestland owners to implement immediately ( <i>High, Medium, Low</i> ) |
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| Please list specific types of <i>practices associated with livestock operations (e.g. manure management, grazing/pastureland practices)</i> that should be available as offsets, and then use the terms provided to evaluate the practices. |   |  |   |  |
|---|---|--|---|--|
| Type of Practice  | Effectiveness at sequestering carbon or reducing GHG emissions ( <i>Excellent, Good, Moderate</i> ) | Ability to verify carbon sequestration or GHG emission reductions ( <i>Excellent, Good, Moderate</i> ) | Cost for agricultural producers and private forestland owners to implement ( <i>High, Medium, Low</i> ) | Capacity of agricultural producers and private forestland owners to implement immediately ( <i>High, Medium, Low</i> ) |
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| Please list specific types of <i>crop production practices</i> that should be available as offsets, and then use the terms provided to evaluate the practices. |   |  |   |  |
|--|---|--|---|--|
| Type of Practice   | Effectiveness at sequestering carbon or reducing GHG emissions ( <i>Excellent, Good, Moderate</i> ) | Ability to verify carbon sequestration or GHG emission reductions ( <i>Excellent, Good, Moderate</i> ) | Cost for agricultural producers and private forestland owners to implement ( <i>High, Medium, Low</i> ) | Capacity of agricultural producers and private forestland owners to implement immediately ( <i>High, Medium, Low</i> ) |
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