



November 18, 2016

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RE: Public Comment: RGGI 2016 Program Review: Expanding the RGGI Forestry Offset Protocol to Include Christmas Tree Farms

Commenters:

Mr. Wes L. Hanson
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Summary Statement: We urge RGGI to consider amending the Forestry Offset Protocol section to allow Christmas tree farms to participate. These farms sequester almost as much carbon as a working forest, and have the potential to much more carbon than they are currently. Additionally, the market for real Christmas trees is on the decline, due in large part to unaddressed externalities in the Christmas tree market. Inclusion of these tree farms would create incentives to encourage more sustainable practices, while compensating Christmas tree growers for the positive externality they are providing by sequestering carbon.

RGGI

A Market in Decline

Christmas trees farms have been in steady decline for over two decades. Between 2002 and 2012, the total acres covered by Christmas trees decreased by 14,670 in the 9 RGGI member states, and 137,601 acres nationwide. While we don't know for certain what these lost acres are currently being used for, we can be relatively certain that it isn't agricultural in nature, as Christmas tree farms are typically grown on land that is considered inadequate for other forms of agronomy.

There are numerous factors driving this decline, but they are largely related to two major Christmas tree market failures, both stemming from the same issue – the lack of a social cost of carbon in the Christmas tree market. Artificial Christmas tree manufacturers generate as much as 600,000 MT CO₂ each year, for which they pay nothing. On the other hand, Christmas tree farms are an excellent carbon sink – a positive externality that they are currently uncompensated for.

Christmas Trees as a Carbon Sink

Christmas tree farms store more carbon than any other type of agricultural land-use. This is because Christmas tree farmers use techniques that are atypical to most farming operations. They do not till the soil in their farms, the trees are harvested with very little soil disturbance, and farmers often allow at least some interspace vegetation to accumulate between rows of trees. They are as much in common with the timber industry as they are with the agricultural industry. Rough estimates show that on average, Christmas tree farms store approximately 40,000 lbs. of CO₂ per acre, and have the potential to store that much CO₂ if they were managed specifically for carbon sequestration, as a doubling in the amount of interspace vegetation has been shown to double the amount of CO₂ sequestered in the soil.

The easiest way to convince Christmas tree growers to manage their land in this manner, is to find a way to compensate them for it. This is where their inclusion into RGGI comes in. We see this approach as a way to address multiple overlapping issues at once. It corrects the aforementioned market failure, helps struggling farmers, protects vulnerable land from development, and promotes farming practices that would dramatically increase carbon sequestration.

Please send comments and inquiries to:

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