

To: Jahi Wise
Acting Director for the Greenhouse Gas Reduction Fund
Environmental Protection Agency

The purpose of this letter is to urge the EPA to include environmental infrastructure, particularly “nature-based solutions” (NBS) as a fourth priority area for the GGRF. This would include investments in the water, forestry & land conservation, and agriculture sectors that would significantly contribute to greenhouse gas reductions. Broadening the scope of the GGRF to include NBS is essential to reduce greenhouse gas emissions, benefit public health, economic development, community resilience, and biodiversity. These projects are also within the purview of the GGRF’s enabling legislation, which specifies that eligibility is determined by whether a project *“reduces or avoids greenhouse gas emissions and other forms of air pollution in partnership with, and by leveraging investment from, the private sector.”* The White House Council on Environmental Quality has emphasized that natural solutions can [reduce emissions](#), remove carbon from the atmosphere and lock it away, make ecosystems more resilient, and lower climate change risks for people.

Nature-based solutions are critical for combating the effects of climate change – with estimates suggesting that NBS can provide [37%](#) of the mitigation needed to achieve the 2030 targets of the Paris Agreement. In the US, [agriculture](#) is responsible for 11% of all greenhouse gas emissions—with management of agricultural soils accounting for just over half of those emissions. These investments can also draw massive amounts of existing emissions out of the atmosphere – with the land sector absorbing the equivalent of about [13%](#) of the country’s GHG emissions (mostly from forests).

Tools for achieving these outcomes are varied. For example, climate-smart agriculture enables farmers to retain more carbon in their fields as they produce crops while climate smart forestry can increase the carbon storage benefits of forests. In addition to the carbon sequestration benefits, climate-smart agriculture and forestry practices preserve vital ecosystem services, improve water quality, and more. Established green banks such as the Connecticut Green Bank and the Rhode Island Infrastructure Bank already recognize the role green banks should play in these sectors and have programs specifically focused on these types of nature-based solutions. New green banks that emerge through the GGRF should be empowered to mirror these efforts.

NBS can leverage investment from the private sector to make massive strides in helping historically under-resourced communities to mitigate and adapt to climate change, as many of the climate impacts that NBS can help address, like extreme heat, heightened flood risks and others, are disproportionately faced by [disadvantaged communities](#).

In summary, adding nature-based solutions as a fourth stated priority area in the GGRF framework will send a clear message that these investments are valued and can significantly increase the odds that these types of projects are scaled up through GGRF financing.

Sincerely,

American Forest Foundation, Appalachian Mountain Club, The Conservation Finance Network, Dirt Capital, Foundation for Regeneration, The Freshwater Trust, Gathering Waters, Land Trust Alliance, The Lyme Timber Company, LegacyWorks Group, New England Forestry Foundation, Quantified Ventures, Revive Ag, and the Soil and Water Outcomes Fund.



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