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Docket Number: USDA–2021–0003

Public Comment from Climate Land Leaders on the Executive Order on Tackling the Climate Crisis at Home and Abroad

Thank you for the opportunity to submit comments on USDA's Executive Order on Tackling the Climate Crisis at Home and Abroad. USDA has a tremendous opportunity – and responsibility – to help our nation address climate change, increase biodiversity and clean our waters, all while growing healthy food for our nation and beyond. **We can do all of this with the right incentives.**

The Climate Land Leaders are owners of farmland in Minnesota, Iowa and Wisconsin who set yearly conservation goals and monitor soil health improvements. Our mission is to provide community and support to help farmland stewards mitigate the climate crisis and enhance rural vitality.

Climate Land Leaders acknowledge and oppose systemic inequalities that limit access to land. Our guiding principles include:

- Respect and learn from the natural world through observation and engagement.
- Use scientific evidence as a guide.
- Utilize partnerships for greater impact.
- Focus on accomplishing work on-the-ground.
- Acknowledge that extractive farming has negative effects on soil, water quality and the climate while regenerative farming improves soil health, water quality and the climate.
- Recognize that working lands are necessary for growing nutrient-dense food and supporting rural communities.

The Climate Land Leaders have much experience using USDA conservation programs and are well qualified to comment on this Executive Order. In general, *USDA will maximize its contribution to addressing climate change only if:*

1. Paperwork burdens for farmers and landowners are reduced.
2. Payments better reflect the extensive ecosystem services conservation-minded landowners are providing.
3. The enrollment process, approval confirmations and payments are expedited in a timely fashion.
4. Early adopters are not excluded from eligibility and penalized for implementing carbon sequestration conservation practices over the long-term.
5. USDA better serves small- and mid-sized farmers growing nutrient-dense food.
6. USDA extends its new commitment to equity to be fully reflected in all of its climate activities and programs.

We respectfully urge USDA to:

1. Protect and conserve 30 percent of land and water by 2030.
2. Increase funding, flexibility and sustainability in EQIP (Environmental Quality Incentives Program) and (CSP) Conservation Stewardship Program.
3. Expand the Conservation Reserve and Conservation Reserve Enhancement programs.

Mission: To provide community and support to help farmland owners mitigate the climate crisis and enhance rural vitality.

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4. Improve sustainability and resiliency through changes in the crop insurance programs
5. Ensure that carbon markets are equitable and result in significant carbon sequestration.
6. Stop offering payments to new or expanding concentrated animal feeding operations (CAFOs).
7. Fully support and empower Black, Indigenous and People of Color in their climate resilience and mitigation efforts.

1. Protect and conserve 30 percent of land and water by 2030

We urge USDA to work closely with other departments and agencies to implement President Biden's initiative to protect and conserve 30 percent of land and ocean by 2030. USDA should:

- Increase payments for voluntary agricultural conservation easements to permanently protect at least 5 percent of U.S. crop for farmers growing nutrient-dense food.
- Incentivize the adoption of conservation measures on those permanently protected acres and an additional 25 percent of land, with a specific focus on conserving biodiversity and implementing climate solutions.
- Expand investment in the Agricultural Conservation Easement Program-Agricultural Land Easements (ACEP-ALE) and require those with ALE contracts to develop conservation plans that lower greenhouse gas emissions and improve soil health.
- Expand investment in ACEP-Wetlands Easements and the Healthy Forests Reserve Program (HFRP).
- Provide major new funding for the Regional Conservation Partnership Program (RCPP).
- Establish an RCPP initiative focused on protecting and conserving private working lands in biodiversity hotspots and wildlife movement corridors.

2. Increase funding, flexibility and sustainability in EQIP (Environmental Quality Incentives Program) and CSP (Conservation Stewardship Program)

USDA should:

- Include the mandatory funding elements from the Agriculture Resilience Act in the Administration's Proposal for the American Jobs Act to move as quickly as possible to a more regenerative, equitable and resilient agriculture.
- Implement full funding of the cost of cover crops for a continuous six-year period in EQIP and CSP contracts.
- Encourage the further adoption of advanced grazing management systems, including Management Intensive Grazing, through robust ranking consideration, increased payment rates, technical assistance and training for implementation and bundled payment options under the CSP and EQIP.
- Re-issue and reform the Trump Administration's misguided CSP final rule to enable CSP to be a premier climate stewardship program.

3. Expand the Conservation Reserve and Conservation Reserve Enhancement programs (CRP and CREP)

Thank you for your April 2021 commitment to expand and increase CRP payments for highly effective carbon-sequestering and climate-mitigating practices such as forested riparian buffers and improved range and pasture. In addition, USDA should:

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- Take additional steps to prioritize the Clean Lakes, Estuaries, and Rivers (CLEAR) initiative, the Conservation Reserve Enhancement Programs (CREP), the Grasslands Initiative and other working land applications of CRP, and ensure that acreage remains available at all times for those applications under the overall CRP acreage cap.
- Allow for adoption of the 2018 Farm Bill's improved management options without any payment rate reductions in CREP negotiations with states.
- Expand the flexibility for farmers and ranchers to graze CRP, including management intensive rotational grazing under an approved conservation plan rather than a rigid grazing one year out of every three.
- Incentivize the use of native plants and provide technical assistance to ensure the success of native plantings.
- Implement a payment rate for CRP that is adjustable, based on commodity price changes over the 10-year contract.
- Create and pilot a new agroforestry initiative within CRP to encourage transition to perennial production systems.

4. Improve sustainability and resiliency through changes in the crop insurance programs

USDA should:

- Develop and support the provision in the Agriculture Resilience Act to provide crop insurance premium incentives to farmers who commit to a set of soil health measures, which might include cover crops, resource-conserving crop rotations, conservation tillage and related conservation practices.
- Conduct a thorough review of the crop insurance program with respect to its impact on perpetuating environmentally unsustainable practices, including increased greenhouse gas emissions and poor soil health. The taxpayers' investment in crop insurance should not lead to poor outcomes for the climate and the environment.

5. Stop offering payments to new or expanding concentrated animal feeding operations (CAFOs).

CAFOs are bad for rural communities, for the environment and for the animals themselves. Without stronger safeguards, conservation funding further entrenches CAFOs and their harmful environmental and public health externalities and allows them to persist at the expense of climate-friendly alternatives.

- We urge NRCS to reallocate the 50 percent of EQIP funding for livestock production to support more sustainable pasture-based livestock, dairy and poultry operations by providing technical assistance, outreach and more robust payments to producers seeking to initiate, improve or transition to grass-based operations.
- No conservation program funding should be provided for building new CAFOs or expanding existing ones; payments should be limited to fixing problems on existing facilities that are below the Clean Water Act regulatory threshold and should be focused on converting to dry storage technology and soil-enhancing compost applications.

6. Ensure that carbon markets are equitable and result in significant carbon sequestration.

USDA must ensure that carbon markets:

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- Result in real reductions of greenhouse gases and not just offsets.
- Include farmer and landowner innovators and reward early action.
- Are inclusive of small and moderate size farms, with limits on support at upper ranges.
- Improve racial equity and ensure that farmers who are Black, Indigenous and People of Color benefit from the program.
- Reward practices and commitment without penalty for circumstances beyond control.
- Include strict conflict of interest provisions that prevent company employees from verifying their own plans.

7. Fully support and empower Black, Indigenous and People of Color in their climate resilience and mitigation efforts.

USDA should:

- Include the mandatory funding elements from the Justice for Black Farmers Act in the Administration's Proposal for the American Jobs Act.
- Improve outreach and service delivery to Black, Indigenous and People of Color, including technical assistance with conservation planning and program application.
- Inform eligible producers about the EQIP advance payment option and set asides in CSP and EQIP for Black, Indigenous and People of Color.
- Study and act on the recommendations about the impact of EQIP funding of CAFOs on surrounding communities, which are often communities of color.
- Study and act on the recommendations about the impacts of intensified heat stress and increased pesticide use on the health and safety of the nation's 2.4 million farmworkers.

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