



IOWA INTERFAITH POWER & LIGHT

April 29, 2021

The Honorable Tom Vilsack
Secretary, U.S. Department of Agriculture

Re: Docket No. USDA-2021-0003-0001

Dear Secretary Vilsack:

Thank you for the opportunity to provide comments to USDA on President Biden's Executive Order on Tackling the Climate Crisis at Home and Abroad. USDA has the opportunity to develop agricultural solutions, centered on rural Americans, that can deliver enormous economic and environmental benefits. These include:

- Ecosystem services as part and parcel of production systems that can bring farmers, ranchers, and foresters revenue and economic development to their communities;
- Countervailing forces to the global concentration in agriculture and food systems;
- Increased opportunities for current farmers, ranchers, and foresters, new farmers, ranchers, and foresters, and the Americans historically dispossessed of their land.

I am commenting as the Executive Director of Iowa Interfaith Power & Light (Iowa IPL), a faith-based non-profit empowering Iowans of faith and conscience to take bold and just climate action. As a 5th generation Iowa farmer who owns and operates a farm, I know American farmers, ranchers, and foresters are best positioned to lead America's response to the climate crisis. I also know that no one has a monopoly on good ideas and approaches. We need:

Republican **and** Democratic solutions
Public policy **and** supply chain resources
Local **and** global strategies
Domestic **and** international markets

But most importantly, **farmers, ranchers, and foresters in every state must be in the driver's seat developing and implementing agricultural solutions to the climate crisis.** Unleashing the power of rural America is one of the very best and fastest ways to keep the world from warming above 2 degrees Celsius.

At Iowa IPL, we've been inviting farmers to lead for nearly three years with our [Faith Farms & Climate](#) project. In church halls and basements, we bring farmers together so they can talk about how they are called to climate action. Iowa is a leader in climate action through renewable energy and our farmers know they can lead the way in capturing carbon and reducing emissions

on their farms. Our comments are grounded in the willingness of Iowa farmers to lead the changes put forth by President Biden's Executive Order.

"Never be afraid to change. I farm differently today than I did twenty years ago. I believe that successful farming requires overcoming adversities in a productive and sustainable way while recognizing and creating the solutions to the climate crisis."

Marion County, Iowa farmer Justin Jordan

We've listened to farmers like Justin and created a very clear value proposition that cuts across political ideologies.

Why? Because climate change is the great challenge of the 21st Century.

Who? American farmers, ranchers, and foresters because they know how to solve problems. And they have the most advanced agricultural systems with the most public policy support of any farmers on the planet.

How? Farmers, ranchers, and foresters of all sizes, from all backgrounds, and across all regions of the country must lead and be paid when they deliver ecosystem services from regenerative agriculture, sustainable land management, and clean energy.

It is not enough to simply encourage farmers, ranchers, and foresters to adopt the practices, technologies, and innovations from agribusiness, environmental groups, academic researchers, and new ag-tech startups. We need to also be incentivizing them directly to lead and to innovate.

USDA must shape their programs and efforts to directly empower farmers, ranchers, and foresters to deliver performance-based ecosystem services as a means of production and not just as an alternative land use to the production of crops and livestock.

We continue to be amazed at how often farmers, ranchers, and foresters are considered as implementers and adopters of the ideas, products, and practices of others but not seen as primary innovators and entrepreneurs themselves. The country has made huge leaps forward in considering agricultural solutions to climate change. Agribusiness, old and new, is celebrated as innovating and moving forward. While the efforts of agribusiness are important, they do not provide all of the fundamental innovations needed on our farms, on our ranches, and in our forests. The best science, both established and emerging, points to broad systems change across the global landscape that farmers, ranchers, and foresters are best equipped to develop and deliver.

Through our Faith Farms & Climate project, conventional Iowa crop and livestock farmers have shown up speaking this truth in major media stories, proving that when given a chance, American farmers are ready to lead:

- [Carbon Capturing Buzz Turns into Stacked Payments for Farmers: Farmers are getting paid for capturing carbon, improving water quality, and more.](#) **Successful Farming.** March 3, 2021, Dan Looker.
- [Once skeptics, Iowa farmers look to lead fight against global warming.](#) **KGAN cbs2iowa.com.** November 9, 2020, Christopher King.
- [Farmers Preach Climate Change Gospel in the Heartland.](#) **CircleAround.** Staff. Circa June 2020.
- [Farmers Challenge Climate Change.](#) **PBS's This American Land.** May 2020, by Jill Woodward, Gary Strieker, and Dave Timko.
- [Scientists say farmers could grow their way out of the climate crisis.](#) **CNN,** August 8, 2019.
- [One Man Is Trying to Fight Climate Change By Mobilizing an Unlikely Team: Iowa's Farmers.](#) **Mother Jones,** July/August 2019, by Brian Barth.

We need farmers, ranchers, and foresters to be innovating within and across these five practice areas for ecosystem services:

- Decreased tillage.
- Integrating livestock and cropping systems that create environmental benefits, such as managed grazing.
- Permaculture, such as cover crops that keep roots in the ground all year
- Increased diversity of a wider variety of crops grown on a larger number of acres. For example, in Iowa that means we can't keep growing 23 million acres of corn and soybeans every year but instead must use some of those acres to grow different crops
- Clean energy—technologies like on-the-farm solar, wind, and methane digesters and more farmer-led efforts for advanced biofuels.

Every program and effort at USDA should be encouraging innovation and entrepreneurialism to develop diverse landscape strategies to produce greater environmental outcomes.

If we're serious about using agriculture and land management to help solve the climate crisis, and to be clear we must, then we need to incentivize those who are best able to provide the changes needed. **Change must come not only in providing the food, fuel, and fiber the world needs, but also in providing the ecosystem services that have become just as critical for sustaining human life.**

We offer these recommendations to USDA for empowering farmers, ranchers, and foresters in order to achieve the goals of the Biden Administration.

In general throughout the entire Department, USDA needs to do the following:

- Support programs to pay farmers, ranchers, and foresters as environmental entrepreneurs who produce ecosystem services on a whole farm basis, allowing them to

voluntarily use the regenerative and other conservation agriculture practices that work best in their operations and provide the highest performance for environmental benefits.

- Use existing and new USDA programs to compensate farmers, ranchers, and foresters in all 50 states and territories for ecosystem services for climate change mitigation and adaptation, including payments, loans, subsidies, and technical assistance for innovations that increase performance based environmental outcomes.
- Provide resources to agricultural scientists and other public interest scientists to work with farmers, ranchers, and foresters to identify innovations, the replicability of regenerative practices, and the value of sustainable and resilient systems.
- Empower farmers, ranchers, and foresters while strengthening rural development by supporting and expanding regional, state, and locally based Natural Resources Conservation Service, Farm Service Agency, and Rural Development offices and staff.
- Expand and coordinate research agencies, land grant university scientists, the Office of the Chief Economist, and other entities who can partner with farmers, ranchers, and foresters to advance on-farm, ecosystem services including energy, energy storage, energy efficiency, and other energy activities that happen on farms, on ranchers, and in forests.
- Set payment limitations to encourage diversified, small and mid-sized farms.
- Invest in past, current, and future socially disadvantaged farmers, ranchers, and foresters because we cannot achieve the goals of climate smart agriculture without their leadership.

In addressing the specific questions in the request for comments, we support the comments submitted by the National Sustainable Agriculture Coalition and the National Farmers Union. We are also drawing on some of them below as they strongly reinforce our general comments above.

1. Climate-Smart Agriculture and Forestry Questions

Establish Climate Mitigation and Resilience as a Resource Concern throughout NRCS conservation programs, a nationwide Priority Resource Concern for the Conservation Stewardship Program, a top priority throughout USDA intramural (ARS) and extramural (NIFA) research programs, as an integrated part of RMA crop insurance programs, and a consideration in the delivery of FSA programs.

Efforts to stabilize the climate must be recognized and established as a Resource Concern commensurate with soil, water, air, plants, animals, and energy. It must become part of the

mandate of the NRCS to address the climate as a vital natural resource concern. NRCS should establish both climate mitigation and climate adaptation as Purposes for Conservation Practices, as Resource Priorities throughout the agency's portfolio of conservation programs, and as nationwide Priority Resource Concerns for CSP.

USDA research needs to focus on and invest in carbon sequestration, climate mitigation, and resilience to support farmers and ranchers to remain in business in the face of climate change and to become part of the solution in achieving a climate-neutral or climate-mitigating U.S. agriculture. USDA must establish climate mitigation and resilience as a top priority throughout its portfolio of research programs including both intramural (Agricultural Research Service, Climate Hubs, Long Term Agroecosystem Research Network) and extramural (National Institute for Food and Agriculture) programs.

Climate risk is a major component of production risk covered by crop insurance and other risk management tools offered through the RMA and private insurers. RMA must make climate risk and its management a major objective throughout its programs and risk management offerings, and must adjust actuarial factors to take full account of the climate resilience-enhancing aspects of Good Farming Practices. FSA loans and disaster programs are focused on commodity and livestock production. FSA needs to develop similar tools to support the production of ecosystem services.

Make the Conservation Stewardship Program (CSP) the agency's premier climate mitigation and adaptation program.

CSP is ideally suited to play a central role in USDA's climate change strategy. Its whole-farm approach ensures that the net greenhouse gas footprint of the entire farm or ranch, not just a small part, is considered in determining climate-related incentives. It provides rewards for both existing and new conservation practices which provides a means to reward the 'early adopters' who may otherwise be left out of climate-related payments. CSP's focus on continuous improvement in conservation systems can help American agriculture reach or exceed net zero greenhouse gas emissions.

Set a Department-wide goal and timeframe for U.S. agriculture to achieve carbon neutrality.

USDA has made erosion reduction, healthy soils and improved water quality national priorities – which are reflected throughout USDA conservation, research, and rural development programs. USDA should establish a department-wide goal and timeframe for U.S. agriculture to reach net zero GHG emissions and focus a significant portion of conservation, energy, research, risk management, and rural development program spending on systems and practices that most-effectively store carbon and minimize greenhouse gas emissions.

Improve payment rates for climate-friendly conservation practices and fund projects that develop and expand market opportunities for crops in resource-conserving crop rotations such as small grains, cover crops, and forages.

The benefits of climate-friendly conservation practices, including resource-conserving crop rotations (RCCRs) are well documented and include building healthy soil, sequestering carbon, increasing soil organic matter, and protecting vulnerable water resources. Additional financial incentives, field demonstrations, improved guidance and technical assistance, dedicated outreach, and market development are needed to overcome obstacles to develop and utilize RCCRs. We need improved payment rates for practices that maximize plant biomass, optimize biodiversity in cropping systems, integrate livestock and crop production, and encourage whole-farm system changes.

Establish that all NRCS conservation practices and standards are Good Farming Practices (GFP) without exception or caveat.

When farmers implement conservation practices and enhancements in line with NRCS standards they should not be in conflict with RMA rules as a result. RMA rules and policies should reflect that conservation is a key element of risk management. The fact that RMA and NRCS, two Farm Production and Conservation (FPAC) agencies, often give farmers contrary recommendations must end.

Increase agricultural data integration and analysis, both within agencies and across agencies throughout all of USDA.

The Department can improve data innovation and research at USDA, both internally and externally, by partnering with researchers at land grant institutions or other agricultural colleges and universities. The Department needs to analyze and integrate USDA's agency-wide agricultural data across all programs and agencies.

Increase research partnering with farmers, ranchers, foresters, and stakeholders in perennial production systems and incentivize widespread expansion of these production systems.

Perennial cropping systems and crop-livestock integrated systems cycle nutrients efficiently, protect soil from erosion and degradation, and require far less fertilizer per acre-year. Low fertilizer inputs combined with year-round living roots minimize excesses of soluble N and P in the soil, and thereby curb emissions of the powerful greenhouse gas nitrous oxide, and protect water quality by reducing nutrient loss. Perennial production systems, including agroforestry, alley cropping, permaculture, and silvopasture, are highly promising – both in terms of production (highly nutritious fruit, nut, and other perennial crop products, and high-quality meat, dairy, and eggs from pastured livestock) and environmental benefits. Conversion of annual cropland to any of these forms of perennial agriculture typically sequesters 2,000 lb. or more carbon per acre annually.

Improve the Interim Conservation Practice Standard (CPS) 808 Soil Carbon Amendment. Make it a national and permanent practice standard.

This standard promotes soil health, soil carbon sequestration, and compost use as a conservation practice. CPS 808 can play a major role in achieving the Biden Administration's GHG mitigation goals within the agricultural sector. NRCS has continued to develop and modify the standard to optimize conservation outcomes. The use of compost and other organic amendments play a central role in most organic production systems, and when done in accord with sound nutrient management and in conjunction with maximizing soil coverage, living root, and biodiversity, can be highly effective in promoting both soil carbon sequestration and resilience to weather extremes and other stresses.

Establish a Monitoring, Evaluation, and Reporting Initiative to create outcomes-verified data and metrics that would be needed for tax credits, supply chain initiatives, and carbon trading

Measurement, evaluation, and reporting (MER) requirements on conservation outcomes are needed for all conservation programs and initiatives, including a description of all the approaches, methods, and metrics USDA is developing or already has in place. This information is necessary in order to define, evaluate, and communicate outcomes specifically related to the potential of USDA conservation programs to help farmers mitigate impacts of climate change. Recent and ongoing advances in sensor technology and real-time in-field monitoring of soil carbon and nitrogen dynamics as well as crop-soil water relations, crop nutrient status, and plant diseases should help make effective MER more feasible in the near future.

Increase support for small- and mid-sized slaughter and processing capacity to build resilience and increase markets for pasture-raised livestock.

A key bottleneck in the local, sustainably-raised meat value chain is limited availability of processing services, exacerbated by increased demand for local meat resulting from pandemic-driven supply chain backlogs. Limited access to processing keeps current producers from expanding and new producers from entering the market. Pasture-based livestock systems build soil health, control erosion, and capture carbon from the atmosphere, so USDA should encourage and incentivize transition to pasture-based systems to support climate change mitigation and adaptation. Small-scale meat production can help conserve farmland and benefit local rural economies.

2. Biofuels, Wood and Other Bioproducts, and Renewable Energy Questions

Advance renewable energy produced and used on farms to replace fossil fuels, lower costs, and improve resilience of farms.

Farmers, ranchers, and foresters can improve energy use efficiency and generate renewable energy from low-carbon sources for use within and beyond the agriculture sector. Solar and wind show great promise as low-carbon energy sources, while biofuel production from agricultural biomass requires careful life cycle assessment and consideration of social and environmental impacts. Powering America's farms with low-carbon renewable energy rather than fossil fuels can increase the control of farmers and ranchers over their energy sources, reduce costs, and mitigate climate change.

Increase the focus of EQIP, CSP, and the Regional Conservation Partnership Program (RCPP) on climate change mitigation, energy conservation, and renewable energy production.

USDA should continue and expand the use of EQIP, CSP, and RCPP, which are authorized to promote energy conservation, to assist farmers and ranchers in obtaining energy audits of their operations, improving the energy efficiency of their operations, and establishing renewable energy systems.

Promote replacing carbon mined from fossils with carbon from living systems.

While USDA is deeply committed to serving mining communities in rural America, mining fossil fuels is not a part of its mandate. However, deriving clean energy from natural systems is. By 2050, we can replace all liquid and gaseous fuels produced from fossils with liquid and gaseous fuels produced from carbons grown on farms, on ranches, and in forests. As we continue to develop more advanced biofuels and depend more on carbon free electricity, rural America can deliver the path to being free of fossil fuels by 2050.

4. Environmental Justice and Disadvantaged Communities Questions

There is a clear history of discrimination in how USDA has delivered programs. It is fair and just that USDA now compensate for past wrongs by investing more resources in and for farmers, ranchers, and foresters from communities of color including Black, Indigenous, LatinX, immigrants, and refugees. However, the most important reason for USDA to invest in these current and future farmers, ranchers, and foresters is that we simply cannot achieve the kinds of innovations in natural resource management, including agriculture, that are needed to solve the climate crisis without their leadership.

We support the comments submitted by the Rural Coalition as one of the best organizations fighting for equity and environmental justice for farmers, ranchers, and foresters. We are also drawing on some of them below as they strongly reinforce our general comments above.

Reverse course on payment limitations, tightening them to slow down consolidation of agricultural land.

We need serious payment limitation reforms. USDA must stop increasing incentives for larger operations creating a false sense of efficiency and undermining the benefits and solutions that can come from more diverse operations. We cannot get serious about creating more opportunities for more farmers, ranchers, and foresters, if we continue to dismantle payment limitations that create unfair advantages based on size rather than performance.

When it comes to ecosystem services, the science is clear that greater diversity on a whole farm basis (or on integrated landscapes for ranches and forests) outperforms less diversity in an acre-to-acre comparison. There is a limit to the amount of taxpayer funded public resources available to farmers, ranchers, and foresters. We must prioritize investing those dollars at the

point of action to encourage stacked and diverse approaches to ecosystem services which generate multiple beneficial environmental outcomes. Without payment limitations, ecosystem services will develop to incentivize larger scale operations at the expense of greater performance-based environmental outcomes. Simply put, we need more farmers, ranchers, and foresters on the land rather than fewer. And more of those farmers, ranchers, and foresters must be from communities historically dispossessed of their access to land.

Ensure historically underserved farmers, ranchers, and foresters are fully supported and empowered in their climate resilience and mitigation efforts.

USDA has adopted provisions to improve service to producers of color, beginning, veteran, and limited-resource producers, and other historically underserved constituencies, particularly through higher payment rates and advance-payment options in EQIP and other conservation programs. However, much more needs to be done to ensure that these producers receive the financial and technical support they need in order to meet the challenges of climate change and contribute to solutions.

- Improve outreach and service delivery to farmers and ranchers of color and other historically underserved producers
- Invest in programs such as the ATTRA Sustainable Agriculture Program whose mission specifically serves historically underserved producers and communities to build resilience and contribute to climate solutions
- Create new RCPP Critical Conservation Areas to cover significant gaps in geographic regions where many small-scale farmers of color operate
- Ensure program eligibility rules do not exclude or pose barriers to tenant farmers who wish to participate in conservation programs, and payment structures that ensure tenants, not the cash landlords, collect the payments and other program cost shares
- Conduct and share transparent data collection on rates of farmers of color application and enrollment in all USDA conservation and easement programs
- Commit to at least doubling funding available for conservation programs and projects serving underserved communities – including farmers of color, indigenous, women, urban, immigrant, and refugee farmers, as well as farmworkers and military veterans;
- Design and implement all climate-mitigation and climate-resilience provisions within conservation programs and across mission areas so that they actively dismantle historical racism and thereby protect public health and food security, preserve natural resources, and provide environmental and climate justice for communities of color and other disproportionately impacted communities; and
- Ensure those farming, ranching, and foresting on Heirs' property, fractured allotments, and colonias can participate in *any* USDA program, including climate-smart programs.

- Make available options for operating loans that defer the first payment for 24 months and provide interest rates reductions. These terms would allow them to build up the equity that many BIPOC producers lack due to the cumulative effect of discrimination.
- Provide more options to work with a mentor farmer or otherwise substitute work on a family operation, as a farmworker, or farming experience outside the US in order to meet the 3-year requirement to qualify for beginning farm loans.
- Implement the heirs property relending fund authorized in the 2018 Farm Bill and funded by Congress annually since to assure the required pilot projects are set in places with results ready to inform the next Farm Bill.
- Increase incentives and reduce the amount of paperwork for BIPOC, limited resource and beginning producers in existing conservation programs.
- Ensure workplace protections for all farmworkers and food chain workers, including protections against sexual harassment and discrimination. USDA should work with other federal agencies to address heat stress. It should also institute immediate reduction of line speeds in poultry processing.

Mainstreaming BIPOC leadership in helping solve the climate crisis through agriculture and resource management

USDA must assure that any USDA Climate Policy and Rural Investment Advisory Board, or similar federal advisory committee established with the purpose of advising the Secretary on climate policy include a critical mass of representation identified by Tribal Governments and from groups with documented experience representing socially disadvantaged producers and landowners including forest landowners.

Small, mid-sized, and diverse farmers can provide higher management with greater environmental outcomes on land in their use. Carbon sequestration should be seen as an important but not the only factor in evaluating success. New investments should also be evaluated based on total ecological benefit and related factors including increases in overall resilience, in pollinator habitats, restoration of watersheds and water quality and disaster resilience.

USDA should consult with Tribal government and BIPOC communities to institute essential measures to protect the rights of tribal and other communities to retain control of their seeds and breeds.

Conclusion

In the face of the dire need for climate action, we are at the beginning of another agricultural revolution. USDA will play a critical role in empowering rural Americans to shape changes that will literally save the world. As Congress and the White House work together to advance comprehensive legislation like the Agriculture Resilience Act, USDA must partner hand in hand with American farmers, ranchers, and foresters to develop the regenerative agricultural systems and clean energy strategies that will come from rural America. While climate change is a global

threat, climate action is an opportunity that can deliver these enormous economic and environmental benefits.

- Ecosystem services as part and parcel of production systems that can bring farmers, ranchers, and foresters revenue and economic development to their communities;
- Countervailing forces to the global concentration in agriculture and food systems;
- Increased opportunities for current farmers and ranchers, new farmers and ranchers, and the Americans historically dispossessed of their land.

But the promise of this revolution can only be achieved, if American farmers, ranchers, and foresters are leading it.

Sincerely,

Matt Russell,
Executive Director, Iowa Interfaith Power & Light