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Seth Meyer
Chief Economist, Office of the Chief Economist.
1400 Independence Avenue, S.W., Washington, D.C

Re: Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad

Dear Chief Economist,

The National Young Farmers Coalition (Young Farmers) appreciates the opportunity to provide written comments on how USDA can mobilize and resource our farming communities towards climate action. Young Farmers is a national advocacy network that represents, mobilizes, and engages young farmers and ranchers to ensure their success. With the goal of helping 25,000 young people enter into viable farming careers by 2022, we tackle the most critical structural and economic issues that prevent motivated young people from starting and growing farm businesses. Since 2010, the Coalition has launched 48 farmer-led chapters across the United States. We help young farmers become leaders in their communities through local chapter organizing, ensuring they have a seat at the table in local, state, and national policy decisions. In short, we are young farmers fighting for a brighter and more just future for U.S. agriculture.

We are running out of time to take collective policy action before the most dire climate change scenarios become a reality. Climate change is, and will continue, spelling disaster for farming communities and communities of color who are on the frontlines of climate change impacts and highly vulnerable to unpredictable weather, severe storms, drought, pests, and disease. In our 2017 National Young Farmer Survey, 66% of respondents reported experiencing unpredictable weather, more severe storms, increased pest pressure, increased uncertainty in water supply, and/or increased rate of disease. We are pleased to see President Biden's executive order and the actions of Secretary Vilsack to center climate action at USDA.

NATIONAL YOUNG FARMERS COALITION

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But young farmers are also a resource in combating climate change. In our 2017 National Young Farmer Survey, three out of every four young farmers were already using sustainable practices. These land-based practices have been named by the National Academy of Sciences as some of the most cost-effective practices for carbon removal that are available today. Farmers stand witness to climate patterns and disruptions and can share unique and valuable insight into the impacts climate change is having on food production, ecology, and rural communities. **We need climate policy that acknowledges the exceptional climate leadership capability of our young farmers and communities of color.**

In our 2020 survey of policy issues, our members identified climate action as their number [one priority](#) and selected climate change as one of five pillars in our federal policy platform. Young farmers and ranchers are on the frontlines of the climate crisis, acknowledge the necessity of concerted climate action, and are committing their energy and their farms to form part of our national response to this emergency. **They wish for comprehensive climate legislation and administrative action that provide resources to the young farmers and farmers of color who will combat climate change and build resiliency on their farms across the country.**

The following recommendations are based on the results of our [2017 National Young Farmer Survey](#), advice from our 15 farmer member policy committee composed of regional representation, numerous conversations with our farmer members, and a national policy survey we conducted in 2020 to understand our farmers' policy priorities.

Governance, Engagement, and Oversight

The climate crisis is the result of long-standing market failures to account for environmental externalities, a discounting of the future that young people will inherit, and the systematic disenfranchisement and marginalization of frontline communities of color who are already suffering the impacts of the climate crisis. We believe that any climate policy that is equal to the task of counteracting climate catastrophe, that provides for equitable resilience, and comprehends the community impact of climate inaction requires governance, stakeholder engagement, and oversight processes that provide accountability and decision-making power to those most impacted by the crisis.

We recognize that racial equity, climate justice, and land justice must constitute the base upon which all other policy and programmatic work stands. We know that federal policies have reinforced the systemic racism that encumbers BIPOC (Black, Indigenous, and other People of Color) farmers in almost every aspect of life, and we recognize the specific role our agricultural policy has played in perpetuating discrimination against communities of color and limiting opportunities for these communities to access the land and resources they deserve. As a result of agricultural policy, we have an agricultural landscape in which 98% of land is held by white people and 95% of farmers are white. It is imperative that we implement climate action policy

with a climate justice lens to avoid agricultural policies that further ingrain discrimination and perpetuate inequitable access to climate resilience.

As a result, we strongly advocate for governance, stakeholder engagement, and oversight processes that support our farming communities' engagement in policy development and implementation. We recommend:

- **Creation of a climate advisory committee on climate action at USDA with positions allocated for young farmers, farmers of color, and farm workers.**
- **Requirement of program evaluation practices that define program impacts on farming communities with demographic information.**
- **Regular reporting practices and engagement processes to inform farming communities of new climate policy.**
- **Resourcing of outreach to BIPOC farming communities and farm worker communities through organizations led by representatives of these constituencies.**

Climate-Smart Agriculture Research, Practices, and Definitions

As USDA moves to define and champion climate-smart agriculture practices, we urge the Department to adopt established agroecology frameworks and focus on the long-term application of resilience theory principles and outcomes to our broader food and agriculture system. We believe climate action should be science-based and data-driven while prioritizing the experiences of Indigenous and traditional knowledge systems that have proven histories of placing human enterprise in right relationship with the environment.

The value of the practical experience which farming communities possess cannot be overstated. We cannot discount this expertise or minimize its potential contributions in our efforts to reorient our agricultural practices to natural resource boundaries. And climate policy must work to amplify the innovative capacity of these farming communities and resource the natural innovation of “farm laboratories” all across the country. Farmers will be essential to responding to climate change, particularly through a greater emphasis on building soil health. The stacking benefits of soil health practices create climate resilience by increasing organic matter, improving soil structure and fertility, reducing erosion, and improving water quality and infiltration. We must center Indigenous knowledge and practices, such as use of perennial crops, conservation tillage, fire management, rotational grazing, and cover cropping, which have protected soil and water resources for centuries and will be key to addressing the current crisis. We must acknowledge that regenerative practices utilized today are rooted in Indigenous practices that have protected soil and water resources for centuries.

USDA should prioritize climate research, including research that helps small-scale, diversified farmers implement conservation practices and measure their climate mitigation impacts led by and for farmers. Programs like Sustainable Agriculture Research and Education (SARE) and On-Farm Conservation Innovation

Trials (On-Farm Trials) part of the agency's Conservation Innovation Grant (CIG) are important opportunities for young farmers and farmers of color to engage in innovative pilot and research opportunities. They should be an expansion of extension services and technical assistance to producers on sequestering carbon and adapting to the changing climate. We need collaborative knowledge production and sharing from frontline communities and farmers so we can expand platforms for climate knowledge sharing through climate hubs, extension programs, and land-grant universities.

When considering research, definitions, and prioritizations of climate-smart practices, we recommend the following:

- **Climate-smart agriculture definitions should prioritize practices that afford the greatest climate benefit, like incorporating cover crops, perennial crops, managed grazing of perennial pasture, and soil health.**
- **Indigenous communities should be supported in gaining greater land sovereignty, and their traditional land management practices should be recognized as powerful tools to enhance climate resiliency.**
- **USDA should prioritize climate research, including research that helps small-scale, diversified farmers implement conservation practices and measure their climate mitigation impacts led by and for farmers.**

USDA Program Resourcing, Design, and Implementation

Budgets and monetary allocation represent our priorities. There is a huge imbalance in monetary support towards programs that encourage farming practices that are currently contributing to climate change. We hope to see a transition of those programs' funding towards climate-smart agriculture with the goal of eventually dissolving these programs and creating a cultural shift in what programs and practices USDA supports.

Additionally, the design of many USDA programs and their implementation deters participation from young farmers, BIPOC farmers, and farm workers. We applaud ongoing efforts by the USDA to modernize options for accessibility and the current Administration's commitment to addressing systemic discrimination in programming. The creation of new climate agriculture programs and the modification of existing programs provide an important opportunity to correct these design flaws. Climate agriculture programs or modifications that do not encourage a new generation of farmers to participate presents an obstacle to the fulfillment of our climate agenda.

The USDA must prioritize design and modification of new and existing programs to resource these farmers and expand accessibility. This effort will require a series of tactics and approaches to be successful. Program design will need to be coupled with intentional outreach, and outreach will require resourcing and trust-building. These are not ancillary concerns - these are foundational to the operationalizing and adoption of climate programs. To support the next generation of farmers and ranchers, transition productive farmland, and revitalize our nation's rural communities, considerable progress must still be made in the way USDA serves young farmers, who are its customers, stakeholders, and land stewards of the future. In our 2017 survey, we asked

farm owner participants what, if any, challenges they had encountered accessing federal programs. Forty percent said the application and paperwork were too burdensome. Another 30% said they were unfamiliar with the federal programs listed, and 28% said their local staff had been too difficult to work with. Access to federal financial and technical assistance programs remains a significant barrier to the adoption of on-farm conservation practices.

Thankfully, the USDA has experience developing programs that benefit a new generation of farmers. Our 2017 national survey indicates that the NRCS EQIP High Tunnel System Initiative, for instance, was the most used federal program among young farmers. Thirty-nine percent of farm owner respondents reported using this program. The high tunnel initiative is an excellent example of using an existing conservation program to improve young farmer access to competitive cost-share funds, create positive conservation outcomes, and improve farm viability in the process.

To ensure USDA climate programs will be effective, we recommend the following:

- **Include set asides for awards and outreach to young farmers and farmers of color for programs that were created and will be created to directly address climate change in agriculture.**
- **Improve training to make field staff more aware of the challenges young farmers face and the business models and farming practices they use.**
- **Increase the number of USDA staff specifically dedicated to beginning farmer outreach at NRCS and in other conservation program offices.**
- **Modify program terms and applications to be more flexible and scale-appropriate for young farmers including payment upfront instead of via reimbursement.**
- **Make beginning farmers more competitive in conservation cost-share programs by prioritizing them for awards.**
- **Make conservation programs like CRP accessible to land renters, cooperative enterprises, and different land size owners.**
- **Expand existing conservation programs and implement conservation stewardship practices as defined in the Climate Stewardship Act and the Agriculture Resilience Act.**
- **Revise the final rule for the Conservation Stewardship Program (CSP). The rule makes updates to the popular conservation program as directed by the 2018 Farm Bill and failed to integrate critical feedback from agricultural producers and other stakeholders.**
- **State beginning farmer and rancher coordinators should be full-time employees dedicated to increasing young farmers' access to federal farm programs, especially programs related to land tenure and conservation, like the NRCS EQIP High Tunnel System Initiative.**

Refrain from Carbon Market Mechanisms or Significantly Bolster Oversight

USDA should focus on programs that have a track record of success. We are concerned that carbon markets will mostly benefit agribusiness and large farm operations, and will lack accountability and transparency. Agriculture offset markets already don't work for most farmers. They don't pay farmers fairly and they are tightly controlled by a handful of companies that dominate the market, thus increasing consolidation and reducing market opportunities. If a carbon bank is inevitable, **USDA's ARS and ERS should jointly regulate an emerging carbon market to ensure this mechanism is overseen by the public sector.** These agencies will ensure that standards are rigorous and are measuring sequestration at appropriate soil depths and with regularity. Corporations positioned to benefit from buying or selling carbon credits should not be the main regulators. Taxpayer dollars fund USDA to benefit the public good; mitigating climate change through food production certainly goes toward the public good.

It would be a mistake to commodify carbon the way we have commodified agricultural products. Small scale, intentional stewardship is what will yield the greatest, longest lasting impacts and will be most equitable for farmers. Small scale, diversified farmers, including young farmers and farmers of color who have faced systemic discrimination at the hands of USDA and have been historically underserved and excluded, will not be well served by this model. Farmers and ranchers should be invested in as stewards of the land, not as a carbon sink for corporate polluters.

Thus, **carbon sequestration should be seen as an important factor in climate action but not the only factor in evaluating success.** New investments should focus on ecological benefits and related factors, including increases in the overall resilience of farm and food systems. We hope to see a focus on payments, financial rewards, and incentives for ecosystem services, ecological benefits, and adopting climate-friendly and conservation practices.

Prioritize Land Research as Complementary to Climate Action

Secure land access is the primary barrier keeping young farmers from leading climate solutions. Capital and labor that could be deployed to build climate resilience is instead sunk in land rents and acquisition costs, and instability of access prevents investments in climate change mitigation.

Land that is properly stewarded plays a critical role in climate change mitigation and resilience. Project Drawdown estimates that by minimizing soil disturbance, maintaining soil cover, and managing crop rotation, farmers around the world have the potential to reduce carbon dioxide emissions by 9.4-13.4 gigatons per year.

Yet, accelerating trends of farmland loss and development are occurring disproportionately on soils rated highest for productivity, versatility, and resiliency. The impacts of climate change are also degrading the soil on remaining, more marginal lands through processes of erosion, salinization, desertification, and disruption of water

cycles. Policy must value the contributions of farmers to building resilience in the face of the climate crisis and ensure farmers have the land security they need.

USDA should immediately implement and complete the National Agricultural Statistics Service survey of land ownership as a baseline to measure the impact of any payments for ecological services on land tenure, including changes in the incidence of land held in undivided interests and absentee ownership. USDA is still pending administration action on enacting the 2018 Farm Bill Relending Program to Resolve Ownership and Succession in Farmland. This fund would help cover legal costs and succession plans to secure land ownership by farmers of color.

Voluntary adoption of climate-smart agricultural practices

Young farmers and farmers of color are already more likely to adhere to climate-smart agricultural practices. Focus should center on expanding and supporting the number of young farmers and farmers of color already following climate-smart agriculture guidelines. These farmers are essential to creating peer-to-peer support, multigenerational and multiracial education, and awareness of voluntary adoption of climate-smart agriculture. They should be compensated and recognized for this labor/service.

Many young farmers across the country are employing climate-smart strategies not only out of a sense of environmental urgency, but because they make the most economic sense for their farm businesses over the long term. In the short-term, however, these practices are expensive to implement, and therefore government support can bolster young farmers' businesses in the critical start-up years. The increased consumer demand for sustainably grown products, savings on inputs and irrigation achievable with improved soil health, and profits attainable through integration of on-farm renewable energy production are only a few of the many opportunities for boosting farm income. Again, investing in programs critical to young farmers and farmers of color will increase climate-smart agricultural practices and increase their viability.

An unpredictable climate future, coupled with the existing high barriers to entry for beginning farmers—including burdensome student loan debt, land access challenges, limited capital, unaffordable health insurance, and non-citizen status—will further deter talented young people and people of color from launching careers in climate-smart agriculture. **USDA should invest in intersectional issues beyond the farm gate to support young people and people of color transitioning to agriculture, such as affordable college education in the agricultural sciences and apprenticeship programs.**

Programs like the Beginning Farmer and Rancher Development Program (BFRDP) and the Outreach and Assistance for Socially Disadvantaged and Veteran Farmers and Ranchers Grant Program (also known as the “2501 Program”) should be expanded. These grantees are well positioned to support and provide technical assistance as community-based entities that have developed the trust of

farmers and can help them navigate the full suite of conservation programs. We also suggest an expansion in cooperative agreements at FSA and NRCS, so community-based entities are at the frontlines of recruiting and enrolling farmers in conservation programs.

Conclusion

We appreciate this opportunity to share our insights and recommendations with you. We are willing to answer any questions you may have and to offer our assistance on refining and implementing a vision that reorients our current food and agriculture systems to one that is resilient, productive, and equitable.