Recommendations for a USDA Climate Strategy

Docket No. USDA-2021-003

These comments from the Ohio Ecological Food and Farm Association (OEFFA) reflect deep appreciation for the efforts of the current administration to prioritize the issue of climate change through a comprehensive Climate Strategy. This includes addressing the role of agriculture in mitigating and adapting to climate change while also working toward greater resilience in the food system. These are mutually synergistic goals.

OEFFA is a grassroots coalition of more than 4,200 farmers, gardeners, retailers, educators, and others working to build a healthy food system that brings prosperity to family farmers, safeguards the environment, and provides safe, local food. We have been accredited by USDA as an organic certification agency for almost 20 years. and we certify more than 1,280 organic producers and food processors, in a twelve-state region. The remainder of our farmer members include regenerative, sustainable producers committed to our mission.

We understand that you will be inundated with tremendous amounts of data, opinion, policy and programmatic suggestions. To that end, we have kept our comments as succinct as possible. We can provide data sources and additional detail upon request.

Thank you in advance for taking the time to hear from a sustainable agriculture organization that has been doing work to support farmer best practice for more than 40 years. Our comments on focus on your request for information in two areas: Climate-Smart Agriculture and Environmental Justice and Disadvantaged Communities.

Existing policies and programs that can be utilized today to encourage voluntary adoption of agricultural practices that sequester carbon, reduce greenhouse gas emissions, and ensure resiliency to climate change.

There is so much good news in that USDA currently has existing programs and authorities available to encourage the voluntary adoption of climate friendly agricultural practices that address the specific goals outlined in this docket. Before outlining those existing tools, we must underscore the importance of a holistic approach to this issue. There are individual practices that can and are already incentivized that are "climate friendly". Many of these practices are currently funded through the Environmental Quality Incentives Program (EQIP) and the Conservation Stewardship Program (CSP). There are programmatic changes in emphasis and allocation that can be made within these programs to support more climate friendly practice and it cannot be overemphasized how important it is that ***whenever and wherever possible, USDA support the use of suites of practices that, working together total more than the sum of their individual impacts.***

The premier example of a ***voluntary system*** of agricultural practices that sequester carbon and reduce greenhouse gas (GhG) emissions in addition to reducing water pollution, increasing the resiliency of agriculture and its adaptability to climate change, ***is certified organic management systems***. The USDA National Organic Program (NOP) has more than 20-years of experience enforcing rigorous regulations related to soil health, water quality, and biodiversity in a holistic, ecological manner.

The management practices associated with organic agriculture focus on soil building techniques and reducing the need for ***off-farm inputs*** which ***are a persistent emitter of nitrous oxide, a long-lived greenhouse gas (GhG)***. N2O emissions from soils comprise 50.4% of all domestic agricultural emissions and are a long-lived GhG and ozone depleter, with 310 times the global warming potential of carbon dioxide. ***Synthetic pesticides disrupt nitrogen fixation and inhibit soil life.*** The absence of these pesticides in the soil allows diverse organisms and beneficial insects to decompose plant residues and help sequester carbon.

According to renowned Researcher Dr. Rattan Lal, Director of Ohio State University's Carbon Management and Sequestration Center, the world's cultivated soils have lost between 50 and 70 percent of their original carbon stock, much of which has oxidized upon exposure to air to become CO2. Carbon is the main component of soil organic matter and helps give soil its water-retention capacity, its structure, and its fertility.

Many of the practices delineated in the Organic standards are consistent with climate-smart agriculture best practice.

- Organic regulations (§205.203) require the implementation of soil fertility and crop nutrient management practices to maintain or improve soil such as crop rotations, cover cropping, and the application of plant and animal manures.
- Cover crops, routinely planted by organic farmers after harvesting cash crops, rebuild soil nitrogen and improve carbon sequestration by adding soil organic matter. Planting deep-rooted cover crops like forage radish or cereal rye further aid in the long-term sequestration of carbon.
- Compost is an important organic farming soil amendment and, when used judiciously and in combination with cover crops, accrues more soil organic carbon than when used alone.

Healthy soils are a cornerstone for organic farmers and an important factor in reducing GhG emissions. As biologically active soils break down crop residues, they release carbon dioxide and nutrients. Stabilized soil organic carbon that adheres to clay and silt particles or resists decomposition is sequestered and can remain in soils for decades or longer.

Long-term studies conducted at the Rodale Institute demonstrate both the increased water holding capacity and the better water infiltration of organically managed soils which is also key to the kinds of adaptations necessary for farmers to survive and thrive in the years ahead. Organic farming practices also help mitigate climate change by keeping roots in the soil, preventing soil erosion, and sequestering soil carbon.

Research has also shown that ***if the standard practices used by organic farmers to maintain and improve soils were implemented globally, it would increase soil organic carbon pools by an estimated 2 billion tons per year – the equivalent of 12% of the total annual GHG emissions, worldwide***. While individual practices such as cover cropping and reduced tillage can accrue measurable amounts of SOC, integrated systems of practices based on sound agro-ecological principles have the greatest potential to mitigate agricultural GHG emissions, sequester and stabilize SOC, and attain the full measure of a productive and resilient agriculture.

To maintain the integrity and viability of this voluntary and holistic system of sustainable agriculture, USDA should prioritize rulemaking that, despite broad support, has not been advanced. Specifically, the Organic and Livestock Poultry Practices Rule, the Origin of Livestock Rule and the newly developed Strengthening Organic Enforcement Rule. We cannot maintain the viability of the organic marketplace and the continued participation of growing ranks of certified organic farmers without a strong base of voluntary standards that is consistently enforced. ***Advancing organic rulemaking must be a high priority.***

Abandon the policy that USDA cannot extol the benefits of organic management and promote the good work that is being done by organic producers across the country. The research and field data are conclusive enough to warrant the USDA making significant investments in the National Organic Program. USDA can and should promote organic management systems as a proven approach to addressing climate change and create a plan for significant increases in organic research at the Agricultural Research Service and National Institute for Food and Agriculture to a minimum of 6% by 2024 with an emphasis on climate mitigation. ***It is vital that USDA reframe organic agriculture as a leading tool for addressing the climate crisis and other environmental and natural resource concerns.***

We also urge USDA to ***restore organic enhancements under CSP, revisit the process for determining and establishing stewardship thresholds, and address the low payment rates for certain climate-friendly practices under CSP.*** The new NRCS Chief should direct the Program division, and the Science and Technology division as needed, to make these changes in time for inclusion in the FY 2022 enrollment process materials**.**

There are certified organic farmers who go above and beyond the standards in the National Organic Program and focus on regeneration and there are also sustainable/regenerative farmers that may never certify but see the need for a holistic, systems-based approach to farming and are using integrative suites of practices that are critical to addressing climate impacts in and on agriculture. All of these farmers need to be supported in the most holistic manner possible and those broader recommendations are detailed below.

- ***Establish Climate Mitigation and Resilience as a Resource Concern throughout NRCS conservation programs,*** a nationwide Priority Resource Concern for the Conservation Stewardship Program (CSP), a top priority throughout USDA intramural (ARS) and extramural (NIFA) research programs, and an actuarial factor in RMA crop insurance programs.

- ***Allow for greater economic use for the cover crop conservation practice and all of the cover crop conservation enhancements under federal conservation programs.*** Current NRCS policy includes restrictions on whether a producer can graze cover crops under the cover crop conservation practice standard (CPS 340) and multiple cover crop enhancements. We urge NRCS to reconsider these restrictions and modify the practice standard and enhancements to allow for grazing of cover crops in a way that preserves the conservation benefits of cover crops but allows for their economic use as well. Language is needed to clarify that grazing cover crops can enhance soil organic matter and soil health benefits. This will encourage adoption across farming operations and reintegrate livestock into cropping systems, enhancing the carbon sequestration potential of agricultural soils.

- ***Eliminate cover crop termination guidance and leave determination of when and how to terminate cover crops up to the farmer with help from NRCS if needed.*** One of the biggest

barriers to planting cover crops is the fear that putting in a cover crop will cause a loss in crop insurance coverage, and farmers have been denied indemnity payments precisely for this reason in the past. Farmers have the best understanding of their land and need to be able to optimize the ecological benefits on-farm by deciding when to terminate cover crops. RMA can take steps now to incentivize the implementation of cover crop practices by revoking the current cover crop termination guidance and provide information and support for good cover crop practices.

- ***Modify the Good Farming Practices definition and handbook to clarify that all NRCS conservation practices and standards are Good Farming Practices (GFP) without exception or caveat.*** Farmers who implement conservation practices and enhancements in line with NRCS standards should not conflict with RMA rules as a result. Conservation is a key element of risk management and RMA rules and policies should reflect this understanding. The fact that RMA and NRCS, two Farm Production and Conservation (FPAC) agencies, often give farmers contrary recommendations must end.

- ***End payments for new or expanding concentrated animal feeding operations.*** Liquid manure storage facilities are a major driver of increased total U.S. agricultural greenhouse gas emissions and threatens water quality and drinking water safety. NRCS has a responsibility to protect natural resources and the environment, so it is extremely problematic that the agency has continuously supported and subsidized the expansion of these operations in areas already at high environmental risk and that disproportionately impact communities of color.

For deeper understanding of these issues we refer to the report from the National Sustainable Agriculture Coalition, "Agriculture and Climate Change" Policy Imperatives and Opportunities Help Producers Meet the Challenge" https://sustainableagriculture.net/wp-content/uploads/2019/11/NSAC-Climate-Change-Policy-Position_paper-112019_WEB.pdf ,which offers considerable scientific detail regarding the role that organic and regenerative farming has to play in the climate crisis.

New strategies USDA can explore to encourage voluntary adoption of climate-smart agriculture and forestry practices include:

- Create a new CRP agroforestry initiative to encourage transition to perennial production; and
- Offer premium subsidies for the adoption of climate-smart regenerative agricultural practices.
- Increase the minimum payment for participation in the Conservation Stewardship Program and rewrite the CSP rule to emphasize and encourage the holistic systems of practices that work synergistically to address climate and ecological health.
- Expand the SARE program to include a $50 Million a year Ag Resilience initiative for farmer-led innovative research, demonstration, and adoption.

Promising legislation has been introduced which will set clear goals for reduction in agricultural-related climate emissions, invest in related research, prioritize soil health, farmland preservation and viability, pasture-based livestock, on-farm renewable energy and reduction of food waste. ***The Agricultural Resilience Act should be advanced and supported*** as it is a comprehensive approach that brings together many needed pieces in one package.

It has been suggested in the past that ***USDA create a National Food Strategy***. While this may seem beyond the scope of this request for information, we have developed national strategies for issues of concern and, in fact, this call for information is a request to do just that for climate change in response to President Biden's Executive Order 14008 of January 27,2021. We would be remiss if we did not recommend the administration take this opportunity to be proactive on a national food strategy to address food system regulatory challenges that would encourage the sustainable agriculture practices and systems necessary to sequester carbon, limit other harmful GhG, and build a resilient food system that is also able to respond more effectively to climate (and other) food system disruptions. For more information see "Making the Case for a National Food Strategy in the United States", by Laurie J. Beyranevand & Emily M. Broad Leib: https://dash.harvard.edu/handle/1/33014764. Additionally, this should be kept in mind as the American Jobs Act/Infrastructure efforts move forward. The role of local and regional food systems and job creation is often undervalued. Food system work is recession-proof and investing in regional food systems infrastructure would contribute to an effective and holistic climate-smart agriculture strategy.

Partners and stakeholders, including State, local and Tribal governments and the private sector can work with USDA in advancing climate-smart agricultural and forestry practices.

States across the country are currently serving as land and policy laboratories to advance effective soil health practices which are foundational to address climate change. The National Healthy Soils Policy Network: https://calclimateag.org/national-networks/ is a collective of those efforts and can serve to inform and partner with federal efforts in terms of what has worked in differing regions, and political environments. All too often these efforts stall due to budget limitations. USDA can be a key catalyst in these efforts by providing a federal funding match for state, local and tribal efforts to improve soil health and mitigate climate change.

Examples of this work include:

- Kansas Rural Center is building a cohort of farmers to refine and help advance HB 2640, a bill that proposes a tax incentive for those employing carbon farming practices. Utilizing survey methods, KRC will reach an even larger group of farmers to understand needs around farming for soil health.

- Maine Farmland Trust will engage a four-member advisory council, comprised of farmers that represent the diversity of Maine's agricultural sector, to advise them as they continue their shaping healthy soils recommendations to be considered in the state's revised Climate Action Plan.

- Illinois Stewardship Alliance continues work with the farmer-led Soil Health Caucus (SHC), hosting a series of virtual workshops aimed at SHC leadership development on the topics of racial equity and agricultural policy, the politics of soil health, and building power for the 2021 focus on SB 3462 – the Partners for Nutrient Loss Reduction Act.

- OEFFA is working with other farmer-focused organizations, conservation groups, soil and water conservation districts, land grant universities and farmers to advance a state task force to review the issues faced in our diverse landscape, including the nutrient loading in Lake Erie, legislation enacted in other states and develop an Ohio plan for how to incentivize climate friendly soil health practices.

Private sector partners committed to regenerative and organic practices are valued in incentivizing the systems of production that provide public benefits and minimize the negative externalities of which climate change is just one.

How can USDA help support emerging markets for carbon and greenhouse gases where agriculture and forestry can supply carbon benefits?

USDA can be most helpful in this area by conducting thorough analysis of the past and current market mechanisms, any positive outcomes achieved, the shortfalls of these programs and how those lessons learned can be applied to this iteration of carbon markets. It is important first and foremost that the USDA be able to verify that Carbon Markets will achieve the net reduction in GhG emissions necessary to meet targets and ensure we, or future generations, do not face catastrophic consequences. USDA action should focus on building resilience and zeroing-out the GhG footprint of agriculture prior to aiding other sectors and industries through carbon offsets.

OEFFA greatly appreciates the focus of the Biden administration on addressing racial inequities. Far too often it has been low-income communities of color that have borne the brunt of fossil fuel industry pollution. Allowing offsets that enable industry to continue the status quo will perpetuate the environmental injustice of their situation and continue the racial inequity, health, and economic consequences they experience.

What data, tools, and research are needed for USDA to effectively carry out climate-smart agriculture and forestry strategies?

We request the USDA increase resources for the regional climate hubs in line with the recommendations of the Biden administration American Jobs Plan. The combined leadership of the Agricultural Research Service and Forest Service Senior Directors in partnership with other programs including the Natural Resources Conservation Service, Farm Service Agency, Animal and Plant Health Inspection Service, and the Risk Management Agency provides the kind of cross-agency collaboration that is important in analyzing trends, informing policy and providing information, technical assistance and programmatic support. As stated by USDA, "The Climate Hubs link USDA research and program agencies in regional delivery of timely and authoritative tools and information to agricultural producers and professionals."

We see the need for this important resource growing and yet the awareness of this resource on the ground, among farmers, is limited.

How can USDA encourage the voluntary adoption of climate-smart agricultural and forestry practices in an efficient way, where the benefits accrue to producers?

OEFFA has provided organic and sustainable agriculture education to farmers for over 40 years. Based upon that experience, and reaffirmed in in recent farmer forums, one of the best ways to encourage adoption of best management practices is through peer learning. Farmers seeing both the successes and failures of other farmers is incredibly instructive and quite often farmers in the field are pioneering sustainable practices and are open to on-farm demonstration projects.

Direct technical assistance from and to farmers will be critical in the years ahead. The variability of climate change in regions across the country may make regional demonstration projects, research and peer learning more important than ever before. While we need the peer reviewed research to inform

and test climate-smart agriculture and forestry practices, working directly with producers is an efficient way to ensure effective practice adoption.

Environmental Justice and Disadvantaged Communities Questions

A. How can USDA ensure that programs, funding and financing capabilities, and other authorities used to advance climate-smart agriculture and forestry practices are available to all landowners, producers, and communities?

B. How can USDA provide technical assistance, outreach, and other assistance necessary to ensure that all producers, landowners, and communities can participate in USDA programs, funding and other authorities related to climate-smart agriculture and forestry practices?

C. How can USDA ensure that programs, funding and financing capabilities, and other authorities related to climate-smart agriculture and forestry practices are implemented equitably?

Identify and empower communities of color, at all stages of the process from initial assessment, the development of policies and programs, through implementation and evaluation. This includes people within historically disadvantaged populations and in communities that are experiencing environmental injustices, as well as people who have experienced USDA specific discrimination in credit and conservation programming to inform the agency on how to best overcome the barriers they did and do face. Set aside a dedicated source of funding for these communities.

Engage a diverse array of farm groups in gathering input and disseminating data and resources for farmers. Ensure that there is adequate funding to support effective engagement at the community level and to reach farmers of all production types and scales. Partner with the individuals and groups that have existing relationships with these communities and with sustainable education providers.

Empower and when necessary, train these individuals and organizations to conduct the outreach and provide support and technical assistance to the communities where they live and work.

Work together among USDA agencies to outline and promote a suite of services and programs specifically tailored to serve disadvantaged communities. Cross-train agency staff to be able to speak to programs within other agencies well enough to connect producers, landowners, and community members to other USDA staff who can be of assistance in meeting the needs and goals of the stakeholders. Create continuity of service among USDA departments to increase access to related programs which dovetail for climate, soil, and therefore community health.

This may require the USDA NRCS, FSA, and RMA to conduct a dedicated hiring initiative for this purpose; it is an effort worthy of investment.