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Public Comments Processing
Attention: USDA-2021-0003
Office of the Chief Economist
U.S. Department of Agriculture

Submitted via regulations.gov

Re: USDA's Climate-Smart Agriculture and Forestry Strategy
Docket No. USDA-2021-0003

To the U.S. Department of Agriculture,

On behalf of the National Audubon Society (Audubon), and its 1.8 million members and 17 state and regional offices across 29 states, we submit these comments in response to the January 27, 2021 *Executive Order on Tackling the Climate Crisis at Home and Abroad*.

Audubon is an organization dedicated to protecting birds and the places they need, now and into the future, through advocacy, science, education, and on-the-ground conservation. Audubon's 2019 *Survival by Degrees*[1] report shows that climate change is the greatest threat to North American birds, with nearly two-thirds of species at risk of extinction if greenhouse gas (GHG) emissions continue at their current pace. These declines are predicted because of rapid shifts in and loss of suitable habitat for individual species, and are amplified by other threats like sea-level rise, and extreme weather events like drought, fire, flood, and false springs. Outcomes improve for 76% of imperiled species if warming is limited to 1.5 degrees C rather than 3 degrees C, but maintaining and restoring places that are important for birds will be critical to their survival.

Many of the places on which birds will continue to depend are around farms, rangelands, and forests. Birds are critical pieces of these ecosystems, serving as pollinators, controlling pests, and providing ecological linkages. Management decisions that aim to reduce emissions or increase carbon sequestration should be made with bird habitat in mind, as well as other co-benefits like improved soil health, reduced runoff, and increased resilience. Audubon has a history of working alongside private landowners on voluntary conservation practices, including through the Audubon Conservation Ranching Initiative (ACR)[2] and the Bird-Friendly Maple Project.[3] ACR rewards ranchers that adopt specific protocols—including a custom habitat management plan, regenerative grazing practices, and prioritization of native grasses—through a certification program that allows those ranchers to market their products to environmentally conscious consumers. ACR has certified 70 ranches on more than 2

[1] https://nas-national-prod.s3.amazonaws.com/climatereport-2019-english-lowres.pdf
[2] https://www.audubon.org/conservation/ranching
[3] https://vt.audubon.org/conservation/working-lands/landing/bird-friendly-maple-project

million acres of land across 13 western states, with enrollment expected to reach four million acres in June 2021. The Bird-Friendly Maple Project certifies maple syrup producers in Vermont that adopt management practices that are good for birds. Audubon has also worked with private forest managers to help adopt bird-friendly management of forests in North Carolina through outreach, financial assistance, tools, and training.[4] Audubon advocates for pioneering state-level programs to provide grants to farmers to reduce emissions and increase carbon sequestration.[5] These projects demonstrate a deep commitment to creating incentives for private landowners to adopt voluntary practices that are verifiable and not overly burdensome.

Audubon has also been the recipient of funding through Farm Bill Conservation Title programs. For example, in 2016, Audubon California received funding through the Regional Conservation Partnership Program (RCPP) to partner with farmers to protect Tricolored Blackbird colonies in the Central Valley.[6] Audubon also received funding in 2017 through the Conservation Innovation Grant (CIG) program and in 2020 through the RCPP Alternative Funding Arrangement to support ACR.[7]

Audubon submits the following responses to the questions supplied by USDA following the January 27 Executive Order:

1. Climate-Smart Agriculture and Forestry Questions

A. How should USDA utilize programs, funding and financing capacities, and other authorities, to encourage the voluntary adoption of climate-smart agricultural and forestry practices on working farms, ranches, and forest lands?

1. How can USDA leverage existing policies and programs to encourage voluntary adoption of agricultural practices that sequester carbon, reduce greenhouse gas emissions, and ensure resiliency to climate change?

Double Funding for and Refocus Conservation Title Programs: Programs such as the Environmental Quality Incentives Program (EQIP), Conservation Stewardship Program (CSP), Agricultural Conservation Easement Program (ACEP), and Regional Conservation Partnership Program (RCPP) have a history of success in achieving conservation benefits through incentives. These programs remain popular and oversubscribed, with applications funded at just 27.7% for EQIP in FY19, 36% for ACEP Agricultural Land Easements (ALE) in FY19, and 33% for RCPP between FY14 and FY18. Funding is set through the Conservation Title of the Farm Bill every five years; however, USDA should make Congress aware of the need to increase funding outside of Farm Bill cycles so that USDA can rapidly increase enrollment, and of the potential conservation that could be realized through doubling funding for each of the programs.

- Carbon sequestration and emissions reductions should be added as an explicit programmatic purpose and evaluation criteria for ACEP, CSP, EQIP, and RCPP. USDA should make Congress aware of how these changes to the programs could enhance adoption of climate-smart practices.
- USDA should target ACEP at working grasslands, which have become some of the most reliable and resilient carbon sinks. UDSA should also allow for 100% federally funded acquisitions for

[4] https://nc.audubon.org/landing/forest-legacy-landbird-project-0
[5] https://wa.audubon.org/news/growing-support-sustainable-farms-and-fields
[6] https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/programs/financial/rcpp/?cid=nrcseprd1481028
[7] https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/newsroom/releases/?cid=NRCSEPRD1332211

high priority lands for climate mitigation and resilience. Currently, the match is 50% or 75% depending on lands acquired, with a 100% match only available for wetlands.

- RCPP has unrealized potential in advancing climate mitigation and resilience.
    - In the short term, NRCS should direct some grants each year to partnerships that advance conservation innovation and climate solutions on working lands. USDA should issue guidance to promote conservation innovation by prioritizing applications that combine existing covered conservation practices with innovative ones that build climate resilience. Funding for innovative practices was authorized by statutory authority in the 2018 Farm Bill, but NRCS has only accepted RCPP proposals for covered practices to date.
    - Guidance should remove the RCPP's blanket limitation on Technical Assistance (TA) funding to partners, and instead tailor TA funding to support successful adoption of climate resilience strategies on working lands within an RCPP, as authorized by new RCPP statutory authority in the 2018 Farm Bill. In addition, drawing distinctions between "TA-E" and "TA-I" for tracking and reporting time adds unnecessary complexity and imposes undue burdens on agency staff and partners, and should thus be eliminated.
- USDA should issue guidance to prioritize EQIP and CSP projects that incorporate or center on conservation practices that increase soil carbon and soil health in project ranking and selection. Focus on soil health will help improve water absorption and retention and protect against drought, as well as produce other co-benefits.
- Doubling the funding for these conservation programs will also begin to meet producer needs for TA, enhance soil health, and begin to meet producer demand for the suite of Conservation Title programs noted above. USDA can also improve drought resilience through effective implementation of the 2018 Farm Bill's new authorization for irrigation water delivery infrastructure investment with water management entities (WME).

Increase Enrollment and Acreage for the Conservation Reserve Program: As of November 2020, the Conservation Reserve Program (CRP) had 20.7 million acres enrolled,[8] well below the 25 million acre cap set for FY21, and down from a peak of 36.7 million acres in 2007. CRP is critically important for reducing soil erosion, improving bird habitat, and sequestering carbon. USDA should work to quickly enroll four million acres to reach the cap, with mind to the additional 3 million acres expiring in October 2021. USDA should increase rental rates and incentive payments to drive enrollment. USDA should make Congress aware of the potential benefits of increasing the CRP acreage cap to

- Carbon sequestration and emissions reductions should be added as an explicit programmatic purpose and evaluation criteria for CRP. USDA should make Congress aware of how these changes to the programs could enhance adoption of climate-smart practices.
- USDA should aim to increase enrollment of conservation practices that have high carbon sequestration value through the creation of a climate incentive payment. Monitoring of the carbon sequestration benefits of eligible practices should be expanded, with results eventually informing the rates for the incentive payments.
- USDA should seek to increase enrollment in the Bottomland Hardwood Trees Initiative because of the potential for high carbon sequestration as well as other co-benefits such as unique wildlife habitat and flood control.[9] Bottomland hardwood forests have been reduced to about 40% of their historic range, including a decrease from 10 to 2.8 million acres in the Mississippi

[8] https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/Conservation/PDF/crp-summary-nov-2020.pdf

[9] https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/FactSheets/archived-fact-sheets/bottomland_hardwood_trees_initiative_jul2015.pdf

Alluvial Valley. Additional resources and outreach, and increased payments should be provided to increase enrollment in this program.
- USDA should allow for longer term continuous CRP contracts in order to incentivize longer term carbon savings.
- USDA should expand measurement and monitoring of carbon sequestration on lands enrolled in CRP to help refine practices.

Many of Audubon's priorities around CRP expansion were addressed in the changes announced by Secretary Vilsack on April 21, 2021.[10]

Expand the Healthy Forest Reserve Program: The Healthy Forest Reserve Program (HFRP) provides private forest owners with resources to restore their lands for improved wildlife habitat or carbon storage. HFRP is a good candidate for expansion because climate mitigation is already an explicit programmatic goal; however, HFRP is only available in 12 participating states, does not have mandatory funding, and requires partnership with an individual or a Tribe. HFRP should be expanded nationwide and eligibility should be opened up to entities such as land trusts, which are not currently eligible. Emphasis should be placed on long-term and permanent easements instead of 10-year agreements, to prioritize permanence of carbon sequestration. USDA should make Congress aware that current funding levels are inadequate, and should be increased to $100 million annually.

Focus on Urban Forestry: USDA's focus on climate-smart agriculture and forestry should not be limited to private lands and rural areas. Urban trees and forests are critical in mitigating air pollution, reducing the urban heat island effect, conserving energy, providing wildlife habitat, and increasing mental wellbeing. The Urban and Community Forestry Program can help increase the presence and health of urban forests, but USDA should inform Congress of the need for funding increases to $85 million annually to match the goals set by the most recent Urban Forestry Action Plan.[11]

- The program should be expanded to include a grant program prioritizing low-income, underserved, and environmental justice communities and neighborhoods in order to increase tree canopy cover and access to green spaces in these areas.
- USFS should coordinate with the U.S. Fish and Wildlife Service's Urban Bird Treaty Program,[12] which supports cities that carry out community-based conservation to address bird habitat loss, including through restoration of urban forests. Coordination of these efforts could help ensure that urban forestry efforts are sensitive to the needs of wildlife as well as people, including through the selection of native and regionally-appropriate species.

Support Existing State-level Climate-Smart Agricultural Programs: Some states are on the leading edge of developing grant programs to assist landowners in adopting climate-smart farming practices. For example, in 2020, Washington State's legislature created the Sustainable Farms and Fields grant program to support efficient and effective carbon-reducing and sequestration practices aimed at increasing the quantity of carbon stored in the land. USDA should fund programs like Sustainable Farms and Fields as pilot projects to demonstrate how a voluntary incentive program to climate-smart farming can be implemented at the state level and ultimately, at the federal level.

2. What new strategies should USDA explore to encourage voluntary adoption of climate-smart agriculture and forestry practices?

[10] https://www.usda.gov/media/press-releases/2021/04/21/usda-expands-and-renews-conservation-reserve-program-effort-boost
[11] https://urbanforestplan.org/wp-content/uploads/2015/11/FinalActionPlan_Complete_11_17_15.pdf
[12] https://www.fws.gov/migratorybirds/pdf/grants/UrbanBirdTreatyfactsheet.pdf

Create a National Grasslands Strategy: Less than 40% of historic grasslands remain intact in North America due to conversion for cropland and other uses.[13] These grasslands are important climate sinks because of their ability to hold carbon in their deep root systems. Many remaining grasslands have been degraded by invasive species, which lack deep roots and are prone to catastrophic levels of burning. Currently, certain programs such as ACEP and CRP directly address grassland conservation, but there is no national strategy to identify high-value grasslands for conservation, provide guidance on best practices, or direct funding in a targeted manner. USDA will miss an opportunity without an explicit focus on native grasslands and their carbon sequestration potential.

- USDA should create a comprehensive inventory of remaining native grasslands in order to identify areas of high conservation and climate value, and track conversion.
- Regardless of whether a national strategy is created, USDA should inform Congress of the need to expand Sodsaver nationally from its current six states in order to remove incentives for the tilling of native sod. Avoided conversion could decrease loss of topsoil, protect habitat, and result in substantial carbon savings.[14]
- ACEP Agricultural Land Easements (ALE) should be targeted specifically at working grasslands, with the federal share of easement acquisition increased from 75% to 100% for grasslands of special environmental significance. Technical assistance should be provided to help landowners re-seed lands with native grass and forb species, including matching landowners with seed suppliers that can produce ecologically appropriate mixes. Audubon's NATIVE program has helped create specific seed mixes for Arkansas in partnership with historically underserved farmers thanks to support from a CIG.[15]
- USDA should create a program specifically focused on sagebrush ecosystems with an emphasis on improving soil health, removing invasive species like cheatgrass, and restoring sagebrush on private lands as a means of increasing carbon sequestration and improving wildlife habitat. Reestablishment of native sagebrush has the potential to provide a significant amount of carbon sequestration[16] and could reduce the severity of wildfires in the intermountain west. The program should be run through NRCS, and should provide landowners with technical and financial assistance to implement practices that restore sagebrush.
- USDA should partner with the Bureau of Land Management (BLM) to improve continuity of climate-smart and climate-adaptive management practices across public and private lands.

Focus on Conservation Ranching: Regenerative grazing and other bird-friendly practices can help restore ecologic function of working grasslands, improve soil health, bring back birds and pollinators, and increase carbon sequestration. Typical grazing practices leave behind monocultures and grasses leveled to a uniform height—often exposing soil and reducing soil health—but regenerative grazing can restore the habitat diversity and variety needed for a healthy ecosystem while providing production benefits to ranchers. USDA should support ongoing research to develop protocols for regenerative, wildlife-friendly, climate-friendly grazing practices, which can then be used as the foundation for an incentive program for a climate-smart ranching program. Based on existing and new research, NRCS should invest in grassland and rangeland protection and enhancement through easements, and technical and financial assistance that allows ranchers to move to more regenerative practices like those prescribed by ACR.

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[13] https://www.audubon.org/conservation/working-lands/grasslands-report

[14] https://advances.sciencemag.org/content/4/11/eaat1869

[15] https://ar.audubon.org/conservation/native

[16] https://ui.adsabs.harvard.edu/abs/2011AGUFM.B23F..08A/abstract

- Audubon recently received an RCPP Alternative Funding Arrangement (AFA) award to measure carbon benefits of the ACR program, which certifies beef raised on bird-friendly land. This new monitoring program will help validate the benefits on over 2 million acres of land across 13 states. Currently, ACR helps ranchers make up cost differential through market signals, but a new program could provide incentive payments similar to other Title II programs and could increase the focus on carbon sequestration practices and measurement of climate and biodiversity outcomes from those practices
- USDA should focus on regions with greatest potential for carbon sequestration, which were set to be identified through the 2016 *USDA Building Blocks for Climate Smart Agriculture and Forestry* report.[17]

Create a Forest Carbon Incentives Program: USDA does not currently have a forest program that explicitly advances carbon benefits as a primary aim. This gap could be filled through the creation of an incentives program that works with private forest owners to increase carbon storage and sequestration and keep forests intact through long-term carbon contracts or permanent easements. The program must have specificity around practices—including longer timber harvest rotations—rate of compensation, and compliance and verification, as well as guarantee that practices are ecologically appropriate and take into account the long-term ecological health of the forest.

Support Sustainable Groundwater Management: Groundwater is the water savings account of the West, yet it continues to be overdrawn with negative consequences including subsidence, drinking water issues for rural communities, and supply challenges for agriculture. Important new regulations, such as California's Sustainable Groundwater Management Act, were developed to secure and protect groundwater; however, the limits imposed on groundwater use along with continued population expansion are resulting in crop conversion, land fallowing, habitat loss, and degradation of wetlands and groundwater dependent ecosystems. NRCS investment in bringing together communities, conservation groups, and agriculture to plan and implement sustainable groundwater management projects at a local and landscape level will have an important impact on what the western farming and habitat landscape looks like over the next 20-50 years. Investments through the PL-566 Watershed Program or other programs in planning, infrastructure improvements, and conservation practices now will be more cost effective than the continued overuse of groundwater resources. As we face a future of more climate change-driven extreme events like drought, ensuring sustainable groundwater reserves will be increasingly important for the resiliency of agriculture, our cities, and the environment.

Reduce Consumptive Use of Water: Particularly in the Colorado River Basin—where irrigation supports more than 5 million acres of farms and ranches—water stress and potential water shortages are on the rise, with climate change increasing the magnitude of these impacts over time. Every drop of water entering the Basin is already claimed, and these stresses threaten all who depend on the river. The Upper Colorado River Basin states are considering "demand management" as an approach to addressing their waters supply challenges, and Colorado's Water Conservation Board has initiated a stakeholder process for input.[18] Demand management is the concept of reducing the volume of water needed ("demand") for a specific water use through temporary, voluntary, and compensated reductions in water use. Through demand management programs, the volume of temporary, voluntary, and compensated reductions in consumptive use water can be used to balance the amount of water supply available for beneficial uses, including ecosystem health. As agriculture is the majority water right owner

[17] https://www.usda.gov/sites/default/files/documents/building-blocks-implementation-plan-progress-report.pdf
[18] https://cwcb.colorado.gov/focus-areas/supply/demand-management

in the basin, in the coming years NRCS could support partner opportunities to explore the feasibility and specifics of how such a program might actually work in practice. Water users and other stakeholders may craft a proposal to test a programmatic approach to demand management that includes monitoring and evaluation of the outcomes to inform a potential future program based on lessons learned. NRCS guidance could help refine and assess a demand management project and better understand impacts to return flows and irrigation-influenced wildlife habitat. Stakeholders in Upper Colorado River Basin states may need technical assistance to manage a pilot program/process and evaluate its program effectiveness, benefits, and impacts.

Focus on Ecosystem Function and Health: Many in the conservation field are moving towards managing for ecosystem function and health, rather than single issue or species management. This is particularly important when it comes to water. For example, water efficiency projects should consider impact on habitat, downstream water quantity and quality, and groundwater as part of their implementation. Also, new opportunities to think about floodplain reactivation and naturalizing stream channels offer a chance to restore ecosystem function in a way that works with current farming practices and creates, retains, and enhances habitat.

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

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

Establish a Set of Protocols for Technical Assistance Providers and Third-Party Verifiers. There is currently no national system for certifying individuals who provide help to producers trying to access carbon markets through technical assistance or third-party verification. USDA should relay to Congress the need to stand up a certification system so that producers can have confidence that they are receiving reputable assistance from individuals with experience in agriculture or forestry, and can have more certainty that their activities will qualify for credits. This will also improve the reliability of existing carbon markets. As part of this process, USDA should formulate a list of best practices of which certified assistance providers and verifiers should have mastery, and should create a central hub where producers can access the providers and verifiers. This should be done in close coordination with state and local land managers in order to identify opportunities to connect landowners with emerging carbon markets.

Identify Ways to Help Small Producers Participate: USDA should provide investment vehicles that help smaller private forest owners participate in voluntary carbon markets. Investment vehicles can back private entities or charitable organizations that can aggregate small forests, so that markets are accessible to those for whom upfront cost may have been prohibitive. Priority should be given to historically underrepresented forest owners.

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

Update Building Blocks Report: The 2016 *USDA Building Blocks for Climate Smart Agriculture and Forestry* report created a framework for addressing emissions from working lands using existing authorities and programs. Although the report outlines actions that can be taken through 2025, USDA

should update the report with more ambitious emissions reductions targets, which would reflect USDA's current, more aggressive stance on climate change. A new report would guide cross-agency efforts and could help inform lawmakers. Emphasis should be placed on building blocks that currently have modest annual emissions reductions goals despite high sequestration potential, such as stewardship of federal forests, grazing and pasture lands, and conservation of sensitive lands.

- An updated *Building Blocks* report should include specific goals and key actions that incorporate equity principles and help reach historically underrepresented producers within each building block.

Invest in Foresty Inventory and Analysis Program: The Forest Inventory and Analysis (FIA) program is the primary source of ecological data on public and private forests across the US, and is critically important for providing credible and current information on forest status and trends to land managers. These data will be critical in measuring and verifying efforts to increase carbon stock and ecological health of forests over time. In order to deliver high quality and timely data, FIA requires adequate staffing and consistent, full funding. USDA should work to shorten measurement cycles and increase number of research plots, and increase soil sampling.

Increase Research on Soil Carbon: The benefits of increased soil carbon are well understood—including increased yield and enhanced water retention—however, the total quantity of carbon that can be sequestered in soils remains an area of active research. Rebuilding carbon in agricultural soils should continue to be an objective for USDA programs, and additional research should be undertaken to understand resource potential, relationships between atmospheric carbon, biomass, and soil carbon storage, implications for regions of greatest opportunity, and best practices. Participation in carbon markets could help producers pay for the upfront cost of adopting practices aimed at soil carbon, but credits must be awarded using evidence-based metrics, with an emphasis on lowering barriers to entry, while maintaining enforceable protocols. USDA should enhance resources for the soil carbon inventory (RaCA) and existing research programs, such as those conducted through the Agricultural Research Service (ARS).

Invest in Climate Hubs: Since 2014, the USDA Climate Hubs have provided valuable information and technical support to producers responding to climate change and resulting impacts, such as drought. Emphasis should be placed on agriculture, ranching, and forestry practices that promote climate mitigation as well as adaptation. Additional resources should be devoted to outreach, including materials appropriate for non-English speaking communities and landowners. Without specific statutory authorization, USDA has latitude to increase funding and resources to the initiative, to better service producers seeking to reduce emissions from their operations.

Create Monitoring, Reporting, and Verification (MRV) Tools: USDA needs evidence-based MRV platforms that utilize specific protocols in order to create certainty around practices. USDA should prioritize investments in on-the-ground development of these tools, both through collaboration with land-grant universities and supporting pioneering state-level climate-smart-agriculture grant programs.

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

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

A. How should USDA utilize programs, funding and financing capacities, and other authorities to encourage greater use of biofuels for transportation, sustainable bioproducts (including wood products), and renewable energy?

B. How can incorporating climate-smart agriculture and forestry into biofuel and bioproducts feedstock production systems support rural economies and green jobs?

C. How can USDA support adoption and production of other renewable energy technologies in rural America, such as renewable natural gas from livestock, biomass power, solar, and wind?

3. Addressing Catastrophic Wildfire Questions

A. How should USDA utilize programs, funding and financing capacities, and other authorities to decrease wildfire risk fueled by climate change?

Protect Old-Growth Forests: Old-growth forests are less likely to experience high-severity wildfire than younger forests, despite having more vegetation.[19] Old-growth forests will burn cooler and thus lose fewer trees during wildfires, which means less sequestered carbon is lost to the atmosphere, and more wildlife habitat is left behind. Protecting remaining old-growth forests in Alaska—especially the Tongass National Forest—and the Pacific Northwest will help those regions stay better protected from catastrophic wildfires. To protect the Tongass, the most restrictive roadless regime must be restored in the region.

Invest in Fire Preparedness and Restoration of Grasslands: Particularly in the West, action is needed to help reduce wildfire risk in grasslands and protect surrounding communities. Though attention has rightfully been placed on reducing catastrophic wildfires in forest landscapes, USDA must also devote attention and resources to worsening wildfires on grasslands in the West. Invasive annual grasses like cheatgrass have drastically increased wildfire intensity and devastated ecosystems, grasslands and nearby communities. Well-resourced federal-state-local partnerships can combat the surge of invasive annual grasses, reduce the threat of wildfire, and restore the health of landscapes including the sagebrush steppe, home to the iconic Greater sage-grouse and 350 other different species of wildlife and plants. USDA should engage across the agencies—to include the Bureau of Land Management and the Fish and Wildlife Service at the Department of Interior, and NRCS and USFS at USDA—in a cross-cutting initiative that would focus on a coordinated approach for cheatgrass and other widespread invasive weeds removal and eradication in Western landscapes.

Increase Staffing in Recreation and Wildlife Biologist Roles: USFS must fill vacancies in National Forests for recreation and management planning staff, especially in units facing a high risk of wildfires. Chronic staffing shortages have increased risk and reduce responsiveness to wildfires. Wildlife biologists are needed to help create and evaluate changes to forest management plans, but staffing shortages can lead to delays that make it difficult to respond to changing ecosystem needs caused by climate change. USFS should prioritize filling vacancies for these roles in the short term, and should relay to Congress the need to increase funding for additional roles soon after.

B. How can the various USDA agencies work more cohesively across programs to advance climate-smart forestry practices and reduce the risk of wildfire on all lands?

[19] https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.2696

C. What additional data, tools and research are needed for USDA to effectively reduce wildfire risk and manage Federal lands for carbon?

D. What role should partners and stakeholders play, including State, local and Tribal governments, related to addressing wildfires?

Incorporate Indigenous Knowledge: Incorporating local and indigenous knowledge and partnerships into planning, preparedness and response to wildlife can leverage NRCS investments, and also provide valuable local and regional expertise that improves wildlife preparation and response.

4. Environmental Justice and Disadvantaged Communities Questions

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

Increase Staff Capacity, Training, and Expertise to Support EJ and DACs: USDA should continue to support and provide sufficient staff capacity for NRCS offices and to provide flexibility for state offices to work with local partners and producers to design and prioritize practices and projects through State Technical Committees, landscape initiatives, and regional partnerships. In addition to capacity, staff should be provided training opportunities to expand their expertise in working with environmental justice and disadvantaged communities and linguistic resources should be provided to perform outreach to non-English speaking communities and landowners. Additionally, NRCS could play a valuable role in helping convene and build capacity within partner organizations to support underserved farmers, ranchers, and communities. Finally, any opportunities to streamline and simplify the application and reporting processes for NRCS programs would benefit producers, as well as partner organizations—this includes reducing match requirements, simplifying financial specifications for programs like RCPP, and reducing application requirements

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

Include Historically Underrepresented Producers in Development of New Practices and Programs: USDA can improve participation for historically underrepresented producers by conducting outreach and ensuring inclusion in the development of new practices and programs. USDA should work to ensure that programs incorporate traditional knowledge and practices, including local and indigenous knowledge.

Partner with Minority Serving Institutions: USDA should provide support to Historically Black Colleges & Universities (HBCUs), Hispanic Serving Institutions (HSIs), Tribal Colleges and Universities (TCUs), and other minority serving institutions, especially 1890 and 1994 land-grant institutions. Support should be given in the form of partnership for research and development, funding and assistance for expanded course offerings, and selection for conservation partnership programs. These resources will be used to train the next generation of producers, and can improve regional information sharing and outreach to historically underrepresented producers.

Make Advance Payments Available: Currently, EQIP offers a 50% advance payment option for historically underserved producers in order to limit out-of-pocket costs for implementing new conservation practices. USDA should expand this option to other conservation programs in order to remove financial barriers, and should extend it to small landowners.

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?

Prioritize a Percentage of Funding for Historically Underrepresented Producers: In addition to increasing funding and resources for popular and successful USDA conservation programs, a portion of the funding should be prioritized for historically underrepresented groups. Land ownership has declined significantly for Black producers, with Black farmland ownership declining by about 90% over the last century, fueled in part by discriminatory practices by the USDA. Enrollment in conservation programs can help provide the technical and financial support to sustain climate-smart agriculture, ranching, and forestry operations, and can help stem the pattern of land loss while increasing adoption of climate-smart practices. NRCS Civil Rights Reports indicate that the vast majority of contracts for NRCS programs such as ACEP,[20] CSP,[21] RCPP,[22] and EQIP[23] are awarded to white farmers. Equitable participation in these programs should begin with a prioritization of diversity, as well as outreach and technical assistance programs that are accessible via multilingual materials and translation services.

Focus on Outcome-Based Efforts: USDA should support prioritization of efforts that assist underserved farmers and ranchers, and efforts that are outcome-based rather than practice-based. Increasing outcome-based practices as a complement to practice-based specifications—particularly when working on natural resources and wildlife issues—could provide land managers more flexibility to adaptively manage to changing hydrology and site conditions to achieve desired results.

Thank you in advance for your consideration. We look forward to working with you to expand the use of climate-smart agriculture, ranching, and forestry practices that can reduce emissions, increase resilience, and improve bird habitat. We would be happy to virtually meet with you to discuss these recommendations further at your earliest convenience.

Sincerely,
Sarah Greenberger
Senior Vice President, Conservation Policy
National Audubon Society

[20] https://www.nrcs.usda.gov/Internet/NRCS_RCA/reports/rsdno_acep.html
[21] https://www.nrcs.usda.gov/Internet/NRCS_RCA/reports/rsdno_cstp.html
[22] https://www.nrcs.usda.gov/Internet/NRCS_RCA/reports/rsdno_rcpp.html
[23] https://www.nrcs.usda.gov/Internet/NRCS_RCA/reports/rsdno_eqip.html