



April 29, 2021

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

Re: [Docket Number: USDA-2021-0003] Notice of Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad

Dear Secretary Vilsack:

National Farmers Union (NFU) appreciates the opportunity to comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad called for by the U.S. Department of Agriculture's (USDA) March 16, 2021, request for stakeholder input. NFU is a general farm organization with about 200,000 members across the country from all segments of agriculture.¹ We work to improve the wellbeing of and encourage economic opportunities for family farmers and ranchers and rural communities through grassroots-driven advocacy. We believe that the family farm is the keystone of a free, progressive, democratic national society, as well as a strong America, and is the basis of a safe, secure, and stable food system.

NFU members have long recognized that the climate is changing—they are watching it happen in real time across their land—and support meaningful efforts to reduce carbon emissions across the U.S. economy. Family farmers and ranchers also recognize that there are actions they can take, working with the government and the private sector, to adapt agricultural lands to and mitigate the effects of climate change. Agriculture is in a unique position to provide the easiest, the least costly, and the most readily available means to reduce greenhouse gas emissions on a meaningful scale through soil and biomass sequestration, curbing the factors that contribute to climate change while helping the land to adapt. To be sure, the same practices that sequester carbon promote healthy soils, which help land hold water in times of excessive moisture and make water available in time of drought, reduce pest pressures by encouraging biodiversity, and insulate root systems from temperature swings, extreme weather

¹ NFU is a co-chair of the Food and Agriculture Climate Alliance (FACA) and submits these comments in addition to the recommendations detailed in the FACA response to the request for information.

and other effects of climate change. These ecosystems services are just as valuable as carbon sequestration. Farms and ranches can also contribute to a cleaner energy future through the production of wind and solar energy and the source materials for biofuels.

However, just as climate change is a multifaceted problem, it will require multiple tools from USDA, the private sector, and other stakeholders as farmers implement solutions on their land.

Carbon markets have received attention in climate change discussions—and have much potential—but they are just one of many tools that should be available to farmers and ranchers and may not work for many operations. They are a tool, and potentially an important one, that can bring more money into the system, but USDA should work with Congress and other stakeholders to develop additional tools to ensure opportunities for farmers and ranchers of all sizes, production types, crops, livestock, and regions as they look to sequester carbon and address other resource concerns exacerbated by climate change. These tools should include Natural Resource Conservation Service (NRCS) programs and other incentives such as a carbon sequestration tax credit or efforts using Commodity Credit Corporation and other funding mechanisms, as well as state and local initiatives, among others. Options should exist that work for all farmers and ranchers and provide the flexibility they need to make the best decisions for their operations. Once all these tools are available, USDA should ensure that these initiatives:

- function as expected and will achieve their intended goal,
- operate in the best interest of farmers and ranchers,
- do not put at risk the longevity and economic security of farmers and ranchers and the rural communities where they live, and
- do not jeopardize U.S. food security.

These comments² focus on actions that could significantly encourage the development, adoption, and equitable delivery of climate smart practices designed for all family farmers and ranchers. USDA should:

- publicly state that climate change is an urgent priority across USDA and ensure programs reflect this prioritization, setting an example both internally and among stakeholders.
- appropriately staff and train USDA NRCS employees to ensure all farmers and ranchers across the country have access to technical assistance that addresses the specific needs of their land and operation.
- implement a range of science-based tools—including private carbon markets, NRCS programs, and state and local initiatives, among others—that provide options for farmers and ranchers.

² These comments were prepared with feedback from the NFU Climate Change Policy Advisory Panel. NFU is committed to elevating the voice of farmers in conversations about action on climate change.

- encourage the installation of on-farm renewable energy systems and use of biofuels.
- actively seek input, guidance, and participation from farmers who identify as Black, Indigenous, and people of color (BIPOC), as well as other socially disadvantaged and underrepresented groups.

Please let us know if you have additional questions or if NFU can be of further assistance as USDA seeks to address climate change across agriculture. NFU looks forward to being a partner in this crucial effort.

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?

USDA has several policies and programs that can be used to encourage the adoption of climate-smart agricultural practices that both sequester carbon and contribute to a range of ecosystems services. Farm Bill programs like the Environmental Quality Incentives Program (EQIP) and Conservation Stewardship Program (CSP) are already helping many farmers address climate-related concerns and could be directed to have even more focus and priority on climate change. However, these programs are not helpful to family farmers and ranchers if they cannot access them due to a lack of staff and shortcomings in Conservation Technical Assistance from USDA's Natural Resources Conservation Service (NRCS).

NFU's farmers and ranchers report longstanding challenges in accessing NRCS staff. In some parts of the country, one NRCS employee may be tasked with serving scores, if not hundreds of farmers across a large geographical region. In other places, different NRCS offices may offer conflicting advice or may conduct only minimal outreach to farmers, meaning that some farmers may not know what resources exist. All told, some NRCS offices are unable to provide the assistance and services that farmers need to help with basic conservation needs, let alone help farmers and ranchers adapt to and prepare for climate change. Meanwhile, representatives from carbon markets, farm input providers, and other corporate entities are increasingly knocking on farmers doors with a pitch. With no one available at NRCS to provide trusted information, farmers often do not know how they should move forward.

In order to promote broader adoption of climate-smart practices, USDA must provide trained staff to help farmers and ranchers implement needed changes on their land. As of April 2020, NRCS was down about 1,200 full time employees and was preparing a hiring push to fill those vacancies, which was described by NRCS officials at the time as necessary to "maintain peak

performance across the country.”³ Certainly, the proposed staffing level of 10,800 full time employees reflects available funding for NRCS staff, and not necessarily the optimal staffing to help farmers implement practices to adapt to and mitigate the effects of climate change. It is unclear how many of those positions have been filled, especially given fluctuations from general attrition caused by retirements and other factors. The extent to which new hires have been appropriately trained is also unclear, as these staff will provide expertise to farmers based on regional soil types, production and cropping systems, livestock, and weather conditions.

Moving forward, an appropriately staffed and robustly trained NRCS should focus on working with farmers on climate conservation planning and technical assistance. The assistance they provide must be science-based, reflect the conditions on the farm, and be consistent.

Certainly, NRCS must also look to its programs to ensure they are maximized to help farmers adopt climate-smart practices and reward those early adopters who have pioneered these efforts. NRCS should prioritize new CSP and EQIP applications and existing contracts that result in demonstrated positive soil health, carbon sequestration, and resilience outcomes in line with local climate change resource concerns. This will ensure that positive climate benefits will be identified and adopted, encouraging producers to continue with these stewardship efforts. The department should also consider climate effects in contract renewals to ensure it is recognizing long term stewardship efforts.

Further, USDA must ensure there is no conflict between climate focused conservation practices and other USDA programs. As such, the department should work with input from farmers to conduct a study to review the impact of soil health practices on crop productivity and on crop insurance coverage, liabilities, and premium rates. This study should also identify potential policies or actuarially sound modifications to crop insurance to accelerate the voluntary adoption of climate-smart farming practices.

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

The science is clear that the climate is changing and that human activities are contributing to these changes. USDA needs to prioritize climate change across all its programs, sending a clear message to farmers and ranchers that these resource concerns are real and must be addressed, and setting an example for conservation organizations, agricultural groups, farm input providers, and other stakeholders.

³ Davies, S. (2020, April 29). NRCS hiring 1,000-plus employees to bolster field offices. Retrieved April 21, 2021, from <https://www.agri-pulse.com/articles/13569-nrcs-hiring-1000-plus-employees-to-bolster-field-offices>

To be sure, the scope of the climate challenge and its potential effects on agriculture are huge, and the entire sector must work together to develop the tools and resources, remove barriers, and enable widespread adoption of needed land management and other changes. USDA must encourage this coordination and lead by example.

USDA should look for additional opportunities to apply existing authorities to address climate change issues. One such opportunity could be the use of Commodity Credit Corporation (CCC) funds for a Carbon Bank or other carbon sequestration, carbon emissions reductions, and soil health management efforts.

Finally, USDA should engage with early adopters of climate-smart practices to determine best practices in a given area and production system. The expertise and experience of those farmers can be used to highlight the opportunities and potential path forward for others. and the hard work of early adopters must be recognized.

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?

USDA and NRCS must set strong messaging on climate change to signal the priority to its partners and other stakeholders and encourage them to follow suit. Some states, local and tribal governments, and other groups are already increasingly interested in climate-smart agriculture and taking actions to help farmers adopt these practices. USDA should build on this momentum, share training and research, and encourage and coordinate among stakeholders to ensure that farmers and ranchers have access to the best resources that can help them implement the best practices for their land and operation. Partnerships with like minded groups and other stakeholders will be key to expanding these offerings and adoption.

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

Improving the resiliency of America's private lands and realizing the broad potential for terrestrial sequestration of carbon in agricultural soils will require work and attention from both the public and private sectors. USDA programs and government funding will be needed to assist some farmers and ranchers, but the scale of the climate crisis and the costs of combating it is too large for these efforts alone to resolve. There is a growing corporate and consumer

interest in carbon emissions reductions and voluntary carbon markets—the government should encourage these activities while ensuring adequate protections for farmers.⁴

Carbon markets present a great opportunity for farmers and ranchers; however, they do come with risks. Not all farms will be able to participate due to size, soil types, land ownership issues, or other factors that limit the land’s ability to sequester carbon or a farmer’s ability to engage with the market. Certainly, some farmers and ranchers who are interested in adopting climate smart practices may not want to participate in carbon markets. USDA should work to make sure that farmers know all their options—carbon markets, USDA programs, and others—as they look to adopt climate-smart practices. NRCS should be a trusted place for farmers and ranchers to ask questions about carbon markets and work to ensure that these private efforts are not taking advantage of farmers or have any unintended negative consequences.⁵

The Growing Climate Solutions Act (S. 1251) addresses some of these issues. The Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Certification Program created by the bill would ensure appropriately trained third party service providers are available to assist farmers and ranchers as they work to sequester carbon and generate revenue from the sale of offsets on their land. The advisory council created in the bill will provide valuable insights to USDA on the operation of these private markets and the role and participation of farmers in them, while reporting requirements will help Congress to monitor the growth and activities of the markets and prepare for future needs of farmers and ranchers. Enforcement and funding mechanisms give the measure teeth.

As USDA reviews the growth of carbon markets, it should consider additional steps to provide more certainty for farmers as they look to participate in carbon markets, including potentially creating a public third-party verification system should it determine that the private sector efforts are not providing appropriate options and service for farmers and ranchers. Such a system could help to reduce costs for farmers and ranchers and set base standards as they look to produce a tradeable carbon credit.

However, USDA could accomplish many of the initiatives laid out in the bill through existing authority should Congress fail to act. USDA must work to ensure that farmers are not being taken advantage of by private market efforts. The department should also look for ways to

⁴ NFU President Rob Larew detailed NFU’s position on carbon markets, their opportunities, and protections for farmers in July 24, 2020, testimony to the Senate Agriculture Committee. See the full testimony here: https://1yd7z7koz052nb8r33cfxyw5-wpengine.netdna-ssl.com/wp-content/uploads/2020/06/062420_Senate-Ag-Hearing-Testimony_Larew.pdf

⁵ NFU member and Oklahoma rancher Clay Pope provided a detailed farmer perspective of the role USDA should play in overseeing carbon markets in March 11, 2021 testimony to the Senate Agriculture Committee: <https://1yd7z7koz052nb8r33cfxyw5-wpengine.netdna-ssl.com/wp-content/uploads/2021/03/Testimony-of-Clay-Pope-NFU-03112021.pdf>

prevent consolidation in agricultural carbon markets and the corporate purchasing of farmland for the generation of carbon credits.

Further, USDA should, where possible, make public its research into climate-smart practices and other related issues to ensure these private sector efforts are built upon the best available science. While USDA should not work to collect data specifically for carbon markets as that should be a job for the markets themselves. However, the information that USDA develops in response to questions about the best climate smart practices for agricultural lands, how to get farmers to adopt those practices, and how to make sure they are working may be helpful to the private sector. Encouraging data sharing with carbon markets and other stakeholders should also help to pool resources to gain action on issues farmers are facing.

In short, USDA should let private markets develop on their own, act as a trusted resource for farmers and ranchers who have questions about these new markets, and work to ensure that markets are working for farmers.

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

Just as climate change is having different effects on farmers and ranchers across the United States, the tools and practices they will need to use also differ from region to region to reflect local conditions and resource concerns. Certainly, this is not a problem where there is a one-size-fits-all solution. USDA should work with its Climate Hub network and research agencies to develop regional and locally specific tools and systems to help farmers address climate change on their land. Such tools and resources include soil health management systems that are designed to both build soil health and address local resource concerns such as water quality and quantity, wildfires, changes in wind patterns, pest pressures, and others. USDA should also consider input needs, including regionally specific cover crop seed production, plant genetics needs, and tools that appropriately address the soil microbiome, among others.

Further, progress on the broadscale adoption of climate-smart agricultural practices will require the expansion of rural broadband networks. To be successful, farmers will need access to the latest data and research, real time communication with trusted advisors, and precision data tools—all of which rely on highspeed internet access.

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?

USDA must remove barriers for farmers and ranchers to access the information and technical and financial resources needed to adopt climate smart agricultural practices. To accomplish this, USDA must:

- make climate change a clear priority within the department and encourage stakeholders to do the same;
- appropriately staff NRCS and provide that staff comprehensive training in regionally specific climate smart practices and related issues;
- prioritize EQIP and CSP contracts that address climate related concerns;
- highlight, encourage, and reward the work of early adopters of climate smart practices;
- encourage partnerships to reach more farmers and ranchers, and the sharing of research and information; and
- act as a referee on carbon markets, ensuring that they work for farmers, and provide honest, unbiased information to farmers on these efforts.

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?

NFU has been a strong supporter of increased use of ethanol as an important and vital component of this nation's energy policy. NFU appreciates and strongly supports USDA's commitment to promoting renewable fuels, including expanding incentives for infrastructure at the distribution and retail level.

Through Higher Blends Infrastructure Incentive Program (HBIPP) and other programs, USDA is exploring options to expand domestic ethanol and biodiesel availability and is reviewing options on opportunities to consider infrastructure projects to facilitate increased sales of higher biofuel blends (E15/B20 or higher). While NFU fully supports expansion of E15/B20 infrastructure, we submit these comments to ask USDA to establish incentives that would help move this country toward high-octane fuels. Moving toward high-octane fuels to increase fuel economy and vehicle efficiency is widely supported. Mid-level ethanol blends are the most cost-effective, high-octane fuels available today. Such a move would significantly benefit farmers, the economy, this country's energy independence and security, and the environment.

NFU believes that mid-level ethanol blends should be a primary focus of USDA's incentives. These fuels are commonly used in Flexible Fuel Vehicles today and can support the transition to more efficient engines that run best on high octane fuels.

Because there continues to be certain regulatory hurdles, USDA should provide flexibility so that parties can comply with current EPA regulations that may restrict use of mid-level ethanol blends to Flexible Fuel Vehicles. USDA should urge EPA to address those hurdles.

NFU supports efforts spearheaded by the Governors Biofuels Coalition to use midlevel blends of ethanol, like E30 in state fleets. States like Nebraska and South Dakota have taken the lead in midlevel ethanol blends and seen great success.

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

Ethanol further provides GHG emissions reductions, which is increasingly important as the carbon intensity of gasoline *is increasing* with greater use of unconventional fossil fuels. “Emissions from fossil fuel combustion comprise the vast majority of energy-related emissions,” with an increase in emissions from the transportation sector largely attributed to increased vehicle miles travelled and motor gasoline consumption by light-duty vehicles.⁶ At the same time, energy use in ethanol production and lifecycle GHG emissions have decreased with changes in farming practices and increased intensification (*e.g.*, higher yields). As one automaker stated: “Higher-octane fuels are the cheapest CO₂reduction.”⁷ The NREL study found that feedstock availability *and costs* are not expected to be obstacles to the substantial development of a high-octane fuel market, with E20-E40 being the likely optimal blend and E40 providing the greater fuel cost savings.⁸ The NREL study also found that fuel retailers’ investment in high-octane fuels equipment is a limiting factor in most scenarios.⁹ Any incentives to promote infrastructure for higher blends of renewable fuel should include incentives for those projects that would facilitate blending and distribution of mid-level ethanol blends.

NFU supports mid-level ethanol blends because it would support farmers economically, but also because it would promote further GHG emissions reductions. NFU has long been concerned with the impacts of climate change on farmers. Anticipated disruptions to agricultural production caused by climate include, but are not limited to, rising temperatures; changes in precipitation; increasing frequency of extreme weather events; new pest, disease and weed pressures; and increases in heat stress on livestock. As a family farm organization, NFU is particularly concerned with the challenges that climate change poses to family farmers’ ability to pursue improvements in global food security.¹⁰ NFU further believes that farmers play a

⁶ EPA, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2017, at 3-1, 3-20 (2019).

⁷ Eric Brandt, 100-Octane, Super Premium Fuel is Coming to a Pump Near You, *The Drive*, May 1, 2017, <http://www.thedrive.com/news/9836/100-octane-super-premium-fuel-is-coming-to-a-pump-near-you>.

⁸ Presentation, High Octane Fuels: Benefits and Challenges, Robert L. McCormick, NREL, Mar. 17, 2016, available at https://cleancities.energy.gov/files/u/news_events/document/document_url/158/CC_HOF_Webinar_Combined.pdf.

⁹ *Id.*

¹⁰ See M.E. Brown, et al., Climate Change, Global Food Security, and the U.S. Food System, U.S. Global Change Research Program, at 111-112 (2015), available at http://www.usda.gov/oce/climate_change/FoodSecurity2015Assessment/FullAssessment.pdf.

crucial role in mitigation against climate change. Support of renewable fuels facilitates and promotes these efforts.

A transition to higher octane fuels also benefits consumers. In testimony before Congress, a representative of General Motors stated: “We believe increasing the minimum octane level in U.S. gasoline for new vehicles will be a win for all industries and, most importantly, consumers.”¹¹ “We have an opportunity to play a large role in offering consumers the most affordable option for fuel economy improvement and greenhouse gas reduction. We believe a higher efficiency gasoline solution with a higher Research Octane Number (RON) is very important to achieving this.”¹² Consumers would benefit from projected fuel cost savings, reduced price volatility, increased torque in performance applications, and the energy security and environmental attributes of mid-level ethanol blends.

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?

Family farmers and ranchers are increasingly interested in producing their own renewable energy to power their operations and reduce the nation’s reliance on fossil fuels. However, farmers face considerable challenges in adopting these systems due to the upfront costs of installation and a lack of centralized information on the best options for specific operations.¹³

The problem is severalfold. First, states regulate energy production and sale, thus the rules differ on what farmers can do and how they can do it across the country. Secondly, there is limited research on small scale renewable energy production in agricultural settings. Third, resources for helping with upfront costs to these systems has not kept up with demand.

To address these problems, USDA should better coordinate with the Department of Energy to assess state policies related to on-farm renewable energy production and develop a list of best practices should states want to encourage farmers to increase production on their land. Further, USDA should work with DOE to ensure appropriate funding for research on farm-scale renewable energy systems.

Finally, USDA should streamline the application process for the Renewable Energy for America Program (REAP) and work with Congress to ensure appropriate funding. The REAP program

¹¹ Written Testimony of Dan Nicholson, General Motors Vice President of Global Propulsion, Before the House Committee on Energy and Commerce Subcommittee on Environment, Hearing on High Octane Fuels and High Efficiency Vehicles: Challenges and Opportunities, at 1, Apr. 13, 2018, available at <https://docs.house.gov/meetings/IF/IF18/20180413/108122/HHRG-115-IF18-Wstate-NicholsonD-20180413.pdf>.

¹² *Id.* at 2.

¹³ NFU member and Minnesota farmer Jim Falk detailed the barriers to on-farm renewable energy production in July 23, 2020 testimony to the House Agriculture Committee: <https://docs.house.gov/meetings/AG/AG22/20200723/110928/HHRG-116-AG22-Wstate-FalkJ-20200723.pdf>

provides guaranteed loan financing and grant funding to agricultural producers and small businesses to install renewable energy systems and improve energy efficiency. The funding covers up to 75 percent of total eligible costs of a given projects. While REAP is popular among farmers and ranchers, there are two key barriers for their participation. First, the application requires many farmers and ranchers to find a grant writer, an upfront cost that can prevent them from engaging in the program. USDA should streamline the REAP application process to put it in line with other programs, such as those at NRCS, that farmers and ranchers can easily navigate. Secondly, the demand for participation in REAP far exceeds available funding. Currently, REAP receives \$50 million in mandatory funding from the farm bill, with additional funding subject to annual appropriations. However, supporters of the groups say that the need is closer to \$300 million annually, an amount far above what lawmakers put aside for the program.¹⁴ USDA should clearly communicate the demand and funding needs for this program to Congress, especially as lawmakers look to enact policies aimed at addressing climate change.

3. Addressing Catastrophic Wildfire Questions

The increased occurrence of wildfires across U.S. forest and rangeland due to the effects of climate change is putting at risk the livelihoods of farmers, ranchers, and rural communities. The number of large fires in the western United States doubled between 1984 and 2015, according to the Center for Climate and Energy Solutions, and is a trend that is expected to continue.¹⁵ Curbing this trend will take a combination of targeted funding, education for farmers, ranchers, and foresters, and better coordination with stakeholders.

While it would be impossible to prevent fires all together, the intensity of fires could be mitigated through best practices on rangeland and forest land to reduce fuel loads, including prescribed burns and livestock grazing. USDA and stakeholders must clearly express the budgetary needs to Congress that will allow the department to mitigate the conditions that fuel fires. Similarly, USDA and stakeholders should encourage soil health and land management practices aimed at increasing moisture in the soil to reduce the amount of dry organic materials that can fuel wildfires while working within local water cycles and weather patterns.

4. Environmental Justice and Disadvantaged Communities Questions

To best answer the questions related to diversity issues, NFU strongly urges USDA to listen to and heed the words of the many organizations actively working to promote the livelihoods of

¹⁴ NFU has joined with other organizations in calling for annual REAP funding of \$300 million as part of infrastructure improvement proposals: <https://elpc.org/wp-content/uploads/2021/04/REAP-support-letter-to-White-House.pdf>

¹⁵ Center for Climate and Energy Solutions. Wildfires and climate change. (2021, April 14). Retrieved April 21, 2021, from <https://www.c2es.org/content/wildfires-and-climate-change/#:~:text=Climate%20change%20has%20been%20a,in%20the%20Western%20United%20States.&text=Research%20shows%20that%20changes%20in,these%20increases%20in%20wildfire%20risk>

farmers who identify as BIPOC, as well as LGBTQ farmers, women, veterans, and other socially disadvantaged groups.¹⁶ Historically Black colleges and universities, 1890 and 1994 land grant institutions, and other institutions of education that serve BIPOC communities will be a key resource in this process. These farmers and ranchers know what they need, and it is imperative USDA respond to those needs to ensure that efforts by agriculture to address climate change are equitable and successful.

Certainly, USDA should also look to learn from these groups. For example, Native American Tribes are actively developing practices to adapt their farming operations to climate change—work that could be helpful to other farmers.¹⁷ Similarly, Black farmers across America are developing innovative ways to farm with natural cycles and increased climate resilience, at least in part due to a historical lack of services and assistance from USDA.¹⁸ USDA must work to ensure that all of its programs, funding and financing capacities, and other authorities, including those that can promote climate-smart agriculture and forestry practices, are available to all landowners, producers, and communities, and should strive for equity among those groups.

Conclusion

NFU stands ready to offer any additional support and assistance within our means that USDA may find valuable in developing and implementing the tools and programs for farmers and ranchers to meaningfully adapt to and mitigate the effects of climate change.

Sincerely,

Rob Larew
President, National Farmers Union

¹⁶ NFU's grassroots driven policy calls for "efforts to provide equality of rights for all in every aspect of life. These rights shall not be denied or abridged by the United States or any state within." Further, our policy calls for "Efforts to remedy historical inequities in access to farm programs and other systemic barriers to succeeding in agriculture faced by socially disadvantaged groups, especially farmers of color." The full 2021 Policy Book is here: <https://1yd7z7koz052nb8r33cfxyw5-wpengine.netdna-ssl.com/wp-content/uploads/2021/03/2021-NFU-Policy-Book.pdf>

¹⁷ Jones, N. (2020, February 11). How native tribes are taking the lead on planning for climate change. Retrieved April 21, 2021, from <https://e360.yale.edu/features/how-native-tribes-are-taking-the-lead-on-planning-for-climate-change>

¹⁸ Wildfires and climate change. (2021, April 14). Retrieved April 21, 2021, from <https://www.c2es.org/content/wildfires-and-climate-change/#:~:text=Climate%20change%20has%20been%20a,in%20the%20Western%20United%20States.&text=Research%20shows%20that%20changes%20in,these%20increases%20in%20wildfire%20risk>

