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Director Hohenstein,

The Theodore Roosevelt Conservation Partnership is a leading national organization advancing advocacy efforts on issues of importance to all hunters and anglers at the federal level. Our work brings together the interests of a broad coalition of sportsmen's groups, conservation organization and trade associations to advance funding and programs to improve wildlife habitat and sportsmen's access. We appreciate the opportunity to provide feedback and guidance as the federal government pursues programs and policies to address our changing climate.

The USDA's suite of conservation programs is well suited to be effective in addressing carbon sequestration and climate resilience while continuing to meet varying soil, water, and habitat resource concerns across our nation's varying landscapes. We urge the agency to build upon this existing capacity in a manner that both enables landowners to be effective stewards to their lands and ensures that wildlife co-benefits remain central to the administration of farm bill conservation programs.

The TRCP has built a reputation as an organization dedicated to collaborative policy development and appreciate the inclusive stakeholder process that the USDA has undertaken in gathering feedback on climate and agriculture policies. We hope that the recommendations included below help to guide the administration as this process of policy development moves forward.

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 forestlands?

As the USDA evaluates how programs, authorities and funding mechanisms can address carbon sequestration and resilience, the agency should evaluate how existing authorities can be optimized to address climate while continuing to achieve stated soil health, water quality and habitat improvement goals. Climate-smart adoption must support the long-term durability and

biological value of ongoing conservation practices. Outlined below are several ways in which existing USDA programs and authorities can address carbon sequestration.

- Achieving widespread adoption and prioritization of climate-smart agriculture will require **significant investment in conservation technical assistance at the NRCS**. We urge the USDA to support significant investment in NRCS and third-party technical service providers to proactively engage landowners, build meaningful relationships, and provide the technical support necessary for practice adoption to be successful.
- As has been recommended by lawmakers, the **TRCP supports carbon sequestration being adopted as a priority conservation practice under the Environmental Quality Incentives Program (EQIP) and Conservation Stewardship Program (CSP)** for both new and existing contracts. The creation of an incentive directly tied to carbon sequestration would support greater financial assistance for the majority of practices under the two programs. Extending the incentive to existing contracts will ensure that landowners are appropriately compensated for the accrued value of carbon that continues to be sequestered resulting from ongoing practices.
- **The TRCP supports the addition of a climate practice incentive to the Conservation Reserve Program**, as announced by Secretary Vilsack on April 21, 2021. The additional incentive will strengthen the financial supports provided by a host of CRP conservation practices and improve the ability of the CRP to meet the needs of landowners across a host of farm and forestlands.
- **Develop financial incentives for the purchase of easements that hold high carbon value and are at-risk to conversion or development.** Private forestlands in particular provide high-value carbon sinks however are among the ecosystems most under threat to conversion. Prioritizing the measurement (and marketability) of this stored carbon will have an immediate impact on landowner interest in easement enrollment.
- **Develop crop insurance incentives for the adoption of soil health practices.** The TRCP encourages the USDA to develop protocols to identify how the adoption of soil health practices within EQIP, CSP and CRP improves crop productivity and lessens liabilities. In doing so, the agency should work with the Risk Management Agency to evaluate how modifications to the federal crop insurance program will grow landowner interest in soil health practice adoption—including disincentivizing crop production on marginal lands.

In order to ensure the applicability of USDA conservation practices across varying diverse landscapes and uses, we encourage the agency to evaluate how some definitions and requirements prevent adoption at scale. Specifically, **we urge the USDA to consider reversing recent acreage limitations on eligible non-industrial forestland**, which restrict eligibility under NRCS programs to 45,000 acres. Further, **the agency is encouraged to waive Adjusted Gross Income (AGI) requirements as necessary, remove forested acreage percentage limitations and streamline administrative processes** to maximize the enrollment of private forestlands in conservation.In addition to modifications to existing programs and authorities, the USDA should conduct a thorough examination of new strategies to encourage climate-smart adoption.

- **Development of a carbon mitigation bank at the Commodity Credit Corporation.** The TRCP supports the development of a carbon-bank backed by the CCC to establish a price-floor for carbon and provide landowners a secure additional funding stream to their operations. Doing so would ensure long-term marketability for stored carbon and assert agriculture as a leader in reducing net emissions.
- **Adoption of a one-time incentive payment for early adopters of carbon sequestration practices.** The USDA should consider either use of CCC funds or a one-time appropriation to incentivize the early adoption of climate-facing conservation practices available under a new or existing conservation program. Individual incentives would be determined based on the scope and duration of practices undertaken.
- **Support the development of a forest conservation easement program.** The development of a forest conservation easement program for both federally- and entity-held easements within the farm bill conservation title would serve to enhance carbon sequestration on private lands. Moreover, the forested easement program would ensure privately-held forests are part of a national climate mitigation strategy.

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?

State and local governments, shared staffing programs, university extension and local conservation organizations serve a critical role in the deployment of farm programs nationally. As the USDA evaluates opportunities for these partnerships to advance climate-smart agriculture, we have provided recommendations below:

- **We encourage the USDA to direct available resources to growing technical service capacity both within the NRCS as well as third-party Technical Service Providers (TSP).** In addition to supporting investment in NRCS Conservation Technical Assistance, we urge the agency to evaluate how the TSP certification process can be improved to accelerate the accreditation of local crop advisors to serve as technical service providers.
- **Improve coordination with state agriculture agencies and state technical committees (STCs).** State agency officials and personnel are often actively engaged in program implementation and hold an understanding of the dynamics and resource challenges unique to their state. Often STC personnel have a closer relationships and history with local leaders and landowners, providing a unique understanding of how the application of programs and services within their state will achieve conservation goals. Partnerships with state and local agencies, farm and conservation organizations enable outreach and education to farmers and landowners beyond providing general information on soil health and allow a more localized focus on building resilience into farm systems.

C: How can USDA help support emerging markets for carbon and GHGs where agriculture and forestry can supply carbon benefits?

The USDA can support emerging markets through the development of processes to evaluate and verify the value and durability of carbon sequestrating conservation practices, across various landscape types. Determining a baseline of carbon sequestration for lands prior to their

enrollment as well the durability of practices to be adopted and having that information verifiable by the USDA provides landowners with a great deal of confidence in their assets as they look to market their conservation outcomes.

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

The TRCP, partner organizations and the broader conservation community support the development and implementation of a national soil sampling regime to establish a baseline understanding of soil carbon sequestered on grass, forest and wetlands enrolled in conservation, and develop methodology to track the soil carbon impacts over the life of a contract. This ongoing data set would support the mapping and understanding of high value-carbon stores, dictate the value of additional climate incentives in conservation programs, and inform the price of carbon on an open marketplace.

We support development of additional program deliverables outlined in the Forest Service 2015 Forest Inventory and Analysis (FIA) Strategic Plan, including enhanced timber products monitoring, improved carbon and biomass estimates, enhanced landowner studies, research into land cover and land use change, and urban forest inventory, which will all help identify trends in forest ownership, forest conversion, and measurement of carbon stocks. Additional investments in the Timber Products Output (TPO) survey and in new technologies and use of remote sensing can further enhance tools to quantify carbon sequestration and storage in forests, forest soils and long-lived forest products.

The long-term carbon benefits of enhancing forest resilience through active management to restore diversity and ecological function are likely undervalued in approaches used to estimate carbon sequestration and storage. Additional research assessing these benefits is warranted.

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?

The USDA should be proactive in addressing the needs and concerns of landowners as domestic agriculture moves in the direction of climate sustainability. Ensuring that new programs and practices address the diversity of operations that vary both in size and commodity production will be important to achieving wide-spread buy-in among producers. Further, streamlining programs and funding mechanisms to avoid creating unnecessary obstacles for landowners to adopt practices, enroll acreage, or participate in ecosystem markets will also be critical in drawing landowner interest in adopting newly created on-farm practices.

Biofuels, Wood and Other Bioproducts, and Renewable Energy Questions

Developing markets for innovative wood products and mass-timber provide significant opportunity both for their capacity to sequester carbon, as well as support rural, forested economies. The USDA is urged to continue growing these markets through pilot demonstrations and expanding university-level education, as well as by technical assistance to architectural and engineering firms for the use of wood in building construction.

We urge the agency to promote innovative wood design and construction with state governments and support increased funding to the USFS Forest Products Lab and Wood Innovation Grants programs to advance new wood products and market development. We further urge the agency to prioritize accelerating the transfer to wood building material technologies within the WIG's administration, growing investment in education and outreach, supporting mass-timber within infrastructure, and changes in International Building Codes. **Addressing Catastrophic Wildfire Questions**

While a natural part of many ecosystems, uncontrolled wildfires on public and private forests and rangelands exacerbated by drought, invasive species and poor forest and range management pose an increasingly catastrophic threat to life and property in the western United States. The proactive management of lands across property lines is critical to ecosystem health and resilience both before and after wildfires.

To address the continued threat of wildfire across both private and public lands, the TRCP encourages the USDA to support significant investment and expanded authorities for forest management in the following programs and accounts: Regional Conservation Partnership Program; Forest Stewardship Program; USFS Landscape Scale Restoration Program; Collaborative Forest Restoration Program; NRCS Working Lands for Wildlife Program; Shared Stewardship Agreements; as well as the Hazardous Fuels Reduction and Watershed Management accounts.

Collaborative land management approaches which bring together federal, state, tribal and local interests have proven successful in balancing proactive forest and range management with ecological and economic health, while addressing localized resource concerns. Further development of the collaborative models utilized in the programs listed above, serve to greatly reduce the costs of fire suppression, and resulting damages to health, habitat and property.

USDA should work with additional federal agencies and Congress to Authorize collaboration in federal land decisions and protect collaboratively based decisions from litigation. Arbitration should serve as an alternative remedy to litigation on collaboratively based decisions, and fee reimbursement should be limited to cases of direct and personal interest as defined in the Equal Access to Justice Act.

The Forest Service strategy for Shared Stewardship should be formalized as policy to increase effectiveness, efficiency, and scale of landscape conservation to improve active management of federal lands to address wildfires and provide other benefits. Shared Stewardship agreements should be funded to enhance management capacity by leveraging non-federal match, capacity, and expertise. The Forest Service's should change their own internal Shared Stewardship processes to get more work done on the ground, and USDA should provide leadership and collaborate with other federal land management agencies and Coordinate with Congress to expand Stewardship Authorities and implementation to other federal land management agencies.

Environmental Justice and Disadvantaged Communities Questions

Addressing the historical inequities in the application of farm bill funding and programs continues to be a priority for the TRCP and the broader conservation community.

The 2018 Farm Bill extended the USFS Good Neighbor Authority to tribal and county governments, however, there has been limited use of this authority amongst tribes to date, likely in part due to restrictions placed on revenues. We encourage the USDA to support legislative efforts to address the exclusion of tribes from revenue retention provisions within the GNA, in order to mitigate the cost of non-revenue generating management activities, providing additional funding streams to tribes and subsequently growing use of the GNA.

We urge the USDA to actively engage tribal and minority agricultural communities, and when appropriate, formal consultation with tribal nations. We encourage NRCS to prioritize hiring individuals for technical service positions that are both trained and have knowledge of customs and cultures, as well as the varying needs of the local agricultural community.

To ensure that information is made widely available to audiences of varying backgrounds, USDA notices and funding announcements should be made available in multiple languages. Lastly, the USDA is urged to convene annual symposiums targeting regional communities of farmers and ranchers to gather feedback on how funding availabilities can be improved upon to ensure equitable availability.

Addressing Climate Action Through Conservation in the Tongass National Forest

The recently released U.S. Nationally Determined Contribution recognizes the need for forest conservation as a critical natural climate solution. Smart investments in forest conservation can create jobs, support rural economies, and ensure communities are more resilient to the future impacts of climate change.

Mature and old growth forests and trees throughout the U.S. store a significant percentage of the world's carbon. Nationally, forests in the United States capture 16 percent of U.S. carbon emissions, and the Tongass National Forest alone holds 44 percent of all the carbon stored by our national forests. In total, the Tongass stores an estimated 3 billion metric tons of carbon and sequesters an additional 10 million metric tons annually.

We urge USDA to take action to restore the 2001 Roadless Area Conservation Rule on the Tongass National Forest to reestablish safeguards on 9.2 million acres of roadless forest recently opened to incompatible development by the previous administration.

In addition to reinstating the Roadless Rule, the TRCP asks that USDA work to support rural economic development in Southeast Alaska, where increased community wellbeing and a diversified economy – such as commercial fishing and mariculture, tourism, and second growth forest management – could increase local support for and dependance on the conservation of the Tongass National Forest. We also ask that you look utilize USDA resources to help local sawmill infrastructure transition to small diameter logs to help reduce demand on old growth resources. Research on forest management practices in the Tongass would also be valuable to ensure that second growth management helps to store carbon, while increasing forest and ecosystem resilience.

Conclusion

The TRCP and broader conservation community appreciate the intention of the USDA to develop programs and practices targeting climate-smart agriculture. American farmers and ranchers have proven time again the ability to adapt and overcome and are well suited to take on the task of addressing our changing climate. We look forward to working alongside the USDA, agricultural producers, and our broader conservation community to address the challenge before us and ensure that conservation and climate policies meet the needs of landowners, sportsmen and wildlife alike.

We appreciate the opportunity to provide feedback on how the USDA can use existing and new authorities to address the role of agriculture in sequestering carbon and building climate resilience. Should you have any questions related to these comments, please contact Andrew Earl, TRCP Director of Private Lands Conservation, at 518-334-0820, or via email at aearl@trcp.org.

Sincerely,

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