

Secretary Vilsack
U.S. Department of Agriculture
Washington, D.C. 20250

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

Dear Secretary Vilsack:

On behalf of the Midwest Row Crop Collaborative, we thank you for the opportunity to comment on the U.S. Department of Agriculture (USDA) priorities for the expansion of climate-smart agriculture and forestry practices and systems. Founded in 2016, the Midwest Row Crop Collaborative (MRCC) catalyzes systems-changing solutions through diverse public and private sector partnerships and projects. Our efforts are designed to support the scaled adoption of sustainable agricultural practices across the landscapes of the upper Mississippi River Basin, and we test innovative strategies that further these objectives in our collaborative project work. MRCC members are supportive of policy that aligns with our guiding principles:

1. Healthy soils as a basis for ecosystem and farm resilience
2. Agriculture as a solution for climate change
3. Place-based interdependence of farms and nature that supports biodiversity
4. Equity and economic viability for all in the value chain, especially farm families and minority farmers
5. Promoting regenerative outcomes

We recognize the value that sustainable agriculture practices offer to everyone and have identified three priority areas for renewed federal and state investment:

- Accelerated in-field and edge-of-field conservation practices that improve water quality and soil health, including locally driven adoption of existing and innovative practices.
- Strengthened soil health and water quality research and data collection to improve the adoption of conservation practices, impact of on-farm conservation practices, and measurement of outcomes.
- Improved opportunities for public-private partnerships to drive implementation of conservation practices. In particular, public-private partnerships should increase the availability of incentives to farmers in order to overcome cost, risk, or learning-curve barriers to the adoption of conservation measures.

As the USDA has requested feedback on current and future opportunities to encourage the adoption of climate-smart practices through methods that benefit producers and build equity within the agricultural system, we offer our recommendations which we hope will enhance the USDA's efforts.

Opportunities to incentivize and support practice adoption

1. Consider modifying crop insurance to encourage farmer adoption of climate smart agriculture practices with changes to premium discounts, for example, similar to what the states of Iowa, Illinois and Indiana are pursuing to adopt cover crops.
2. Evaluate other mechanisms to provide financial incentives for climate smart agriculture (e.g., through the Farm Credit Administration) and support farmers in purchasing the equipment needed for more sustainable production systems.
3. Strengthen the capacity for technical assistance for farmers through increased funding for NRCS office staffing.
4. Pursue partnership with land grant university extensions and provide them with funding for geographically specific technical assistance and outreach to farmers.
5. Encourage culture change and practice uptake through the support of peer learning groups with a focus on marginalized farmers, allowing farmers to discuss success, failures, and lessons based on their personal experience with climate smart agriculture.
6. Invest in research and development for accurate tools by which to measure farm methane emissions, further enabling effective goal setting and reporting for the private sector.

Opportunities to increase impact of existing programs

7. Analyze existing data and collect additional data as needed to more effectively demonstrate the lowered risk associated with the adoption of climate smart agriculture practices.
8. Prioritize areas with higher conservation potential for programs like CRP, identified by their status as key watersheds, biodiversity hotspots, migratory wildlife corridors, or other considerations, rather than current practice which determines eligibility by soil erosion and provides funding on a first come, first served basis.
9. Commit additional resources to public-private collaboration by hiring a sustainability expert located within USDA to accelerate the scaling of climate smart agriculture programs and expand the reach of existing programs.
10. Improve logistics to support public-private collaboration; system inefficiencies, including software issues, have historically hindered the success of these partnerships and made farmer program enrollment difficult and drawn-out.
11. Improve implementation of the Regional Conservation Partnership Program with an eye toward simplification through changes like shortened application review, announcement, negotiation, and agreement processes, and by providing greater flexibility for project partners to manage projects awarded through the Alternative Funding Arrangement provision.
12. Plan for the future of sustainable agriculture: climate change is expected to impact regions differently¹, which will require a new set of strategies and practices for the different landscapes. Planning climate-smart agriculture for today's conditions alone will mean that by the time farmers widely implement these practices, they will no longer be best suited for these conditions.

Opportunities to advance equity in the agricultural sector

13. Ensure outreach campaigns target all farmers—including marginalized farmers—rather than relying on existing relationships with farmers as the current system has historically failed to establish relationships with Black farmers.²
14. Include disadvantaged communities in decision-making processes as the Department works through technical assistance, financing, and the establishment of climate smart programs.
15. Elevate agricultural workers as a stakeholder group for USDA engagement, as working conditions for agricultural workers are likely to grow worse with climate change.

We appreciate the opportunity to provide input into the USDA's development of a climate-smart agriculture strategy and welcome opportunities to work together as the USDA moves to implementation. Please [reach out to MRCC's Managing Director](#), Ryan Whisnant, with any questions you may have related to this submission.

Sincerely,

Members of the Midwest Row Crop Collaborative



CC: Robert Bonnie, Deputy Chief of Staff for Policy, USDA

¹ Malikov, E., Miao, R., & Zhang, J. (2020). Distributional and temporal heterogeneity in the climate change effects on US agriculture. *Journal of Environmental Economics and Management*, 104, 102386.

² Jennings, J. M. (2020). The Disappearing Act: How to Prevent the Decline of Black Farmers in the United States. *Kentucky Journal of Equine, Agriculture, & Natural Resources Law*, 12(2), 5.