

November 1, 2021  
The Honorable Thomas J. Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue SW  
Washington, D.C. 20250

**Re: Notice of Request for Information on Climate-Smart Agriculture and Forestry  
Partnership Program, USDA-2021-0010**

Dear Secretary Vilsack:

As members of the Midwest Row Crop Collaborative (MRCC), we appreciate the opportunity to provide input regarding the development of a *Climate-Smart Agriculture and Forestry (CSAF) Partnership Program* (docket number USDA-2021-0010). The need for climate-focused policy throughout our economy is critical to achieve impact at the scale necessary, and we believe the food and agriculture system offers especially potent opportunities to reduce GHG emissions while also enhancing water quality, biodiversity, supply chain resilience, and the livelihoods of farmers and their communities.

With significant experience driving the adoption of climate-smart agriculture practices through various levers for change within the food system, our partnership represents leading environmental non-governmental organizations and companies across the full agricultural value chain. As such, we offer the following insights with the intention of supporting the program's priorities, design, and activities. Our comments address aspects of questions three (3) and eight (8), which relate to activities eligible for CSAF funding and designing equitable partnership projects that include a wide range of landowners and producers.

Drawing on the broad portfolio of collaborative projects and initiatives operated by MRCC's members, certain needs for the scaled adoption of climate-smart agriculture are visible, pressing, and would benefit from USDA's leadership. These needs include:

- Funding directed towards improving the accuracy of models and developing new technologies that can measure GHG outcomes to decrease the costs associated with quantifying, verifying, and monitoring GHG outcomes of implementing practices.
- Significantly expanded agronomic, technical, and social support for producer outreach and program enrollment.
- Financing for those practices and strategies that are not economically viable for companies to support but offer significant opportunities for GHG sequestration and other environmental benefits, e.g., edge of field practices.<sup>1</sup>
- Strengthened financial incentives to offset the transition risk incurred by farmers in choosing to adopt soil health practices through mechanisms like crop insurance discounts or alternative payment programs.

---

<sup>1</sup> Magdoff, F. and van Es, H. 2010. Sustainable Soil Management: Building Soils for Better Crops (Third Edit). Sustainable Agriculture Research and Education (SARE) Program.

Regeneration is an outcome rather than any individual practice or set of practices, and our membership seeks to push beyond practice adoption to measurable regenerative outcomes. Recognizing the varied outcomes of any given agricultural practice due to factors like geography and soil type, the development of a Climate-Smart Agriculture and Forestry Partnership Program is an opportunity to align USDA resources with local realities while targeting the landscapes that present greatest opportunity for impact (e.g., critical watersheds and growing regions with high productivity).

Increased federal investments in climate-smart agriculture present the risk of further reinforcing systemic inequities present within U.S. agriculture, but also offer opportunities to direct benefits to those previously excluded. We applaud USDA's focus on ensuring that early adopters and historically marginalized producers and communities derive value from the program alongside those new to climate-smart agriculture, and we are committed to mirroring those values within our own climate-smart agriculture programs. Our hope is that the Climate-Smart Agriculture and Forestry Partnership Program emphasizes accessibility, by reducing barriers to entry through streamlined systems that allow for the bulk of financial support available to flow to farmers. Additionally, the Program would be well-served to both ensure early adopters are able to receive compensation for their continuous carbon reductions and to encourage and reward the early adopters that serve as mentors to other farmers through programs led by local implementing partners. Finally, we urge USDA to include an explicit focus on non-operating landowners and renting farmers, as scaling climate-smart agriculture will be contingent on their successful engagement.

We appreciate the chance to comment on the Climate Smart Agriculture and Forestry Partnership Program and are committed to partnership with USDA to realize a stronger food and agricultural system that is part of a healthy environmental ecosystem and is economically viable for all in the value chain. We look forward to serving as a resource and encourage you to reach out to Camille Morse Nicholson, MRCC's Senior Program Manager, at [cmorsenicholson@en-in.org](mailto:cmorsenicholson@en-in.org) or 612-334-3388 ext. 8119 with any questions about this submission.

Sincerely,  
Members of the Midwest Row Crop Collaborative

