April 28, 2021

Secretary Thomas J. Vilsack
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Docket Number: USDA-2021-0003
Request for Comments: Executive Order on Tackling the Climate Crisis at Home and Abroad; Climate-Smart Agriculture and Forestry Questions

Dear Secretary Vilsack:

The Agriculture Fairness Alliance (AFA) is a nonprofit organization advocating for climate-smart farm policy. AFA members include people who opt for eco-friendly foods and farmers across the country who want the USDA to adopt policies to help them transition to producing ingredients for the fast-growing alternative protein markets. We welcome the opportunity to comment on addressing climate-smart agriculture policies.

Farmers working with the Agriculture Fairness Alliance (AFA) are desperate to transition their land to produce both financially and environmentally sustainable products.

A partner farmer near Madison, Wisconsin wrote to his Member of Congress recently, “I would much rather get funding to transition to something better than get funding to keep producing milk for a market that already has a surplus. I would feel better knowing I’m producing something in high demand that’s also benefiting the environment.”

Another partner farmer across the state wrote, “With so many dairy farms being forced out of the industry, why not create an option to keep the small farmer on their land to produce something else instead of running their business into the ground? It is time to try something new. Instead of burn-out or bankruptcy, let's create a program to keep these farmers on their land to produce something much more in demand.”

AFA appreciates the Biden Administration’s request for public comments on climate-smart agriculture and forestry. Our recommendations can reduce greenhouse gas concentrations in the
atmosphere while empowering American farmers to increase income and prosper on their land. They center on providing market-based and incentive-based policies, advancing science-based best practices, and helping rural economies rebuild by providing options for independent farmers.

American farmers and ranchers have made great strides in addressing climate change, and USDA agencies have developed an impressive set of conservation standards to utilize going forward. This solid foundation is critical to build upon in achieving further progress.

Before listing each recommendation, we would like to suggest a concept be integrated into wider climate-smart agriculture policy: that of farm mobility. **Farm mobility** is the ability to change what is produced on a farm, especially as a means to improve environmental impacts and profitability. Establishing farm mobility as a valid goal for conservation programs will give American farmers more options to pursue environmentally-friendly and profitable agriculture practices. With greater agility to change what is produced on their land, farmers can quickly pivot to address the free-market choices of everyday Americans as more and more opt for eco-friendly options. To achieve this, new and existing USDA programs can and should support farm mobility.

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

**Create farm mobility transition programs**
The USDA can offer farmers a voluntary pilot program that would assist in transitioning from producing goods with high greenhouse gas emissions to growing climate-smart crops that are more suitable for their land. This program would help farmers identify target crop options and finance the transition. It is our understanding that no such farmer mobility programs exist at USDA.

In fact, current conservation programs sometimes entrench small and mid-sized farmers in the very industries they might want to get out of. For example, AFA partner dairy farmers in Michigan implemented an expensive conservation project with National Resource Conservation Service (NRCS) EQIP grants and loans in 2014. The new debt became, in their words, “just one more nail in the coffin.”

Another partner farmer in Wisconsin has a 600 milking-cow dairy with 1200 acres where he grows corn and alfalfa for his herd. He has been approached to install a methane digester. However, he would rather transition his land to a food forest centered on hazelnut production.
This switch would eliminate approximately 200 tons of methane emissions per year\(^1\) while sequestering additional carbon in newly planted trees and undisturbed soil. A methane digester, on the other hand, would remove only a fraction of his farm’s methane emissions, while leaving him with additional debt. He wrote, “There are many farmers in the area like me who want to diversify into growing perennial or woody crops in order to build soil, store carbon, and create additional income streams to stabilize our businesses financially.”

With these and other farmers in mind, AFA scoured USDA programs. We spoke with FSA and NRCS agents to determine whether any programs had been overlooked. The short answer was that USDA did not offer programs for these kinds of projects.

For farmers like those working with AFA, farm transition funding would not only be a lifeline, but would be incredibly effective at achieving immediate carbon reductions as compared to conservation measures that would keep them making the same products.

**Promote Restorative Agriculture Principles through NRCS**

This year, the House and Senate Agriculture Committees have been embracing concepts such as no-till planting for improved yields, food forests for biodiversity, and cover cropping for building soil health. These measures are hardly new. But, if broadly adopted, they will drastically reduce CO2 emissions by letting soils build up organic matter. These practices should therefore be promoted far and wide.

**Level the playing field by shifting subsidies toward climate-smart food production**

USDA subsidy reports\(^2\) and EPA greenhouse gas inventories\(^3\) indicate that approximately half of federal farm aid in 2020 benefited producers of the foods that emit the most greenhouse gases in the agriculture sector.

The USDA can shift subsidies to encourage production of foods like legumes, nuts, fruits, fungi, and vegetables. These crops impose a lower environmental impact while delivering high-quality nutrition to America. Considering that approximately 95% of Americans are failing to consume the recommended daily allowance of fiber,\(^4\) increasing accessibility and decreasing costs for these kinds of foods through federal subsidies can be good for public health.

**End USDA involvement in checkoff programs**

Checkoff programs that promote consumption of foods that emit the most greenhouse gases work against USDA’s goal of reducing emissions. The USDA should therefore not be involved in

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\(^1\) [epa.gov/sites/production/files/2021-02/documents/us-ghg-inventory-2021-chapter-5-agriculture.pdf](https://epa.gov/sites/production/files/2021-02/documents/us-ghg-inventory-2021-chapter-5-agriculture.pdf) (Table 5-2: Emissions from Agriculture (kt) and Table 5-8: CH4 and N2O Emissions from Manure Management (kt) with a herd size of about 9 million milking cows)


facilitating these programs. Trade groups can and should manage their own marketing campaigns independently.

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

**Expand LAMP funding to assist rapid development of domestic plant-based food production and supply chains**

The Plant Based Food Association (PBFA) reports that the majority of their members' plant-based inputs must be sourced from overseas. For example, vital wheat gluten often comes from Australia, hazelnuts from Turkey, and dried peas from Canada. Whatever factors led to this situation, boosting domestic production of plant-based food inputs can reduce the carbon footprint of food transport while improving national food security and resilience.

The Local Agricultural Marketing Program (LAMP) is well positioned to bolster the domestic plant-based food supply chain. Increasing grant sizes under LAMP to accelerate the development of processing facilities and transportation networks would assist in helping Americans get more of their protein from low-GHG sources. This could also facilitate getting plant-based foods to underserved markets and communities.

**Enable NRCS to adopt new Conservation Practices quickly**

New conservation practices often take years to be added to the National Conservation Practice Standard List. Climate action is urgently needed; new practices need to be adopted now. An effective way to leverage existing conservation programs would be to speed up the approval processes for new conservation standards.

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

**Improve Natural Resources Conservation Service (NRCS) reporting**

Determining which agriculture sectors benefit from conservation funding is difficult. Current reports lack the transparency needed to assess whether conservation grants are truly improving the environment or are acting as incentives to allow polluting operations to simply expand.

These programs should be reported like any other grant program - on a project basis. Barring that, NRCS could report each NRCS grant program using dashboards and categories similar to those published for the Coronavirus Food Assistance Program 1 (CFAP1). The CFAP1 dashboard

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5 nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/cp/ncps
shows how much money went to specific producer categories. For oversight and transparency purposes, these reporting methods should be applied to disaster relief programs as well.

**Incorporate Farm Mobility Goals into the Conservation Grant Process**

Before investing taxpayer dollars into costly measures to mitigate the environmental impacts of ongoing enterprises, it would be wise to assess whether transitioning to producing other goods might remove the need for conservation measures altogether. If farm mobility transitions are offered as options under the EQIP program, livestock farmers who opt for them could qualify under Congress’s statutory mandate “to provide at least 50 percent of the funding for livestock.”

While conservation projects may still be suitable for many farms, in some cases, changing what is being produced may present a more lasting solution for reducing emissions and storing carbon.

**Prioritize research for alternative proteins**

Funding plant-based and cell-based alternative protein research can position the United States as a global leader in these emerging technologies. USDA can:

- increase public funding for open-access research into alternative protein development as called for by organizations like the Good Foods Institute
- increase funding for well-established research grant programs such as the Specialty Crop Block Grant Program (SCBGP) and the Agriculture and Food Research Initiative (AFRI)
- increase land grant university funding for vegetable and alternative protein research (for example, fund upgrades for the vegetable crop research wing at the University of Wisconsin, Madison)

**Conclusion**

If the USDA aims for increasing farm mobility across the agency, small and mid sized farmers will be empowered to nimbly capitalize on new emerging market trends rather than rely on federal bailouts and expensive capital equipment that keep them stuck.

While not every farmer will want to transition to producing something new, the USDA should encourage and support those who do. In the event that the administration would like to meet with any of AFA’s partner farmers, we will arrange that.

Sincerely,

Laura Reese
Executive Director and Co-founder
Agriculture Fairness Alliance

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