American Farmland Trust

November 1, 2021

American Farmland Trust
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Dear Secretary Vilsack,

AFT is pleased to submit these comments regarding the Climate-Smart Agriculture and Forestry Partnership Program (CSAFPP). Our nation's farmers and ranchers are not only being heavily impacted by climate change, they are also critical allies in our efforts to address this crisis. Our recommendations are aimed at harnessing their incredible potential.

Founded in 1980, AFT is the only national organization that takes a holistic approach to agriculture, focusing on the land itself, the agricultural practices used on that land, and the farmers and ranchers who do the work. Because of this diversity of perspectives, AFT is uniquely positioned to offer recommendations for how USDA can implement the CSAFPP in a way that benefits producers while expanding the market for climate-smart commodities.

AFT has been a leading voice at the intersection of climate change and agriculture for well over a decade, building upon our extensive history in soil health. In 2010, AFT created the "BMP Challenge" to reduce financial risk for farmers adopting climate-smart nutrient management practices. In 2015, we partnered with the University of California, Davis on a study demonstrating how farmland protection, when coupled with smart growth, can significantly reduce greenhouse gas (GHG) emissions. This research undergirded California's decision to invest over $100 million into farmland protection based on its climate benefits.

In 2017, AFT launched its National Climate Initiative, whose director testified on the science of climate change before the House Select Committee on the Climate Crisis in 2019. In 2020, we published our Combatting Climate Change on US Cropland report, which presents the substantial sequestration potential of cover crops and no-till. This analysis used our CaRPE tool, developed in partnership with the USDA ARS. We have also advanced climate-smart policies across the nation, including Illinois' Cover Crops for Spring Savings Program.

Below is a non-comprehensive list of examples of AFT's on-the-ground work with producers:

- AFT's Women for the Land Initiative provides outreach and conservation technical assistance to women, especially non-operating landowners, with funding from NRCS.
- In New England, AFT staff conduct extensive conservation planning activities in partnership with NRCS and have launched a soil health program with RCPP support assisting farmers in adopting climate-smart practices and rewarding them based on verified practice implementation and projected GHG benefits.
- AFT has partnered with Danone and NRCS to provide technical assistance to producers and to evaluate and assess the impacts of farm management practices.
- In Ohio's Upper Scioto River Watershed, AFT implements an innovative ecosystem services model with local stakeholders to drive climate-smart practice adoption to improve water quality.
- The Farms for a New Generation program in California conducts outreach to socially disadvantaged farmers and offers land access training and resources.
- AFT's Soil Health Stewards Program is focused on increasing climate-smart practice adoption on agricultural land protected through ACEP and FRPP.

The following document responds to questions 2, 3 (b. and c.), 4, 6, and 8.

November 1, 2021

Submitted Via Federal eRulemaking Portal (http://www.regulations.gov)

Commodity Credit Corporation, Farm Production and Conservation Mission Area
Office of Chief Economist
U.S. Department of Agriculture

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Climate-Smart Agriculture and Forestry Partnership Program

Dear Secretary Vilsack,

AFT commends USDA on its work to expand the market for commodities produced using climate-smart practices through the Climate-Smart Agriculture and Forestry Partnership Program (CSAFPP). Not only could this program help our nation achieve its climate goals, it could help build on-farm resilience to the impacts of climate change, improve farm viability, and enhance air and water quality, biodiversity, and soil health.

Private demand already exists for climate-smart commodities, evidenced by the many ambitious corporate commitments to environmental goals – including from major food companies like General Mills. Institutions, such as schools and hospitals, are also searching for opportunities to reduce their environmental impacts. The advancement of verified climate-smart commodities could help private and public organizations alike reach their climate goals and provide purchasing options that reflect their values.

By harnessing private demand, the CSAFPP could also achieve critical public goals. For instance, the science advanced by USDA through the CSAFPP could lead to shared best practices for the widespread implementation of climate-smart practices, as well as improved GHG accounting, quantification, and verification methodologies appropriate for diverse agricultural systems.

AFT has several general recommendations regarding the development of the CSAFPP. In order to help agricultural producers rapidly and successfully implement – and permanently maintain – climate-smart practices, USDA and its partners will need to:

1. Prioritize training and on-farm conservation technical assistance through NGO's, other entities, and early adopters.
2. Provide incentives for implementation of climate-smart practices, including synergistic bundled practices.
3. Invest in land protection, whether permanent or semi-permanent, which will help maximize the long-term benefits of climate-smart practices.
4. Ensure that the CSAFPP is built to be inclusive of small-scale and diversified operations, socially disadvantaged producers, and more.

Question 2: In order to expand markets, what should the scope of the Climate-Smart Agriculture and Forestry Partnership Program be, including in terms of geography, scale, project focus, and project activities supported?

Engage NGOs, Other Entities, and Early Adopters in Providing Conservation Technical Assistance to Producers

Increasing the adoption of climate-smart agricultural practices will depend upon there being adequate assistance to help farmers transition their operations. At present, the lack of available Conservation Technical Assistance (CTA) is one of the greatest barriers producers face to successfully adopting and maintaining climate-smart practices. CTA serves many purposes, including outreach, teaching new techniques, and supporting producers in applying for conservation programs. While NRCS has done a commendable job of increasing hiring, staffing still remains below the ideal level for current program delivery.[1] As such, USDA should work closely with partners in implementing the CSAFPP.

Recommendation: Partner with NGOs, universities (including HBCUs), and other entities experienced in providing CTA to producers. External partners have existing relationships and producer networks that can be leveraged to efficiently implement the CSAFPP. AFT, for instance, already serves in this capacity, providing training, soil classification, conservation planning and contracting, and financial assistance implementation for NRCS as part of a cooperative agreement in Massachusetts. AFT is also providing other forms of technical and financial assistance, such as outreach and application support, practice prioritization, and outcomes-based geographical targeting through RCPP and Mississippi River Basin Initiative projects in the Midwest.

Recommendation: Strengthen outreach to underserved communities. AFT praises USDA for specifically including equity as part of this request for comment. The CSAFPP could be an opportunity to expand outreach and inclusion of communities underrepresented within current conservation programs. Deliberate outreach should be done to socially disadvantaged producers through organizations experienced in providing service to these communities (See response to Question 8), as well as to non-operating landowners (NOLs). Over 40 percent of agricultural land is rented, and AFT research has found many NOLs to be deeply committed to the health of their land, but not necessarily aware of related practices and federal program opportunities.[2, 3] Through our Women for the Land Initiative, we have built a program tailored to reach, inform, and meet the conservation needs of this community.

Recommendation: Engage early adopters in peer-to-peer outreach and education. Many producers across the nation have adopted, maintained, and developed climate-smart agricultural practices for years, if not decades. These early adopters have significant value as educators, mentors, and members of peer-to-peer support networks for farmers and ranchers new to climate-smart agriculture. These producers should be incentivized to contribute to outreach and education efforts while maintaining or improving their own management systems. A compelling opportunity for the CSAFPP would be to partner with an organization to form, oversee, and equip a network of early adopters to offer CTA to their peers. For instance, AFT's Genesee River Demonstration Farms Network

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[1] House Agriculture Democrats, "Challenges and Successes of Conservation Programs in 2020." October 1, 2020. Youtube video, 1:54:12. https://www.youtube.com/watch?v=lnCS-OrQdGQ.

[2] P. Petrzelka, J. Filipiak, G. Roesch-McNally and M. Barnett, "Understanding and Activating Non-Operator Landowners." AFT, 2020. https://www.farmlandinfo.org/wp-content/uploads/sites/2/2020/09/AFT-NOLs-MultiState_9_20b-web.pdf.

[3] P. Petrzelka and A. Sorensen, "Conversations with Women Landowners." AFT and Utah State University, 2018. https://s30428.pcdn.co/wp-content/uploads/2019/05/WNOLs-focus-groups-2018-for-web.pdf.

works with farmers to demonstrate conservation practices, share information and lessons learned, and facilitate farmer-to-farmer conversations.

Provide Incentives for Climate-Smart Agricultural Practice Adoption and Explore Innovative Incentive Models

Many climate-smart practices generate economic benefits to producers by increasing resilience and productivity, or decreasing expensive inputs such as fertilizer, as shown by AFT's Soil Health Case Studies. However, these benefits can take years to become evident, and farmers and ranchers must often pay upfront for new equipment, fencing, or seeds, and engage in a several-year period of "trial and error" as they learn how to implement new practices. This can initially result in reduced yields or other unanticipated challenges. Alongside increased CTA, AFT supports the use of CSAFPP funding to provide financial incentives to producers for the implementation of practices. This support could come in the form of direct payments, but could also be used to pilot other innovative approaches.

Recommendation: Provide payment based on practice adoption. Paying for practice implementation, rather than for the measured carbon sequestered or GHGs mitigated, would:

1. Provide producers with a clear and predictable financial benefit, rather than having payments fluctuate from year to year and/or be determined after implementation.
2. Reduce expensive soil testing requirements to quantify exact benefits, thereby freeing up more funding to support wider practice adoption.
3. Help ensure that a broad range of producers can participate in CSAFPP projects. Payments based purely on measured carbon sequestered would exclude operations with smaller sequestration potential (such as small-scale operations or those located on sandy soil), while not accounting for the fact that carbon is just one part of a broader climate-smart strategy. While they are more challenging to quantify, reductions in nitrogen fertilizer and fuel, as well as increases in water infiltration and soil plant cover, are also critical climate contributions.

This recommendation, however, should *not* be construed as a lack of support for quantification and testing since AFT believes that these both should factor strongly into CSAFPP projects (See response to Question 3c). Investments into quantification and testing through the CSAFPP will help to further payment models based on projected or measured environmental benefits.

Recommendation: Offer longer-term incentives. It can take several years for producers to become accustomed to new practices and for the benefits of those practices to become evident. Furthermore, many practices (e.g., cover crops, crop rotations) are not one-time decisions, but are determined on an annual basis. As such, AFT recommends that CSAFPP establish longer-term incentives (e.g., 5 –10 years) with annual payment for appropriate practices.

Recommendation: Explore innovative incentive approaches. CSAFPP could provide direct payments based on acreage, similar to current conservation programs. However, it could also be used as a laboratory to test novel incentives, such as a discount on crop insurance premium payments. This concept has been tested through state programs and was recently implemented nationally via the Pandemic Cover Crop Program. The Illinois "Fall Covers for Spring Savings" Cover Crop Premium Discount Program has been highly successful, incentivizing farmers in 2019 to keep the ground covered by planting cover crops on 50,000 acres, including 35,000 acres of new adoption. Another novel incentive would be to implement a tiered payment system, which could define a higher payment rate for the first X acres, with additional acres receiving a lower rate. This could help to account for economies of scale, thereby making the program more attractive to smaller operations.

Give Special Priority in the CSAF Partnership Program to Protected Lands

Agricultural land offers significant opportunities for carbon sequestration.[4] Unfortunately, sequestered carbon is not always permanent since carbon (and its associated climate benefit) can be lost if the land is developed or if practices are not maintained. When agricultural land is developed, it both releases the stored carbon back into the atmosphere and destroys the land's ability to sequester carbon in the future.[5] Because of this, prioritizing practice adoption on protected farmland and protecting more land represent two of the best ways to ensure that the climate benefits associated with climate-smart agricultural practices are retained.

Local and state Purchase of Agricultural Conservation Easement (PACE) programs, USDA's Agricultural Conservation Easement Program (ACEP), and land trusts working directly with landowners, have put millions of acres of land – often our most productive, resilient, and versatile – into permanent agricultural conservation easements. Prioritization, however, should not just be limited to permanent easements. Rather, it should include any land that is enrolled in a program designed to keep it in active agricultural use for at least 10 years.

Recommendation: Prioritize protected agricultural land for enrollment in CSAFPP. Because these lands are unlikely to be lost to development, protected lands represent some of our best investments for carbon sequestering practices. Moreover, this is a particularly receptive audience to conservation practices since research has demonstrated that producers on permanently protected agricultural land already have a higher rate of conservation practice adoption than the general farming population.[6]

Question 3: In order to expand markets, what types of CSAF project activities should be eligible for funding through the Climate-Smart Agriculture and Forestry Partnership Program?

b. Activities that supply grants, loans, and loan guarantees to producers for equipment needed to implement CSAF practices, or for capital-intensive CSAF technologies.

Provide Grants, Loans, and Loan Guarantees for Equipment Directed at those with the Greatest Barrier to Entry

Engaging in climate-smart agricultural practices sometimes require expensive specialized equipment (e.g., no-till drills, roller crimpers). This can present a significant barrier to entry for socially disadvantaged, young, beginning, and small-scale producers. As such, AFT supports the use of CSAFPP to provide grants and loans for the purchase of climate-smart equipment.

Recommendation: Provide grants or loans for the purchase of climate-smart equipment to support select types of farmers. This funding would be best directed to those facing the largest barriers to adopting climate-smart practices. It should be noted that this funding could also be used for the purchase of equipment by NGOs, conservation districts, cooperatives, and other entities who might

[4] E. Bruner, J. Moore, M. Hunter, G. Roesch-McNally, T. Stein, and B. Sauerhaft, "Using Cover Crops and No-Till to Combat Climate Change on US Cropland." AFT, 2021. https://farmlandinfo.org/publications/combating-climate-change-on-us-cropland

[5] AFT, "Greener Fields: California Communities Combating Climate Change." 2018. https://farmlandinfo.org/publications/greener-fields-california-communities-combating-climate-change/.

[6] AFT, "Impacts of the Federal Farm and Ranch Lands Protection Program: An Assessment Based on Interviews with Participating Landowners." 2013. https://s30428.pcdn.co/wp-content/uploads/sites/2/2019/09/AFT_IMPACT-of-FEDFARM-RANCH-PRO_FINAL_singles-4_0.pdf.

share, loan, or rent equipment to these types of producers. In this case, the equipment should be accompanied with support for additional outreach and training related to use of the equipment.

c. Activities that test and evaluate standardized protocols that define eligible CSAF practices, quantification methodologies, and verification requirements, with an emphasis on minimizing transaction costs and operating at scale.

Use CSAFPP to Deepen our Understanding of Practice Outcomes

AFT does *not* recommend that CSAFPP pay producers for measured carbon sequestration, due primarily to the uncertainties and cost involved with using the existing methods of carbon quantification. Instead, funding should be used to advance our understanding of the benefits of climate-smart practices (both individually and as bundled systems) and their ecosystem services, in order to inform public policy, private markets, and consumers. By incentivizing widespread climate-smart practice adoption, CSAFPP could generate the biophysical data necessary to build greater confidence around estimates of soil carbon storage across soil types, regions, production systems, and management approaches. This could enable the development of accurate quantification models, which would undergird subsequent efforts to train and pay producers based on carbon and other ecosystem services like water quality and biodiversity. It would also help to inform the investments of policymakers and private industry.

Recommendation: Create a Research Initiative and a National Calibration Dataset as part of CSAFPP. While protecting individual privacy, the Research Initiative would collect data on soil carbon sequestration from farms and ranches participating in CSAFPP projects in order to deepen the scientific understanding of soil carbon sequestration and inform the development of quantification models. The level of sequestration would be documented in the field throughout, if not beyond, the life of the project, along with practice and other outcome information. In addition, the Research Initiative and corresponding calibration dataset should cover the other GHGs (i.e., nitrous oxide, methane) and water quality outcomes (e.g., nitrogen, phosphorus, sediment) which various climate-smart management systems can simultaneously achieve.

The Research Initiative should be led by USDA ARS and NRCS scientists and/or in partnership with NGOs and universities, potentially leveraging the work accomplished to establish the national dataset for NRCS' On-Farm Soil Health Demonstration Trials. It should also be designed to provide data that can improve upon the existing models of agricultural GHG emissions and carbon sequestration, such as COMET. The results of the studies would provide USDA with the additional data needed to understand:

1. How much carbon can be sequestered within a given production system and soil type.
2. For carbon sequestration and GHG reduction, what practices are best, and how can they be implemented most effectively and economically to manage for these goals.
3. What are the best practices for the measurement of sequestration (e.g., sampling designs, sampling depth, statistical protocols, measurement tools).
4. Length of time to stabilization or reaching a carbon saturation point.
5. What are the ecosystem and economic benefits of climate-smart practices, such as impacts on water quality, flood and drought reduction, biodiversity, and risk-mitigation.

In addition, the Research Initiative could collect the social and demographic data required to answer questions about the best ways to incentivize diverse groups of producers to adopt and maintain climate-smart practices.

As part of these efforts, a National Calibration Dataset could aggregate research data into a centralized, interoperable, publicly available repository to strengthen models.[7] Models are ultimately only as good as the data that inform them. The data gathered through CSAFPP projects could help enhance public and proprietary climate and water quality outcomes estimation models and tools, as well as producer decision support tools, on an ongoing basis. This would better inform implementation and conservation investments. Doing so would increase credibility of the tools for conservationists, their farmer clients, the public, and policymakers.

Develop Guidance to Inform GHG Mitigation and Sequestration Efforts

Private interest in supporting climate-smart practices, including purchasing climate-smart commodities and carbon credits, continues to grow. This new market could offer a powerful incentive to farmers and ranchers to adopt climate-smart practices, while giving them a new source of income – a true "win-win." However, many of these markets are struggling to overcome fundamental questions surrounding the quantification of net reductions in GHG emissions from various practices, verification of practice implementation and performance, and satisfaction of differing permanence and additionality standards.

AFT believes that USDA could play a pivotal role in helping to advance private markets by developing standards and guidance. This guidance should not be prescriptive, but rather, provide transparency around the numerous current agricultural credit generation approaches.

Recommendation: Conduct analysis and issue guidance to inform the development of private carbon markets, including:

1. Outlining best practices for soil carbon sampling to achieve a variety of objectives through identifying the strengths and weaknesses of current sampling and testing approaches.
2. Benchmarks for net GHG reduction verification and estimation modeling to inform comparisons across different approaches.
3. Identification of the climates, soil types, and production systems with the greatest potential to sequester and hold carbon long-term.

Recommendation: Assess existing sequestration models. USDA could utilize data gathered as part of CSAFPP as means of testing current models. This could include publicly available models such as COMET, as well as proprietary models in partnership with their developers. This assessment could identify the level of uncertainty within a given model to inform the quality of related accounting and credits.

Recommendation: Establish an advisory board to assist in the development of guidance. The Growing Climate Solutions Act presents a model for an advisory board that can assess the state of carbon markets, barriers to participation, and provide ongoing guidance shaped by the best science.

Question 4: In order to expand markets, what entities should be eligible to apply for funding through the Climate-Smart Agriculture and Forestry Partnership Program?

As noted in our response to Question 2, partnerships with NGOs, universities (including HBCUs), and other entities experienced in working with producers are essential to the success of the CSAFPP.

[7] For more information, see: M. Perez and E. Cole, "A Guide to Water Quality, Climate, Social, and Economic Outcomes Estimation Tools." AFT, December 2020. https://farmlandinfo.org/publications/guide-to-outcomes-estimation-tools/.

Question 6: In order to expand markets, which CSAF practices should be eligible for inclusion?

Support Adoption of Proven Climate-Smart Systems of Practices, Especially Practices Associated with Secondary Benefits

AFT supports USDA including a wide variety of practices in CSAFPP, so long as they have proven climate benefits, whether through sequestering carbon or reducing GHG emissions. These include practices for crop production (e.g., cover crops, no-till, nutrient management, biochar) as well as animal agriculture (e.g., prescribed grazing, methane digesters, integration of managed grazing on cropland). However, not all practices have the same level of benefit. For this reason, certain practices – and especially practice bundles – should be prioritized for their mitigation potential as well as their additional co-benefits. These include achieving maximized live plant soil cover, production system resilience, water quality and quantity, flood and drought resilience, and wildlife habitat.

***Recommendation*: Prioritize synergistic bundled practices over individual practices.** Farmer experiences across the country and numerous research studies, including research from AFT, have shown instances where the combined use of two or more climate-smart practices can have synergistic effects. Examples include no-till with cover crops, cover crops with prescribed grazing, and silvopasture and agroforestry. There should be opportunities to incentivize the adoption and long-term maintenance of such bundled practices, also referred to as soil health management systems.

***Recommendation*: Prioritize the use of practices that have proven secondary environmental benefits.** Certain practices not only have climate benefits, but also have positive impacts on air and water quality, aquifer recharge, biodiversity, soil health and temperature, and more. They can also help producers reduce their need for inputs, such as synthetic nitrogen fertilizer, fuel, and irrigation water. Practices with such secondary benefits should also be prioritized. Further, while the focus should be on in-field practices that improve soil function and carbon sequestration on a landscape scale, edge-of-field practices such as vegetative buffers should be incorporated and adapted for expanded benefits.

***Recommendation*: If the CSAFPP is used to support solar, prioritize installation on existing structures and marginal lands and advance dual-use (agrivoltaics).** AFT supports increased solar generation to address climate change and enhance farm viability. However, given the size of solar's potential footprint, poorly planned and sited projects could present a major threat to the agricultural land that our nation depends on to produce food, feed, fiber, and fuel, and ecosystem services such as clean water and carbon sequestration. AFT's 2020 Farms Under Threat: The State of the States report showed that the US is already losing 2,000 acres of agricultural land every single day, a trend that would only be exacerbated by poorly planned solar energy development. Given this challenge, AFT recommends the following:

- If solar projects are included under CSAFPP, they should be built on existing structures and marginal lands. If they are sited on land well-suited for agriculture, the projects should only be dual-use (described below).
- Agricultural land with dual-use solar should be used to advance research on the integration of solar into different production systems and climates in order to ensure dual-use projects support viable farm operations.
- Any solar investments should identify best practices for installation, maintenance, and decommissioning compatible with continued climate-smart agricultural use.

AFT uses the term "dual-use" to refer to a solar installation that integrates renewable energy and farming activity on the same ground. To be considered dual-use, AFT believes a solar installation cannot displace farming activity, should have a suitable decommission plan, and must enable the land

to return agricultural use similar to what was possible prior to the installation.[8] When these conditions are met, the operation maintains agricultural production while providing an additional source of income as well as products that can be marketed to consumers as climate-smart. AFT's support for dual-use is conditional upon more research providing proof of concept. For more information on our renewable energy positions, please consult AFT's Policies on Smart Siting of Wind & Solar Energy Facilities.

Question 8: How can USDA ensure that partnership projects are equitable and strive to include a wide range of landowners and producers?

Ensure that the CSAFPP is Accessible, Equitable, and Culturally-Sensitive

Socially disadvantaged farmers and ranchers face distinct barriers to engaging with USDA programs. These communities may distrust USDA, either due to personal experience or the Department's history of discrimination, which may keep many Black, Indigenous, and People of Color (BIPOC) producers from applying for support. Many socially disadvantaged producers also face challenges with enrolling in USDA programs, such as cumbersome application processes, information being written in highly technical language or not available in their native language, among others. Even when enrolled, they may not receive the culturally-sensitive services necessary to set them up for success.

Recommendation: Provide culturally-sensitive outreach, education, and technical assistance to socially disadvantaged producers engaged in CSAFPP. Outreach efforts should be tailored to distinct communities, application processes should be streamlined, and producers should be provided with support to reduce barriers to entry (such as offering interpretation and translation services). USDA should also hire additional bi-lingual service providers and community representatives, and forge partnerships with individual racial and ethnic communities and community-based organizations. Best practices should be followed for participatory community engagement to ensure resources are desired, understood, and ultimately accessed.

Include BIPOC-Focused Organizations in CSAFPP and Help to Build Their Capacity

Organizations that primarily serve socially disadvantaged farmers and ranchers are essential partners in any effort to more fully engage these communities in CSAFPP. However, many are under-resourced and under-staffed, which limits their outreach capacity. This can translate into being less competitive for funding and partnership grants, especially when pitted against larger organizations. Many community-based organizations also face challenges with raising the money necessary to match a federal grant.

As USDA develops CSAFPP, it should ensure that it prioritizes supporting and partnering with BIPOC-focused organizations to provide services such as conservation technical assistance and grants for conservation equipment. This could be a way of both accessing populations who might otherwise be hesitant or unwilling to be engaged by USDA, and helping USDA to strengthen relationships with populations most in need of support.

Recommendation: Partner with NGOs that focus on providing services to socially disadvantaged producers. There are many community-based organizations focused on serving BIPOC communities. USDA should work to engage organizations that have the trust and relationships needed to broaden the reach and efficacy of CSAFPP. This funding could also be an opportunity to

[8] See AFT's recent comment to the Federal Energy Regulatory Commission here: https://farmland.org/wp-content/uploads/2021/10/AFT_Comment_FERC.pdf.

strengthen the capacity of these organizations. Multiyear capacity-building grants would help develop internal infrastructure such as hiring finance staff, purchasing financial software, hiring consultants, and more. This would enable these organizations to be more competitive for federal grants and partnership opportunities, thereby enabling them to provide additional support to the communities they serve.

Include Equitable Access for Diversified, Small, and Mid-Size Operations in CSAFPP

<u>Recommendations</u>: As discussed in Question 2 and 3b, ensure that CSAFPP:

1. Provides payment for practices, rather than measured carbon, to be more inclusive of small and diversified operations, as well as operations in arid geographies.
2. Considers potential tiered payments that provide a premium for the first acres, and then a flat rate for subsequent acres, to account for economies of scale.
3. Offers grants to certain types of producers to purchase climate-smart equipment, or programs that allow producers to reliably rent the equipment they need.

CONCLUSION

AFT appreciates the opportunity to submit our comments on the development of the Climate-Smart Agriculture and Forestry Partnership Program. We look forward to serving as a resource to the Department on these issues and continuing to work with USDA to help farmers and ranchers be leaders in addressing climate change.

Respectfully submitted,
American Farmland Trust