

November 1, 2021  
The Honorable Thomas J. Vilsack  
U.S. Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Secretary Vilsack:

Thank you for the opportunity to respond to USDA's request for information: [Federal Register, Docket ID: USDA-2021-0010](#). The Climate-Smart Agriculture and Forestry Partnership Program provides a promising opportunity to use private capital to finance, de-risk, build and operate the infrastructure needed to equitably decarbonize the agricultural system. We support a public-private partnership framework whereby USDA, food and agriculture companies, and other financial stakeholders strategically share the full costs and risks of helping producers transition to, implement and maintain practices long term that generate measurable, verifiable climate benefits.

Environmental Defense Fund (EDF) encourages USDA to use the CSAFPP to accelerate adoption of climate-smart practices and the sector's ability to affordably verify subsequent net greenhouse gas reductions. This program also has the promise of serving farmers, ranchers and forest landowners who would like to or are already producing climate-smart commodities, but do not have equitable access to existing private sector incentives such as financial institutions' products and voluntary carbon markets. Additionally, once producers are maintaining climate-smart practices with verifiable results, EDF encourages USDA to consider how this, or other policies can encourage maintenance of practices to achieve durable climate benefits. For example, USDA may consider providing a public-facing certification that producers can leverage to substantiate a premium for their commodities. USDA could also take this opportunity to set high quality standards for voluntary agricultural carbon markets. There are several considerations of the interplay between use of public funds and corporate investments, and implementation of CSAFPP in a way that increases the integrity of various developing markets and leverages their capital will maximize climate benefits and program efficiency.

EDF recommends that USDA begin with pilots projects to help test which groups, engagement techniques and project structures have the ability to (1) produce and help maintain net GHG mitigation for the long term, (2) improve the accuracy and affordability of measuring and verifying net GHG emissions, (3) help early and new adopters market their climate-smart products, gaining recognition and rewards for the continued use of best practices, (4) feasibly scale beyond the pilot phase, both economically and technically, and (5) produce equitable outcomes, especially in regard to the participation levels and financial success of small-scale operators and Black, Indigenous, and other producers of color. These pilots can identify remaining barriers to participation, practice implementation and maintenance, and climate-smart commodities' marketability.

EDF experts welcome the opportunity to provide additional information and support the department.

Sincerely,

Britt Groosman  
Vice President, Climate-Smart Agriculture  
Environmental Defense Fund

## **Question 1: How would existing private sector and state compliance markets for carbon offsets be impacted from this potential federal program?**

Robust carbon crediting systems can be an integral part of effective climate policy, but voluntary agricultural carbon markets and farmer participation are currently hindered in several ways. The current price of carbon does not cover the expenses and risks that producers face while transitioning to, implementing and maintaining climate mitigation practices. Additionally, some producers are still navigating barriers caused by a lack of knowledge and technical assistance, or the size of their operations. If the quality of carbon credits and their underlying projects is not guaranteed, buyers of agricultural credits may risk their reputations by not actually providing the desired climate benefits through their purchases. The Climate Smart Agriculture and Forestry Partnership Program (CSAFPP) can help resolve these challenges and lay the building blocks for mature voluntary markets.

First, the program should build out the high-quality research and standardized measurement, reporting and verification (MRV) infrastructure necessary for high integrity, scalable climate mitigation programs. Second, by focusing support and tailoring delivery mechanisms, the program can provide small and disadvantaged producers with technical assistance, training and administrative support to address historic discrimination. Provisions that allow for the aggregation of individual contributions from small-scale operations will be essential to closing the wealth gap among producers, making the benefits of carbon and climate-smart commodity markets more broadly and equitably accessible to all. Third, the program can leverage private capital and stack it with public financing to expand impact. The program can be a platform to keep food companies engaged in climate action and long-term funding, as outside industries are beginning to funnel financing to the producers in the food companies' value chains via carbon credits. Finally, the program can provide a new certification system through which early adopters, who may not qualify to sell credits through carbon markets, can bring their climate-smart commodities to market and potentially fetch a premium from buyers.

USDA should consider that carbon credits need to be deemed "additional" to be sold into current voluntary carbon markets because of the "additionality" norm. Additionality means that the practice change and resulting emission reductions or removals from a mitigation activity would *not* have occurred without the added incentive provided by the carbon credits. USDA should consider that because of this additionality test, carbon credit buyers may not be interested in purchasing producers' credits if the mitigation activity was already fully funded by the USDA program. If CSAFPP program funds do not cover the full cost of implementing and maintaining practices, and an expectation is made that the remainder of the finance would come from carbon credit revenue, then producers could generate carbon credits that would be considered valid. To objectively assess whether a carbon credit project would reduce producers' emissions beyond what the CSAFPP helped achieve, USDA could develop a set of benchmark costs for the ongoing, annual activities involved with transitioning to and implementing mitigation and sequestration practices. Many variables can be added to make costs specific to regions and production systems. That way, any costs that remain after CSAFPP investment could be covered by high-quality carbon credit payments.

Another consideration is "regulatory additionality," which means that emissions reductions or removals from a mitigation activity should not receive carbon offset credits if those activities are already required by law. This could come into play in California where there is a cap on net GHG emissions from agriculture.

To guard against double-issuance and double-counting of credits, USDA should establish a transparent, public-facing and nationwide GHG project accounting system for agriculture, forestry and other land use. This system could track voluntary carbon marketplace crediting and USDA project activity, publish where USDA partnerships are producing GHG outcomes, and help ensure that no other industry purchases offset credits from producers whose full costs are being covered.

**Question 2: To expand markets, what should the scope of the CSAFPP be? Include specifics regarding geography, scale, project focus and project activities supported.**

**Project scale:** EDF is encouraged by USDA's design of this program to engage non-overlapping groups of producers and landowners. In an [article published August 2021](#) in Environmental Research Letters, EDF and Princeton University researchers showed how emissions reductions policies and programs that attain a sufficiently large scale — including jurisdictional-scale tropical forest protection programs — can drive lasting reductions in carbon dioxide, even if governments and markets change in the future. This maximizes program funds and helps mitigate climate accounting and certainty risks, such as leakage, impermanence and non-additionality, which are particularly challenging for cropland and forest land projects. Operating at a sufficiently large scale may also be better able to address systemic challenges to conservation by bringing communities together. A group or community can provide support to its members, test out ideas and advocate with greater strength for infrastructure, markets or other local needs.

USDA could work with ag tech companies to implement use of existing Major Land Resource Areas (MLRAs) as regions in which an inventory of land use, agricultural practices and carbon project locations would provide data that would allow accounting for additionality and leakage, and help protect against inadvertent double counting. USDA Agricultural Statistical Districts (ASDs) could coordinate statistical reporting — potentially leveraging ag tech companies' capabilities, especially as part of supply chain partnerships — up to the MLRA regions to allow tracking of practice adoption within a USDA MLRA and enable more transparent and consistent accounting of additionality. Regional provision of technical assistance could be incorporated into this approach.

Additionally, USDA could institute a national agricultural soil and practice monitoring system for crop and rangelands analogous to the Forest Inventory and Analysis database. This could build off the existing National Resources Inventory currently conducted by the Natural Resources Conservation Service to include more comprehensive soil analysis for sequestered soil carbon.

**Time scale:** Direct emissions reductions — such as nitrous oxide from improved soil management, carbon dioxide from reduced fossil fuel usage or manure methane emissions from improved manure management — can be identified and quantified on an annual basis. However, it often takes more than a single year for producers to reach the point of readiness to implement new practices, and multi-year averages might be useful to smooth out the impacts of variable weather and other factors.

The time scale needs to be longer for soil carbon sequestration. Our ability to measure changes in soil carbon is not sensitive enough to detect annual changes, and likely is not sensitive enough to quantify sequestration for at least five to 10 years. Current credit protocols use models to assess annual increments, but the accuracy of these estimates at the field scale cannot predict real soil carbon changes with an acceptable degree of certainty. Model estimates need to be aggregated over many thousands of fields to reduce uncertainty to acceptable levels. This is another benefit of USDA action to aggregate climate-smart agricultural practices at scale.

**Maximize climate benefits:** The CSAFPP should augment or complement existing farm bill funding to make progress on climate opportunities that are not already being addressed or incentivized through NRCS programs. Through that lens, as a first priority, CSAFPP should support county- or conservation-district scale transition to and implementation of practices that permanently avoid emissions of carbon dioxide and other more potent GHGs like nitrous oxide and methane. This category of practices includes improved fertilizer and manure management; field equipment, energy and irrigation use efficiencies; reduced enteric emissions from

livestock; and avoided conversion and degradation of temperate forests. Avoided emissions are the most high-impact opportunities today.

Second, CSAFPP should support the transition to and implementation of natural climate solutions that facilitate long-term carbon dioxide removals, for instance reforestation in areas that would not otherwise be reforested. This is low hanging fruit. Two specific focal areas are areas in the Western U.S. that have experienced catastrophic fire; and areas in the Eastern U.S. where private landowners are not inclined to re-establish forest cover after harvest for various reasons. The Nature Conservancy's [Reforestation Hub](#) visualizes where these opportunities are the greatest.

Third, CSAFPP should advance research in natural climate solution areas where more substantive scientific basis is needed — for example, clarifying GHG fluxes and the ability to measure GHG outcomes — to promote more practices into the higher certainty, second priority category above. This third priority set of practices includes improved temperate forest management and adoption of conservation agriculture practices — cover crops, reduced and no tillage, conversion to perennial crops or vegetation, and extended crop rotations. Until a stronger scientific basis exists for net GHG mitigation through carbon dioxide removals from these practices, only direct emissions reductions should be counted for the U.S. national GHG inventory, Nationally Determined Contributions to the Paris Agreement, and supply chain scope one accounting purposes.

***Advance innovative finance and leverage private capital:*** The CSAFPP should be used to test and scale innovative financial products that support groups of producers to grow climate-smart commodities. Many climate-smart production systems are profitable, but farmers need time and upfront investments to transition to such systems. Producers need access to appropriate finance that both supports their ability to overcome transition barriers and incorporates the long-term financial value of climate-smart agriculture and forestry.

CSAFPP funding could be blended with private capital in multiple ways: interest rate buy-downs, subordinated debt, guarantees and more. Such funding should not be limited solely to conservation expenses such as cover crop seeds and conservation-related equipment. It should also be offered to any innovative financial product that achieves and measures beneficial climate outcomes, for example a transition loan product that replaces a traditional operating loan for a farm in adopting climate-smart practices.

There are several benefits to this approach. It will allow CSAFPP projects to 1) reach many more producers; 2) reach new partners such as agricultural lenders, community development financial institutions, and other businesses and nonprofit organizations that offer financial products to producers; 3) improve cost-effectiveness of the pilot projects by leveraging private capital; and 4) test financial products that can then be scaled without additional government support. As with all pilots, a key requirement of such funds should be to measure both environmental and economic performance of the project and the producer, commodity or financial product involved. This is a critical step to achieve the goal of launching financial products that incorporate the long-term financial value of climate-smart agriculture and forestry practices and systems without continued government support.

***Establish and implement criteria for high quality net GHG reductions:*** Analogous to the organic standards, USDA could develop standards for high-quality net GHG reductions from agricultural production, and a system for implementing those standards. These criteria should include factors such as GHG credit buffers, long-term monitoring, and discounting for project length to help address issues of permanence and reversals, additionality, leakage, credit determination, and MRV. A CSAFPP project could fund the development of criteria. EDF, World Wildlife Fund and the Oeko-Institut's [High Quality Carbon Credits Initiative](#) offers guiding principles for USDA to build upon as the basis for results-based climate financing via

CSAFPP. The market needs a signal to help sort between carbon crediting protocols of varying quality and methodologies. The CSAFPP could also fund projects that improve existing voluntary carbon market protocols to meet this guidance for quality, with an eye toward ease of use for producers to unlock their participation and leverage this source of private sector funding.

***Certify marketable climate-smart commodities:*** Another tranche of projects can focus on activities that help those producers who have been using climate-smart practices with measurable, verifiable net GHG reductions to market their commodities. On an ongoing basis, USDA could certify producers' performance, confirming that they are continually reducing net GHG emissions by further optimizing and adding additional climate mitigation practices. The accounting and verification used for this certification would be based upon the criteria established via the project focus described above.

**Question 3e. Activities that generate voluntary carbon offsets through CSAF practices. Within carbon offset markets, the GHG benefit is separated from the commodity and sold as a carbon offset credit. Should USDA consider hybrid approaches where the GHG benefit is assigned to a climate-smart commodity, or separated and sold as an offset?**

No, a hybrid approach is not advisable as the commodity buyers are often different entities than those willing to pay for only the GHG benefits. Bundling the commodity and the GHG benefits will limit the types of financial opportunities producers can pursue to be compensated for GHG reductions. Currently, supply chain companies are unlikely to bear the full costs of climate adaptation and climate mitigation.

EDF supports a cost-share, public-private partnership framework whereby USDA, food and agriculture companies, and other financial stakeholders share the full costs and risks of helping producers transition to, implement and maintain practices that produce measurable, verifiable climate outcomes. We see CSAFPP as a promising opportunity for food and agriculture companies to partner with the government and financial institutions to finance, build and operate innovative ways to pay for farmers to transition to climate-smart agriculture, and cover the associated risks. As far as claiming resulting GHG benefits, USDA should count any resulting net GHG reductions towards the U.S. NDC and allow partnering food and agriculture companies to make transparent scope three and product-level reduced GHG claims, indicating that the U.S. government shared in the costs of the reductions. Once producers are maintaining the practices and verifying net GHG reductions, we'd like to see USDA support them in a public-facing certification that they can leverage to substantiate a premium for their commodities.

Another more complicated possibility is a three-way cost-share framework whereby USDA funding is blended with not only food and agriculture company investments, but also with voluntary carbon market incentives. This additional payment to producers could come into play if needed to help cover transition, implementation and maintenance costs not fully paid for by the USDA and food and agriculture companies. This would introduce a more complex accounting system to guard against double-counting. Please see response to question one regarding benchmarking of practice costs, which would be a key tool to implementing either approach.

**Question 4: To expand markets, what entities should be eligible to apply for funding?**

Any group receiving CSAFPP funding should be required to comply with criteria, including but not limited to a high bar for transparency of contracts and administrative costs; stringent monitoring and reporting; outreach to and inclusion of small and disadvantaged producers, and not setting a minimum volume of potential emissions reductions; and passing a maximum possible percentage of funds through to the producers by minimizing administrative and transaction costs.

In addition to ensuring that producers of color and small-scale producers are prioritized in project funding and design, USDA also needs to include these producers in the project proposal review and approval process and get their recommendations of preferred intermediaries.

We recommend allowing participation by financial institutions and their associations. Financial institutions such as agricultural lenders, community development financial institutions, and other businesses and nonprofit organizations that offer financial products to producers, should be eligible to receive funding through the CSAFPP if they can show that the funds will be utilized to expand production of climate-smart commodities. This will likely be through innovative financial products or other related efforts. Emphasis should be given to the potential to leverage private capital to expand the reach of CSAFPP projects, or to reach segments of the producer population that already produce climate-smart commodities but are not fully served by existing financial institutions and/or products, such as socially disadvantaged and small producers. USDA may consider imposing additional eligibility requirements to ensure that financial institutions that receive funding have a track record of equity and experience serving diverse clients.

USDA may also consider adding ag tech companies that can potentially serve the needed role of collecting, aggregating and providing USDA with recommendations regarding farmer performance, certification eligibility and more. The Environmental Protection Agency's Safer Choice certification program has a similar model of verified "data reviewers" who do much of the heavy lifting for EPA.

**Question 5: To expand markets, what criteria should be used to evaluate project proposals for receiving funding through the CSAFPP?** We recommend USDA evaluate proposals based on whether they align with the project focus areas described in the answer to question two.

**Question 6a: What systems for quantification and key metrics should be used to assess the benefits of projects funded through the CSAFPP?**

**Equity and justice:** To ensure that equity and justice are social outcomes of this program, USDA needs to include them in the stated goals of the CSAFPP. For example: "*Support the transition to and implementation of climate-smart agriculture and forestry practices, especially among Black, Indigenous and other producers of color and small-scale producers, and promote equitable access to markets for climate-smart commodities.*" Then, to measure progress toward that goal, EDF recommends collecting data related to recognition, procedural, and distributional equity and justice should be collected and studied to assess project and overall program success, where equity and justice are indicators of success. This entails collecting project data specific to the participation and success of historically marginalized groups, who should be surveyed — both participants and nonparticipants — to understand whether their needs, cultural values and perspectives are addressed in the program policy. Analysis and findings based on this data should be made publicly available. Please also see EDF's [April 2021 response](#) to USDA's previous RFI, section IV: "Prioritize Equity and Environmental Justice."

**Climate:** Building a better inventory of existing carbon storage pools is critical to track changes in storage due to specific practices. USDA should collect the data necessary to quantify GHG baselines and annual GHG outcomes. Best practice metrics for all project types, regardless of subsector, include: baseline GHG emissions; historical years' GHG emissions if data is available; practices used and commodities produced prior to and because of the project; whether the practices were successfully implemented; size, type and location of production operation; and socioeconomic attributes of participating producers. USDA should also support the research and development of tools that support integrated metrics like remote sensing and eddy covariance towers. Please see EDF's April 2021 response to USDA's previous RFI, section III: "Improve Research, Data Collection and Data Sharing."

- **Forests:** A robust infrastructure for the existing carbon pool inventory is essential. The U.S. baseline tool in the Forest Inventory and Analysis program of the Forest Service is a critical model, but new and greater investments should be made to support more sampling intensity, both (spatial and temporal, and integrate remote sensing technology. These capabilities will help enable predictive modeling.
- **Range and croplands:** An analogous, comprehensive system to the Forest Inventory Analysis does not exist. There are several initiatives underway to improve carbon reporting for agricultural lands, but USDA should pursue a comprehensive, all lands approach.
- **Nitrous oxide:** To assess the reduction of emissions from agricultural soils due to improved nutrient management, projects should report on annual field-scale [nitrogen balance](#) determined from nutrient inputs and outputs<sup>1,2</sup>. Data on yield and total N application rates are necessary.
- **Soil carbon:** USDA should develop a spatial dataset of land use and projects within each region, stratified by soil and environmental characteristics and updated annually. This dataset will enable USDA to conduct a regional additionality assessments, identify any conversion of areas to cropland (leakage), identify reversals, assess equity of program access, identify any inadvertent double-counting and more. For cropland projects specifically, it is also worth collecting data and metrics on direct soil organic carbon and bulk density sampling at baseline and after five years, to test models rather than relying only on models. Soil measurements deeper than 30 cm may be used to improve models, test model outputs, and accurately quantify whole-profile soil carbon changes, which often cannot be predicted from changes in more shallow soil depths, e.g., 0-15 cm). Soil carbon measures should consider quantification below the top 6 in. to get better estimates of deeper soil carbon. Data and metrics collection should also include results from annual process models in between baseline and year five, annual yield, practice and crop history, any management changes made, and environmental impacts like droughts and floods on yields on an annual basis.
- **Fuel and energy carbon dioxide:** Fuel and energy usage should be tracked to account for carbon dioxide emissions.
- **Livestock methane:** For manure management, track the percentage of manure in anaerobic systems over time; the percentage of methane captured, the diet composition for quantifying enteric emissions, and the nitrous oxide coming from pastures. For livestock manure and enteric methane, additional types of data and metrics worth collecting include: baseline manure management practices and feed rations across the U.S. and in key livestock producing regions; adoption of improved manure management practices such as composting, solid/liquid separators, covered lagoons and anaerobic digesters; and monitoring of non-methane pollution, such as ammonia emissions, nitrate leaching, and odor from livestock operations, especially in regions in close proximity to low-income or communities of color.

**Economics:** Include direct quantification of the economic impact of the climate-smart agricultural practices on farm finances, analysis of the impact of any incentives offered on the producers' ability to implement climate-smart production practices/systems, quantification of the economic value of the environmental benefits generated by the CSAFPP projects and more.

<sup>1</sup> Eagle, A. J., McLellan, E. L., Brawner, E. M., Chantigny, M. H., Davidson, E. A., & Dickey, J. B., et al. (2020). Quantifying on-farm nitrous oxide emission reductions in food supply chains. *Earth's Future*, 8, e2020EF001504. <https://doi.org/10.1029/2020EF001504>

<sup>2</sup> Mclellan, Eileen & Cassman, Kenneth & Eagle, Alison & Woodbury, Peter & Sela, Shai & Tonitto, Christina & Marjerison, Rebecca & van Es, Harold. (2018). The Nitrogen Balancing Act: Tracking the Environmental Performance of Food Production. *BioScience*. <<https://academic.oup.com/bioscience/advance-article/doi/10.1093/biosci/bix164/4831124>>. 10.1093/biosci/bix164.

### **Question 6c: What types of systems should be used or supported to track participation, implementation and potential benefits generated?**

Pre-project assessment to establish a baseline and post-implementation monitoring should both be incorporated into project costs. As suggested above, making use of USDA's existing geographic framework would efficiently allow a county- or conservation-district scaled approach for tracking producer participation and outcomes. Such an approach can also be utilized to allow aggregation of producer efforts that increase access of programs to small-scale producers. Pilots can leverage private sector information management systems that can automate and facilitate tracking.

As part of outcomes tracking, USDA should also collect and make publicly available the data needed to perform robust program evaluation for the program. USDA can draw from the executive branch's extensive experience with regulatory impact analyses and the emerging experience implementing the Foundations for Evidence-Based Policymaking Act to develop guidance documents for agency use in planning for and conducting performance evaluations.

Re-establishing the Conservation Effects Assessment Program of NRCS and Agricultural Research Service would provide an institutional home for this monitoring and verification, as well as build off an existing rigorous program. Establishing a program like the Strategic Agriculture Research and Extension specifically for CSAFPP would explicitly incorporate research and extension directly tied to the CSAFPP activities and would ensure that researchers work with the landowners and producers to build the scientific basis for continuation of practices. Assuming the CSAFPP pilots will be distributed across the nation's ecosystems, and thus regionally distributed, consider using the current USDA Climate Hubs, possibly expanded to additional regions, to serve as managers of the pilots within their designated region.

Historically, landowners are slow to adopt new practices. The SARE program has proven to be successful in that regard because the landowner is working with the researcher to solve a practicable problem. Through the behavioral economics portfolio of the Economic Research Service, research has been able to describe and quantify "nudges" that increase program participation. Including ERS and other socioeconomic researchers in the development of the CSAFPP is likely to increase the chance for success and greater adoption by landowners and producers.

### **Question 6d: How should the data and metrics be analyzed to inform future decisions?**

Individual projects' post evaluation should be based on: 1) their ability to produce and/or help maintain net GHG mitigation long-term, and/or improve our ability to accurately and affordably measure and verify net GHG emissions; 2) their ability to help early and new adopters market their climate-smart products, gaining recognition and rewards for their ongoing maintenance of best practices; 3) their technical and economic feasibility of scaling; 4) their outcomes on equity, especially the participation levels and success of producers of color and small-scale producers; and 5) the existence of remaining barriers to participation, practice implementation and maintenance, and climate-smart commodity marketability. Projects which fare well on these criteria should be considered for scaled-up demonstration projects. Projects which exhibit promise but face ongoing barriers to adoption should be considered for additional pilot-scale experimentation to address remaining barriers. Lessons learned from projects and from the program can inform USDA's research and development agenda and the criteria for selection of programs in subsequent years.

### **Question 8a: How can the CSAFPP include early adopters of CSAF practices?**

An excellent way for USDA to include and support early adopters of climate-smart agriculture and forestry practices through CSAFPP would be to establish and support a certification process for their commodity outputs, like the activity types listed in the RFI. In addition, USDA may consider developing a pay-for-performance policy where anyone who is interested in enrolling in the program could provide evidence of



historic sequestration practices by a deadline to receive a one-time payment for those efforts. USDA can look to Alberta and California as examples for how to include early adopters: California Air Resources Board Cap-and-Trade Program, [Program for Recognition of Early Action Offset Credits](#); and [Alberta Emission Offset System](#) Protocol, which follows an “adjusted baseline” approach to subtract out carbon accrued before the 2002 start year of the offset eligibility criteria from current adoption rates of zero or reduced tillage from a region — deriving regional discounted baselines.

### **Question 8b-c. How can the CSAFPP be designed to ensure that benefits flow to historically underserved producers and communities?**

We are pleased to see USDA considering how to ensure that benefits flow to historically underserved producers and communities at the program design phase. The importance of inclusion, from the initial design of the program and throughout the process is critical. USDA should prioritize input from organizations that directly serve historically underserved producers. Additionally, there are several design considerations that can be incorporated to support the equitable access to CSAFPP opportunities:

- Conducting targeted outreach to organizations that directly serve historically underserved producers to raise awareness of program funding is crucial. Offer pre-development grants to support proposal development and submission, include organizations’ staff time in project budgets, and consider deadlines to allow appropriate timelines for project development and proposal writing.
- Avoid burdensome application requirements and ensure that eligibility criteria are defined broadly, and do not disadvantage producers of color, small-scale producers and the organizations that serve them due to scale or other operational attributes – such as equipment availability or crop type that differ along racial lines.
- Connect to communities of color and build capacity for future engagement through the Historically Black colleges and universities and minority serving institutions. Develop an internship program directly tied to the CSAFPP, possibly coordinated through the Climate Hubs, to contribute toward building a future workforce, as well as harness the innovation and brainpower of capable future farmers, ranchers, foresters, and landowners.
- Consider how best to include producers with a variety of land ownership structures, small and low-revenue operations, and operations that lack clear title to their land.
- Allow funding for technical assistance and take a broad view of what qualifies for technical assistance when it serves the purpose of enabling the participation of historically underserved producers, which may require funding in greater amounts to support additional staff, equipment, and other needs required to be able to participate in climate-smart commodity certification and marketing initiative.
- Consider carving out a specific amount or percentage of CSAFPP funding each year to be used toward these types of projects, and fund proposals that overcome barriers to participation in climate-smart commodity markets through collective action. For instance, support producer cooperatives that can pool resources and collectively generate climate-smart commodities, and prioritize proposals that aggregate, or facilitate aggregation, of several small, emerging or socially disadvantaged producers who can pool GHG contributions and MRV processes.
- Consider ways to reduce the burdens of data management on small and disadvantaged farmers who may not have the enabling technologies and resources available, while maintaining the integrity of the overall program. For example, rely more heavily on standard emissions factor values for practices implemented, fund their access to farm management information systems that can get them producers started on the path to data-driven decision making and reporting, and fully fund any direct measurements.
- Track and disclose CSAFPP funding recipients regularly and adapt program funding quickly if required to target diverse populations.