Dear President-elect Biden and Vice President-elect Harris,

Environmental Defense Fund is pleased to submit this letter with recommendations for early stage agricultural priorities of the incoming Biden-Harris administration. EDF is a global, non-partisan, non-profit organization with more than 2.5 million members dedicated to protecting human health and the environment by effectively applying science, economics and the law. We share the goals presented on the transition website, including to “create jobs in climate-smart agriculture, resilience and conservation,” and we believe that the U.S. Department of Agriculture has immediate opportunities to advance these and other environmental goals.

EDF has a vision for America’s farms, ranches and forests to produce food, fuel and fiber, protect communities from extreme floods and droughts, provide ecosystem services like clean water and reduced greenhouse gases, and help rural communities prosper in the face of climate change. In the context of this vision, and understanding the challenges facing rural America, we offer the following overarching priorities:

1. Support agricultural and other rural communities in adapting to the rapidly expanding impacts of climate change.
2. Capitalize on the ability of our working lands to both sequester more carbon and reduce greenhouse gas emissions while generating environmental and production co-benefits.
3. Equitably expand revenue for farming, ranching and forestry businesses from nature-based solutions.

**Climate adaptation**

Farmers, ranchers and forestland managers are accustomed to walking a tightrope of variable weather and economic fluctuations, but a growing body of scientific research shows that climate change is creating increasingly large vulnerabilities that undermine the long-term viability of agricultural production and threaten global supplies of food, fiber and energy. These increased risks are largely attributed to expected increased occurrences of unpredictable and increasingly extreme weather and natural disasters (e.g. wildfires, floods, droughts), in addition to increased rates of pressure from heat, pests, weeds and diseases — all of which are expected to contribute to crop failure and reduced livestock productivity. To address these threats, USDA should:
- Increase investment in applied research to clearly identify specific vulnerabilities that farms, ranches and forestry operations are likely to face from climate change, as well as the pathways for adaptation. Focus research on specific approaches to adaptation that create resilience, maintain or increase productivity, make use of nature-based solutions, and improve environmental outcomes within specific timeframes and geographies.
- Reinvigorate USDA Climate Hubs to ensure development and delivery of region-specific and relevant applied research results. Increase investment in and partnerships with land grant universities and cooperative extension to do the same.
- Launch an effort to modernize the crop insurance program to increase benefits to farmers who take early steps to adapt to climate change, thus reducing the eventual payout burdens on the program.

**Carbon storage and emissions reductions**

Farm, ranches and forests are both carbon sinks and sources of emissions. USDA can play an important role in maximizing sinks and minimizing emissions, thus putting our lands to work for climate action. To meet this opportunity, USDA should:

- Invest in research, data collection and aggregation, and analyses to more accurately quantify the specific climate benefits derived from carbon sink and emissions reductions activities in the agriculture and forestry sectors. As efforts to capture these opportunities expand, it is critical that USDA promote a rigorous approach to quantification that is grounded in science and transparent with regard to uncertainty. This approach will help build public confidence in these emerging practices and associated markets.
- Maximize opportunities for existing farm bill conservation programs to deliver climate benefits, engaging farming communities for collective action rather than one-off interactions with individuals. Increase budget allocations within each program for management actions that deliver measurable benefits. Tie payments to performance as measured in units of net reduction of greenhouse gases in the atmosphere.
- Increase USDA’s investment and engagement in reducing greenhouse gas emissions from animal agriculture through alternative manure handling, reducing enteric emissions, integrated crop-livestock management and anaerobic digestion. With respect to methane capture from manure digesters, USDA should study and promote technologies and management approaches needed to reduce community impacts of such systems, including odor and air and water pollution.

**Revenue from nature-based solutions**

Building a resilient rural economy will require diversifying revenue streams for farmers, ranchers and forestland managers. USDA should expand its efforts to promote revenue diversification through markets for nature-based solutions (NBS). To ensure that these markets deliver environmental benefits while building resilience for rural businesses, USDA should:

- Rapidly expand efforts to scale climate-smart agricultural and forestry practices through innovative financial tools. The Secretary should encourage each USDA unit to look for opportunities to pair private capital with public capital to help producers participate in emerging NBS markets. Furthermore, the Secretary should explore using the borrowing power of the Commodity Credit Corporation to raise
capital for a new program in which USDA would buy high-quality NBS credits from producers providing quantified environmental benefits. Such capital could also be deployed to contribute to reserve pools for NBS credits to address reversals and other program risk.

● Any credits for nature-based solutions need to be based on outcomes that are quantified according to robust, scientifically-based and transparent monitoring, reporting and verification (MRV) protocols that address issues of additionality, leakage, double counting of emission reductions or removals, and non-permanence. USDA should leverage opportunities to streamline and automate MRV processes to minimize burdens for participating farmers and reduce program costs.

● The Secretary should expand efforts to provide technical assistance to producers participating in emerging NBS markets, particularly those who might face steep barriers to entry.

Finally, we offer three additional cross-cutting recommendations:

● Access to high speed internet is essential for rural prosperity and community well-being. Rural America is currently poorly served with broadband capacity compared to urban and suburban communities. Widespread broadband will unlock technology solutions that provide educational, health care, environmental and other advancement opportunities. This is a critical step toward providing rural communities the ability to take full advantage of low, zero or negative emissions technologies that facilitate the needed transition toward net zero emissions. USDA should greatly expand efforts to deploy broadband across rural America, an effort modeled on rural electrification efforts in the 20th century.

● USDA should commit to advancing resources for diversity, equity, inclusion and justice in all programs and staffing structures. The agency should look to both increase the fairness in allocation of benefits provided and reduce the inequities in the distribution of USDA benefits and services that have plagued the agency.

● USDA should take steps to elevate the role of guest workers and their families in creating a vital and prosperous rural America. Our country’s farming, ranching and forestry sectors depend on the good will and hard work of immigrant families, especially from Latin America. The last four years have introduced multiple challenges and hostilities toward immigrant communities. The Secretary should work with President-elect Biden, the Secretary of Homeland Security, the Secretary of State and Congress to create a just, safe, humane and legal mechanism for guest workers to contribute to the agricultural economy.

Thank you for the opportunity to provide these recommendations. We look forward to discussing them with the USDA transition team in more depth.

Sincerely,

Britt Groosman
Vice President, Ecosystems
Environmental Defense Fund

CC: Robert Bonnie, Team Lead, USDA transition review team