Statement and Recommendations to the
Select Committee on the Climate Crisis

November 22, 2019

Introduction

Our farming and rural communities report they are facing intensifying cycles of flooding, droughts, rain, fog, fire, and more. We are hearing of these conditions increasing all over the country. For example, the 2019 planting season was seriously delayed by wet fields in much of the Midwest, and the Northeast and Great Lakes regions, with numerous accounts of crops left rotting in the fields. And in the West, conditions are very dry, with wildfires threatening livelihoods and homes. We are deeply concerned about the policy and regulatory response to an emerging climate and ecosystem collapse, both immediately and long-term. The Rural Coalition and the undersigned organizations support critical and well-planned policy to instill resilient farm practices and structural support systems at every level. We further propose immediate transition to proactive mitigation programs rather than reactive disaster relief. We also observe at the outset that a food and agriculture system that is not equitable, inclusive and just is, by definition, not sustainable.

Observations of Climate Change from our Communities:

Our communities across the United States are reporting an increase in unpredictability in climate, impacting many of our farmers. A changing climate makes it difficult for farmers to time their plantings, plan for harvesting, predict need for support, and has greatly disrupted their bottom line with significant crop loss, thus impacting the viability of their businesses and livelihoods. A changing climate does not affect all areas uniformly. Below are examples from our communities:

In regions such as New Mexico, land-based communities are coming off several years of drought. This means conditions are better this year than the past four or five, but the uncertainty has left farmers nervous for the future.

Invasive species thrive in places facing climatic changes and put farmers at further risk. In Oklahoma, *eastern redcedar* is spreading at the rate of 800 acres a day.
Without help for mitigation from USDA especially for historically underserved farmers who farm on heirs property, small cow and calf operations have seen their grazing land taken over by redcedar, which competes with pastureland by consuming up to 55,000 gallons of water per acre per year and puts the viability of their operations at further risk. Other risks they have faced over the past decade include severe cycles of floods, droughts, fires, freezes and tornados.

In California, one of our leaders recently expressed excitement to see fog in coastal regions of California – previously a normal sign of ecosystem health. However, most often that fog is disappearing, negatively impacting ancient bionetworks such as the Redwood Forests. These signs point to eventual ecosystem collapse impacting the surrounding regions, increasing the already great risk of drought and fire.

In Texas, successful Conservation Reserve Programs are ending, with contracts not being renewed. As these end, land may go back into production, releasing more carbon. However, after a time in a reserve program, the amount of carbon sequestered may decline, so benefits may be greater if more fragile land is instead placed in reserve. Reserve program contracts have also typically gone to larger farmers and been less available to historically underserved producers.

In Michigan, farmers have stated that seasonal changes are becoming difficult to predict with spring flooding, longer summers, and later arrivals of snow causing greater disruptions to planting and harvesting seasons. In Massachusetts, farmers who have been farming the same land for 50 years noted they had never experienced a wetter season than in 2018. Farmers of all types were affected and experienced crop loss ranging from significant to total. Just two years prior to this season of extreme wetness, over half of Massachusetts experienced extreme drought - the worst recorded drought since 1965. These extreme weather variations create vast uncertainty for farmers and are very costly to combat.

In Minnesota, the seasons are changing, with maple syrup running much earlier than in the past. The water levels in the northern lakes are higher, threatening the cultivation of wild rice, which has long provided sustenance to the Ojibwe communities.

West Virginia is experiencing extreme heat, with projections that by 2100, the state will experience almost three months’ worth of days with temperatures above 90 degrees. For reference, in 2019, approximately 13 days a year fell into that range.
In Arizona, an indigenous leader with whom we work has documented in his recent dissertation \(^1\) “how management based on Indigenous Agricultural Knowledge (IAK) leads to the same conservation outcomes as NRCS standard practices, but getting IAK based conservation methods approved by NRCS is a complicated process that happens on a case-by-case basis.” He further notes that American Indian participation in USDA Natural Resources and Conservation Service programs remains very low and details the reasons why. He has also shared with our members his methods in cultivating the same land - sharing photos of land that has remained productive for over 100 years. He emphasizes the need to support the continuing planting, saving, selecting and sorting of seeds to assure they adapt to changing conditions.

The Kansas Black Farmers Association reached out to its partners, Kansas State University, the Sustainable Agriculture Research and Education Program and also USDA-Natural Resources and Conservation Service to help figure out what is going on climate wise and how to better educate and simply help its farmers. Their farmers faced extreme drought until 2017 and have now been 'hit' with two years of extreme flooding (washed out roads, bridges, farms and homes). Climate is drastically affecting crops and their production. They plan to conduct research to better understand this phenomenon and to come up with best practices and strategies for farmers and other constituents.

Based on this input and the experience and wisdom of tribal communities and the diverse land-based farmers, ranchers and communities we serve across the nation, we call for policies and programs that supply an immediate response coupled with holistic and durable long-term solutions to build resilience for all communities.

Rural Coalition and its community-based leaders and allies who contributed these comments have worked together for over 40 years. Together, we have helped to craft and worked with Congress to see encoded over 40 sections of policies to improve equity in federal agriculture, food and trade policy. Our proposals, like those shared here, are rooted in the knowledge of land-based communities with deep knowledge of agriculture and ecology. The policies we have seen encoded are designed in consultation with our farmer, rancher, farmworker and indigenous members to both transform previously unresponsive systems, and to provide practical

\(^1\) Johnson, Michael Kotutwa, INDIGENOUS AGRICULTURE KNOWLEDGE: BARRIERS, INTEGRATION, POLICY, AND OUTREACH - A Dissertation Submitted to the Faculty of the SCHOOL OF NATURAL RESOURCES AND THE ENVIRONMENT in Partial Fulfillment of the Requirements for the Degree of DOCTOR OF PHILOSOPHY WITH A MAJOR IN NATURAL RESOURCES in the Graduate College, THE UNIVERSITY OF ARIZONA, 2019
and useful tools to benefit these stakeholders and others like them as they endeavor to care for the earth they till.

**Our Food and Farm System Modus Operandi Needs to Change**

Farmer reports from throughout the U.S. provide substantial evidence of how climate impacts imperil our communities, the farmers, ranchers and workers we serve, and the future of food for our country. We must act swiftly to make changes on all fronts, including developing policies to ensure resilient operations that contribute to the restoration and protection of the environment.

Building programs that support crop diversity, carbon sequestration, silvopasture, and resilience to natural disasters will ensure reductions in greenhouse gas emissions and keep our farmers on their land. Policies must address the need to move away from our input-reliant, monoculture production system that has interrupted and destroyed natural ecosystems, which will only continue to intensify if we fail to confront climate impacts with substantive and forward-looking solutions.

Our long-term concerns include addressing the policies that drive down the prices of commodities far below the cost of production, leading to long-term over-production and the extraction and depletion of nutrients from the soil and of water from aquifers. This system has destroyed the wealth of families and communities across the earth. We share these concerns with our sister organization, the National Family Farm Coalition.

Small to mid-size farm operations cannot maintain their viability and employ sound practices while commodity prices continue a downward trend in an increasingly vertically integrated global market. In this system, capital can move without restrictions while labor cannot. Farm and food chain workers and their families are denied fair wages, and the ability to secure legal presence and live and work safely and with dignity in their communities. Women workers often the least protected and most vulnerable to low wages and sexual harassment. The combined impact of these factors profoundly affects farming and farm laborer communities. The long-term effect is the extraction of the ecosystem’s wealth and productivity from families, communities and future generations.

We seek a holistic and comprehensive approach to building resilience. We believe in the long run this approach will reduce the need for disaster relief programs, better invest scarce resources, and preserve and hopefully quickly restore natural ecosystems.
Overall Approach:

1) **Build Economic and Climate Resilience into Short Term Disaster Mitigation.**

Farmers, ranchers, farmworker and rural communities are all experiencing profound climate catastrophes every year that require immediate response. In the short term, we call for updated approaches to conservation, risk management and disaster mitigation programs. There is a need to create and expand comprehensive disaster mitigation programs to assure these investments also build economic and climate resilience. For example, United States Department of Agriculture’s Wildfire and Hurricane Indemnity Program Plus (WHIP+) designates funds to certain regions affected by natural disasters. However, it is only distributed to a small range of farmers identified as being struck by these defines disasters, leaving many others in economic ruin. Disasters programs need to reach and work for all farmers. Programs such as WHIP+ must be clarified and expanded regarding the climate catastrophes or disasters included under the programs. This farmers whose operations are impacted by all kinds of extreme weather must be able to claim assistance.

Timely and comprehensive disaster support can mitigate current crises and foster resiliency, enabling farmers to be less reliant on disaster aid in the future. Restructuring loans, and increasing direct disaster relief, especially in situations where existing crop insurance programs are not working is also important. This response is particularly crucial for the most vulnerable populations including historically underserved farmers and ranchers, where reducing land loss as a result of natural disasters must be included as a major goal. In this regard, the full implementation of the 2018 Farm Bill provisions related to provide alternate access for operators farming on heirs property is especially important. Previously, operators on land held in undivided interests were ineligible to receive any USDA assistance.

Policies must reflect changes to support risk management programs and practices with demonstrated impact in increasing resilience. The economic impact of increased resilience must also be measured and documented. Current crop insurance programs and options including Noninsured Crop Disaster Assistance Program (NAP), organic programs, and Whole Farm Revenue Protection, are not working hard enough to support diversified and small-scale farmers, and those who are natural stewards of the land. Crop insurance programs that support farmers of a certain scale should be adapted to incentivize carbon sequestration, enhance resiliency, and build health and water storing capacity of soil. Programs such as these have the potential to
encourage farmers to diversify and mitigate climate disasters, while building ecosystem and economic resilience, through the promise of a safety net. The many structural and economic barriers in these programs must be addressed, so they yield the support and tools needed by farmers to succeed.

2) **Address Structural Issues in Agriculture** - We address our comments in the following section to the Select Committee’s questions on agriculture. Because we represent and work on behalf of many front-line communities, we emphasize that our responses are grounded as well in responding to the following fundamental question that permeates all of our work:

11b. **How can Congress better identify and reduce climate risks for front-line communities, including ensuring that low and moderate-income populations and communities that suffer from racial discrimination can effectively grapple with climate change?**

**A) Keeping Land in Agriculture**

In order to restore ecosystems and build and sustain resilience, we must keep farmers, ranchers and rural communities connected to the land. We would argue that we need more farmers and ranchers, and an increase in employment opportunities in the agriculture system. In addition, our federal policies must support the very communities who can best care for the land, the water, and the full ecosystem across our nation.

The industrialization and vertical integration of food system directly contributed to extraction of wealth and resulting land loss. Corporate consolidation pushes down commodity prices and increases monopolization of the food system in everything from production to market access. Small and mid-sized operations are unable to compete in the current economic and climate unpredictability. Consolidation, lack of access to good markets, and a focus on greater industrialization and shortsighted technological fixes are leading us in the wrong direction. We need to create instead policies that preserve land tenure and keep agricultural land in the hands of the farmers and tribal and traditional land-based communities who can best care for the soil, the land, the water, and the forests.

The Rural Coalition and its members including our founding members the Rural Advancement Fund of the National Sharecroppers Fund (Founded 1937) and the Federation of Southern Cooperatives/Land Assistance Fund (Founded 1967) have for over 4 decades focused our efforts on preserving the land base for this nation’s traditional and land-based farmers and communities. These efforts were dedicated to addressing decades of discrimination in USDA programs and services that resulted in
the loss of livelihoods, land, communities and wealth. Our work also includes a longstanding and continuing focus on connecting new farmers and farm workers, including migrant workers, and immigrant and refugee farmers—many of whom are farmers unable to currently access land—with the vocation of agriculture.

Insecure land tenure arrangements are a fundamental issue for all the producers and communities we represent. In order to participate in USDA programs, producers must demonstrate control of the land to secure a farm number and access to federal farm, credit and conservation program benefits.

Immigrant and refugee farmers are often unable to afford land and operate on year to year and word of mouth lease arrangements that render them ineligible for federal conservation support and disaster assistance or any ability to invest in the improvement of the land and protection of the resource base.

Producers operating on heirs property were until passage of the 2018 Farm Bill also unable to secure a farm number and therefore access to most USDA programs, including commodity programs, microloans, the Environmental Quality Incentives Program, the Non-Insured Crop Disaster Assistance Program or other risk management and disaster programs.

The issue of Heirs Property has generated much attention with regard to housing and eligibility for assistance from FEMA and other agencies following natural disasters. A Uniform Partition of Heirs Property model statute was developed and has now been adopted in 12 states and the US Virgin Islands and is pending in several more. Similar laws in other states protect the rights of heirs property interests.

“Heirs Property” is created when landowners die without a will or a succession plan designed to transfer ownership of the land or assigning an executor to divide the property among all living inheritors. “Heirs property” then becomes intestate, and the laws of the state control to whom ownership is passed. Multiple descendants become tenants in common, with each having a fraction of the undivided interest in the land. Land so held lacks a clear title, and therefore cannot be sold without court action such as a partition sale. Family members who may wish to continue farming the land may be without adequate financial resources to buy out other disinterested heirs. The land then most often goes to an outside purchaser. This phenomenon is a primary factor that destroys wealth for the next generations.
Many long-standing landowners, and African American farmers in particular, are unable to secure the resources and qualified and unconflicted legal assistance necessary to secure clear title to land that has been in their family for generations. Producers operating farms on undivided heirs property were also unable to produce a valid deed or lease, which is a mandatory requirement to secure a USDA farm number. Without a farm number, these producers are ineligible for most USDA programs.

The 2018 Farm Bill extended Fair Access for Farmers and Ranchers to operators who farm on “heirs property”. The new provisions ensure that more farmers — especially African-American farmers and farmers of color operating on land with undivided interests – can finally access USDA programs that enable them to protect the soil and water; and continue to operate viable farms that feed their communities. When fully implemented by USDA, the provisions will expand access to critical federal farm programs and help more families resolve long standing heirs property issues by:

- Requiring USDA to provide a farm number and program eligibility to farm owners and operators farming on land that has an assigned administrative authority representing more than 50% of the interests in the property in states who have in force a Uniform Partition of Heirs Property Statute.

- Requiring the Secretary to identify similar alternate forms of documentation in each state as evidence of control of the land, including self-certification, and require FSA and NRCS in each state to accept the same forms of documentation.

- Providing authority for a pilot project in the Credit Title for FSA to make loans available through qualified intermediaries for revolving loan funds to work with heirs to allow owners to resolve heirs property ownership on farmland that has multiple owners. The bill authorizes up to $10 million annually for this pilot, with $ 5 million in appropriations included in the pending funding bill.

- Providing authority to the Secretary to collect data and perform analysis on trends in farmland ownership and operation, transitions of farms and ranchers to new generation of owners and operators, and also to help understand the number of farmers operating on land with undivided interests, and how unresolved land tenure issues impact the ability of producers to access the USDA benefits needed to operate such farms and pass them on to new generations of owners.
• Authorizing State Mediation Programs receiving matching funds to assist families with heirs property issues.

The incorporation of the Fair Access for Farmers and Ranchers Act as part of the 2018 Farm Bill also provides a critical incentive to more states (including territories) to adopt the Uniform Partition Act Statute, and help more families develop succession plans to protect and pass on land to future generations.

The alternate documentation provisions developed in the Farm Bill should serve as a template for language that also must be incorporated in numerous other federal statutes to assure heirs property owners of both land and housing--which for rural and farm families are often linked--can also access federal flood insurance, FEMA and other disaster assistance, federal housing programs, and the full range of conservation easement and forestry programs. We are currently working with several members of Congress to draft relevant legislation.

Another potential method to jointly ensure tenure and environmental remediation is to improve and endow agricultural easement and land trust programs to be operated by and for the benefit of the land-based peoples. Thus, the lucrative tax breaks and endowments now offered for such programs should be redirected to those who have struggled to keep and care for the land in perpetuity. By redirecting these resources, we can find the resources for endowments to build the long-term connection of historically underserved and new entry farmers to the land and communities while generating long-term economic and climate co-benefits. These may include improving soil and air quality, energy diversity, reduced fuel costs and increased employment opportunities, especially in small rural areas.

While NRCS maintains useful easement programs, such as the Agricultural Conservation Easement Program (ACEP), these are still not accessible to most of the producers we represent. More support to farmers is necessary to set aside land, and encourage crop rotation, cover cropping and livestock integration. In addition to direct support, the use of tax code to provide additional and refundable tax deductions should be considered to reduce burdens to families and encourage real investment and support in family scale agriculture.

Easement programs must be restructured to protect and ensure intergenerational tenure especially for traditional and historically underserved farmers and ranchers, and to provide stability and reduce future risk for young farmers, farmworkers seeking to enter farming and transitioning generations. Expansion of these programs will
protect land from development, encourage diverse young farmer participation, and incentivize carbon sequestration and resilient farm management.

**B) Building a New Generation of Farmers**

Protecting land tenure and generational transitions is crucial to future environmental impact and sustainability. A climate justice platform should favor keeping agricultural lands in the hands of farming families.

In order to fully realize all of the potential climate benefits of agriculture now and into the future, support must therefore be provided for a new generation of farmers and ranchers. The stability and longevity of their agricultural operations will ensure healthy and productive farms.

We propose full funding and support for beginning farmer and rancher loan programs, and full borrowers rights including training and protections for all socially disadvantaged and beginning farmers and ranchers. We also are developing a concept for new forgivable loan program focused on getting farmers started and keeping their operation functioning for a minimum of a decade with succession built in.

We further support the proposals of the National Young Farmers Coalition for forgiveness of student loans for farmers after ten years of farming through the Public Service Loan Forgiveness Program.

We emphasize the need to support the organizations who work hand-in-hand with the farmers of the future, including increased support for the Farming Opportunities Training and Outreach (FOTO) Program. This program is a vital investment to provide technical assistance, fair access to USDA programs, education and ability to access markets for historically underserved, veteran, and beginning farmers and ranchers.

The FOTO Program, created in the 2018 Farm Bill streamlines and strengthens existing efforts to support beginning, veteran, and socially disadvantaged farmers. Through a more coordinated and efficient approach, this new consolidated program permanently protects resources that address the critical issues socially disadvantaged, veteran, new and aspiring farmers face in accessing land, building skills, and managing risk and financial security.
It permanently authorizes and provides continuing funding two complementary programs by linking the statutory authorities for both the Outreach and Assistance for Socially Disadvantaged and Veteran Farmers and Ranchers Program and the Beginning Farmers and Ranchers Development Program. It further ensures coordination with the relevant USDA Advisory Committees to ensure continuous stakeholder input, oversight, and improvement of both programs.

For nearly 3 decades, the Outreach and Assistance to Socially Disadvantaged and Veteran Farmers and Ranchers (OASDVFR) Program, authorized in Section 2501 of the 1990 Farm Bill, has been USDA’s primary tool to help our nation’s historically underserved producers gain access to USDA credit, commodity, conservation and other programs and services. The program supports technical assistance to farmers and ranchers through the community-based organizations, tribes, and minority serving educational institutions best prepared to reach and serve them. It has helped sustain rural food systems in hundreds of very small and food insecure counties across the US, particularly concentrated in the South, Southwest and in immigrant and refugee communities. It was expanded in the 2014 Farm Bill to include Veteran Farmers and Ranchers.

Congress created the Beginning Farmers and Ranchers Development Program over a decade ago with the recognition that more needed to be done to ensure the stability and success of the next generation of farmers, including veterans which were formally added to the program in 2014. To date, BFRDP remains the only federal program that is explicitly focused on training the next generation of farmers.

These programs received direct shared funding of $30 million for FY 2019, which will increase to $50 million by 2023 and thereafter. However, Congress should increase support for this important initiative by supporting the additional $50 million in appropriations authorized annually in order to assure support for the programs most critical to helping historically underserved and new entry farmers grow their important role in the agriculture and food system.

C) Building Resilience in our Agriculture, Food and Energy Systems.

Much of the current thinking regarding resilience relates to expanding policies, strategies and methods to sequester carbon. In our view, we must focus on greenhouse gas reduction policies that build rural sustainability. These policies must focus on practical and effective ways to build rural resilience and economic equality.
In order to focus on effective methods of carbon sequestration and reduce the agricultural sector’s contribution to greenhouse gas emission there must be genuine policy and regulation directed towards ending the subsidization of monocultures, GMO production and CAFOs. Focus must be directed towards smart investments in renewable energy and building regenerative ecology in our communities through agriculture. In order to do this, there must be a reliable structural and agency support system.

Farmer, rancher and rural support must be redirected into smarter investments, such as restoration of prairies, native animals and pollinator strips. Restoring prairie grasses and chickens, as well as buffalo/bison populations enhance carbon sequestration and improve climate resiliency.

Additionally, investments in non-genetically modified or biotech crops and animals will improve and diversify economic prospects. Industrial hemp is able to sequester two tons of carbon per one ton of hemp. It can be cultivated for thousands of products, including paper, clothing, food and even powerful batteries. Bison is also a dynamic prospect for livestock production, ideal for regenerative land management, land restoration and provides a range of sustainable products, from meat to hide. Integrating sustainable grazing through buffalo/bison, prairie chickens and native grasses on prairie land can move agriculture away from toxic feedlots and CAFOs.

It is possible to restore ecosystems and introduce resilient methods of regenerative farming by focusing on carbon sequestration. Through introducing proper support structures and investments in native plants and animals, as well as beneficial crops like industrial hemp, policy can guide the agricultural sector to becoming carbon neutral.

D) Reorientation of the Agriculture, Food, and Energy Systems

The current vertically integrated industrial food and agriculture system is unsustainable. Decreasing crop prices and limited options for safety nets require farmers to increase production to profit or simply survive till the next year. The result is larger volume or supply of basic commodities, further decreasing the prices and returns farmers receive. This cycle leaves farmers reliant on subsidy support and leaves many with no choice but to produce as much as possible. Choosing the best management practices for the ecosystem in the long term is not a viable option at present for farmers seeking to make loan payments and continue their operations. A reorientation is an essential step to transitioning to a system that is ecologically, socially and economically sustainable, as well as ethical and fair.
Basic infrastructure must also be addressed in order to facilitate sustainable agricultural operations. Investment in regional connectivity is crucial, allowing for reduced Greenhouse Gas emissions and facilitating diverse pathways for agricultural products to reach markets. The current industrial model consolidates resources, market access, and decision-making influence. By investing in basic connectivity infrastructure, there can be great distribution of resources and information, services and more.

This nation is dependent on energy resources secured from rural areas and produced through our agriculture system. There are currently are many opportunities to move away from the current reliance on fossil fuels for energy and examine the potential of developing solar and wind energy and using biomass from waste products for the production of both energy, and for fiber, plastic-alternatives and other consumer products. However, in each case, it is critical to understand that land must also be used for the production of food, and for care of the ecosystem and climate, including sequestration of carbon.

Industrial Hemp - Industrial hemp has grown in the U.S. since before this nation was founded. The plant was cultivated during the colonial times for thread and fiber. According to Hempstead Project Heart, the US Department of Agriculture (USDA) from 1890-1950 was a hub of research and development on Hemp in part due to a fiber shortage in America at that time. However, for the past 68 years, Hemp was labeled as dangerous drug and regulated as a controlled substance by the Drug Enforcement Agency under the US Department of Justice. Industrial Hemp differs from its narcotic cousin, Cannabis, popularly known as marijuana in that it contains only a trace of THC, the chemical that creates the narcotic effect.

On December 20, 2018, the Agricultural Improvement Act of 2018 (Farm Bill) was signed into law, which relegalized hemp for farmers and entrepreneurs in tribal, rural, and urban communities throughout the United States. Our coalition of organizations anticipates hemp as one solution to the problems we face in our current economic landscape.

An emerging Industrial Hemp industry has been expanding for the past several years led by large investors who could operate using their own cash assets. However, small farmers have largely been unable to enter the market. The 2018 Farm Bill authorized the restoration of ability of producers to cultivate and sell hemp by removing it from the controlled substances list and under prescribed conditions allows tribes, states, and territories to establish regulatory structures within their boundaries.
This will allow farmers and ranchers to produce a high value cash crop while retaining federal farm program benefits that were previously not allowed.

While Congress directed USDA to draft as well as implement rules and regulations for the American hemp industry, the rollout has been pushed back to the 2020 growing season. This in turn has caused issues preventing farmers and tribes from moving forward on hemp production and for accruing the benefits to the land, soil and climate that industrial hemp could help them achieve.

**Our Specific Recommendations:**

The following recommendations from solutions are derived from the above analysis and categorized according to the agriculture-related questions put forward by the Select Committee.

**Reorienting our Food and Agriculture System**

“What policies should Congress adopt to reduce carbon pollution and other greenhouse gas emissions and maximize carbon storage in agriculture? And What policies should Congress adopt to help farmers, ranchers, and natural resource managers adapt to the impacts of climate change? “How can Congress better identify and reduce climate risks for front-line communities, including ensuring that low and moderate-income populations and communities that suffer from racial discrimination can effectively grapple with climate change?”

Congress should adopt the following guiding criteria to support policy creation in this process:

- Ensure full, prior and informed consent from Tribal Nations and that tribal consultation be incorporated into all steps in developing climate action policies.
- Enable and ensure the full and active representation and participation of communities, particularly vulnerable and marginalized communities, in policy creation.
- Enable farming operations of all scales to benefit equitably; eliminate barriers to participation in benefits endemic to small operations and historically underserved farmers.
- Eliminate and/or counter the disproportionate climate burden borne by low-income and communities of color.
Our Recommendations - We urge the Select Committee to consider the following recommendations. Many of these would both reduce carbon pollution from agriculture and help those charged with caring for the land adapt to climate impacts.

1. Significantly increase research and technical assistance for agricultural producers to make agriculture a net carbon sink. Involve Tribal Nations, farmers, ranchers and rural communities especially from the most vulnerable communities in research to develop the best solutions.
   
   - Specifically increase support for beginning and historically disadvantaged farmers, including female and tribal farmers,
   - Assure implementation of new heirs property protections and the funding and implementation of the heirs property relending fund.
   - Recommend that Congress approve full annual appropriations to support the National Agriculture Statistics Service study on land ownership and tenure, including the degree absentee ownership and land held as heirs property.
   - Fund and incentivize agricultural extension, NRCS, Conservation Districts and nonprofit assistance to partners carrying out technical assistance (including whole farm planning) or supporting peer-to-peer learning about carbon-friendly practices.
   - Fund farmer led and initiated research in partnership with land grant university research to increase support for regenerative agriculture
   - Support USDA research and grants to support innovative approaches to sequestering carbon.
   - Significantly increase federally funded climate mitigation and adaptation research.
   - Support organic practices research and farm transition to organic; significantly increase investment in organic research (OREI) and ensure all farmers have access to these programs.
   - Fund public and tribal led plant and animal breeding for climate-resilient agriculture.

2. Support climate-friendly livestock production systems and eliminate support for Concentrated Animal Feeding Operations (CAFOs')
   - Diversify livestock production to include a wider range of ruminants, including restoration of bison and other species and the native prairie grasses that benefit the ecosystem
   - Expand small-scale meat processing to enable regenerative ranching and incorporation of animals into crop agriculture.
   - Support small scale meat processing.
● Strengthen rules for grazing management on public lands to prevent overgrazing and increase soil carbon sequestration.
● Assure fairness and protection of civil rights in the allocation of leases for grazing on federal lands.
● Reduce or eliminate subsidies to CAFOs and implement a CAFO moratorium
● In addition to the rental agreement fee paid for having solar panels on the land, landowners/farmers should receive a percentage of payments received per kilowatt hour of the output of the leased panels.
● Federal or state laws should be adopted to assure transparency and fairness in the making of all energy leases including those for production of solar and wind energy.
● Policies should also establish extra incentives for solar companies to utilize working farmland for solar project and partnering with farm landowners.

3. Enforce antitrust laws and other policies to reduce consolidation of the meat industry
   ● Identify and dismantle policies that undermine family farming and force farmers to “get big or get out.”

4. Support policies that promote reduction of waste in the agricultural system, from field to table — in all its forms.
   ● Reorient the food system from one that is highly vertically integrated to incentivize production closer to where markets are located and to incentivize exchange among and between communities.
   ● Develop distribution systems, especially local distribution systems, that are responsive to consumer needs, and especially for vulnerable populations and to provide healthy and culturally valued foods.
   ● Provide new investments to increase production and availability of fresh products in rural areas and in cities, especially in new communities, and to provide new and better jobs from field to table in this reoriented food system.

5. Refine farm policy to enhance climate outcomes
   ● Incentivize planting cover crops, trees, filter strips, hedgerows, and other practices that increase soil capacity to sequester carbon and hold water.
   ● Significantly expand funding for conservation programs (CSP, EQIP, CRP, WRP, FWP, GRP).
   ● Improve operation of conservation programs to ensure money is targeting top climate and social priorities (e.g., no CAFO funding).
● Implement mandatory conservation compliance within all crop insurance programs to ensure healthy soils.
● Fund support for water conservation; require protection of groundwater from pollution and overuse.
● Condition receipt of funds on farm implementation of conservation practices
● Tighten rules on organic standards and/or establish a regenerative label
● Increase the organic cost-share program.
● Establish a grant program for farmers to transform their existing farm equipment into a biodiesel engine and/or purchase new equipment that is environmentally friendly (i.e. run on solar or electric), effectively supporting farmers who are looking to reduce GHG emissions through their operations.
● Expand USDA’s Wildfire and Hurricane Indemnity Program Plus (WHIP+) which provides disaster payments to producers to offset losses from hurricanes, wildfires, and other qualifying natural disasters by redefining qualifying natural disasters in the WHIP+ Program to include extreme weather events such as an excess or absence of rain.

6. Strongly limit the use of pesticides and other petroleum-based inputs that destroy soil health and harm pollinators and require full reviews and great caution for all plants and animals designed with genome manipulation.
   ● Remove barriers and strengthen support for sustainable and organic production systems.
   ● Support climate-friendly nutrient management methods to reduce N2O emissions.
   ● Issue a moratorium on genetically modified organism approvals tied to new pesticide traits and full study of herbicide resistance.
   ● Restore and strengthen the regulatory and approval process for plants and animals designed with new methods of plant genome manipulation to include gene editing, gene drives, CRISPR, and all forms of new breeding techniques.

7. Create program support for on-farm energy conservation and clean energy production.
   ● Close the loop by encouraging biofuels or other energy solutions from agricultural waste products.
   ● Support on-farm use of waste as an energy conservation strategy.
   ● Invest in the development of industrial hemp for use in solar energy and improved batteries,
8. Support composting of manure and other organic “wastes” as well as appropriate application of compost on working lands to enhance soil carbon sequestration
   ● Invest in compost infrastructure with best available control technologies and incentivize ‘good neighbor’ policies.
   ● Designate compost facilities as “essential public services,” as are landfills and wastewater treatment facilities.

9. Protect and build the carbon sequestration potential of sensitive and marginal lands

10. Develop a comprehensive program to assure farmers of color and small- and mid-scale diversified family farmers are recruited, trained and supported to share their wisdom on relevant boards, committees, commissions, and advisory panels.

11. Maximize participation by historically underserved farmers and ranchers in healthy soils programs and all USDA programs, including access by heirs property owners.

12. Tighten rules on water pollution, including part-time streams, and enforce nutrient pollution standards.

13. Establish a large sustainable farm corps program within AmeriCorps.

   ● Model sequestration incentives after existing mechanisms that support development of wildlife tunnels, pollinator corridors, and raptor perches.
   ● Also consider programs such as Massachusetts Chapter 61 and 61a – a tax break/incentive to preserve forestland pockets on agricultural land, not monoculture timber production or GE trees schemes that do not cycle carbon effectively, if at all. These programs tax land based on the current use of the property (i.e., the productive potential of your land for growing trees), not the much higher “fair market” or development value of the land.
   ● Incentivize the use of cover crops to sequester carbon and restore soil, including native seeds blends, industrial hemp and seed selection programs for farmers to maintain and develop soil as well as seed resilience;
   ● Prioritize whole ecosystem approaches, such as coupling the reintroduction of bison alongside prairieland restoration; and research and development of appropriate, eco-friendly marketing, processing and distribution.
   ● Scale sustainable markets toward smaller operations, lessening the need for concentrated feedlots and processing.
● Examine the health of the whole economy, including the social, ecological and economic costs of labor, fair compensation, conditions of workers (farm, field, factory) and their exposure to climate impacts.
● Develop an accounting model that considers the non-monetized costs of commercial models that rely on the export of highest-value products without calculating the costs of poverty, food insecurity, health, forced migration, and large-scale economic displacement of land-based peoples.
● Instruct agencies to work together, and incentivize combined strategies, so that funding for conservation and innovation incentives may benefit from the multiplier effect.

The Role of Carbon Pricing - The following section includes our recommendations on the following Select Committee Question:

“What role should carbon pricing play in any national climate action plan to meet or exceed net zero by mid-century, while also minimizing impacts to low- and middle-income families, creating family-sustaining jobs, and advancing environmental justice?” and “How could sectoral-specific policies, outlined in questions 1-3, complement a carbon pricing program?”

Carbon Taxing, Carbon Markets, Carbon Trading, and offsets – In our view, these work only to prolong the lifespan of outdated, dirty corporations by affording them the ability to buy more carbon credits to slow their transition towards meaningful carbon emission reduction. A carbon Cap and Trade or budgeting system favors large corporations with the highest buying power, as they are able to more easily spend money on increasing their carbon cap, rather than investing in emissions reduction or ceasing harmful operations. It puts a price tag on the value of healthy human lives, allowing certain larger corporations to continue their polluting ways, while forcing others to alter their operations. While a cap and trade system might work to reduce emissions in some areas in the long-term, it’s a halfway solution that does not address the underlying structural causes of climate change and is not a sufficiently urgent response to an immediately pressing issue.

The businesses that are able to sell their carbon credits because of their ability to reduce emissions below the carbon cap are effectively designated as the sole decision-makers on how best to reduce carbon emissions. It removes the local community, local and regional legislature, and broader public from the climate conversation, only allowing a select few to decide which companies continue to emit greenhouse gases, how they continue to emit greenhouse gases, and where they will continue to emit greenhouse gases. It also excludes the public from the conversation
on what technologies or policies are best for reducing emissions, leaving it up to shareholders and business executives to decide how money from trading carbon credits will be used to reduce emissions.

Carbon taxes work similarly, serving effectively as a green light for businesses that can afford a higher tax rate to continue producing high levels of emissions. In order to stay in business, companies that cannot afford higher operational costs become the sole decision-makers in deciding how best to reduce emissions. Reserving the power to affect changes that impact the livelihood of everyone - with most profound implications for the most vulnerable populations - means that the results accrue for just a few – particularly shareholders and business executives – and disables key stakeholders’ voices from being considered and subjugates communities to the will of only a few.²

We propose instead that Congress redirect money away from destructive tax credits and instead to invest in compensating farmers and workers in the food system from the farm to the grocery for the work they do. Investments in the long-term resiliency of agriculture, such as healthy soils and cover crops, regional food systems, and zero waste infrastructure are critical to redirecting this extractive approach.

The past and impending costs of climate disasters and extreme weather should be calculated to redirect future investment into long-term climate resiliency.

**The Role of Innovation** - Included here are our recommendations in response to the following Select Committee questions on Innovation:

- *a. Where should Congress focus an innovation agenda for climate solutions? Please identify specific areas for federal investment and, where possible, recommend the scale of investment needed to achieve results in research, development and deployment.*
- *b. How can Congress incentivize more public-private partnerships and encourage more private investment in clean energy innovation?*

Related to our analysis of carbon market solutions that primarily benefit the largest economic players, and exclude the most vulnerable communities from decision-making, we recommend that Congress focus an innovation agenda on equitable inclusion in advancing the emerging climate solutions that have the most wide-reaching benefits, and co-benefits. Just as anything considered to be mitigation should directly reduce climate impacts for frontline communities, innovation should be defined by investment in the resilience of small to mid-scale businesses, as well as

² [http://co2colonialism.org/historical-overview/](http://co2colonialism.org/historical-overview/)
restoring economies in rural and urban areas that have been shut out of the prosperity and opportunity generated by climate-damaging economic schemes.

There are many existing and emerging opportunities to focus investment on equitable inclusion in the advancement of energy diversity. For example, investments that incentivize on farm expansion of cultivation of industrial hemp for remediation combined with research and development to expand its use as an ideal material to substitute for graphene could help lower the cost of manufacture of solar panels and advancement of battery technology. Similarly, rooftop solar incentives with the co-benefit of jobs creation can benefit rural as well as urban communities. Biodiesel from agricultural waste products and biodiesel and electric farm vehicles present another opportunity to incentivize businesses to diversify energy production and innovate with those investing in sustainable agriculture. Support for these and similar initiatives would accelerate the transition from imperfect solutions to genuinely cleaner inputs and outputs.

We also wish to endorse the comments sent by our colleagues leading Solutionary Rail regarding transportation. The current agriculture and food system, and access to markets, employment and labor, are dependent on fossil-fuel powered transportation systems that also largely bypass rural communities and launch most products into vertically integrated transportation and distribution systems. We favor more investment in rail systems and well-planned transportation networks such as those proposed by Solutionary Rail that re-establish and build connections and restore systems of exchange within and between communities.

We also strongly recommend that Congress invest only in public-private partnerships in which all partners have demonstrated a commitment to the broadest public interest, and multi-sector collaboration that includes real support and leadership by the most vulnerable communities. The results of these enterprises must be shared by all partners, and particularly the most vulnerable communities. Indicators of the kinds of innovation that should be employed should include the capacity for partnering, collaboration, and whole system solutions. Holistic solutions should be applied to any approaches claiming to advance the bioeconomy. We have deep reservations about employing concepts such as climate smart and precision agriculture, and about the appropriate uses of technology and innovation. We should develop, research, adopt and replicate the most far-reaching, long-term climate solutions with results that are clean, equitable and just.
Research and development as well as deployment of results should have measurable outcomes that include ecologically sound methods and outcomes, and equity including increased economic opportunity.

Whereas the genetic engineering of seeds, food, fiber plants, and animals has played a significant role in the increased consolidation of the agriculture industry, the privatization of national food security, and the increasing reliance of agriculture on petrochemical inputs, we strongly recommend that Congress place a moratorium on the approval of genetically modified organisms and uphold regulatory oversight rules for new breeding techniques and biofuels.

Additionally, technological innovation should center on sustainable farming and agriculture and forestry practices as well as clean manufacturing.

Sponsored scientific inquiry (studies) should also recognize innovation as working to recuperate many of the already recognized best practices including traditional stewardship and conservation of farmland, forest and waterways, as well as native foodways, plant medicine, seed preservation, wild harvesting and gathering.

We thank the Select Committee on the Climate Crisis for considering our comments, and we are prepared to answer any questions you may have.

Rural Coalition
Alabama State Association of Cooperatives
Alianza Nacional de Campesinas
Black Farmers and Agriculturalists, Tillery, NC
Black Farmers and Ranchers New Mexico
Concerned Citizens of Tillery, Tillery, NC
Cottage House, Inc., Ariton, AL
Kansas Black Farmers Association
North Carolina Association of Black Lawyers Land Loss Prevention Project
Oklahoma Black Historical Research Project, Inc.
Operation Spring Plant, Oxford, NC
National Latino Farmers and Ranchers Trade Association
Rural Advancement Fund of the National Sharecroppers Fund, Orangeburg, SC
World Farmers, Lancaster, MA

We also wish to recognize and thank the Sierra Club Grassroots Network Team on Food & Agriculture and the Indigenous Environmental Network for their contributions