



February 18, 2022

Terry Cosby
Chief, Natural Resources Conservation Service
U.S. Department of Agriculture
Washington, DC 20250

Chief Cosby,

Thank you for the opportunity to provide feedback to the Natural Resources Conservation Service (NRCS) on a number of revisions to conservation practice standards. The Institute for Agriculture and Trade Policy (IATP), based in Minneapolis, Minnesota, cares deeply about access to federal programs that make daily life better for farmers while helping them be more resilient against the effects of climate change. We were formed in the wake of the 1980's farm crisis and aim to provide policy solutions that prevent another crisis from happening. We engage in local, state-level, national, and international policy and participate in Minnesota's NRCS State Technical Advisory Committee to advocate for equitable farmer-focused programs.

Attached are our comments on Federal Register, Vol. 87, Pages 2746-2747, Docket No. NRCS-2022-00853 the following revised conservation practice standards: 327 Conservation Cover, 329 Residue and Tillage Management/No-till, 345 Residue and Tillage Management/Reduced Till, 368 Emergency Animal Mortality Management, and 379 Forest Farming.

We are encouraged by ways in which the proposed revisions provide more clarity and specificity, making these practices more accessible. We also believe that climate mitigation through greenhouse gas emission reduction should remain a priority for NRCS and should be emphasized as much as possible, not removed from CPS language. While we believe there are ways these practices can be improved, more than anything we appreciate NRCS's willingness to make them better.

Please feel free to reach out to us if you have any questions. Thank you for your consideration.

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327 Conservation Cover

IATP is encouraged by language changes included in this practice standard. Specifically, we appreciate the following:

- The detail added in the Soil Health purpose highlighting that conservation cover can enhance soil organic matter, aggregate stability, habitat for soil organisms, and reduce compaction.
- Creating a separate Purpose focused on reducing sediment transport to surface water.
- A clarification of General Criteria adding “amendments” to nutrient application and the statement “*Nutrients and amendments are not always needed for native plant establishment.*” IATP appreciates that NRCS recognizes that adding nutrients when they are not needed can be detrimental to water and soil quality.

We are disappointed to see that NRCS removed specific language on reducing greenhouse gas emissions as a Purpose of this practice standard. While this purpose still includes “*Reduce emissions of particulate matter,*” we encourage the restoration of the mention of greenhouse gas emissions. Conservation cover is one of the most approachable NRCS practices for farmers and can be a gateway for larger emissions reductions. Conservation cover can help reduce carbon emissions, as well as nitrous oxide emissions associated with fertilizer use. In the midst of a worsening climate crisis, it would be irresponsible to remove a focus on such harmful gases.

329 Residue and Tillage Management – No Till

IATP supports the following changes to CPS 329:

- The addition of criteria for erosion reduction by including complementary practices such as cover crops, crop rotation, and contour farming.
- The additional focus on soil health – specifically identifying habitat for soil organisms, aggregate stability, and improving soil organic matter quantity as separate Purposes.
- The addition of a new Consideration regarding pollinator and insect habitat.
- The addition of a new consideration on soil moisture conservation.

We encourage the consideration of all energy inputs into criteria to reduce energy use. While we appreciate the stated goal of reducing energy consumption associated with field operations by at least 25 percent, we emphasize that other energy inputs should be considered, including the production and transportation associated with fertilizers, herbicides, and other chemicals.

345 Residue and Tillage Management - Reduced Till

IATP supports the following changes to CPS 345:

- The addition of Purposes relating to soil organic matter and soil life.
- The addition of Additional Criteria for soil health.
- The addition of General Considerations regarding deep-rooted crops. Crops with extended root systems can have myriad soil health benefits, including reduced compaction, as mentioned in the revised CPS.
- The addition of considerations for wildlife habitat.

We encourage the following improvements to this practice standard:

- Reword soil health purposes to emphasize the improvement of soil health indicators rather than the maintenance of them. Specifically:
 - “Improve soil health by *maintaining or increasing* soil organic matter quantity
 - “Improve soil health by ~~maintaining~~ *improving* soil aggregate stability
 - “Improve soil health by ~~maintaining~~ *improving* habitat for soil organisms”
- Similarly to CPS 329, we encourage the reduction of all energy inputs, including from production and transportation of fertilizers and herbicides, not simply energy use from in-field activity.
- More explicitly mention greenhouse gas emission reduction in this practice standard, as soil disturbance is a major source of carbon loss.

368 Emergency Animal Mortality Management

During the COVID-19 Pandemic, supply chain disruptions, mass infections of slaughterhouse workers, and other factors led many livestock farmers to make the difficult decision to eliminate their animals. Similar choices are made in the aftermath of natural disasters where barns, pastures, and other facilities for livestock are destroyed.

While we recognize that these incidents are difficult and affect the bottom line of many farmers, especially small farmers, we do not believe that this practice should be a part of NRCS’s conservation programs. USDA and Congress should consider alternative payment programs such as special disaster payments for animal mortality while ensuring that funds are not disproportionately being awarded to Confined Animal Feeding Operations (CAFOs).

IATP will continue to advocate for local and regional food systems and more abundant small and mid-scale meat processing plants that ensure that large market shocks such as pandemics or climate-related disruptions do not lead to mass casualties of livestock.

379 Forest Farming

IATP supports many of the revisions to Practice Standard 379, formerly known as Multi-Story Cropping. Among the aspects of this revised practice standard we support are the following:

- The name change from multi-story cropping to forest farming is a positive change. Forest farming is a more descriptive name and more approachable for farmers.
- The new purpose of increasing plant/tree diversity, native understory species, and overall species compatibility. It is important to replicate natural systems as much as possible through agriculture, especially in diverse and dense forest ecosystems.
- The added purpose of “improve terrestrial habitat.”
- We appreciate the inclusion of soil health enhancement with plant residue and woody debris as a consideration.
- We appreciate the added flexibility for grazing in forest farmed settings. The desire for the addition of grazing to this practice is something we have heard directly from responsible farmers as a way to manage invasive species and other species that do not enhance the forest ecosystem.

We would encourage the following improvements to this practice standard:

- Add “Reduce greenhouse gas emissions” as a Purpose of this practice standard.
- Remove the consideration “*Select crop, tree, and/or shrub varieties based on their tolerance to agricultural chemicals that may be applied at the site or on adjacent lands.*” We believe that forest farming should aim to replicate the natural forest environment as much as possible. In many cases, selecting plant varieties based on tolerance to chemicals runs contrary to the stated purpose of increasing plant diversity, native understory species, and terrestrial habitat.