



BIPARTISAN POLICY CENTER

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

November 1, 2021

RE: Notice of Request for Public Comment on Climate-Smart Agriculture and Forestry Partnership Program, Docket Number: USDA-2021-0010

Dear Secretary Vilsack,

We are writing to you in response to the Department's request for input regarding the proposed new Climate-Smart Agriculture and Forestry (CSAF) Partnership Program in our capacity as the current co-chairs of the Bipartisan Policy Center's Farm & Forest Carbon Solutions Task Force. The task force was convened with the recognition that America's lands have an enormous opportunity to deliver important carbon removal and emissions reduction benefits, capitalizing on emerging markets for carbon credits, new incentive programs, and other tools that could generate tens of billions of dollars per year in new investment for working lands within a decade. Task force members include leaders across industry, agriculture, and forestry; environmental and conservation nonprofits; trade associations; and former government officials.

Over the past months, the task force has been developing a roadmap for scaling public and private investments in land-based carbon storage and emissions reductions, ensuring the integrity of these solutions, and reducing barriers to adopting voluntary stewardship practices that sequester carbon and result in important environmental co-benefits like improved water quality and wildlife habitat. The task force expects to issue recommendations and policy priorities following final deliberations later this year.

The task force has discussed and supports using the Commodity Credit Corporation to finance pilot efforts that can expand climate-smart practice adoption and build investor confidence in emerging markets for carbon credits, greenhouse gas emissions reductions, and associated commodities, with an eye toward scaling up if the pilots prove successful. Through the CSAF Partnership program, USDA can help enhance the consistency, integrity and transparency in these emerging markets and reduce transaction costs for participants. As USDA moves to a call for proposals, we believe the program would be best implemented if developed in accordance with the following broad goals:

1. **Be Flexible and Complementary:** The CSAF Partnership Program should allow for diverse financing, incentive, and insurance structures with the goals of reducing risks and entry costs for participating landowners and enhancing investor confidence in emerging markets. The program should complement existing USDA conservation programs and avoid competition with existing carbon offset marketplaces and registries. Specifically, USDA can complement existing market efforts by reducing market entry costs for certain capital and time intensive climate-smart agriculture and forestry practices; support efforts to aggregate projects among multiple landowners and land operators; and pursue partnerships that streamline and reduce



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- quantification, monitoring, and verification costs. USDA should work with the private sector to support improved consistency, risk management, and quality across carbon offset projects.
2. Support a Producer- and Landowner-Led Approach: A variety of applicants should be eligible for the CSAF Partnership Program, including landowner associations and nonprofits, conservation districts, state, local and tribal nation governments, cooperatives, corporate partners and others. USDA's eligibility criteria should require the appropriate producers and landowners who will adopt practice changes to lead all projects.
 3. Advance Consistent and Accurate Quantification, Monitoring, and Verification Measures: The CSAF Partnership Program must support investments that advance consistent and accurate quantification measures and streamline reliable approaches to any monitoring or verification needed to ensure climate benefits are measurable and reliable for market participants. Doing so will help ensure the long-term confidence of carbon credit purchasers in the validity of these offsets.
 4. Ensure Pathways to Participation for Small, Disadvantaged, and Diverse Communities and Production Systems: USDA should ensure the program and individual proposals are equitable and include clear and accountable pathways for participation among a wide range of landowners and producers.

Thank you for your leadership and consideration of our comments. The BPC Farm & Forest Carbon Solutions Task Force looks forward to sharing our full recommendations with the Department in the coming months.

Sincerely,

Senator Heidi Heitkamp
Co-chair

Senator Saxby Chambliss
Co-chair