



March 20, 2020

Chief Matthew Lohr
Natural Resources Conservation Service
U.S. Department of Agriculture
1400 Independence Ave., SW, Room 5105-A
Washington, DC 20250

Docket Number: NRCS-2019-0006

Dear Chief Lohr:

Thank you for the opportunity to comment on the interim rule for the Agricultural Conservation Easement Program (Docket Number: NRCS-2019-0006). The Ecosystem Service Market Consortium's (ESMC) mission is to advance ecosystem services markets that incentivize farmers and ranchers to improve soil health systems that benefit society. ESMC is a member-based organization launching a national scale ecosystem services market for agriculture to recognize and reward farmers and ranchers for their environmental services to society. ESMC members represent the spectrum of the agricultural sector supply chain with whom we are scaling sustainable agricultural sector outcomes, including increased soil carbon, reduced net greenhouse gases (GHG), and improved water quality and water use conservation. USDA conservation programs, technical assistance and science-based standards can play an instrumental role in our efforts.

ESMC's market will financially reward farmers and ranchers who voluntarily adjust crop and livestock production systems in ways that increase soil carbon sequestration and retention, improve water quality, conserve water use, and provide many additional ecosystem service outcomes. ESMC's program allows producers to choose only those changes they desire to undertake, and as few or as many as they select, with the understanding that they will be paid based on outcomes. The program is currently in development with piloting and deployment prior to full market launch in 2022. ESMC will quantify ecosystem services impacts in a verified and certified program and monetize the impacts as ecosystem services credits or attributes of value to demand side buyers. Farmers and ranchers are paid for desired outcomes, and the attributes or credits are sold in a national ecosystem services market to entities seeking to reduce their environmental impacts.

ESMC expects to work with producers participating in Farm Bill conservation programs; therefore the provisions in the rule and the 2018 Farm Bill that support a producer's ability to participate in and receive compensation from a private environmental services market will

ensure that farmers and ranchers can participate in both ACEP and the ESMC market. Section 1468.10 includes provisions for landowners participating in Wetland Reserve Easements or Agricultural Land Easements to obtain environmental credits under other programs. ESMC encourages NRCS to ensure that ongoing program implementation allows landowners to have the opportunity to participate in ecosystem services credit markets. Ensuring that producers and NRCS staff have a clear understanding of permitted uses on the land and that participation in ecosystem services markets when consistent with the terms of the easement is acceptable under the program. This will enable ecosystem services market efforts and USDA conservation programs to work cooperatively to advance quantified environmental outcomes of conservation practices and to ensure the provision of financial incentives to producers who voluntarily engage in those efforts.

Thank you again for the opportunity to comment on this regulation.

Best regards,

A handwritten signature in blue ink, appearing to read "Debbie Reed", with a long horizontal flourish extending to the right.

Debbie Reed
Executive Director
Ecosystem Services Market Consortium