

July 15, 2021

**FROM:** Debbie Reed  
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**TO:** Elizabeth C. Archuleta, Director  
Office of Intergovernmental & External Affairs  
U.S. Department of Agriculture (USDA)  
1400 Independence Avenue, SW  
Washington, DC 20250

**SUBJECT:** Notice of Request for Public Comment on Identifying Barriers in Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA (Docket ID: USDA-2021-0006)

Thank you for the opportunity to comment on the U.S. Department of Agriculture's (USDA) request for input on advancing racial justice and equity for underserved communities as part of its implementation of Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. (Docket ID: USDA-2021-0006). The Ecosystem Services Market Consortium (ESMC) is a member-based not-for-profit organization launching a national scale ecosystem services market for agriculture to recognize and reward farmers and ranchers for their environmental services to society. Members and stakeholders of ESMC's public-private partnership include a wide range of agricultural businesses, farmer-led associations, farmer check-offs, farmer cooperatives, conservation organizations, foundations, land-grant universities and research institutes, as well as USDA. 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, reduce GHG emissions, improve water quality, conserve water, and provide many additional ecosystem service outcomes, such as enhanced biodiversity and habitat conservation. Together with our members across the agricultural supply- and value-chain, we are pilot testing the entire program, investing in critical RDD&D to create a national scale ecosystem services market program and infrastructure for the agricultural sector, and refining the program prior to full national-scale market launch in 2022.

In response to recent events, ESMC launched its Working Group on Inclusion and Racial Justice (IRJ) in July 2020 to ensure that equality, equity, inclusion and justice will be consciously incorporated into everything we pursue and achieve, including the ESMC strategic plan and metrics for success, and to ensure that farmers and ranchers who are Black, Indigenous, and People

of Color (BIPOC), and other diverse stakeholders, are included in our organization, our decision-making, and our programs. Over the past year, we have sought to activate measurable changes that address the needs of farmers and ranchers of color as they relate to ESMC's market program, its partnerships, and the broader agricultural sector. As a result of our efforts, the IRJ working group successfully enrolled two BIPOC-serving institutions into our organization's 'Founding Circle', our most prestigious membership group which holds decision-making power over our organization's strategic planning, and are in the process of launching two BIPOC-led pilot projects to develop protocols that will help underserved farmers interact with ESMC's market once it is launched.

ESMC is grateful for this opportunity to provide input on how USDA can leverage its programs, funding and financing capacities, and other authorities to advance racial justice and equity in U.S. agriculture. ESMC incorporates diversity and inclusion into our company culture and working environment, contracting relationships, technical assistance and programs to ensure that they are free of discrimination and harassment. Diversity spans across age, ancestry, ethnicity, color, disability, race, sex, sexual orientation, gender identity or expression, religion, national origin, political affiliation, socioeconomic and family status, genetic information, HIV/AIDS status, protected veteran or military status, geographic region, or any other characteristic. It should be noted that the following comments reflect the official thoughts and positions of ESMC only and do not represent the positions of ESMC's entire membership. Many of ESMC's member organizations plan to submit separate comments to the same solicitation which will reflect those organizations' official statements to USDA's request for public comment.

USDA funded research, analysis, technical assistance and conservation programs help our members and many other farmers in the U.S. agricultural sector access ecosystem services markets by providing a form of up-front financing for systems changes that generate increased beneficial environmental outcomes which can be monetized on these markets. ESMC's innovative and technologically advanced national scale program is specifically designed to leverage USDA cost-share programs to increase agricultural production while also making significant progress towards the recently announced nationally determined contributions (NDC) under the Paris Agreement. In this way, USDA conservation programs can further leverage significant private-sector investments in ecosystem services markets to put agriculture at the center of our nation's climate change mitigation strategy.

However, USDA conservation programs must be accessible to all of agriculture, including farms and ranches of all sizes, socially and economically disadvantaged producers, and BIPOC farmers and ranchers. Currently, many USDA programs are not adequately accessible or appropriately designed to meet the needs of BIPOC and other underserved producers. Conservation programs can provide needed financing in these communities for the adoption of production systems that generate credits and represent a steppingstone for producers towards participation in ecosystem services markets. Lack of access to USDA programs for BIPOC and other underserved agricultural communities can therefore limit their ability to participate in ecosystem services markets and create other barriers to adopting climate-smart agriculture practices, further leaving behind these communities in our national and global efforts to address climate change. ESMC urges USDA to resolve equity and accessibility issues with BIPOC farmers and ranchers who have been largely excluded from USDA programs in the past. Resolving issues of access and participation begins with incorporating equity considerations into the development of all programs, from design to

implementation and reporting, which we believe will further enable Black, Brown, Indigenous, and other underserved farmers and ranchers to participate in private, voluntary ecosystem services markets.

Thank you again for the opportunity to provide input as USDA seeks to identify barriers in its programs and advance racial justice and equity in agriculture. ESMC believes USDA can make significant strides in reconciling past injustices to BIPOC and other underserved agricultural communities as long as it continues to listen to the needs of all producers. ESMC looks forward to working closely with USDA to address racial injustice and promote equity throughout ecosystem services markets and U.S. agriculture more broadly.

Sincerely,

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