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SUBJECT: Proposed Revisions to the National Handbook of Conservation Practices for the Natural Resources Conservation Service [Docket No. NRCS-2023-0022]: Grazing Management (Code 528)

ESMC appreciates the opportunity to comment on the Proposed Revisions to the National Handbook of Conservation Practices for the Natural Resources Conservation Service [Docket No. NRCS-2023-0022], specifically the proposed revisions to Grazing Management (Code 528).

The Ecosystem Services Market Consortium (ESMC) is a member-based, not-for-profit organization operating a national-scale voluntary ecosystem services market for agriculture to recognize and pay farmers and ranchers for their environmental services to society. Over 60 members, funders, and additional stakeholder organizations participate and contribute to ESMC’s public-private partnership, including a wide range of agricultural businesses, farmer-led organizations, farmer
check-offs, farmer cooperatives, conservation organizations, foundations, land-grant universities and research institutes, as well as the U.S. Department of Agriculture (USDA), U.S. Department of Energy (U.S. DOE) and the Environmental Protection Agency (EPA).

Our non-profit organization includes a market program, Eco-Harvest, and a research and innovation program, the Ecosystem Services Research Consortium (ESMRC), in which we invest to continually improve and expand our market program into new regions, new production systems, new producer populations, and to improve and bolster ESMC’s digitized measuring, monitoring, reporting, and verification (MMRV) platform.

ESMC’s Eco-Harvest market program, protocol and outcomes earned program validation and verification from 3rd party auditor SustainCERT in 2022. ESMC is one of only two agricultural carbon programs to achieve SustainCERT validation and verification for Scope 3 outcomes. ESMC’s scope 3 Impact Units are sold to buyers with supply chain commitments and the proceeds allow ESMC to pay farmers and ranchers whose stewardship produces GHG mitigation outcomes. Enrolled producers 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 additional ecosystem service outcomes, such as enhanced biodiversity and habitat conservation—including those outcomes derived through the adoption of improved grazing practices. ESMC’s program enables end-to-end project development through verification in a digitized, scalable, non-profit program.

ESMC is pleased to offer the following comments on the proposed changes to the National Handbook of Conservation Practices regarding grazing. The following comments reflect the official thoughts and positions of ESMC and do not necessarily represent the positions of ESMC’s entire membership.

**ESMC COMMENTS:**

**Proposed Revision to Grazing Management (Code 528):**

*Changed the title to “Grazing Management” to eliminate confusion, promote a sense of adaptability, and better convey the intended purpose.*

**ESMC Comment:**
ESMC agrees with the proposed title change to “Grazing Management” from “Prescribed Grazing” and would recommend updating the terminology to “grazing management” throughout the document.

**Proposed Revision to Grazing Management (Code 528):**

Revised the “Purpose” section to add the purpose to reduce plant pest pressure and create two new purposes from one existing purpose, one addressing soil erosion and the other addressing soil health related resource concerns.

**ESMC Comment:**

ESMC supports the addition of “Reduce plant pest pressure” and supports replacing the current bullet point “Reduce soil erosion, and maintain or improve soil health” with two separate bullet points: “Reduce soil erosion,” and “Maintain or improve soil health.”

Soil health and erosion control are two separate areas of soil management which require two distinct on-farm strategies to address, especially regarding grazing management. Emphasizing the unique requirements of each is an important update to the conservation practices handbook.

**Proposed Revision to Grazing Management (Code 528):**

Revised the “General Criteria” section to include provisions to build resilience and resistance to climate-related disturbances.

**ESMC Comment:**

ESMC supports the addition of “to build resilience and resistance to climate-related disturbances” to the “General Criteria” section. It is important to highlight that the ecological benefits derived from conservation and climate-smart grazing practices not only improve the environment, but make that environment and the grazing practices it supports more resilient to extreme and uncertain weather due to climate change.
Added text to clarify that the standard is intended to be used for managing vegetation using herbivores.

**ESMC Comment:**

ESMC supports further clarification of the intent of the text, but notes that this issue appears well addressed in the existing standard definition:

“DEFINITION: Managing the harvest of vegetation with grazing and/or browsing animals with the intent to achieve specific ecological, economic, and management objectives.”

ESMC supports adding clarifying language but would caution that added language should not dilute the clarity of the existing standard’s definition—managing the harvest of vegetation with grazing and/or browsing animals—nor the existing standard’s purpose—with the intent to achieve specific ecological, economic, and management objectives.

**Proposed Revision to Grazing Management (Code 528):**

Added a new statement to the “Plans and Specifications” section referring to the National Range and Pasture Manual and clarified that contingency plans need to consider if weather events may be intensified due to climate change.

**ESMC Comment:**

ESMC strongly supports expanding contingency plan guidance to include reference to increasingly extreme weather events driven by climate change. While conservation and climate-smart grazing practices help increase the overall system resilience against climate shocks, there is no substitute for good planning for those inevitable, negative weather impacts climatologists know will worsen with climate change. Ranching and farming are a business first, and good planning is vital to the financial sustainability of those practices.

**ESMC Concluding Remarks:**

Improved grazing protocols are a critical intervention to improve environmental outcomes on range- and working-lands across the United States. ESMC is encouraged by NRCS’s proposed revisions to the National Handbook of Conservation Practices and supports these efforts to improve clarity for the end-user and elevate the need for resilience and contingency planning in the face of a changing climate.