



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES  
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On behalf of the State of Florida and the Florida Department of Agriculture and Consumer Services (FDACS), I respectfully offer the following comments in response to the U.S. Department of Agriculture’s (USDA) request for comment on the implementation of the President’s Executive Order on Tackling the Climate Crisis at Home and Abroad.

Our department welcomes the President’s executive focus on advancing conservation and doing so in partnership with farmers, ranchers, and foresters – our best stewards of the land. As this Administration works to identify climate-smart land management practices and prioritize them within federal conservation programs, our FDACS programs and divisions, such as our Office of Agricultural Water Policy and Florida Forest Service, have the potential to support and enhance existing USDA efforts.

Agricultural producers and state departments of agriculture have vital roles to play in addressing the challenges posed by the impacts of the climate crisis. On February 1, my department and I submitted to the Biden Administration a proposed [State-Federal Partnership Plan \(Exhibit A\)](#) aimed at leveraging state and federal cooperative opportunities to address the climate crisis within existing frameworks, while developing new programs in the coming months. The comments below expand upon the concepts proposed within that Partnership Plan.

Existing USDA programs can be improved to better incorporate resiliency and climate change adaptation into implementation frameworks. Priority practices within existing cost share can be prioritized, more robustly funded, and better directed with minor changes to current program structures. Watershed assessments can be more broadly targeted to address larger resiliency focuses that would holistically address cross-cutting issues, as well as incentivize resiliency on the landscape. Due to the voluntary nature of the existing programs, partnerships are necessary with state programs that have more robust best management practice implementation requirements. These partnerships will help incentivize practices that not only benefit the production of agricultural entities, but also encourage a cultural shift towards a focus on the public goods that can be provided through resilient land management practices.

In addition to benefiting the agricultural community, approaches that target resiliency and adaptation to climate change provide larger watershed benefits to many communities, including urban environments that are dependent on a broader watershed for water quality (Lake Erie and the Everglades), water supply (groundwater aquifers throughout the U.S.), and flood control (Mississippi River Valley). Given that 90 percent of the deleterious flood, water quality, and water scarcity impacts occur during 10 percent of the precipitation or drought events, and these events are becoming more frequent as a

result of climate change, existing USDA programs must be adapted to address these impacts and prioritize environmental services beyond the farm or micro-regional level. This will require research to determine the best per-acre valuation of the services provided as a result of program or project implementation, as well as the establishment of a baseline expectation of conservation practices expected or required in normal agricultural production practices.

Programs addressing new, younger, and beginning farmers, minority, veteran, women, and socially disadvantaged farmers, and emerging local markets that benefit and involve small and medium size farmers are vital to promoting sustainability on the landscape. These programs, engaging opportunities such as the emerging urban agricultural framework developing in New York, California, Oregon, Florida and several other states, can interface with other frameworks to address diversity in agriculture, promote environmental justice and food access, tackle the continuing problem of food deserts and disconnects in providing vital social programs such as free and reduced lunches, and provide a ready food source (gleaning) for local NGOs and food banks.

The below represents my department's feedback on the specific issues to which USDA is seeking public comment.

### ***1. Climate-Smart Agriculture and Forestry Questions***

*A. How should USDA utilize programs, funding and financing capacities, and other authorities, to encourage the voluntary adoption of climate-smart agricultural and forestry practices on working farms, ranches, and forest lands?*

*1. How can USDA leverage existing policies and programs to encourage voluntary adoption of agricultural practices that sequester carbon, reduce greenhouse gas emissions, and ensure resiliency to climate change?*

We recommend utilizing existing programs within a systems approach at the watershed level, including intrastate and transboundary ecosystems, and including the expansion of the existing NRCS programs to allow funding for suites of practices with benefits calculated cumulatively. USDA should significantly increase water, wastewater, and climate resiliency infrastructure funding, particularly targeting rural infrastructure, and build resiliency prioritization into grant and conservation programs.

We recommend reversal of the current Department of Justice/EPA policy banning supplemental environmental projects (SEPs), which could result in greater flexibility in integrating holistic approaches. We also recommend utilizing and enhancing the Role of Advisory Committees and Agricultural Advisors within EPA, enhancing the Water Sub-Cabinet model to include climate resiliency and better reflect the policy priorities of the new Administration, and emphasizing interdepartmental coordination and cross program pollination, particularly between EPA and USDA on program implementation and watershed-level research.

*2. What new strategies should USDA explore to encourage voluntary adoption of climate-smart agriculture and forestry practices?*

We recommend that USDA focus water efforts on ensuring a safe drinking water supply, including attention to lead and forever chemicals within an environmental justice framework, reclaimed and recycled water, and integrated water management, wastewater and stormwater - LID and green development incentivization.

We also recommend that USDA promote green infrastructure in the rural environment and agricultural production, through tax credits, dedicated funding, and an integrated systems application utilizing stormwater and reclaimed wastewater recycling, as well as emphasize the integration of natural systems into greater watershed management, such as “room for the river” conceptual frameworks, and incentivize and promote the expansion of integrated and multi-faceted urban green spaces.

USDA could consider payments for water storage, watershed management, and wetland rehydration, including a set rate per acre-foot above an established expected base elevation and retention schedule, in addition to auction/bid frameworks, tied to development of models showing efficacy of water storage in certain regions and scenarios. Research is necessary to quantify watershed benefits regarding the restoration of former wetlands for a variety of land uses, such as ditched-drained soils. Citrus is a key driver in Florida, and the dispersed water frameworks utilized by the South Florida Water Management District could provide a template.

USDA may also consider tying agricultural practices to rural infrastructure resiliency in the water realm through existing programs and funding, including connecting NRCS programs to State Revolving Fund programs to allow for collaboration between rural water and wastewater utilities and conservation practices in the agricultural sector.

*B. How can partners and stakeholders, including State, local and Tribal governments and the private sector, work with USDA in advancing climate-smart agricultural and forestry practices?*

We recommend enhancing the cooperative federalism framework to tie NRCS programs to congruent state programs through Orders and MOAs with state agencies. This will eliminate redundancy and allow leveraging to achieve greater conservation outcomes that benefit both the producers and natural resources. Many of the cover cropping and crop rotation and management strategies being emphasized are already being implemented in an effective fashion through state programs, such as those in Florida and Ohio, that can provide templates as well as leveraging opportunities.

We also recommend that USDA integrate advisory committees and domestic and international climate policy frameworks. It is critical that USDA and the Biden Administration restore role of science in all agencies, including reversing recent policies on involvement of scientists receiving federal funding, and restore Advisory Committees and Advisory Boards to a more prominent role in advising and auditing agency actions.

*C. How can USDA help support emerging markets for carbon and greenhouse gases where agriculture and forestry can supply carbon benefits?*

We recommend the establishment of payments structured on land use types tied to research (USDA, EPA, state partner) on per-acre sequestration rate for grasslands, wetlands, and other lands. This will require state and region-specific research that can involve state agencies and research institutions under a cooperative federalism framework. For instance, see [Attachment B](#) regarding research projects currently being undertaken in Florida that could be tied in to existing NIFA research.

*D. What data, tools, and research are needed for USDA to effectively carry out climate-smart agriculture and forestry strategies?*

In addition to existing EPA and USDA research, we recommend the inclusion of NOAA research and climactic assessments, as well as international trend analyses and programmatic research into the structural planning framework for program implementation. As noted above, we also recommend enhancing research targeting the development of per-acre carbon sequestration rates for various watersheds, landscapes, soil types, climates, production methods, and other factors.

We recommend that USDA develop econometric tools to assess multi-faceted practices or suites of processes to set quantitative values for the holistic benefits achieved through implementation, as well as further develop targeted research regarding soil health, including the vital connection between the utilization of soil supplements and other methods aimed at controlling pH that can bind nutrients and impact bioavailability. We also recommend that USDA continue researching the viability of cover crops that can be utilized as nutrient scavengers as part of a crop rotation framework, including the utilization of cannabis and hemp within a holistic systems approach.

*E. How can USDA encourage the voluntary adoption of climate-smart agricultural and forestry practices in an efficient way, where the benefits accrue to producers?*

We recommend that USDA establish a priority focus for environmental and agriculture funding on small and medium sized producers and the incentivization of conservation practices. USDA should stress greater structural clarity and eliminate the discretionary ability to choose politically expedient projects over highly ranked and productive projects that was endemic in the previous administration.

USDA should investigate the simplification of programs into a holistic interagency “one stop shop” focused on resiliency and watershed management that is not limited to a single program or benefit. Particularly for agriculture, focus on a holistic approach will more efficiently incentivize practices that provide significant multi-faceted benefits.

We also recommend that USDA make the Agricultural Land Easement Program (ALE) congruent with Florida's Rural and Family Lands framework, which currently pays 50 percent (or 75 percent, if certain grasslands). USDA can make ALE a stand-alone agricultural easement program, where NRCS pays 100 percent of easement cost and holds easement – this is already undertaken with WRE. Currently, it is easier to protect a 3,000 acre parcel under a conservation easement than a 300 acre parcel that is more environmentally sensitive or strategically located. Additionally, USDA should tie cost share incentives and water resource improvements to CEs to allow for integrated project development.

We also recommend that USDA update requirements of its Conservation Stewardship Program to increase the prioritized valuation of native habitat and native range. Current programs value native habitat less than improved pasture, and this change will make it cost-effective to manage native habitat that is under pressure to intensify or develop.

Regarding natural disaster payments, current processes are highly complex and result in small and medium growers being lost by the time funding procedures are finally articulated. It has taken almost two years to secure timber and irrigation agreements in place between FDACS and USDA/FSA to deliver meaningful relief to producers decimated by Hurricane Michael. We recommend that USDA provide for the ability to sequester funding that could then be accessed through existing criteria. To incentivize and improve resilience, USDA could allow for enhancement of conservation practices in the implementation of emergency relief; for example, instead of simply replacing an existing center pivot, utilize the opportunity to work with a producer and associated state agency to achieve additional conservation or resiliency benefits.

## **2. Biofuels, Wood and Other Bioproducts, and Renewable Energy Questions**

*A. How should USDA utilize programs, funding and financing capacities, and other authorities to encourage greater use of biofuels for transportation, sustainable bioproducts (including wood products), and renewable energy?*

*B. How can incorporating climate-smart agriculture and forestry into biofuel and bioproducts feedstock production systems support rural economies and green jobs?*

*C. How can USDA support adoption and production of other renewable energy technologies in rural America, such as renewable natural gas from livestock, biomass power, solar, and wind?*

We recommend that USDA promote renewable energy, including tax credits for low emission vehicles and home insulation, and aid to states that struggle with partisan and captured public utility commissions. Where power is provided through co-ops not regulated by public utility commissions, such as many rural communities, we recommend that USDA work to enhance financing opportunities to increase renewable energy in these areas.

We also recommend that USDA address rural infrastructure issues that are currently obstacles to efficient implementation of conservation practices, such as the need to develop funding programs to address challenges with energy infrastructure that result in producers continuing to rely on diesel powered wells and pumps, instead of electric tie-ins or the utilization of renewable energy sources. This will require cooperative efforts at the state level, as state energy regulations can vary significantly, as well as dedicated coordination with and funding for rural electric co-ops.

USDA should also promote use of sound land management practices on federal lands, including the stopping of oil drilling in ANWR and on other public lands, and fulfilling a longstanding, bipartisan commitment to preserve oil drilling bans off the coast of Florida.

### **3. Addressing Catastrophic Wildfire Questions**

- A. How should USDA utilize programs, funding and financing capacities, and other authorities to decrease wildfire risk fueled by climate change?*
- B. How can the various USDA agencies work more cohesively across programs to advance climate-smart forestry practices and reduce the risk of wildfire on all lands?*
- C. What additional data, tools and research are needed for USDA to effectively reduce wildfire risk and manage Federal lands for carbon?*
- D. What role should partners and stakeholders play, including State, local and Tribal governments, related to addressing wildfires?*

With increased wildfire activity impacting many parts of the country, the USDA should look to proven and effective mitigation tools and strategies, including those employed at the state level. When wildfire enters the wildland-urban interface, or WUI, areas where human development meets natural unoccupied lands that are both fire-dependent and fire-prone, the effects on communities can be catastrophic, including the loss of life as well as socioeconomic devastation.

Prescribed fire is the most versatile, cost-effective and valuable land management tool we have to protect our communities, our firefighters, and our forests. Prescribed fire clears out hazardous overgrowth that fuels catastrophic wildfires, makes wildfires less severe and safer to respond to, and fosters new growth that keeps our forests healthy and protects biodiversity. The Florida Forest Service oversees one of the most active and highly-regarded prescribed fire programs in the country; continuing this practice and leading others to build similar programs is essential in effectively reducing the risk of wildfire.

As Florida's population continues to rise, the challenges associated with educating the public also increases. Our fire-dependent ecosystems and fire-prone landscapes can be a complex story to communicate, especially for new residents moving into the WUI areas. The USDA should consider increasing funding and resources that aim to improve the understanding prescribed fire and wildfire. Improving communication strategies and tactics will bridge the gap between perception and reality but ultimately reduce human-caused wildfires, the leading cause of wildfires in Florida.

With increased fuels along coastal areas due to hurricanes, the ability to fight wildfire with traditional tactics has dramatically changed. Additionally, tractor and equipment technology are ever-evolving, making operations and maintenance more difficult. The USDA should consider providing the funding, training, and resources needed for reliable, updated equipment to effectively fight fire.

With nearly half of the state covered in forest land, Florida is primed for leading carbon sequestration efforts. Managing our forests with the highest level of stewardship is the key to ensuring they are viable and available for future generations. The USDA should work with the state to invest in educating and promoting the use of mass timber, which specifically targets reducing carbon emissions and aims to create resilient buildings in existing city infrastructure.

The USDA should also consider carbon sequestration as a viable technique through which both federal and state government agencies can lead by example. Regenerative agriculture can help sequester carbon from the atmosphere at levels that will have a real impact on the climate crisis. With 9.7 million acres of farmland, Florida is an ideal state for potential pilot programs related to the Administration's initiatives to direct federal conservation payments to farmers who use their fields to capture more carbon, as my department recently partnered with state lawmakers on legislation to do at the state level.

#### ***4. Environmental Justice and Disadvantaged Communities Questions***

*A. How can USDA ensure that programs, funding and financing capacities, and other authorities used to advance climate-smart agriculture and forestry practices are available to all landowners, producers, and communities?*

*B. How can USDA provide technical assistance, outreach, and other assistance necessary to ensure that all producers, landowners, and communities can participate in USDA programs, funding, and other authorities related to climate-smart agriculture and forestry practices?*

*C. How can USDA ensure that programs, funding and financing capabilities, and other authorities related to climate-smart agriculture and forestry practices are implemented equitably?*

As one of the greatest challenges facing agriculture, we urge USDA to promote minority owned farms and research the utilization of easements and land trusts to allow greater minority participation in agricultural production. USDA should partner with state and local governments, regional NGOs, and land grant university extension programs to develop programs aimed at specifically targeting minority and underserved populations through outreach and education programs. For instance, FDACS is currently producing significant volumes of handouts, videos, seminars, and other outreach efforts to provide more opportunities and access for underserved demographics. USDA may also consider assessing and restructuring current programs to prioritize portions of available funding for minority farmers and underserved producers, including providing heightened consideration and scoring for those applications that improve access for those groups.

#### ***Conclusion***

In close, USDA, the Secretary, the President, and the Administration have an extraordinary opportunity to make significant gains in the fight against climate change through sustainable, climate-smart agricultural programs and policies. Through collaboration with multifaceted state agencies like ours, as well as NGOs and other partners, innovative new ground may be broken that harnesses the power of agriculture to improve and conserve our lands, waters, climate, and natural resources for generations to come. My department and I look forward to partnering with USDA and the Administration to achieve these goals and address the climate challenges shared by all Floridians, Americans, and the world.

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