NATIONAL CATTLEMEN'S BEEF ASSOCIATION
CENTER FOR PUBLIC POLICY

PUBLIC LANDS COUNCIL

William Hohenstein
Director, Office of Energy and Environmental Policy
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

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National Cattlemen's Beef Association and Public Lands Council Response to Notice of Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad, 86 Fed. Reg. 14403.

The National Cattlemen's Beef Association (NCBA) and the Public Lands Council (PLC) (herein identified as "the livestock groups") appreciate the opportunity to submit comments to the U.S. Department of Agriculture (USDA) in response to its call to collect stakeholder input on climate-smart agriculture and forestry. NCBA is the oldest and largest national trade association representing the interest of cattle producers, with both direct members and over 250,000 members represented through its 44 state affiliate associations. PLC is the sole national association whose singular focus is to represent the interests of approximately 22,000 cattle and sheep producers who hold federal grazing permits throughout the West.

Farmers and ranchers face increasing pressure from consumers to be socially responsible, while balancing existing needs to remain environmentally conscious and economically viable. America's cattle producers work hard to implement new technologies and practices that reduce our environmental impact, while simultaneously increasing efficiency. Beef production in the United States emits 10 to 50 times less greenhouse gases than production in other countries around the world.[1] From 1975-2017, the U.S. reduced emissions from beef cattle by 30% through improved genetics and technologies.[2] Domestic sheep producers have also made significant investments in genetics, grazing technologies, and pasture-based management systems in order to optimize the efficiency of their operations and promote sound environmental practices. We appreciate the USDA allowing the agriculture sector to weigh in on what will be most helpful in driving our current efforts further, faster.

Cattle and sheep production in the United States are a climate solution and already implement climate-smart agriculture practices. Cattle graze nearly 815 million acres in the United States – over one third of our nation's continental land mass.[3] This figure includes approximately 250 million acres of land owned or managed by federal agencies to be made available for permitted

[1] Herrero, M., et al., 2013. Biomass use, production, feed efficiencies, and greenhouse gas emissions from global livestock systems. Proc. Natl. Acad. Sci. 110: 20888–20893.
[2] USDA-NASS Quick Stats Tools. Available at: https://www.nass.usda.gov/Quick_Stats/.
[3] USDA Economic Research Service (USDA-ERS). 2018. Major land uses. https://www.ers.usda.gov/data-products/major-land-uses/.

livestock grazing, where appropriate. It is important to note that livestock grazing is compatible with other land uses –North America's landscape is ideal for ruminant grazing; agricultural producers are able to graze livestock without deforesting. In fact, livestock grazing makes it possible for marginal grounds to provide economic productivity while also enhancing the resources' capacity for environmental good. Farms and ranches across the nation provide open green space, sequester carbon, foster wildlife, and serve as natural water filters. Producers appropriately stock acreage so that livestock do not overgraze or undergraze, maintaining these natural areas for future beneficial use. Utilizing rotational grazing practices, ranchers concentrate livestock for short increments of time to ensure consumption efficiency and reduced impact to both grass and soil.

Not only do cattle graze marginal rangeland that is otherwise unsuitable for agricultural production or development, but also graze in forests across the country and are a key tool in improving forest healthy to prevent deforestation through catastrophic wildfire. This grazing practice, commonly referred to as silvopasture, involves strategically grazing cattle in forested areas to maximize nutritional and environmental benefit. America's livestock producers and forest managers work hard to maintain and enhance forest health through the use of grazing to manage invasive species, strategically remove or decrease fuel load, and conserve wildlife habitat. Land in the United States is suitable for multiple, often simultaneous, uses.

U.S. cattle and sheep producers recognize and appreciate the environmental benefit that ranches' private land investments provide, and work to maximize this benefit by leveraging investment on public lands as well. To this end, farmers and ranchers in the U.S. have collectively enrolled over 140 million acres in USDA conservation programs. As USDA develops a plan to carry out Executive Order 14008, it must focus on maximizing opportunities and positive outcomes for all producers, regardless of size.[4] Ensuring that all agricultural operations in the United States have access to voluntary conservation programs, new technologies, farm loans, and technical assistance is the only way to secure industry-wide emissions reductions.

1. Climate-Smart Agriculture and Forestry

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?

Efficiency in USDA Conservation Programs. Voluntary conservation practices supported by research and implemented by producers with technical assistance are the key to increasing efficiency and resilience. The use of cover crops by farmers across the nation is perhaps the best example. While cover crops have been a key tool in the agricultural producer's toolbox since the mid-20th century, the producer community knew little about which cover crops were best suited for their climate and soil type. Often, the most suitable cover crop can differ between regions, states, counties, or even fields on a single farm. Years of dedicated research by USDA and land grant universities continue to develop the cover crop knowledge base. Now, farmers can utilize USDA and land-grant university resources to determine the cover crops that best suit their individual operations.

[4] *Tackling the Climate Crisis at Home and Abroad*, E. O. 14008 of January 27, 2021.

The livestock groups urge USDA to bolster programs that keep land in production, rather than promoting programs that allow land to lay fallow. These "working lands" programs, including USDA's Environmental Quality Incentives Program (EQIP) and Conservation Stewardship Program (CSP) cost-share programs, allow producers to manage their land efficiently while simultaneously contributing to our nation's food supply. Land in production, whether it be crop fields or pastures with grazing cattle, provides a greater carbon sink than a fallow landscape. Ruminant grazing increases land's ability to sequester carbon, by deepening root structures and encouraging photosynthesis.[5] USDA-NRCS not only provides cost-share funding through its EQIP and CSP programs, but also technical assistance to farmers and ranchers who wish to implement conservation practices. The benefit of Conservation Technical Assistance (CTA) is its personalized approach: local NRCS employees work with agricultural producers to implement a suite of conservation practices best suited to fit the individual needs of each operation. Many of the solutions supported by NRCS' Conservation Technical Assistance are the product of land grant university research and extension. Voluntary conservation practices, supported by research and implemented by producers with technical assistance, are the key to increasing efficiency and resilience.

As USDA works to improve agriculture's environmental footprint, the livestock groups urge the Agency to forgo use of subjective metrics, such as potential climate impact, to determine eligibility to conservation programs. Any standards for conservation program access, including the conservation practice standards, should be rooted in science. Animal feeding operations utilize voluntary conservation programs to establish manure management systems and eliminate waste discharges. By shutting the door to producers who will most significantly benefit from conservation programs, efforts to limit access based on potential climate impact would directly reduce the programs' overall environmental benefit. Greenhouse gas emissions cannot be considered in a vacuum; the Agency must consider how best to achieve holistic environmental improvements. Air quality, water quality, soil quality, and wildlife habitat are all necessary elements in establishing conservation programs that improve the overall environmental footprint of the industry.

Access to Farm Lending. For many farmers and ranchers, farm loans and loan guarantees made available through USDA's Farm Service Agency provide the foundation for their operation's financial stability. For beginning farmers, low-interest loans reduce capital burdens that would otherwise be a barrier to entry. For producers experiencing drought, flooding, or the aftermath of a natural disaster, funding ensures that their operations stay afloat – which in turn ensures consistent land management and continued environmental stewardship. Farm loans ensure that livestock operations, especially small feeding operations that are not subject to federal environmental regulations, have the means to implement manure management systems, reducing their environmental impact while simultaneously allowing the use of manure as organic fertilizer.

A recent paper published by the Commodities Futures Trading Commission (CFTC), considering the risk posed by "climate-exacerbated extreme weather events", called for USDA to limit funding availability to agricultural producers: "The U.S. Department of Energy (DOE), U.S. Department of Agriculture (USDA), and U.S. Department of Transportation (DOT) have the authority to

[5] Lal, R. 2011. *Sequestering carbon in soils of agro-ecosystems.* Food Policy. 36(Suppl. 1):S33-S39.

encourage clean energy and resilience through the loans and loan guarantees they deploy to a range of large-scale infrastructure projects."[6] Lending to agricultural producers is inherently high-risk and without USDA programs would likely be subject to high-interest loan structures; Congress established the Farm Service Agency's predecessors for this very reason. Limiting access to low-interest loans and loan guarantees would directly contradict the mission of the Farm Service Agency. The livestock groups strongly caution against adopting climate-related requirements for obtaining access to USDA loans, loan guarantees, or insurance.

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?

USDA Task Force on Agricultural Air Quality Research. This Task Force, most recently chartered on January 4, 2021, reviews agricultural air quality research, promotes intergovernmental coordination in establishing agricultural air quality policy, and ensures that air quality conservation practices supported by USDA are based on peer-reviewed research. This group of agricultural researchers will play a vital role in ensuring that any USDA policy related to climate-smart agriculture maximizes outcomes while ensuring economic feasibility for farmers and ranchers. The livestock groups urge USDA to utilize the Task Force as a sounding board for updates to existing programs and development of new programs in carrying out Executive Order 14008.

State Technical Committees. The livestock groups generally support the continued utilization of NRCS state technical committees to vet and localize standards related to federal conservation practice standards**.** However, while we appreciate NRCS's localized approach to conservation technical and programmatic assistance, decentralization is only effective when stakeholders maintain an active role in the conversation. Presently, technical boards are not required to include producers, effectively limiting stakeholder input over the standards that effect their ability to participate in vital programs. NCBA notes that its state affiliates are included as State Technical Committee participants in certain states and appreciates this effort by NRCS. NRCS must ensure that producer voices are heard on all State Technical Committees, particularly when Conservation Practice Standards are under review and could limit producer accessibility.

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

GWP*. As the government seeks to enact its climate strategy, the livestock groups urge the adoption of the GWP* methodology. GWP* accurately characterizes the warming potential of short-lived GHGs, such as methane.

The 100-year variant of the Global Warming Potential (GWP_{100}) has been formally adopted in international climate policy (currently as established in the Kyoto Protocol, and in the draft text of

[6] Climate-Related Market Risk Subcommittee (2020). *Managing Climate Risk in the U.S. Financial System*. Washington, D.C.: U.S. Commodity Futures Trading Commission, Market Risk Advisory Committee.

the Paris Agreement[7]) and standardized Life Cycle Assessment (LCA)/carbon-footprinting approaches[8]). Subsequently, GWP_{100} has become the de facto standard for expressing emissions in the scientific literature and general media, having essentially become shorthand for the relative climate impacts of a given product or activity. Despite its ubiquity, the relationship between aggregate CO_2 Equivalent (CO_2-e). emissions calculated using GWP_{100} and global warming itself is ambiguous. Fundamentally, many of the shortcomings of the GWP_{100} calculation as a universal climate metric arise because it cannot sufficiently differentiate the impacts of long- and short-lived climate pollutants (SLCPs). In previous reports, the International Panel on Climate Change (IPCC) has acknowledged the shortcomings of current methods of reporting methane impacts, including GWP_{100}. GWP* was first reported by the Climate Dynamics research team at the University of Oxford in 2018, led by Myles Allen (commonly referred to as "the physicist behind net zero") and has been gaining acceptance in the scientific community as a GWP calculation that more effectively measures the global warming impact of methane.[9]

Under the United Nations Framework Convention on Climate Change (UNFCCC), reporting of GHG emissions has been standardized in terms of CO_2-equivalent (CO_2-e) emissions using Global Warming Potentials (GWP) over 100 years, but the conventional GWP_{100} methodology does not adequately capture the different behaviors of long-lived climate pollutants (LLCPs) and SLCPs. The atmospheric lifetime and radiative impacts of different GHGs differ dramatically. Acknowledgement of this reality led to the widescale adoption of the GWP_{100} methodology. GWP_{100} equates emissions using a scaling factor – CO_2-e. GHGs are assigned a GHG equivalency, then that number is used to determine the emissions' potential impact. Following GWP_{100}, a pound of methane equates to 25 pounds of CO_2. Thus, methane is calculated as $25CO_2e$. However, this simplified scaling factor fails to recognize the amount of time emissions remain in the atmosphere – an equally important factor in determining potential atmospheric impact. The GWP* methodology seeks to remedy this oversight.[10]

Anthropogenic warming estimations are largely determined by the cumulative total emissions of LLCPs and the emission rates of SLCPs. GWP* equates an increase in the emissions rate of an SLCP with a single "pulse" emission of CO_2, and thus considers not only the initial intensity of GHGs, but also the amount of time that they remain in the atmosphere. This approach is a significant improvement on the conventional GWP_{100} methodology. Further, the GWP* methodology modifies the conventional GWP definition to consider CO_2 warming equivalents (CO_2-we) rather than CO_2-e. Following GWP*, SLCPs can be incorporated directly into carbon budgets consistent with long-term temperature goals, because every unit of CO_2-we emitted generates approximately the same amount of warming, whether it is emitted as a SLCP or a LLCP. This is not the case for conventionally derived CO_2-e measurements. The adoption of accurate emissions methodology is necessary to ensure that national and international climate policies achieve desired outcomes. NCBA urges the United States' adoption of GWP*, and further asks the United States to promote GWP* adoption internationally.

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[7] UNFCCC 2018 Presidency consultations on modalities, procedures and guidelines under the Paris Agreement with a focus on transparency Draft Report Version 1.

[8] *ISO 14044 2006 Environmental Management—Life Cycle Assessment—Requirements and Guidelines.*

[9] Allen, M. et al, A solution to the misrepresentations of CO_2-equivalent emissions of short-lived climate pollutants under ambitious mitigation, Climate and Atmospheric Science 1, 16 (2018).

[10] Cain, M., Lynch, J., Allen, M.R. et al., *Improved calculation of warming-equivalent emissions for short-lived climate pollutants*, Climate Atmosphere Science 2, 29 (2019). https://doi.org/10.1038/s41612-019-0086-4.

Enteric Methane Inhibitors. The livestock groups urge USDA to collaborate with other federal agencies in prioritizing the approval of products that reduce enteric methane production while maintaining or improving animal performance. Products that reduce methane emissions at the expense of animal performance are fatally flawed and will likely never reach "scalability." To provide value to both producers and consumers, methane inhibitors should simultaneously limit direct methane emissions while increasing growth efficiency. USDA should consider these criteria when evaluating products to maximize the impact of taxpayer dollars.

Ionophores. Multiple ionophores have been marketed for use in food animals in the United States since 1975. They were first identified as coccidiosis control agents in poultry, then were discovered to have significant performance advantages in cattle as well as coccidiosis control, reduction of rumen acidosis and bloat in beef feedlots, and pulmonary emphysema due to lush pasture conditions. Ionophores comprise the majority of non-medically important antibiotics sold for food animals in the United States. Antibiotic resistance to the ionophores is only able to be estimated based on epidemiological cutoffs, as no clinical cutoffs related to in-vivo efficacy have been established. No genetic resistance elements have been identified and genetic transfer has only rarely been suggested in the literature. Findings indicate that use of the ionophores in food animals poses an almost nonexistent risk to animal or human health, either through co-selection for medically important antibiotic resistance or altering bacterial populations to increase the shedding of potential foodborne pathogens. Maintaining access to this technology is critical to the cattle industry's ability to increase our sustainability footprint. Without these products, USDA will not see the agriculture industry reach its goals of reducing environmental impacts and increasing productivity.

Antibiotics. Antibiotic use is applied in the beef cattle and sheep industries to prevent and treat a wide variety of diseases. As such, this may complicate prevention and treatment of new disease. Levels of antibiotic use may be higher for certain critical diseases in beef cattle, such as Bovine Respiratory Disease (BRD). Many of the currently available alternatives to antibiotics suffer from limited or unproven efficacy. Development of alternatives to antibiotics is dependent upon basic research to better define the processes important to pathogenesis. There are several types of antibiotic alternatives, including four broadly classified types: immunomodulators, bactericidal agents, nutrients, and molecular genetics. Each of these types have several specific examples with some that are currently the subject of ongoing research, and others in which research is needed. The areas for potential research into alternatives for antibiotics are prioritized in the table shown below. Basic studies in these areas would have application throughout the beef cattle industry as well as within other commodity groups.

The exploration of innovative strategies to minimize the risks of animal disease as well as the discovery of novel products that may serve as alternative agents to antibiotics is an ongoing process to improve antimicrobial stewardship. Preserving the efficacy of antimicrobial agents against pathogens encountered in both human and veterinary medicine and effectively treating, preventing and controlling disease will result in positive outcomes and work to ensure optimal cattle health and improved disease management.

2. Biofuels, Wood and Other Bioproducts, and Renewable Energy

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?

Anaerobic Digesters. Beef cattle produce dry manure and are frequently finished in outdoor feedyards; the combination of dry manure and dirt is not conducive to the utilization of digester technology. However, NCBA acknowledges that anaerobic digester technology is still young, and encourages USDA to work with land-grant universities and private entities to further develop this critical technology for use in beef cattle operations.

3. Addressing Catastrophic Wildfire

Catastrophic wildfire and the conditions that precipitate catastrophic wildfire have wholesale devastating impacts. The livestock groups urge USDA to acknowledge the varied tools already at the Department's disposal. While fire itself is a normal part of ecosystem management and can be used as an effective tool when applied to discrete areas, there is a distinction between fire that stimulates growth and the catastrophic conditions we see today. Decades of fire suppression, a changing climate, and management that has prioritized restraint rather than an active cultivation of desirable ecologies have resulted in landscapes that have dense, flammable forage without natural breaks historically provided by fire, grazing, and timber management activities.

Mitigation of catastrophic fire risk, not total prevention of fire, is a climate-smart practice. While some fuels treatments may result in a relatively small volume of carbon emissions, the outcome of these practices – reduced risk of catastrophic wildfire and improvement of habitat for wildlife, improved soil fertility, and improved water storage and retention – far outweigh the avoided emissions achieved by restraint-focused management, especially when such management allows catastrophic conditions to persist uninterrupted.

Federal forests and rangelands have immense potential to continue to be vast carbon stores, but the durability of that carbon storage is compromised when the health of the timber and forage is compromised by poor management. Catastrophic fire destroys a landscape's carbon storage potential and ecology, the restoration of which takes years. Intervention and active management are necessary to achieve landscapes more resilient to fire with increased carbon sequestration potential.

A. How should USDA utilize programs, funding and financing capacities, and other authorities to decrease wildfire risk fueled by climate change?

Programs. The livestock groups urge USDA to coordinate across program areas within the Department and with the Department of the Interior (DOI) to leverage relative expertise, funding, and capacity. Improved coordination among NRCS, U.S. Forest Service (USFS), and the Farm Service Agency, among others, would allow USDA personnel to adopt management principles that see success on private lands and leverage those across ownership and jurisdictional boundaries. Additionally, consistent application of management tools on private and public lands

creates a more predictable resource composition, something that is increasingly important as fires become hotter, move faster, and move more erratically.

In implementation of all USDA programs, there should be an overarching goal of improving resiliency, one ecosystem component at a time. For example, conservation activities that target streambank or riparian improvements should also consider any fuel density that is created along sensitive riparian areas, potentially exacerbating resource damage in a fire scenario. Additionally, programs that target restorative activities, like sagebrush conservation, should account for the program's impact on brush density in drought conditions that may precipitate damage in fast-moving fire scenarios. Decreasing the risk of occurrence or the severity of catastrophic wildfire should be top of mind for all USDA programs applied in the Western Region (NRCS) and/or Regions 1, 2, 3, 4 5, 6 and 10 (USFS).

On USFS lands, USDA should take a generous view of the tools already at the Agency's disposal and prioritize increased use of all available tools to improve resiliency. USFS should adopt a more comprehensive view of grazing as both a fuels reduction and resource management tool across at-risk landscapes. Where NRCS matches specific conservation programs to their most appropriate ecological application, USFS should adopt a similar approach and use resiliency tools to the same end. Whether through improved use of grazing under the Good Neighbor Authority, or improvement in partnerships to conduct post-fire remediation, USFS should increase flexibility in programs to mirror other USDA approaches.

USDA should avoid creation of new programs that would have duplicative purposes, instead focusing on existing programs that could be amended or otherwise improved for novel use.

Funding. The livestock groups acknowledge that significant funding has been provided to USDA, and specifically to the USFS, in the past three fiscal years for the express purpose of improved fire management, fire suppression, and post-fire remediation. Funds made available in Fiscal Year 2020 provided welcome relief for agency budgets that experienced "fire borrowing" year after year, however, continued calls for additional funding must also be met with corresponding progress. The livestock groups believe that more efficient use of funds in pre-fire conditions – decreasing fuel loads through grazing, prescribed fire, mowing, or other methods where appropriate - will improve funding utilization in the long-term and make post-fire remediation less expensive in the short-term.

Other Authorities. Given the complexity and pervasiveness of conditions that precipitate catastrophic wildfire conditions, the livestock groups recommend the creation or retention of an interagency wildfire subcabinet, as first established on January 14, 2021 by Executive Order 13976. Intentional and consistent coordination across departments not only improves collective land and resource management, but will also improve community, firefighter, and stakeholder safety.

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?

The livestock groups first recommend that USDA recognize that reducing the risk of catastrophic wildfire is not limited to forestry practices. Certainly, the risk of catastrophic wildfire is pervasive across many of the forested lands in the Western United States, however intense and fast-moving fires affect landscapes managed by other federal agencies (primarily overseen by DOI) as well as state and private lands that are not traditional forest ecosystems. Hot, intense, and recurring fires affect grasslands and rangelands, causing soil damage and erosion comparable to catastrophic conditions in forested stands.

In all cases, USDA can more cohesively adopt a view that grazing is a valuable conservation practice and a tool that can be applied across variety of landscapes to achieve diverse resource objectives.[11] At a minimum, grazing should at least be considered as one in a suite of options when agencies evaluate fuels reduction tools, particularly on USFS landscapes. As mentioned above, more comprehensive use of Good Neighbor Authorities and grazing as part of joint resource management projects would significantly improve the efficacy and timing of desired outcomes.

C. What additional data, tools and research are needed for USDA to effectively reduce wildfire risk and manage Federal lands for carbon?

Federal lands, including forests and grasslands managed by federal agencies, have immense carbon storage potential, while also providing important wildlife habitat, critical open spaces for connectivity, resources for multiple uses, and other environmental benefits. Because public lands are managed to achieve a series of objectives, monitoring specific activities and their corresponding environmental impacts is often hard to distill. USDA should work with other land management agencies and stakeholders to assess resource conditions that are specific to federal lands: fuel loads, timing of active management as a result of delayed environmental assessments, and historic management authorities. Further, the livestock groups urge USDA to implement existing tools at their disposal to increase the ability of USDA resources to store carbon: reducing the risk of harmful carbon emissions is certainly a primary objective, but additional efforts should be taken to assess soil carbon potential and practices like grazing that enhance organic matter incorporation and improve forage carbon storage.

Often, there are tools available for use on private lands to which access is prohibited or delayed on public lands. Agencies should pursue increasing efficiency in adopting technologies, tools, and practices that are useful in improving forage and soil carbon health, even if Agency approval processes are cumbersome. For example, USDA has created "packages" of chemicals to approve for application on public land. This requirement for a multi-product approval process, while undertaken in the name of efficient use of agency resources, has delayed approval of useful herbicides, fertilizers, seeding products, and fire retardant that if available earlier, may have been useful and cost-efficient tools.

[11] Barry, Shiela; Bush, Lisa, Larson, Stephanie; Ford, Lawrence D. *The Benefits of Grazing – Livestock Grazing: A Conservation Tool on California's Annual Grasslands.* ANR Publication 8517 (2015) https://doi.org/10.3733/ucanr.8517.

While not a new tool, USDA and partner agencies must place a higher priority on rangeland monitoring and coordination of activities with grazing stakeholders. USFS and PLC maintain a Memorandum of Understanding (MOU) for agency partners and grazing stakeholders to conduct cooperative monitoring of grazing allotments to "enhance[s] the working relationship of the parties at the local level when the parties cooperatively acquire, analyze, and approve data collections to assist with creating rangeland management programs that enhance and improve the condition of rangelands." While the MOU has been in place for a number of years, some USFS personnel are still unaware of the contents and fail to make best use of cooperative rangeland monitoring programs. USDA, and USFS specifically, should encourage more widespread monitoring protocols to track range conditions, resource fluctuations, and inform assessments related to carbon storage potential.

D. What role should partners and stakeholders play, including State, local and Tribal governments, related to addressing wildfires?

Coordination across stakeholder groups and regulated communities must play a central role in the development of any climate-smart agriculture framework. Both in reference to cooperative monitoring mentioned above and with respect to increased consistency in program application across jurisdictions, stakeholders and partners facilitate the vast majority of the actual USDA footprint. Whether through farmer or rancher implementation of a USDA conservation program or through application of grazing practices across one of the many grazing allotments that exists on federal lands, stakeholder engagement is critical to the success of any USDA initiative. USDA should prioritize livestock producer engagement to utilize and leverage generations of expertise, but also to ensure consistent management application of conservation practices across private and public holdings.

USDA should support, rather than seek to divert resources and attentions from locally-developed initiatives, understanding that programs or initiatives may vary across locales. In all endeavors, USDA should seek to find ways to support these on-the-ground successes and leverage additional benefit from established successes.

Conclusion

Thank you for the opportunity to submit input as USDA determines how to most effectively implement Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*. NCBA and PLC urge USDA to develop a framework which provides all agricultural producers with necessary resources while allowing for flexibility in innovation. We look forward to future opportunities for engagement.

Kaitlynn Glover
Executive Director, Natural Resources
National Cattlemen's Beef Association
Public Lands Council