



March 7, 2022

Submitted Via Federal eRulemaking Portal (<http://www.regulations.gov>)

Department of the Interior

Re: Document Citation: 87 FR 235  
Docket Number: DOI-2021-0016  
Document Number: 2021-28548  
Federal Register: Tuesday, January 4, 2022; Vol. 87, No. 2; Page 235 – 236

Request for Information to Inform Interagency Efforts to Develop the American Conservation and Stewardship Atlas

American Farmland Trust (AFT) is pleased to submit these comments regarding the development of the American Conservation and Stewardship Atlas as part of the Biden Administration’s America the Beautiful Initiative (Initiative). We believe that the Initiative’s goal of “conserving at least 30 percent of our lands and waters by 2030” through voluntary, locally-led efforts, will help protect the nation’s open lands and priceless biodiversity while also supporting rural communities, ensuring equitable access to nature, protecting critical ecosystems and the services they provide to society, and addressing the worst impacts of climate change. AFT believes that the success of the Initiative will rest on embracing a “continuum of conservation,” and engaging a wide variety of lands and landowners—especially farmers and ranchers.

The American Conservation and Stewardship Atlas will be a useful tool for measuring progress towards the Initiative’s goal, while also highlighting success stories and opportunities for additional investment. Although the *America the Beautiful Year One Report* recognizes that it will not be able to account for all conservation activities, AFT strongly recommends that the Atlas take the conservation contributions of farmers and ranchers into account. This is due both to agriculture’s vast geographic footprint—covering over 900 million acres of American soil—and to the sector’s contributions to biodiversity, including combatting climate change through carbon sequestration and increased soil biodiversity; providing habitat to a wide range of animal species; serving as critical wildlife corridors and, at times, buffers between natural and developed lands; and providing ecosystem services to protect our nation’s soil, air, and water. All of these benefits are in addition to ensuring food security and rural prosperity.

AFT sees an important distinction to be made between the words “protected” and “conserved.” We use “protected” to mean the use of an agricultural conservation easement, covenant, contract, or other instrument to ensure that a parcel of land is not developed, either permanently or for certain period of time (e.g., 30-year term). We believe that all protected agricultural lands should be counted toward the Initiative’s goal because it preserves their potential to support biodiversity and sequester carbon. We use “conserved” to mean the implementation of a management practice or suite of practices to support biodiversity and/or mitigate climate change on a parcel of land. We also believe that all lands treated with long-term conservation practices, especially in “America the Beautiful Priority Areas” (Priority Areas) (e.g., wildlife corridors, prime habitat, riparian zones) should be counted toward the Initiative’s goal.

In May 2021, AFT submitted [detailed comments](#) on how agriculture could be included as part of the America the Beautiful Initiative. **AFT continues to encourage the Administration to permanently protect 5 percent of farmland and rangeland from development, and to support voluntary, long-term adoption of conservation practices on 25 percent of farmland and rangeland – in total, 30 percent by 2030.** Achieving these goals on US agricultural land will be a critical contribution to the Initiative. Given that less than 1 percent of these lands are currently permanently protected, and long-term conservation activities are practiced on a narrow but growing range of land, additional action from the Administration will be required to achieve these goals, including:

1. Increasing funding and technical assistance to accelerate working lands protection and conservation activities by expanding the Agricultural Conservation Easement Program (ACEP), Environmental Quality Incentives Program (EQIP), Regional Conservation Partnership Program (RCPP), Conservation Stewardship Program (CSP), Conservation Reserve Program (CRP), and Healthy Forest Reserve Program (HFRP), and
2. Fighting the loss of working lands to development by strengthening the [Farmland Protection Policy Act](#).

In summary, AFT urges the Administration to support agriculture's role in achieving the America the Beautiful Initiative. To be successful, permanent protection of agricultural land, and long-term adoption of conservation practices, must be increased while also embracing USDA's legacy of voluntary, incentive-based, and locally led conservation. The Atlas must include these similar contributions from state and local governments, and indigenous communities and NGOs. Furthermore, it must prioritize the privacy of landowners and managers and recognize the needs of rural communities, historically underserved groups, and future generations, while drawing on the generational knowledge of long-time land stewards.

### ***Question 1: Science and Data. What data sources, standards, and technical approaches should be applied to data included in the Atlas to ensure that it is an authoritative and useful tool for the public?***

#### **Recommended Data Sources for Protected Lands**

Since 1986, AFT has used mapping to target and prioritize land protection efforts. Our latest effort, [Farms Under Threat: The State of the States](#), is a partnership with Conservation Science Partners and USDA NRCS. The [Farms Under Threat database](#) depicts the agricultural and forested landscape at a 10-meter resolution, including information about land cover and land quality (productivity, versatility, and resiliency of agricultural lands). It also identifies exactly where industrial, urban, and residential development is converting and fragmenting the rural landscape.

As part of this effort, AFT recently released our new [Protected Agricultural Lands Database](#) (PALD). The PALD is a comprehensive effort to map all protected agricultural lands in the US, with the goal of providing better coverage and consistency than existing national databases. This unique data resource will underpin AFT's subsequent analyses and will also be publicly available. **We encourage USDA to use the PALD as a primary data source for permanently protected farmland in the Atlas, alongside the US Geological Survey's [Protected Areas Database](#) and the [National Conservation Easement Database](#).**

AFT is also working with Conservation Science Partners to [map agricultural lands](#) and their potential contributions to wildlife habitat connectivity. From this effort, AFT uncovered that

172 million acres of agricultural land, or almost one-fifth, also serve as wildlife corridors. As AFT saw in *Farms Under Threat*, without permanent protections, agricultural land is vulnerable to development and fragmentation, which can lead to interruptions of key corridors and threats to wildlife and the habitats they depend upon. **Permanent protection of agricultural land as well as adoption of suites of wildlife-friendly conservation activities (e.g., planting native vegetation, using wildlife-friendly fencing) in these areas should both be counted in the Atlas, and incentivized through government programs to help achieve the Initiative's goals.**

**USDA should also include data from existing NRCS programs that support permanent protection and long-term voluntary conservation, including ACEP, CRP, CSP, and the new EQIP Conservation Incentive Contracts (EQIP-CIC).** Data from each of these programs will reflect the protection and long-term conservation activities underway on agricultural land supported by the Federal government.

### Addressing Privacy Concerns

**When including data on protection and conservation activities on agricultural land, protecting the privacy of landowners is paramount.** To meet this need while also counting the critical and enduring contributions farmers and ranchers make toward the Initiative's goals, AFT recommends aggregating data (e.g., from USDA conservation programs) at a higher level for the public-facing Atlas, as opposed to mapping and identifying individual parcels where protection and conservation activities are taking place. This will ensure more of what contributes to these efforts is counted, while also protecting individual privacy. The scale of the data presented to the public is also an important consideration. Presenting state-level data may be too high-level to be useful. The watershed level could represent a balance between presenting useful data and protecting landowner privacy, and may be a more appropriate and accurate scale to use in the Atlas.

### Website Development

**If the Atlas is in website form, AFT recommends making the maps or information simple and easy to load to maximize the tool's accessibility.** AFT has learned that low internet speeds and bandwidth can make complex, data-heavy maps difficult to load and utilize. In fact, a public-facing website could simply display important summary information at a defined spatial scale while still being useful to communities and continuing to preserve privacy. Within a given area, this information could include:

1. The number of protected acres,
2. The number of acres under relevant conservation practices,
3. A tracker that automatically compiles acreage at the national level and shows progress towards the America the Beautiful Initiative goals.

The purpose of such an effort would be to build public awareness of the progress being made and to track what their community is doing to contribute to this national Initiative.

### ***Question 2: Conservation as a Continuum. How can the Atlas reflect the meaningful conservation work already underway in America?***

Agricultural lands can provide broad benefits to biodiversity and wildlife while being a key tool for mitigating climate change. At present, over 900 million acres of land is in farming and

ranching—172 million acres of which also serve as wildlife corridors—making agriculture one of the largest land uses in the nation and critical to the America the Beautiful Initiative. In addition to producing food for human consumption, these lands also provide wildlife with food, shelter, nesting locations, habitat connectivity, and more. Permanently protecting farmland preserves these benefits and can also help to halt sprawl and the destruction of natural habitats. In addition, conservation activities undertaken by farmers and ranchers increase critical micro-biodiversity in the soil, improve water quality and preserve aquatic biodiversity, and sequester climate-warming CO<sub>2</sub> in the soil. Greater adoption of these practices would sequester more CO<sub>2</sub>, mitigating the worst impacts of climate change such as destroying habitat and biodiversity across the globe.

**Due to these benefits, AFT urges the Administration to include the contributions of farmers and ranchers in the Initiative and support the increased adoption of conservation actions.** Many of the actions undertaken by producers to support biodiversity will be difficult to count in the Atlas, but are nonetheless critical to the Initiative's goals. As such, AFT recommends a two-tier accounting system for incorporating agriculture's contributions.

### Accounting for Agricultural Contributions with a Two-Tier System

**While many conservation and protection actions to support biodiversity can be easily accounted for, others may either be difficult to count or not sufficiently durable. This is why AFT recommends a two-tier system for including agriculture's contributions in the Atlas.** Tier One could be used to track progress toward the Initiative's 30x30 goals, and would include permanently protected land and conservation actions backed by multi-year contracts held by federal, state, local governments, or others. Tier Two would include shorter-term USDA conservation contracts as well as actions farmers and ranchers choose to share that they are undertaking to support the America the Beautiful Initiative, such as adopting conservation practices outside of a contract. These Tier Two contributions, though very important, would not be formally counted toward the Initiative's 30x30 goals. AFT envisions the Atlas including maps and accounting as well as narratives from farmers and ranchers for the actions they undertake to support biodiversity.

#### **Tier One: Protection and Conservation Activities that Count Towards the Initiative's goals**

All agricultural lands that meet the following criteria should be counted towards the Initiative's goals, and included in the Atlas:

1. On all agricultural lands:
  - a. Permanently protected farmland and rangeland, which currently accounts for 1 percent of agricultural land in the nation. This will permanently preserve the inherent biodiversity and wildlife benefits these working lands provide,
  - b. All acres on which producers have undertaken long-term adoption of suites of practices defined by NRCS as providing habitat for pollinators and/or endangered species (e.g., planting native prairie strips), and
  - c. All acres on which producers have undertaken long-term adoption of suites of practices defined by NRCS as being climate-smart, particularly in-field conservation practices adopted through long-term contracts (e.g., 5 years or more).
2. On agricultural lands located within America the Beautiful Priority Areas (defined below to include wildlife corridors, prime habitat, riparian zones, etc.):

- a. All acres on which producers have undertaken long-term adoption of suites of NRCS-approved wildlife-friendly practices (e.g., cover crops, native prairie strips, grass buffer strips, wildlife-friendly fencing, riparian corridors).

AFT distinguished between actions being taken on all agricultural lands and actions taken within Priority Areas because we recognize that contributions to biodiversity are highly location-specific. All of the practices listed under “all agricultural lands” would also apply to Priority Areas. For instance, while long-term adoption of cover crops may not inherently support wildlife populations, they are hugely beneficial when located alongside an impaired waterway (to reduce runoff) or within a wildlife corridor (to provide food and shelter). AFT also recommends ensuring that lands are not double counted in the event that they are both protected and conserved.

The Administration can account for all permanently protected agricultural lands through AFT’s PALD database, state and local databases of permanently protected farms and ranches, and from other reliable sources. Conservation activities can be tracked through participation in NRCS conservation programs or other state or local programs with contracts that meet defined criteria. Tier One activities in USDA programs would include, but not be limited to:

1. Conservation easements through ACEP as well as through ACEP’s predecessor programs, the Farm and Ranchland Protection Program, and the Wetlands Reserve Program, and through state Purchase of Agricultural Conservation Easement programs and local purchase of development rights programs,<sup>1</sup>
2. All lands enrolled in long-term (e.g., 10 year) contracts through CRP and the Conservation Reserve Enhancement Program (CREP), and
3. Any relevant conservation practices (defined below, but including cover crops, buffer strips, etc.) with contract durations of 5 years or more through CSP, EQIP Conservation Incentives Contracts (EQIP-CIC), or other federal, state, and local programs that meet the NRCS-defined criteria.

### **Tier Two: Other Beneficial Protection and Conservation Activities on Agricultural Lands**

Tier Two could capture shorter-term conservation efforts, and other critical actions that farmers and ranchers undertake to support the Initiative, but which are more difficult to quantify. This tier could allow landowners and agencies to voluntarily enter information to be aggregated into the Atlas. Tier Two activities could include conservation practices which support aquatic biodiversity by reducing non-point source pollution or insect biodiversity through Integrated Pest Management (IPM), adoption of diverse conservation crop rotations, actions taken by farmers to choose heritage seed and stock to retain crop and livestock biodiversity, and all other conservation activities which support the soil microbiome. Tier Two activities would include, but not be limited to:

1. Short-term (fewer than 5 years) conservation contracts for these activities, such as through EQIP,
2. Voluntary conservation activities with no associated contract,
3. Short-term (fewer than 5 years) non-development covenants,
4. Land enrolled in Working Lands for Wildlife, and
5. Other state and local land use activities undertaken to preserve farmland, as detailed below.

---

<sup>1</sup> The Atlas could include information on the location, terms, and duration of easements or contracts, but must do so in a way that protects individual privacy.

## Agricultural Contributions in ‘America the Beautiful Priority Areas’

In addition to the actions recommended above regarding accounting for conservation actions on all agricultural lands, AFT also recommends that the Atlas include agricultural lands located within America the Beautiful Priority Areas on which producers have undertaken long-term adoption of NRCS-approved suites of wildlife-friendly practices. In order to identify these agricultural lands, it will be necessary first to identify Priority Areas. We believe that Priority Areas should include, but not be limited to:

1. Wildlife sanctuaries and other prime habitats and the immediate surrounding areas,
2. Wildlife corridors,
3. Pollinator habitats,
4. Nesting habitats,
5. Riparian areas, and
6. Areas at high risk of development and fragmentation.

We recommend using the [Connectivity Across US Agricultural Lands map](#), developed by AFT in partnership with Conservation Science Partners, to help determine the location of wildlife corridors on farmland and rangeland.

After the Priority Areas are defined, specific wildlife concerns could also be identified, including development pressure, landscape fragmentation, lack of suitable cover, and lack of food resources. These concerns could help to further target specific conservation and protection actions for relevant species in each region. When endangered species are involved, the Administration could provide assurances against future regulations if landowners undertake actions that help species recover on their land.<sup>2</sup>

This data could be integrated into the NRCS Conservation Assessment and Ranking Tool (CART), as a way of helping to target future conservation actions to Priority Areas and further contribute to the Initiative. For instance, farms and ranches within Priority Areas could be offered additional incentives for adopting wildlife-friendly practices or be prioritized for Working Lands for Wildlife (WLFW), which works with landowners to enhance wildlife habitat on working landscapes.

### ***What stewardship actions should be considered, in addition to permanent protections, to capture a more complete picture of conservation and restoration in America? What are the attributes of lands and waters that should be included in the Atlas?***

As aforementioned, AFT suggests the Atlas include the following Tier One activities in the accounting towards the Initiative’s goals:

1. All permanently protected farmland and rangeland,
2. All agricultural lands on which producers have undertaken long-term adoption of suites of NRCS-defined:
  - a. Practices that provide habitat for pollinators and/or endangered species, or
  - b. Climate-smart, in-field conservation practices through long-term contracts, and
3. All agricultural lands located in Priority Areas on which producers have undertaken long-term adoption of suites of NRCS-approved wildlife-friendly practices.

---

<sup>2</sup> M. E. Hansen, S. M. Bennet, J. Morales and R. M. Yeagley. “Cooperative Conservation: Determinants of Landowner Engagement in Conserving Endangered Species.” Utah State University, The Center for Growth and Opportunity. November 2018. Policy Paper 2018.003.

Regarding accounting for Tier One conservation actions, AFT recommends including land on which a suite of practices is adopted long-term, and which does one or more of the following:

1. On all agricultural lands:
  - a. Mitigates the impacts of climate change, such as in-field practices defined by NRCS as being [climate-smart](#) (e.g., no-till, cover crops, silvopasture, prescribed grazing), and/or
  - b. Provides critical habitat for endangered species or pollinators, such as planting native species.
2. On agricultural lands located within America the Beautiful Priority Areas:
  - a. Covers and protects the soil, such as cover crops, conservation cover, or range planting, as this provides habitat and food for wildlife and increases biodiversity in the soil,
  - b. Practices in riparian areas which reduce nutrient runoff, such as conservation tillage, cover crops, or nutrient management, since this protects waterways from eutrophication and dead zones.

To better understand the role that farmers and ranchers can play in promoting biodiversity, here are three examples from across the nation:

Stone Barns Center for Food and Agriculture is a small, diversified farm and education center abutting a state park 30 minutes north of New York City. They grow crops and raise livestock for direct-to-consumer sales, and pay close attention to the biodiversity both above and below the ground. Stone Barns' farmers consider biodiversity in their choice of seed and stock, in their approach to soil health, and in the wildlife habitat the farm provides—particularly with its proximity to the city and importance as a stop on migration corridors. The farm's prescribed grazing plan and crop rotations, designed with conservation experts, have brought new varieties of birds back to the area, and support a diverse below-ground ecosystem of soil microbes.

Carman's Ranch, located in Wallowa, Oregon, is a fifth-generation grass-fed ranch that spans over 5,000 acres. The focus of the ranch is on holistic management, which involves constantly moving the cattle and paying careful attention to the rate of growth of the animals and grasses. This results in fields that are vibrant—they retain water, resist drought, contain abundant organic matter which contributes nutrients and carbon, and are highly productive without the addition of fertilizer. In turn, this creates healthy soil full of microbial life, and rich habitat for native species.

Kodama Farm, located in Chimacum, Washington, is a small, diversified farm dedicated to regenerative agriculture. After receiving a grant from the state of Washington, Kodama Farm restored a significant amount of aquatic habitat on the property which, historically, had been home to summer and winter Coho salmon. By reforesting the riparian zone, creating more complex stream channels, and protecting the wetland parcels, Kodama Farm hopes to restore original salmon habitat. The farm is also protected by a conservation easement, which will help ensure the parcel remains agriculturally viable while reducing potential negative water quality impacts associated with development.

## ***What are the attributes of lands and waters that should be included in the Atlas?***

As AFT has noted, the accounting towards the goals of the Initiative should include lands that are permanently protected and/or under long-term conservation contracts, and areas on farms and ranches where long-term conservation activities have been undertaken. As stated above, the Atlas could have two tiers so that other beneficial activities that support the goals of the Initiative can still be acknowledged and included without formally contributing to the Initiative's 30x30 accounting either because there is greater uncertainty about their durability, or because they are simply harder to quantify.

## ***How can the Atlas best reflect the contributions of State, local, Tribal, territorial, and private lands?***

While others can better speak to the important actions undertaken by tribes in connection with the America the Beautiful Initiative, AFT can speak to actions that state and local governments take that could be counted in the Atlas, including funding permanent land protection and programs that support conservation activities on working lands and natural areas. **As the Biden Administration recognizes the importance of protecting and conserving land for biodiversity and other purposes, it would be a missed opportunity to not also include, and account for, state, local, and tribal contributions in the Atlas. In particular, AFT recommends that the federal government partner with states, local governments, and NGOs, and encourages their voluntary contribution of datasets reflecting the activities below into the Atlas.**

State and local governments and NGOs have all played a leading role in protecting agricultural land. According to AFT's 2020 *Farms Under Threat: the State of the States* report, thirty states have authorized Purchase of Agricultural Conservation Easements (PACE) programs, and 29 have funded easement acquisitions. Together, the five top performing states of Delaware, New Jersey, Vermont, Maryland, and Pennsylvania have permanently protected more than one million acres of farmland. New Jersey led in the average proportion of agricultural land protected, while Vermont stood out for protecting 3.3 acres for every acre converted. Delaware and Maryland both protected more than one acre of land for each acre converted. Local governments fund PACE programs as well. In 1974, Suffolk County, New York, piloted the first local PACE program and has since protected half of all agricultural lands in the county, an area which is under very high development pressure. Such protection activities should be counted within the Atlas.

State and local governments can also play a pivotal role in conservation efforts. For example, in the state of New York, partners around the New York City Watershed are funded by the city to permanently protect land and adopt conservation practices, like those mentioned above, that protect the drinking water of New York City residents. This successful protection and conservation effort supports both biodiversity and access to fresh water for almost 10 million people. The state of New York also funds the Climate Resilient Farming grant program, which contracts with farmers to undertake soil health activities. All of these long-term, multi-benefit contributions – and others like it – should be able to be counted within the Atlas.

In the Mid-Atlantic, thousands of farmers participate in CRP-CREP with the goal of reducing nutrient and sediment pollution, improving water quality and wildlife habitat, and enhancing

biodiversity throughout the Chesapeake Bay Watershed. Farmers receive combined federal and state incentives, including cost-share and favorable rental rates, to voluntarily restore riparian forest buffers, grass and shrub buffers, and wetlands using CREP-approved best management practices. Environmentally sensitive crop and pasturelands are taken out of production and restored for a 10–15-year term with the option to renew at the end of the term. CREP projects are also in place in the Pacific Northwest. In these states, participants voluntarily enroll in 10-15 year renewable contracts, receiving annual rental payments and cost-share assistance to achieve the goals of the program. In Oregon, the goal is to restore, maintain, and enhance streamside areas along agricultural lands to benefit fish, wildlife, and water quality. This is accomplished with conservation methods such as planting trees, and installing fencing or livestock watering facilities. Washington focuses specifically on planting and maintaining riparian buffers for salmon recovery, and Idaho works to reduce groundwater consumption from irrigated cropland, which helps to reduce the demand for water supplies in the Eastern Snake Plain Aquifer.

Finally, the role of state and local governments in land-use planning that addresses protection of agricultural and other natural resources is critical, but too often ignored. All 50 states have enacted property tax relief programs and authorized local governments to plan and implement local land use regulations. Nearly every state has a program to lease state-owned land for agriculture, and more than half have PACE programs. Even the least widespread approach, Farm Link programs, are found in 11 states. In Washington and Oregon land use planning tools are the main instruments for permanent farmland protection to protect working and open landscapes. In addition, several states can help preserve agricultural land and keep farming viable through “agricultural district” programs. State and local governments also play an important role in determining the buildout of renewable energy. While this is critical to combatting climate change, it could conflict with the Initiative’s efforts if this new development does not consider the need to protect high-quality agricultural land and preserve wildlife habitat connectivity. While such state and local activities and policies may not be permanent or enforceable enough to be included in Atlas’ accounting, they should nonetheless be supported and recognized as critical to protecting working lands and providing biodiversity benefits within Tier Two, as recommended by AFT.

### ***Question 3: Outcomes. How can the Atlas best reflect land and water contributions to biodiversity, climate change mitigation and resilience, and equitable access to nature and its benefits?***

#### **Providing Additional Guidance for Quantification and Improving Modeling as Part of the America the Beautiful Initiative**

At present, there are over 1,000 federally funded farm conservation projects taking place across the country, involving tens of thousands of producers on millions of acres of agricultural land.<sup>3</sup> Measuring the outcomes of these practices is of paramount importance to assessing progress toward the goals of the America the Beautiful Initiative. Such outcomes include soil carbon

---

<sup>3</sup> M. Perez and E. Cole, “A Guide to Water Quality, Climate, Social, and Economic Outcomes Estimation Tools.” American Farmland Trust, December 2020. <https://farmlandinfo.org/publications/guide-to-outcomes-estimation-tools/>.

sequestration and other greenhouse gas reductions, biodiversity, and other benefits such as improved water quality (e.g., nitrogen, phosphorus, sediment).

Given costs, privacy concerns, technical issues, and other challenges involved with on-site monitoring, computer models and tools are an indispensable approach for effective outcomes quantification. Hence, as part of the efforts to quantify the benefits provided by working lands, the Administration should (1) provide additional support to help partners quantify outcomes as well as (2) play a leading role in improving models through a data research initiative and the establishment of a National Calibration Dataset.

**AFT recommends that the Administration provide additional outcomes quantification guidance and tools training assistance.** With its locally-led, partnership-centered, and priority-driven approach, RCPP is an ideal USDA program for engaging working lands in the Initiative. However, RCPP project partners will need additional guidance in order to provide the quantity and quality of data needed for the Atlas. This guidance should not be prescriptive, but rather, offer transparency around the different types of models that are available as well as information on their respective applications, strengths, and limitations. To help address this need, AFT produced *[A Guide to Water Quality, Climate, Social, and Economic Outcomes Estimation Tools](#)*. In addition to disseminating this resource to partnering entities, there are opportunities for the Administration – and USDA in particular – to host meetings of partners and to provide additional one-on-one advising to partners on such tools. While AFT’s guide covers many different types of outcomes tools, additional information would be needed specifically to address biodiversity quantification tools.

For any modeling tool to be effective, it must be calibrated with a steady stream of real-world data. **To achieve this goal, a new research initiative should be established to intentionally generate the information needed to calibrate models and improve their accuracy.** While protecting individual privacy, such a research initiative would collect real-world data on outcomes from conservation practices. The first step would be to convene the modeling community with the research community so they can exchange information and ideas, and home in on the types of data needed to calibrate and validate outcomes estimation modeling tools. This research initiative could be led by USDA ARS and NRCS scientists and/or in partnership with universities, NGOs, and the model developers, and it could leverage the work establishing the national dataset for NRCS’ On-Farm Soil Health Demonstration Trials through Conservation Innovation Grants.

**As part of these efforts, a National Calibration Dataset could aggregate this high-priority data pertinent to strengthening models into a centralized, interoperable, publicly available repository that is easy for modelers to access.**<sup>4</sup> The data gathered through working lands projects could help enhance public and proprietary climate and water quality outcomes estimation models and tools, as well as producer decision support tools, on an ongoing basis. This would better inform implementation and conservation investments, and would increase tool credibility for conservationists, their producer clients, the public, and policymakers.

---

<sup>4</sup> Ibid.

## Conclusion

AFT appreciates the opportunity to submit our comments on the development of the American Conservation and Stewardship Atlas. We look forward to serving as a resource to the Department of Interior, USDA, and the Administration, and continuing to work to help farmers and ranchers fight climate change and improve the stewardship of their lands.

Respectfully submitted,

American Farmland Trust

With contributions by:

Tim Fink, Policy Director

Samantha Levy, Climate Policy Manager

Emily Liss, Federal Policy Associate

Mitch Hunter, Research Director

Ann Sorensen, Senior Research Advisor

Michelle Perez, Water Initiative Director

Cris Coffin, Senior Policy Advisor

Amanda Cather, Mid-Atlantic Program Manager

Dani Madrone, Pacific Northwest Policy Manager