



Friday, March 31, 2023

US Senate Committee on Agriculture, Nutrition, and Forestry
328A Russell Senate Office Building
Washington, DC, 20510
Submitted via [online form](#)
RE: Input Invitation for the 2023 Farm Bill

Dear Chairwoman Stabenow,

Thanks to you and the United States Senate Committee on Agriculture, Nutrition, and Forestry for your leadership with the 2023 Farm Bill and for inviting input to strengthen agricultural advancements. The Carbon Business Council, a nonprofit trade association of more than 80 carbon management innovators, supports a level playing field in policymaking to spur innovation across multiple forms of carbon dioxide removal (CDR). We appreciate your invitation to submit a response as the Committee evaluates the Farm Bill.

The Farm Bill presents an opportunity to create new and incremental economic opportunities for farmers, ranchers, and foresters that also further ecosystem protection and climate restoration. Many elements in the Farm Bill intersect with carbon removal, which restores the climate by removing carbon dioxide from the atmosphere. A new generation of companies is rising to the challenge with a multitude of promising solutions. There are many direct connections with the Farm Bill and the inclusion of CDR brings many co-benefits, ranging from job creation to soil health.

The Farm Bill represents a tremendous opportunity to enhance and expand public sector support for CDR and other carbon management pathways that can deliver great economic and agronomic benefits to America's farmers and foresters. The opportunity to beneficially incorporate carbon management and CDR into the Farm Bill is significant.

Below, we include five recommendations for CDR inclusion in the bill. These recommendations are outlined more fully in an upcoming policy brief, authored by Toby Bryce and Carbon Business Council members, which we'll be releasing next month. The list is not exhaustive, but helps illustrate the many opportunities ahead.

- The Farm Bill [must sustain and ensure the disbursement of funding authorized by the Inflation Reduction Act](#) for climate-smart agriculture and conservation programs benefiting American farmers and foresters.
- The Carbon Business Council supports Carbon180's call for the Farm Bill to create a [Soil Carbon Monitoring Network](#) to consolidate, accelerate, and scale the USDA's efforts to measure and model soil carbon. We also support Senator Grassley's recently reintroduced bipartisan [National Biochar Research Network Act](#) as standalone legislation or beneficially



incorporated into the Farm Bill to provide funding support to assess the circular impact of biochar carbon removal across different soil types, application methods, and climates.

- The Farm Bill should direct the USDA Natural Resources Conservation Service ([NRCS](#)) to create new [conservation practice standards](#) – or modify existing standards – so that farmers may qualify for direct-payment incentives via the Environmental Quality Incentive Program ([EQIP](#)), Conservation Stewardship Program ([CSP](#)), Biomass Crop Assistance Program ([BCAP](#)), or [other NRCS funding programs](#) to replace the burning of crop and forestry residues with beneficial use for biochar carbon removal and other biomass carbon removal and storage (BiCRS); application of silicate minerals for management of soil pH; generation of soil inorganic carbon on agricultural land through microbes; and ocean alkalinity enhancement and blue carbon restoration (such as mangroves, wetlands, and seagrasses for aquaculture). There are an estimated [133 million acres of reforestable land](#) in the US. Incentives for private landowners and support for reforestation on government-owned land could help restore biodiversity and ecosystem services while creating long-term carbon sinks.
- Congress should seize the opportunity of the 2023 Farm Bill reauthorization to improve promotion and extension of NRCS programs to Black, tribal, and [Justice40](#) community farmers, and to increase funding for [Equity in Conservation Cooperation Agreements](#) to ensure equitable distribution of these benefits.
- The Farm Bill's Forestry [Title VIII](#) should be amended to create a regulatory and permitting structure within the USFS for carbon storage on NFS lands via carbon dioxide sequestration in Class VI wells, and terrestrial biomass sequestration. Additionally, Title VIII should clarify current USFS regulations that complicate the use of unmerchantable wood residuals from fire-thinning and other forest-management on NFS lands by private sector actors for biomass carbon removal and storage (BiCRS) and allow the USFS to remit direct payment (competitive with the current cost of pile-burning) to private-sector actors for removal of these residuals. Additionally, adding carbon as a permitted use to the [Multiple Use Sustained Yield Act](#) can help promote reforestation.

We appreciate the Committee's leadership on the 2023 Farm Bill and thank you for the invitation to submit our input.

Sincerely,

Benjamin Rubin

Ben Rubin, Executive Director
Carbon Business Council

Isabella Corpora

Isabella Corpora, Associate Director
Carbon Business Council