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FINDING OF NO SIGNIFICANT IMPACT

Partnerships for Climate-Smart Commodities

The Natural Resources Conservation Service (NRCS) has completed a Programmatic Environmental Assessment (EA) of its proposal to fund projects under Partnerships for Climate-Smart Commodities under the authority of the Commodity Credit Corporation Charter Act (15 U.S.C. 714 *et seq*). The NRCS Chief, the responsible Federal official, has determined that the proposed action, Alternative 2 of the EA, does not constitute a major Federal action significantly affecting the quality of the human environment; therefore, an EIS is not required.

The purpose of Partnerships for Climate-Smart Commodities is to promote innovation in the production and marketing of climate-smart commodities that help reduce greenhouse gases and sequester carbon. The following are indicators of actions that move towards this goal; the program will fund projects that demonstrate the following potential outcomes to meet the purpose of the program, although, no single project is required to demonstrate all of these potential outcomes:

- Increased production and markets (supply and demand) of and for climate-smart commodities.
- Increased adoption of Climate-Smart Agriculture and Forestry (CSAF) practices and systems that reduce agricultural greenhouse gas emissions and/or increase carbon sequestration from the agricultural sector.
- Demonstration of scalable and low-cost measurement/quantification, monitoring, reporting, and verification (MMRV) systems.
- Increased innovation and consistency in measuring/quantifying farm-level GHG benefits.
- Testing and evaluation of efficient traceability through supply chains from production of commodity to delivery to the consumer.
- Improved understanding and communication of economic and adaptation benefits, as well as ancillary environmental benefits.
- Equitable administration that includes small and underserved producers as well as early adopters (i.e., producers who have already used some climate-smart approaches).
- Understanding of marketability advantages for a variety of farm types.
- Empowerment of farmers, ranchers, and forest landowners to drive CSAF markets and practice adoption.
- Development of additional public-private partnerships to foster and develop CSAF markets.

USDA engaged the public on several occasions with early public input due in November 2021 and publication and updates to the funding opportunity beginning in February 2022. In August 2022, NRCS made the Partnerships for Climate-Smart Commodities Programmatic EA available to the public and requested comments. [insert comment summary here].

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The Programmatic EA accompanying this statement has provided the analysis needed to assess the significance of the impacts of the proposed action. Partnerships for Climate-Smart Commodities promotes coordination between USDA and its partners to deliver climate-smart assistance to producers and landowners. Many of the practices likely to be implemented under Partnerships for Climate-Smart Commodities will utilize the same NRCS Conservation Practices Standards as those for several Farm Bill programs: the Environmental Quality Incentives Program (EQIP), Conservation Reserve Program (CRP), Conservation Stewardship Program (CSP), Agricultural Conservation Easement Program (ACEP), Healthy Forests Reserve Program (HFRP), and the Watershed Protection and Flood Prevention Program and provide environmental benefits similar to those under these programs with an emphasis on reducing GHGs and sequestering carbon.

Partnerships for Climate-Smart Commodities supports projects that pilot implementation of climate-smart agriculture and/or forestry practices on a large-scale, including meaningful involvement of small or historically underserved producers, for the purpose of producing and marketing climate-smart commodities. Practices and enhancements to existing practices are not limited to those under existing USDA practice standards. Because NRCS cannot know all the climate-smart actions that may be carried out under such innovative grants, the analysis focused on the effects of known practices. Project-specific NEPA analyses may be required for projects that will not implement NRCS conservation practice standards.

I have determined, for the reasons outlined below, that there will be no significant direct, indirect, or cumulative impacts on the quality of the human environment from implementing Partnerships for Climate-Smart Commodities, particularly when focusing on the significant adverse impacts NEPA is intended to help decisionmakers avoid and mitigate. Therefore, an EIS will not be prepared.

- (1) The Programmatic EA evaluated both the beneficial and adverse impacts of the proposed action, which is to implement Partnerships for Climate-Smart Commodities as described in the Notice of Funding Opportunity (NFO – No. USDA-NRCS-COMM-22-NOFO0001139) and authorized by the Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq). Partnerships for Climate-Smart Commodities provides many benefits to the environment; however, because there is potential to adversely affect one type of resource while improving the condition of another resource, there may at times be minor site-specific adverse environmental effects that would be short-term, occurring during the implementation period. NRCS has in the past and will continue to prepare documentation of project-specific environmental evaluations and will consult with appropriate agencies to avoid, reduce, or otherwise mitigate adverse impacts on natural resources. As part of this process, NRCS also complies with requirements for protecting unique geographic features and other resources, as well as NRCS policies protecting natural resources. Thus, any adverse effects that may result from Partnerships for Climate-Smart Commodities will occur at a much lower threshold than significant impacts.
- (2) The proposed action will not result in significant adverse effects on public health or safety. The application of climate-smart practices under Partnerships for Climate-Smart Commodities is anticipated to provide long-term beneficial impacts to reduce GHGs, sequester carbon, and improve natural ecosystem functions. Appropriate measures will

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be taken on a project- or site-specific basis to mitigate the potential for adverse effects to occur to public health and safety during implementation.

- (3) There is no evidence indicating there will be any significant adverse effects to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas from selection of the proposed action, particularly on a national basis. Implementation of NRCS Conservation Practice Standards under Partnerships for Climate-Smart Commodities to reduce GHGs will also improve the condition of natural resources at a landscape scale. This may result in only minor short-term adverse impacts. In addition, consulting as required with agencies having jurisdiction over these resources helps NRCS and partners to avoid significant adverse effects.
- (4) The effects of Partnerships for Climate-Smart Commodities on the quality of the human environment are not controversial. Partnerships for Climate-Smart Commodities affects the environment through implementation of climate-smart practices. Any controversies that may arise from a specific project will be identified during the environmental review process and appropriate mitigation measures applied. If necessary, a project or site-specific EA or EIS may be prepared in addition to this Programmatic EA to ensure compliance with NEPA.
- (5) The proposed action is not considered highly uncertain and does not involve unique or unknown risks. The on the ground impacts from Partnerships for Climate-Smart Commodities projects will mainly be from climate-smart practices to be implemented using NRCS conservation practice standards, which are climate-smart supported by science and have been demonstrated to improve natural resource conditions. The effects of these climate-smart practices are analyzed at a broad scale in the Programmatic EA and have been detailed in Conservation Practice Network Effects Diagrams that are incorporated in the Programmatic EA. The effects of innovative approaches not using NRCS conservation practice standards will be analyzed to determine whether additional project-specific NEPA analyses are necessary.
- (6) The proposed action will not establish a precedent for future actions with significant adverse effects, nor does it represent a decision in principle about future considerations. The proposed action involves investing in climate-smart markets and farming, ranching, and forestry to strengthen rural and agricultural communities while reducing GHGs and protecting natural resources. Impacts from these actions are expected be beneficial overall.
- (7) The proposed action will result in implementation of climate-smart activities on agricultural and non-industrial forest land across the United States. As discussed in the EA, the impact of these practices is intended to reduce GHGs and be beneficial to natural resources. Though some minor, primarily short-term adverse effects may occur in some locations, the cumulative effects of these individual actions on the quality of the human environment are not expected to be significant. If there are indications that project-specific or site-specific Partnerships for Climate-Smart Commodities activities may have potential to result in significant adverse effects to the quality of the human environment, an EA or EIS may be prepared separately from the Programmatic EA.

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- (8) The proposed action will not adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or cause loss or destruction of significant scientific, cultural, or historical resources. As stated in the EA, NRCS follows the Advisory Council on Historic Preservation's regulations for implementation of Section 106 of the National Historic Preservation Act of 1966 and related policy guidance to ensure historic properties are considered during project and programmatic evaluations. NRCS also enters into programmatic agreements to ensure it takes appropriate steps to identify and avoid adversely affecting these resources when practices are implemented. Partners under Partnerships for Climate-Smart Commodities grant agreements will be required to follow NRCS procedures for historic properties.
- (9) The proposed action will not adversely affect endangered or threatened species, marine mammals, or critical habitat to a significant degree. As discussed in the Programmatic EA, Partnerships for Climate-Smart Commodities purposes include implementation of climate-smart production practices, activities, and systems on working lands that result in GHG benefits. Partners under Partnerships for Climate-Smart Commodities are also encouraged to cooperate with producers in meeting or avoiding the need for natural resource regulatory requirements, including the Endangered Species Act. NRCS regularly consults with the U.S. Fish and Wildlife Service and National Marine Fisheries Service, as applicable, to ensure these species are not jeopardized, adverse effects are minimized, and that there are no adverse modifications to designated critical habitat. NRCS also enters programmatic agreements to ensure measures are implemented in conjunction with the proposed activities to make “no effect” and “may affect, not likely to adversely affect” determinations. Partners will be required to follow NRCS’ procedures for endangered and threatened species and critical habitat.
- (10) The proposed action does not threaten the violation of Federal, State, or local requirements imposed for protection of the environment. An Environmental Evaluation (EE) will identify requirements for protection of the environment to ensure they are considered and that adverse effects are addressed during the EE process, normally by consultation with the agency having jurisdiction. As a result, the proposed action is consistent with the requirements of these laws and related policies. Partnerships for Climate-Smart Commodities projects implemented using innovative approaches other than NRCS conservation practice standards with their concurrent environmental evaluation will be analyzed to determine whether project-specific EAs or EISs are necessary.

Terry Cosby
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U.S. Department of Agriculture

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