April 29, 2021

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave. S.W.
Washington, DC 20250

RE: Comments in 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 (Mar. 16, 2021), Docket No. USDA–2021–0003

Dear Secretary Vilsack:

A broad coalition of stakeholders collaborated through the Regenerative Agriculture and Justice Working Group of the American Sustainable Business Council to develop the following response to the USDA's Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad. We share collective priorities to advance a more resilient, regenerative, and just food and agricultural economy. This letter has over 200 endorsements from business leaders from industries throughout the agricultural value chain, advocacy organizations, farmers, chefs, scientists, and groups representing farmers, workers, and frontline communities. (Please see the end of the letter for the full list of endorsements).

We applaud the USDA for taking a proactive stance on supporting climate mitigation and resilience on agricultural and forestry land through climate-smart agriculture. However, in supporting climate-smart agriculture, it is important that the USDA not narrowly focus on carbon sequestration at the expense of a more holistic and transformative approach. To build a food and agricultural system that is truly able to combat the climate crisis, the USDA needs to facilitate a transition towards approaches like regenerative agriculture, agroecology, and organic agriculture while foregrounding resilience, justice, and equity. These approaches will not only sequester carbon dioxide and reduce the sectors' greenhouse gas emissions but are also the best approaches for building and maintaining soil health, biodiversity, nutrient cycling, resilience to extreme weather events, groundwater recharge, and soil and water retention.

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1. Overview

Regenerative Agriculture and Agroecology

The six principles of regenerative agriculture are as follows: keep the soil covered, minimize soil disturbance, maximize crop diversity, maintain living roots in the ground year-round, integrate livestock, and consider local context (i.e. precipitation, humidity, scale, economics, processing).

Similarly, agroecologists have outlined five principles for designing agro-ecosystems: enhance recycling of biomass, optimize nutrient availability, and balance nutrient flow; secure favorable soil conditions for plant growth, particularly by managing organic matter, ground cover, and enhance soil biotic activity; minimize losses of solar energy, air, and water through microclimate management, water harvesting, and soil management through increased soil cover; maximize species and genetic diversification of the agroecosystem in time and space; enhance beneficial biological interactions and synergisms among agrobiodiversity.[1]

Science and practice have proven that advancing these holistic approaches to farming will be the most effective way that the USDA can mitigate climate change and build resilience.[2] They will simultaneously sequester carbon, restore and sustain functioning ecosystems, and build resilience to extreme climate events on farms and throughout regions. Research has also shown that these approaches can maintain current food production levels and potentially increase overall productivity if adequately supported by public programs.[3][4] By reducing input costs, reducing crop loss to extreme weather, and creating new revenue streams, studies have shown these approaches can improve farmer's profits per acre.[5][6]

To promote a regenerative and agroecological climate-smart agriculture, the USDA should also pursue the following:

- A steep and drastic reduction of the use of synthetic agrochemicals in all of agriculture. The use of synthetic agrochemicals is counterproductive to the USDA's climate-smart agriculture goals as they strip the soil of beneficial bacteria and capacity for resilience and carbon sequestration which results in significant greenhouse gas emissions. Synthetic nitrogen fertilizer use and production is the single largest contributor of nitrous oxide, which is 300 times more of a

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[1] Miguel A. Altieri, "Agroecology: The Science of Natural Resource Management for Poor Farmers in Marginal Environments," Agriculture, Ecosystems & Environment 93, no. 1 (2002): 1-24, https://doi.org/10.1016/S0167-8809(02)00085-3

[2] Altieri MA, Nicholls CI, Henao A and Lana MA (2015) Agroecology and the design of climate change-resilient farming systems. Agronomy for Sustainable Development 35, 869–890. https://doi.org/10.1007/s13593-015-0285-2

[3] Olivier De Schutter, United Nations Special Rapporteur on the Right to Food, 2010. https://foe.org/resources/farming-for-the-future-organic-and-agroecological-solutions-to-feed-the-world/#:~:text=Key%20findings%3A%20%E2%80%9CAgroecology%2C%20if,focus%20on%20small%2Dscale%20farmers%2C

[4] Reganold, J., Wachter, J. Organic agriculture in the twenty-first century. Nature Plants 2, 15221 (2016). https://doi.org/10.1038/nplants.2015.221

[5] LaCanne CE, Lundgren JG. Regenerative agriculture: merging farming and natural resource conservation profitably. *PeerJ*. 2018;6:e4428. Published 2018 Feb 26. doi:10.7717/peerj.4428

[6] https://farmland.org/project/quantifying-economic-and-environmental-benefits-of-soil-health/

damaging greenhouse gas than carbon dioxide.[7] Further, synthetic agrochemicals poison our nation's water waterways, and drinking water, and pose serious health risks to farmworkers, the public, and wildlife.

- Protection of existing conservation land and commitment to a zero conversion approach for lands currently under USDA conservation easement programs. Protecting existing conservation land will reduce greenhouse gas emissions, protect clean water sources, support regional climate resilience, and support biodiversity through the provision and maintenance of habitat. Research has shown that ~50% of emissions related to food systems in industrialized countries are land-based with more than 30% of that being attributed to land-use change.[8]
- A phasing out of concentrated animal feeding operations (CAFOs) that poison water sources, impair local ecologies, and severely affect air quality for nearby communities causing serious health risks. CAFOs should be replaced by integrated crop-livestock systems and approaches like planned grazing, intensive grazing management,[9] and holistic managed grazing.[10]
- Support and recognition for the Indigenous people and people of color who have developed and maintained for generations the practices and principles that are the basis for regenerative agriculture and agroecology

For our recommendations on how the USDA can advance regenerative agriculture and agroecology, please see sections 2 and 3.

Justice and Equity

For the USDA to most effectively address the climate crisis, the agency will need to center equity and social and economic justice throughout its programs. Failing to do so will hinder USDA's efforts at ecological regeneration on a farm and regional level.[11] Farmers who are more economically secure have a longer-term horizon for planning and land management and are therefore better able to adopt practices that conserve and rebuild soil and ecological health. These practices are often more labor-intensive and require highly specialized knowledge of local soils and ecologies. Thus more workers/farmers on the land may be needed to help facilitate more widespread adoption of regenerative and agroecological methods.

To advance social and economic justice, the USDA will need to address ongoing issues of discrimination experienced by BIPOC farmers at local USDA offices, ensure equity in access to programs, credit, and resources, facilitate access to land for young and beginning farmers and Black farmers who have lost land due to discriminatory USDA policies, ensure fair prices for farmers, advance the rights of farmworkers, advance reparations for discriminated against the group and exploited farmworkers, facilitate local control of land and productive resources, and acknowledge and support the generational farming knowledge and experience of BIPOC farmers and immigrant farmworkers who were farmers in their home countries. The voices of marginalized groups must be centered in the USDA's policy discussions.

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[7] In a recent study published in the journal Nature, an international team of scientists discovered that N2O emissions are increasing at a faster rate than any other type of greenhouse gas emission, mainly due to a rise in nitrogen fertilizer application for food production.

[8] Crippa, M., Solazzo, E., Guizzardi, D. *et al.* Food systems are responsible for a third of global anthropogenic GHG emissions. *Nat Food* 2, 198–209 (2021). https://doi.org/10.1038/s43016-021-00225-9

[9] https://extension.psu.edu/intensive-grazing-management-of-cover-crops-for-soil-health

[10] https://savory.global/holistic-management/

[11] Fagundes C, Picciano L, Tillman W, Mleczko J, Schwier S, GraddyLovelace G, Hall F, Watson T (2019). Ecological costs of discrimination: racism, red cedar and resilience in farm bill conservation policy in Oklahoma. Renewable Agriculture and Food Systems 1–15. https://doi.org/10.1017/ S1742170519000322

For more details on our recommendations on how the USDA can ensure justice and equity throughout its work, please see section 4.

Carbon Markets and Carbon Banks

We have several concerns with some of the carbon market and credit proposals the USDA is considering as a tool for addressing the climate crisis. Some of our concerns include that these proposals focus too narrowly on soil carbon sequestration instead of a more holistic total impact approach, that they will be pursued as an alternative to strong regulation of polluting industries, and that they will likely benefit large-scale producers more than small-scale, people of color, and young and beginning farmers, and thus could further consolidate land and market control. We recommend that the USDA instead support more holistic financing schemes that pay farmers for broader ecosystem services while foregrounding justice and equity. For more details on our concerns and recommendations surrounding carbon credit proposals, please see section 5.

In advancing climate-smart agriculture, the USDA must take into account the total impact that practices have on ecosystems and not just the amount of carbon sequestered. By advancing soil health and broader ecosystem regeneration, soil carbon sequestration will occur naturally as an added co-benefit.

2. Leveraging Existing Policies and Programs to Advance Regenerative Agriculture

Existing NRCS programs provide an infrastructure for conducting outreach, training, and payment of incentives to both support farmers in the transition to regenerative agriculture and reward farmers that have already made the transition. Because there is greater demand for these programs than there is funding, the USDA needs to take measures to prioritize access for small-scale, marginalized, and young and beginning farmers. These programs must be made easier to access, must be promoted through grassroots channels, and must be supportive of those that may have difficulty in enrolling in and/or applying for these programs, such as those with limited literacy skills, but who may have significant agricultural skills and knowledge. They also must be language-accessible to encourage beginning farmers and potential farmers of various ethnic backgrounds to engage in these programs. Materials must be made available in various languages and USDA staff must include appropriate diversity among their staff to accommodate those of other ethnic groups to access the programs.

The NRCS must also recognize when traditional indigenous conservation practices are substantially equivalent to NRCS Conservation Practice Standards and thus are eligible for funding from federal programs. To facilitate this, adopt Indigenous Field Office Technical Guides (IFOTG) as an alternative to the standard national NRCS FOTG (see pg. 99 of this publication to learn more).

To make the best use of these programs, limited funding needs to focus on supporting practices that most effectively build soil health, foster ecological regeneration, and promote resilience for small-scale and marginalized farmers. Currently, a significant percent of EQIP funding goes towards highly destructive CAFOs.[12] Instead, the USDA should focus on moving animals out of CAFOs and towards regenerative systems that practice managed grazing and reincorporation of livestock in cropping systems.

[12] https://inmotionmagazine.com/ra08/EQIP_report_1208.pdf

The Climate Stewardship Act, introduced by Senator Booker and Representative Spanberger, and the California Healthy Soil Program both provide a good framework for which types of practices USDA incentives, training, and outreach should focus on.[13]

The USDA NRCS should improve its sharing of data with partners, especially conservation practice data through RCPP. Without good data on what practices are implemented where, and for how long, it's impossible to determine regional outcomes through programs like RCPP.

Federal Crop Insurance

As one of the largest federal Farm Bill programs, the Federal Crop Insurance Program (FCIP) provides an important opportunity to spend more federal dollars on soil health. The Natural Resources Defense Council makes several recommendations to improve the FCIP to support climate-friendly farming. For example, USDA could improve the FCIP by collecting data about soil health practices that have climate benefits, like cover cropping and diverse crop rotations. Rewarding farmers who use these practices with a performance-based discount or premium subsidy adjustment would be one way to transition the FCIP to a 21st century, climate-friendly program. Further investments in the Whole Farm Revenue Protection Program, including specially trained staff and agents, are a good way to transition away from yield-focused risk mitigation to more holistic, resilient farm management.

3. New Programs to Support Regenerative Agriculture

Aggie Bonds
The USDA can expand the Aggie Bond Program to facilitate investment in regenerative and resilient food and agriculture. Aggie Bonds are an existing federal-state partnership that allows private lenders to receive federal and state tax-exempt interest on loans made to small and midsize beginning farmers. The program could greatly increase the amount of capital available to regenerative farms, but it's been marred by inefficient implementation with many states not supporting the program and others not developing a streamlined process. The USDA could work with the IRS to take the process that is working in the few states with functioning programs and implement it across the country. Fixing this would provide more financial inclusion and lower-cost capital for small and beginner farmers, incentivizing better caretaking of the land. For more information, please see this memo.

Program to Transition Farmers to Regenerative Agriculture
The USDA should create a new dedicated program that is a comprehensive support system for farmers transitioning to organic and regenerative agriculture. Farmers need extra financial and technical support as they adopt a new, climate-friendly approach to farming, especially in regions and communities that have been underserved.[14]

Price Parity Program
Achieving fair prices (price parity) will allow farmers to better advance soil health, ecological regeneration, carbon sequestration, and climate resilience.[15] Achieving fair prices in the marketplace

[13] For a list of practices that the USDA should focus on supporting to maximize soil health, resilience, and ecological resilience, please see pg. 5 of the Climate Stewardship Act summary and pg. 6 of this California Healthy Soil Incentives Program document

[14] For ideas for how this comment can be structured, please contact Lara Bryant at Natural Resource Defense Council, lbryant@nrdc.org

[15] https://disparitytoparity.org/parity-an-economic-foundation-for-an-agroecological-system/

through a modernized supply management program, with a strategic grain reserve, would eliminate the $35 billion indirect cheap feed subsidy to industrial dairy, beef, pork, and poultry production that is driving CAFO expansion.[16] It could also save nearly $100 billion in direct payments over the life of the farm bill that could be earmarked for other programs.

4. Justice, Equity, Diversity, and Inclusion

In general, all USDA programs working with farmers to advance climate-smart agriculture should consider the following:

- Funding should prioritize those who have been excluded and/or discriminated against by USDA programs and policies in the past. Special financing incentives should be offered to minorities and farmers classified by the USDA as socially disadvantaged.
- Establishing set-asides for small-scale farmers

Improve access to USDA programs by Socially Disadvantaged Farmers and Ranchers with Limited English Proficiency (LEP)

To improve program access for limited English proficiency farmers, the USDA should do the following:
• Hold listening sessions to determine existing barriers
• Increase awareness within USDA agencies
• Monitor outreach efforts to ensure farmers are aware of translation services
• Recruit bilingual employees to interpret information.
• Use virtual communication with producers to assist with explaining and completing loan applications
• Work with local entities to create markets for products
• Increase knowledge of internet tools

Fully implement delayed landmark tribal provisions passed in 2018 Farm Bill
The 2018 Farm Bill passed landmark provisions designed to provide tribal nations and their citizens opportunities to advance their food security efforts, agricultural production, operations, economic and workforce development initiatives, and public health priorities. For the latest updates on these provisions, please see the Indigenous Food and Agriculture Initiative's 2018 Farm Bill Implementation Tracker here. To make progress towards addressing centuries of injustice and exclusion perpetuated towards tribal nations, the USDA must move to finalize all pending rules without delay.

After the USDA has taken the first legally required step of elevating the Office of Tribal Relations (OTR) to be fully within USDA's Office of the Secretary, next the USDA must ensure the OTR is (1) fully staffed with experienced professionals with particular expertise working in and with Indian Country, and (2) integrated into the central functions of the Department as the primary Indian Country point of contact for all federal agriculture programs.

Implement 2018 Farm Bill provisions to address "heirs property" issues and stem Black-owned land-loss

To stop Black families and farmers from losing their land, direct the USDA to fully implement new land

[16] See Tufts University study, *Feeding at the Trough,* here: https://www.foodsovereigntycanada.com/gdae/Pubs/rp/PB07-03FeedingAtTroughDec07.pdf

tenure provisions in the 2018 Farm Bill aimed at protecting heir's property owners, stemming black farmer land loss, and improving access to agricultural credit for rural communities of color. The USDA has so far failed to implement these provisions and must do so immediately in a fair and transparent manner, and in close collaboration with black farmer community-based organizations with the history and legitimacy to make these provisions effective on the ground.[17]

Promote farmer rights and competitive markets in the livestock sector

- Fully implement the 2016 Farmer Fair Practices Rules (also known as the GIPSA rules), which the previous administration delayed and then withdrew in October 2017
- Update and republish the Western Organization of Resource Councils (WORC) Rulemaking Petition under the Packers and Stockyards Act to require open, public bidding for captive cattle supplies
- Publish a final rule on the origin of livestock ensuring a level playing field for thousands of U.S. organic dairy farmers.

5. Carbon Bank and Carbon Market Proposals - Limitations and Alternatives

There has been growing interest in having the USDA support carbon markets for agriculture and to use the Commodity Credit Corporation as a "carbon bank". While it is encouraging that the USDA is interested in pursuing innovative means for advancing climate-smart agriculture, these proposals will face several limitations:

- Difficulties with measuring carbon and geographical differences in soil carbon stocks.
- Soil carbon is impermanent and can change with land management practices, so changing economic conditions could cause farmers to change practices and re-release sequestered carbon.
- There are regional variances in the soil's ability to store carbon.
    - In parts of the arid west, the soil is brittle, but a small amount of carbon sequestration makes a big difference in water storage capacity and management.
    - In colder climates, it is easier to sequester carbon, but the co-benefits aren't as strong.
- Farmers with more land and resources are positioned to benefit more from payment for carbon sequestration than smaller-scale farmers, which will result in further inequality, consolidation of market control, and concentration of land control.
- Credit prices in existing carbon markets are too low (and often too abundant), not giving polluters an incentive to reduce emissions. The price paid to farmers in current carbon markets is also often too low to enable a transition to conservation practices. The transaction costs (measuring, monitoring, maintaining the scheme and banks, etc.) tend to be too high.
- Offsetting emissions across different sectors and geographic regions fails to promote a considerable reduction in emissions, allowing polluters to continue polluting.
- Carbon markets don't address the local and cumulative impacts to the surrounding communities that are disproportionately affected by industrial plants (usually low-income, minority, and

[17] For more information, please read this backgrounder and reach out to Jordan Treakle of National Family Farm Coalition, jordan@nffc.net, Cornelius Blanding of Federation of Southern Cooperatives, cornelius@federation.coop, or Lorrette Picciano, lpicciano@ruralco.org.

disadvantaged communities). Credits allow polluters to not only continue polluting but to even increase emissions (when the credit prices are too low).
- For being too focused on GHG, carbon markets fail to account for the co-pollutants that impact health and represent cumulative impacts (water and air pollution, etc.) to neighboring communities. They create sacrifice zones, concentrating pollution in certain areas (low-income areas)
- Carbon credits reduce the benefit of healthy agricultural activity to the one of a carbon sink. Production of healthier food, healthier soils, cleaner water, maintenance of habitat for biodiversity, farm resilience, and food security are co-benefits that need to be considered when deciding what and how practices should be funded.

If the USDA does decide to advance climate-smart agriculture through supporting private markets or use of the Commodity Credit Corporation, it should support markets that take a more holistic approach and pay farmers for broader ecosystem services while foregrounding justice and equity concerns. Payment for ecosystem services can support small, minority, and underserved farmers in regenerating degraded land and protecting watersheds - with carbon sequestration being a co-benefit.

If considering carbon market, carbon bank, or payment for ecosystem services program, the USDA should take the following into account to ensure equity and accessibility by small-scale and marginalized farmers:

- Soil carbon tests can be cost-prohibitive for small-scale producers. Water infiltration tests are much cheaper than carbon sequestration tests, thus a focus on incentivizing water capacity and water storage, along with other ecosystem services, will be more equitable and have the same climate-mitigation and resilience benefits as paying for soil carbon sequestration.
- When considering the payment rate for ecosystem services, the rate needs to include the cost of entry. This will help remove barriers for smaller-scale and lower-income land managers.
- The USDA should pay small-scale farmers upfront.
- When payments are based on acreage, payments should be scaled: there should be a payment rate up to a certain acreage and then decreasing rates above that acreage.
- The USDA should cover the cost of testing (soil carbon, soil health, water infiltration, etc.) for small-scale farmers. The cost of entry is higher for small farmers per acre (large farmers are using drones etc. for more efficient data gathering.

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The American Sustainable Business Council and the undersigned businesses and partners stand ready to work with USDA to achieve our shared goals rooted in economic, social, and environmental prosperity and justice. For questions, please contact Colton Fagundes: cfagundes@asbcouncil.org - (530)613-3551

Sincerely,

3Sisters Sustainable Management, LLC
47arts
A.K. A Coach and Company
ABHIRUTU CONSULTANTS
Aboutlistening & Associates
Agrilab Technologies Inc.
All Good Products
Alliance for Sustainability

Alter Eco
American Sustainable Business Council
Anderbell Acres
Apricot Lane Farms
Asclepias Farm
Asterra Partners
Avocado Green Brands
Backlund & Associates
Bank Information Center
Banyan Botanicals
Ben & Jerry's
BIG Acts
Big Lots
Bio-Diversified Ventures, Inc
Bio-Gist Ventures
Birdsong Orchards
Blue Ridge Produce
Boardman Family Office
Business Climate Leaders
Business Engagement Initiative of Pachamama Alliance
C. Wolfe Software Engineering
California Native Garden Foundation
Carlo Voli Consulting
Carmel Building & Design
CEDag
Center for Community Based Enterprise
Center for Food Safety
Centered Wealth
Chez Panisse & The Edible Schoolyard Project
Chrysalis Farm
Circular Systems
Citizen Group
Citizens' Environmental Coalition
Climate Action Santa Monica
Climate Change Leadership Institute
Climate Positive Consulting
Collaborative Solutions
Comeback Farm Organic Produce
Community Co-Pack NW
Congregation of St. Joseph
Conscience Bay Research
CONTEMPL8 T-SHIRTS LLC
Culture Shift Agency
Daughters of Charity, Province of St. Louise
dba Metasports & technologies
Divine Sage Collective
Dr. Bronner's
Durango Compost Company
Earth Animal
Earthfire Institute
Ecosia
Eighty2degrees LLC
Encore Editorial Services
Environmental & Public Health Consulting
Evergreen Sustainability, LLC
Evolution Marketing
Evolving Electric Motor Company
EZ Office Products
Farmworker Association of Florida
FEC LLC
Financial Alternatives
Finca Cielo
Firefly Farm at Burke Hollow
Fort Hill Farm
Funders for Regenerative Agriculture
GDP Group LTD SPC
Genusetics
Global Round Table Leadership
GlobalReach
Golden Coast Mead
Great Patience Zen Stitchery
Green America
Green America- Center for Sustainability Solutions
Green Ossining
Green Retirement, Inc.
GreenPath Properties
GreenSpark Energy Solutions
Greenvest
Harambee house, inc
Harmonix
Hawthorne Valley Association
Health Care Without Harm
Healthy Campaign
Heights of Health
Herbicide-Free Campus
HigherRing
Hillside Botanicals
Hometown Action
Impact Bioenergy
Inclusive Prosperity Capital
Inclusivi-tee, PBC
Institute of Noetic Sciences
Interfaith Center on Corporate Responsibility
Intex Solutions, Inc

Iron Horse Vineyards
Iroquois Valley Farmland REIT
Jarmusz & Assoc
JLFG Communications
JSA Sustainable Wealth Management
Julie Freeman Nutrition Services
Just One World
Keap Co.
Kent Mollohan Designs
Kiss The Ground
Kit Carson Electric Cooperative
Last Resort Farm
Live Creative Studio
LLR Partners
Local FIrst Arizona
Macmillan
Mad Hatter Compost Tea
Maine Angels
Manaaki
Maple Wind Farm
Maplewood Environmental Advisory Committee
Marin Agricultural Land Trust
Marin Sunshine Realty
Mark Hewitt Pottery
Mark's Bookmark Bookseller
McCaffery Media Services
Meals of Marin
MegaFood
Mercy Investment Services, Inc.
MGG LLC
Morning Cloak Flowers
Namu Baru Inc.
Nancy Deren Financial Coaching
National Foundry Products
Naturepedic
Naturepedic Organic Mattresses
Net Impact
Net Positive Solutions
New Leaf World Markets, Inc
New Morning Market
NH Businesses for Social Responsibility
NJ Sustainable Business Council
NM Healthy Soil Working Group
North American Climate, Conservation and Environment(NACCE)
North Carolina Business Council
Northeast Ohio Mediation Services
One Step Closer (OSC)
Opus 1
Our Local Favorites
Painted Tulip LLC
Peninsula Open Space Trust
Perfect Supplements
Phi Strategies LLC
Planet FWD
Planetary C.A.R.E.
plasticfreerestaurants.org
Proof! Maui Photography
Public Market Partners
Queen's Greens
RCD Packaging Inc.
re:Invigorate
Real Speaking LLC
Regenerative Organic Alliance
Regenesis Group
Resonance Media Group
Responsible Markets
Resume Deli
Rincon-Vitova Insectaries, Inc
Roots of Change
Sanderson Sustainable Design
Savage Acres, LLC
Scott Farm Orchard
SE Hemp Association
Seattle Foundation
Seed Consulting Group
Serenity Kids
Seventh Generation
Shifting Patterns Consulting
Slow Money NC
small-r / newly
Social Impact Consulting & Coaching
Solutions Through Dialogue, LLC
Spring Lane Capital
Sprout Consulting
Stakeholders Capital
Steward
Sunsport Gardens, Inc.
Surfrider Foundation
Sustainable Business Network of Massachusetts
Sustainable Investment Group
Sustainable Works
Sustainably Wise
Tai Chi 4 LIFE
Texas Environmental Justice Advocacy Services
Teton Waters Ranch

The Berkshires List
The CAT Company
The COL Agency
The Organic and Non-GMO Report
Thousand Hills Lifetime Grazed
Tiburon Ventures, LLC
Tierra Vista
Toxic Free Future for Our Children
Trailhead Capital
Transformative Wealth Management, LLC
Transition Orcas Island
Trendsetters Network (Imagine Forward Campaign)
Two Guys Trading Co.
UNTOURS
Village Hill LTD
Vintage Vinyl Inc
Walk Your Talk Productions
Wallis Energy Corporation
Walnut Ridge Group
Wisconsin Environmental Institute
Whitestone Mountain Orchard
Wild Fern Farm
Wild Hill Organics
Wiltse Kitchen
Wisconsin Sustainable Business Council
Women Organizing for Change in Agriculture
Your Stellar Self LLC