



National Association of Conservation Districts

November 22, 2019

Chairwoman Kathy Castor
House Select Committee on the Climate Crisis
H2-359 Ford Building
Washington, DC 20515

Ranking Member Garrett Graves
House Select Committee on the Climate Crisis
H2-359 Ford Building
Washington, DC 20515

Dear Chairwoman Castor and Ranking Member Graves,

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies and private sector interest groups to provide technical, financial and other assistance to help landowners and operators apply conservation to the landscape.

We appreciate the opportunity to provide input as your Committee develops recommendations to address climate change. Below, we respond directly to several of the questions poised in the Committee's Request for Information. Overall, NACD believes that any natural resource concern should be approached by looking for locally-led solutions that are voluntary and incentive-based. Our comments below reflect that belief.

Cross-Cutting Policies

5. Innovation:

a. Where should Congress focus an innovation agenda for climate solutions? Please identify specific areas for federal investment and, where possible, recommend the scale of investment needed to achieve results in research, development and deployment.

Publicly-funded research is critically important to expanding our knowledge of natural resource conservation practices and their effects on soil health and carbon sequestration. The Natural Resources Conservation Service (NRCS), the key federal agency tasked with implementing conservation on agricultural landscapes, is continually updating its suite of conservation practices in order to respond to any newly available research into the efficacy or successes of practices.

Additionally, proving any new research on the ground is critical to further adoption of conservation practices. Many producers watch what their neighbors do and outreach at the farmer to farmer level helps spread new ideas and practices. NACD created a network of almost 300 Soil Health Champions who implement good soil health practices on their operations and promote the use of soil health management systems in their communities.



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Further research, both through the land-grant system as well as through federal research agencies, as well as greater outreach farmer to farmer, will only help further the federal government's success in promoting conservation practices that lead to the healthiest soils and carbon sequestration capacity. We urge the Committee to keep funding for these efforts in mind while crafting it's policy proposals.

Agriculture

6. What policies should Congress adopt to reduce carbon pollution and other greenhouse gas emissions and maximize carbon storage in agriculture?

Since conservation districts and the Soil Conservation Service (the precursor to today's NRCS at USDA) were created during the Dust Bowl, our country has committed to address natural resource concerns through voluntary, locally-led conservation. This approach has served us well, as farmers addressed the wind erosion of the Dust Bowl and then expanded conservation efforts to address other resource concerns such as water quality, water quantity and wildlife habitat. Conservation practices that led to healthier soils can provide all the above-mentioned benefits, but these practices also lead to greater carbon sequestration. Voluntary, locally-led conservation has worked for the past 80+ years and should be continued to address all of the resource concerns we face today.

By focusing outreach efforts on the economic and resiliency benefits on operations that improved soil health provides, we are accomplishing far greater overall benefits through reduced greenhouse gas emissions and greater carbon sequestration in our nation's agricultural soils. Although air quality and greenhouse gas emissions are newer natural resource concerns for NRCS to address, the increase in both the adoption of practices such as no-till and cover cropping and our understanding of the air quality benefits these practices can produce have already led to increased success in reducing emissions. This combined approach to addressing multiple natural resource concerns can be one of the most efficient and economically viable carbon storage capacity strategies.

Congress should increase investments in NRCS and voluntary conservation programs in the farm bill, such as the Environmental Quality Incentives Program (EQIP), the Conservation Stewardship Program (CSP), and the Conservation Reserve Program (CRP). These programs, along with annually appropriated Conservation Technical Assistance (CTA) program, help cost-share conservation practices for landowners.

These programs are most successful when they are led locally. Conservation districts were created to give local communities buy-in into federal conservation efforts. Districts help set local priorities to ensure that conservation practices are tailored to local conditions. Enacting one-size-fits-all policies will not ultimately work for the majority of landowners. Efforts by this Committee to reduce greenhouse gas emissions must recognize that without buy-in at the local level, no program, regardless of size, will be successful. Voluntary, incentive-based conservation has a long history of successfully addressing natural resources concerns on private working lands. The Committee should seek to build on this history of success, rather than supplant it



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with other programs or policies.

Conservation programs and cost-share rely on NRCS field staff available to provide technical assistance to landowners, but hiring at NRCS has not kept pace with the need. There are now 760 fewer people working at NRCS than there were in 2013. Even when the USDA authorizes hiring staff at NRCS, the hiring process is slow and does not keep pace with attrition at the agency. By NRCS's own calculations, as of the beginning of the current fiscal year, they are more than 1,000 employees below their staffing cap, and some states have as few as 72 percent of the staff they need. NACD is particularly concerned about these trends, since the President's Budget continues to propose dropping employment at NRCS by 300-400 positions each year, even after accounting for employment changes driven by the new Farm Production and Conservation (FPAC) mission area's Business Center.

7. What policies should Congress adopt to help farmers, ranchers, and natural resource managers adapt to the impacts of climate change?

Landowners are already seeing an increase in the frequency and severity of weather extremes across the country. Members of NACD's Soil Health Champions Network report that they have seen prolonged drought, more intense winds, extreme heat and heavy rains at inopportune times. They also note that the weather has been less dependable than it once was.¹

Increasing conservation practices, such as those offered with technical assistance from conservation districts and NRCS, can help farmers better adapt. Adopting soil health practices can have a two-fold impact on a farm coping with weather extremes. First, the practices increase the resilience of the agricultural system. No-till farming, for example, anchors the soil in place and reduces erosion. It also aids water infiltration, helping to avoid increased runoff and reducing flooding downstream. With excess moisture in a no-tilled field, a farmer can still get their equipment into the field and plant sooner than on tilled acres. When there is too little water, no-till acres retain water better and prevent what water is present from running off the farm, increasing well water levels. Cover crops also help retain water and can reduce wind erosion as well which dries fields.

Even with conservation practices in place, a farm is still not immune from the worst storm events. However, our Soil Health Champions report a second impact of soil health practice adoption. Many soil health practices, like no-till farming, actually decrease the cost of production for the farmer. When a farmer spends less money per acre on inputs, profitability is higher even when crop yields are down, giving them more financial stability to implement additional conservation practices on their land.

As noted above, Congress should build on existing conservation programs at NRCS when seeking to help landowners adapt to weather extremes. In addition, Congress should push NRCS to hire enough staff to adequately implement these programs.

¹ <https://www.nacdnet.org/wp-content/uploads/2019/06/NACD-Report-Soil-Health-and-Weather-Extremes.pdf>



Oceans, Forestry and Public Lands

8. How should Congress update the laws governing management of federal lands, forests, and oceans to accelerate climate adaptation, reduce greenhouse gas emissions, and maximize carbon storage?

Our nation's forests have a tremendous ability to sequester carbon, and if managed properly, prevent the emission of greenhouse gasses. Simply through their natural cycles, forests pull CO₂ from the air and store it, both in the plant as well as transferring it into the soils. Better management of our public forests will help this natural cycle. While the changing climate has created conditions that have led to longer fire seasons, a lack of management of our nation's forests, while also suppressing smaller fires, has led to forest fires in recent years that burn hotter and longer, killing off many more trees than before. Historically, smaller forest fires have accomplished this management by removing smaller vegetation leaving larger trees living, thus reducing the fuel available to future fires.

Removing smaller vegetation and dead trees contributes to a healthy forest while also reducing the risk of larger forest fires. Stewardship Contracting through the U.S. Forest Service and the Bureau of Land Management allows parties other than the two agencies on the land to perform management activities. However, an improvement to these contracts could be to extend the current 10-year cap which might encourage greater participation in Stewardship Contracting thus increasing the acres of public forests that are subject to regular management.

Resilience and Adaptation

11. What policies should Congress adopt to help communities become more resilient in response to climate change? The Select Committee welcomes all ideas on resilience and adaptation but requests comments on three specific questions:

a. What adjustments to federal disaster policies should Congress consider to reduce the risks and costs of extreme weather and other effects of climate change that can no longer be avoided?

As mentioned above, the Committee should look to build on the strong foundation already in place at NRCS. The Emergency Watershed Protection (EWP) Program provides funding for responses to natural disasters. This includes removing debris, repairing eroded streambanks, fixing damaged levees, and repairing conservation practices. This program can also be used to purchase floodplain easements from landowners where that is more cost-effective than recovery. As extreme weather events become increasingly unpredictable, Congress should anticipate additional funding requests for EWP and similar voluntary programs that aid recovery.

NRCS also implements the Watershed Operations and Watershed Rehabilitation programs, which fund the building and rehabilitation of small watershed dams throughout the country. These smaller dams are limited to watersheds of under 250,000 acres, and during heavy rainfall events, can slow the flow of water across the landscape, limiting flooding damage downstream. These programs have historically received both mandatory and discretionary funding from Congress. NACD strongly supports increasing this funding.



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Finally, with varying weather patterns increasing some agricultural operations' reliance on irrigation and with aquifers at concerning levels in heavily irrigated acres, NRCS programs such as EQIP help producers become more efficient with their irrigation infrastructure. Recent data from the National Agriculture Statistics Service (NASS) shows that between 2013 and 2018, while irrigated acres across the country increased slightly, actual acre-feet of water applied through irrigation fell by 6 percent.² The 2018 Farm Bill directed additional authority to EQIP so that more irrigation infrastructure can receive efficiency improvements. This will allow operations to continue to be successful while being better stewards of limited water resources.

Thank you again for the opportunity to provide input as you develop recommendations and for your commitment to voluntary, locally-led conservation.

Sincerely,

A handwritten signature in black ink that reads "Tim Palmer".

Tim Palmer
President
National Association of Conservation Districts

²

https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/Farm_and_Ranch_Irrigation_Survey/fis.pdf