



# National Association of Conservation Districts

June 22, 2020

Deputy Secretary Stephen L. Censky  
United States Department of Agriculture  
1400 Independence Ave. SW  
Washington, DC 20250

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Dear Deputy Secretary Censky,

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.

Conservation districts are uniquely positioned to assist landowners with implementing urban conservation. Conservation districts are spread across the country in nearly every community – large and small, urban and rural. Urban conservation districts assist with erosion and sediment control from new development, stormwater management like bioswales and raingardens, urban forestry and urban agriculture, among other resource conservation activities.

Since 2016, NACD has partnered with USDA's Natural Resources Conservation Service (NRCS) to award Urban Agricultural Conservation Grants to conservation districts across the country. This competitive program has awarded \$5 million to 102 districts to date. Through this grant program and through other work, our members have developed a depth of knowledge about what works in urban agricultural conservation and where the knowledge gaps lie.

NACD appreciates the opportunity to provide stakeholder input in advance of the 2020 Request for Applications for the Urban, Indoor and other Emerging Agricultural Production Research, Education and Extension Initiative. Drawing upon our members' expertise in urban agriculture and conservation, we offer the comments below for your consideration.

**(1) Considering agricultural production through marketing; which phase has the greatest and most urgent REE needs in developing urban and indoor agriculture?**



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Based on the experience of NACD's Urban Agricultural Conservation grantees, NACD sees the most urgent research, education and extension needs in (a) agricultural production; (c) transportation; and (g) markets.

## *Agricultural Production*

There is still much research and dissemination of research needed on agricultural production, specifically as it intersects with conservation. Urban growers face a unique set of challenges, including soil contamination, which require unique approaches. Within this category, NACD recommends separating agricultural production priorities into two areas of focus: environmental and economic topics. The table below outlines specific examples that fall under each of these topics.

<b>Environmental</b>	<b>Economic</b>
Soil lead remediation techniques	Techniques for reaching underserved populations
Invasive plant management	Effects of pesticide ordinances on urban agriculture and beekeeping
Insect management	Templates for organizational structure and sustainable funding of urban agriculture, including community gardens and food forests
Soil and water conservation	Economic studies of edible Main Street programs, community gardens, food forests and farmers markets

## *Transportation*

Transportation and distribution of agricultural products can also be a significant challenge for urban producers. Specifically, our members identified Food Policy Offices as a tool that can help to overcome these challenges. However, communities often lack the guidance needed to put one of these offices in place. Our members see a need for resources on developing Food Policy Offices with a mission and purpose to connect and facilitate producers, the transportation industry and a distribution system that is easy for the general population to utilize, including multicultural, low income or transportation-limited residents.

## *Markets*

Even if an urban agriculture operation is successful with production, it can be severely limited by the lack of access to markets. Our members recommend further research to help address this challenge.

**(2) Of the eight priorities listed [in the Notice], which priority has the greatest and most urgent REE need in developing urban and indoor agriculture that is not being adequately addressed in other Federal REE programs?**



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Based on the experience of our members, NACD recommends focus on (c) identifying and promoting the horticultural, social and economic factors that contribute to successful urban, indoor and other emerging agricultural production and (d) analyzing the means by which new agricultural sites are determined, including an evaluation of soil quality, condition of a building or local community needs.

*(c) Identifying and promoting the horticultural, social and economic factors that contribute to successful urban, indoor and other emerging agricultural production.*

Urban agriculture is more than just growing food. Urban agriculture operations handle many issues across multiple disciplines with far-reaching impacts that few are measuring. This type of information can help local governments make ordinances more urban agriculture friendly, gain community support (including homeowners' associations), and show the true value of urban agriculture operations that is not just dollars and cents.

*(d) Analyzing the means by which new agricultural sites are determined, including an evaluation of soil quality, condition of a building, or local community needs.*

One of the priority concerns for conservation districts' urban agriculture conservation programs is heavy metals and other contaminants in soils. More research and outreach is needed about the impact of soil contamination and the relative necessity of raised beds or other cost-effective techniques to address soil safety. Other concerns that conservation districts observe relative to siting urban agriculture operations include issues such as underground/overhead utilities and local building codes.

Any work related to siting urban agriculture should include an equity lens that gives preference to healthy food priority areas or "Low Income, Low Access" areas. In particular, our members see the need for more research that emphasizes historically underserved communities.

Thank you for the opportunity to provide input on the upcoming grant opportunity and for your commitment to voluntary, locally-led conservation.

Sincerely,

Tim Palmer  
President  
National Association of Conservation Districts