



National Association of Conservation Districts

April 29, 2021

Mr. Seth Meyer
Office of the Chief Economist
Jamie L. Whitten Building
1400 Independence Avenue, S.W.
Washington, DC 20250

Re: NACD's Response to Notice of Request for Public Comment in Federal Register/Vol. 86, No. 49

Dear Mr. Meyer:

The National Association of Conservation Districts (NACD) represents America's 3,000 local conservation districts, state and territory associations and the more than 17,000 men and women who serve on their governing boards. Established under state law, conservation districts are local units of government that share a single mission: to work cooperatively with federal, tribal, state and other local resource management agencies and the private and public sectors to provide technical, financial and other assistance to integrate conservation into land stewardship. NACD understands that there is an immediate need for significant action to address climate change. The cost of inaction ranges from serious impacts to human, animal, forestry, soil and plant health to a drastic effect on the world economy to complete environmental degradation making life unsustainable.

Action is needed now.

Climate-smart agriculture and forestry need significantly more government investment and action to meet the need of oversubscribed programs. The loss of the soil's productivity jeopardizes both the physical and biological health of this fragile resource.¹ We've known since the first conservation districts were created in the 1930s that soil can be restored and rejuvenated again. It's an infrastructure investment that when working through the USDA's longstanding collaborative partnership with conservation districts, we can "Build Back Better" healthy soil and forests.

The U.S. has already experienced significant economic and agronomic impacts of climate change and is projected to experience further devastation as global warming continues. Shifts in societal awareness have caused increased demands for nature-based solutions, which are supported by both Congress and the Biden-Harris Administration. NACD appreciates the opportunity to provide input as the United States Department of Agriculture (USDA) implements the Executive Order on Tackling the Climate Crisis at Home and Abroad.

NACD – A leader in protecting land, forest and water resources.

Conservation districts work with millions of cooperating landowners and operators to help them manage and protect land, water and forestry resources on private, public and tribal lands in the United States. In every local jurisdiction in the country, we promote practices such as prescribed fire, no-till or reduced till, cover crops, nutrient management, increased cropping complexity and biodiversity, residue management, use of buffers and perennial strips, integrated livestock, silviculture, addressing invasive species and other practices that increase nutrient cycling and plant diversity, wildlife, soil biodiversity and carbon sequestration.

¹ Nelson, Gerald, et al. "Climate change effects on agriculture: Economic responses to biophysical shocks" Proceedings of the National Academy of Sciences of the United States of America 2013. <https://www.pnas.org/content/pnas/111/9/3274.full.pdf>. See also Impact of Climate Change on Agriculture, University of Reading FutureLearn.com <https://www.futurelearn.com/info/courses/climate-smart-agriculture/0/steps/26565>.



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These and other practices are part of NACD's well used toolbox and play a critical role in climate change mitigation, infrastructure protection, and healthy farm and forestry economies. Therefore, NACD calls on USDA to provide strong leadership within the Administration for soil health and forestry infrastructure funding in the American Jobs Plan Act, as President Biden referenced in his State of the Union speech, and to utilize local conservation districts as a major part of the solution to climate change.

Landowners are already seeing an increase in the frequency and severity of weather extremes across the country. In the United States, 291 weather and climate disasters have exceeded \$1 billion since 1980; the total cost of these 291 events exceeds \$1.9 trillion.² Climate change creates serious threats to the world's agriculture, forests and food supply. Global soil degradation affects at least a quarter of all land.³ Extreme weather from drought to high precipitation events have become regular occurrences.⁴ More than a third of farmland in the Corn Belt – nearly 100 million acres – has completely lost its carbon-rich topsoil due to erosion.⁵ The current cost of land degradation reaches about \$490 billion per year, much higher than the budget for action to prevent it.⁶ While production has kept up with costly advanced genetics and additional fertilizer, we must utilize more natural methods to increase soil health. The same is true in our forests. Today's fire seasons last 78 days longer on average than they did in the 1970s, and are projected to grow hotter, more unpredictable and more expensive.⁷ Over the last few decades, the portion of the USDA Forest Service's total budget dedicated to fire has grown from under 20 percent to more than 50 percent. CoreLogic's 2020 Wildfire Risk Report shows 1,975,116 homes in the United States are at risk of being destroyed by wildfires. These homes carry an associated reconstruction cost of over \$638 billion.⁸

Regenerative agriculture and forestry practices are critical for productivity in a world of increased competition for land and water resources, including through urban expansion. Building soils, while reducing inputs and increasing organic matter, will balance a circular system that minimizes material loss, reduces waste, and secures the necessary quality and quantity of food production into the future. The NACD model empowers the local connections to deploy resources that prioritize and improve conservation on lands in every county in America by:

- Aligning the best available climate-smart agriculture and forestry research from USDA, land-grants and the private sector;
- Gaining knowledge from early adopters, creative farmers, ranchers and foresters, conservation districts, and other partners to create a conservation district plus-up effect in education and outreach; and
- Increasing efficiencies and funding that maximize technical assistance capacity that prioritizes local, on-the-ground, climate-smart agricultural and forestry expertise.

² Billion-Dollar Weather and Climate Disasters: Overview. NOAA (accessed 25 April 2021) <https://www.ncdc.noaa.gov/billions/>. See also The State of the Global Climate 2020. World Meteorological Organization (accessed 25 April 2021) <https://public.wmo.int/en/our-mandate/climate/wmo-statement-state-of-global-climate>.

³ Gibbs, H.K. "Mapping the world's degraded lands" ScienceDirect February 2015. <https://www.sciencedirect.com/science/article/pii/S0143622814002793>.

⁴ Al-Kaisi, Mahdi, Rattan Lal. "Aligning science and policy of regenerative agriculture" Soil Science Society of American Journal 2 September 2020. <https://access.onlinelibrary.wiley.com/doi/abs/10.1002/saj2.20162>.

⁵ One-Third of Farmland in the U.S. Corn Belt has Lost Its Topsoil." YaleEnvironment360 Digest 18 February 2021. <https://e360.yale.edu/digest/one-third-of-farmland-in-the-u-s-corn-belt-has-lost-its-topsoil>.

⁶ Agriculture at a Crossroads, Soil Fertility and Erosion. Global Agriculture. <https://www.globalagriculture.org/report-topics/soil-fertility-and-erosion.html>.

⁷ National Association of State Foresters. Wildfire. <https://www.stateforesters.org/where-we-stand/wildfire/>.

⁸ Woollard, Deidre. "How Have the California Wildfires Impacted The Local Real Estate Market?" 21 Oct. 2020 Million Acres, a Motley Fool Service. <https://www.fool.com/millionacres/real-estate-investing/articles/how-have-the-california-wildfires-impacted-the-local-real-estate-market/#:~:text=Many%20areas%20currently%20battling%20fires,cost%20of%20over%20%24638%20billion>.



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These comments include input from the NACD Climate Action Task Force. The task force combines the unique experiences and perspectives of diverse, nationally leading conservation experts to articulate actionable policy and programmatic recommendations that prepare and support conservation districts for increased challenges and opportunities because of climate change. These recommendations position conservation districts as partners with USDA and others in leading climate-smart agriculture and forestry systems that mitigate the effects of weather extremes by increasing soil carbon sequestration, reducing greenhouse gas emissions (GHG), and improving soil health, which secure our food, fiber and forest supply.

Members include:

- **Dr. Mahdi M. Al-Kaisi**, Professor of Soil Physics, Department of Agronomy, Iowa State University; American Society of Agronomy Fellow; Soil Science Society of America Fellow; and Soil and Water Conservation Society Fellow
- **Arthur “Butch” Blazer**, former President, Mescalero Apache Tribe; former Deputy Under Secretary, Natural Resources and Environment; former New Mexico State Forester
- **Ryan Britt**, Missouri farmer; National Conservation Foundation Next Generation Leadership Institute Member; Past President, Missouri Association of Soil and Water Conservation Districts
- **Jimmy Emmons**, former FPAC Regional Coordinator, Past President for Oklahoma Association of Conservation Districts, Dewey County Commissioner, Oklahoma; No-till on the Plains Vice President; Leopold Conservation Award Winner
- **Joe Fox**, President, National Association of State Foresters; Arkansas State Forester
- **James Gulliford**, former Administrator, EPA Region 7; former Soil and Water Conservation Society Executive Director
- **Leonard Jordan**, former Natural Resources Conservation Service (NRCS) Acting Chief; former NRCS Associate Chief for Conservation; former NRCS Eastern Regional Conservationist; former NRCS State Conservationist in Georgia, Washington
- **Cindy Lair**, Colorado Department of Agriculture, Director Colorado State Conservation Board (CSCB), Conservation Services Division; former president, National Association of State Conservation Agencies
- **Ray McCormick**, Lifelong conservationist; 2010 Indiana Master Farmer; Past President, Indiana Association of Soil and Water Conservation Districts
- **Tim Palmer**, National Association of Conservation Districts Immediate Past President; diversified farmer in South Central Iowa
- **Laura Wood Peterson**, President, LWP Consulting
- **Dr. Victoria Reinhardt**, Ramsey County Commissioner, St. Paul, Minnesota, National Association of Counties; U.S. Environmental Protection Agency’s Local Government Advisory Committee; Recycling Association of Minnesota Chairwoman
- **Dr. Karen Waldrop**, Ducks Unlimited, Inc. Chief Conservation Officer

A. How to Implement the Civilian Climate Corps – An Immediate Opportunity

The Biden-Harris Administration has set forward an ambitious climate agenda that cannot be achieved without a modern, flexible, mass mobilization of technical assistance. NACD has asked for at least \$1.2 billion fiscal year (FY) 2022 discretionary funding for Conservation Operations, of which \$1.1 billion is requested for Conservation Technical Assistance. Even with this budget, we cannot meet all challenges to reduce GHG emissions, increase carbon sequestration, and mitigate the impact of GHGs in the United States and its territories. **We applaud the Administration’s proposal for creating a Civilian Climate Corps (CCC) and believe its purpose is highly aligned with the federal, state and local conservation delivery model supported by conservation districts.**



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1. Conservation districts and the original Civilian Conservation Corps collaborated on programs and projects to respond to the severe soil erosion issues of the Dust Bowl and can do so again today to respond to climate challenges.⁹

The ability to offer financial assistance enables cooperators to install conservation practices and is necessary to meet the Administration's climate goals, but it is of little value without the expert technical assistance required to install and manage these practices. We do not think the Administration will be successful in mobilizing the CCC without trusted, local partners working together – from private industry to public interest organizations to government at all levels – federal, tribal, state and county – to provide technical assistance and conservation planning on a massive scale. Hurdles, such as landowner reluctance, can be overcome by working with conservation districts and other partners through the locally-led model to deliver a unified message. Landowners cannot be driven to make significant change without incentives, education and local demonstration. This requires direction setting, and conservation districts can coordinate between public and private sector partners, including private investors and companies that seek to complement the federal government's role in spurring climate solutions. Working through locally-led conservation districts that have existing state legal authority to deploy resources in every community, especially those that are underserved, is the most efficient and effective way to deploy the proposed \$10 billion for the CCC.

2. NACD's growing Soil Health Champions Network can mentor a diverse, new generation of boots-on-the-ground capacity.

In order to accomplish the CCC's much-needed soil health outreach, education and increased capacity, we will need to rely upon the paid expertise of early adopters and experts in soil health management on forested, rangeland, urban and working lands. NACD's existing Soil Health Champions Network established a peer-to-peer network of such individuals, and all Soil Health Champions have strong working relationships with their local conservation districts. The conservation delivery model, which works in partnership with state and federal agencies, is an existing framework that provides the ability to scale up as the CCC effort grows. Conservation districts are able to help manage, train and develop a diverse pool of participants interested in the CCC program and can help mold, teach and groom conservationists who ultimately join the CCC. Conservation districts have established relationships with land-grant universities, including 1890 historically black colleges and universities and 1994 tribal colleges and universities, and can leverage their expertise. We offer a path for underserved communities to access natural working lands and connect between rural and urban constituencies, as well as conduct youth outreach through programs such as 4-H, the National FFA Organization and the Boy Scouts and Girl Scouts of America. By working with one's hands in a team environment, conservation districts help educate a new generation of young talent from across the country who will go on to innovate new conservation solutions. These emerging leaders, benefit from the decades of expertise that exist within conservation districts, empowering them to take on the climate challenge and deploy innovative conservation solutions on a massive scale through the existing locally-led conservation delivery framework.

The revival of a modern-day CCC can align with the locally-led conservation district model that empowers community connections to deploy resources that prioritize and improve climate-smart agriculture and forestry on lands in every county in America. This includes utilizing the best available climate-smart agriculture and forestry research – from USDA, land-grant universities and the private sector – combined with practical knowledge – from early adopters, creative farmers, ranchers, foresters, conservation districts, extension and other partners – to scale education, outreach and impact. Leveraging the locally-led approach will increase the taxpayer

⁹ Helms, Douglas. Journal of Soil and Water Conservation 40 (March-April 1985): 184-188. Accessed at: https://www.nrcs.usda.gov/wps/portal/nrcs/detail/?ss=16&navtype=SubNavigation&cid=nrcs143_021393&navid=2101600000000&pnavid=2100000000000000&position=Not%20Yet%20Determined.Html&ttype=detail&pname=The%20CCC%20Demonstrati



return on investment (ROI) in a CCC because of the efficiencies and effectiveness of dollars spent by maximizing technical assistance capacity that prioritizes and compensates local, on-the-ground, climate-smart agriculture and forestry expertise.

B. Responses to USDA Questions in Request for Public Comment

1. Climate-Smart Agriculture and Forestry

a. Conservation Technical Assistance (CTA) and Producer Education

The Secretary of Agriculture has agreements in place with each of state and territory that allows for delivery of conservation and climate program assistance through the nation's 3,000 conservation districts. Conservation districts represent an opportunity for the Administration to rapidly deploy climate-smart agriculture and forestry assistance to landowners across the U.S. and its territories on a meaningful scale and with no bureaucratic obstacles to impede implementation. Perhaps the single largest obstacle to overcome to effectively deliver on the President's climate priorities is funding and technical capacity at the local level. A robust budget request in the President's FY 22 Budget for the CTA program would help overcome this obstacle.

i. Bolster existing programs.

Conservation districts already work to protect natural resources while ensuring a safe, reliable and secure food supply. Landowners naturally consult conservation districts to receive expert advice on practices that help build resiliency and mitigate and decelerate the impacts of climate change on their land while building soil health across diverse landscape coverage and cropping systems across the United States.

USDA must ensure that the CTA program has robust investments so that capacity at the local level can increase focus on climate change and resilient agricultural systems. This will help achieve the greatest benefits on specific, localized resource management, and will provide economic sustainability for farmers, ranchers, foresters and landowners as an important result of mitigating climate change impacts through technical assistance.

In addition, the focus on climate-smart practices will:

- Improve the range of soil health biological, chemical and physical indicators;
- Protect water resources (quality and quantity) through improved rainfall infiltration, reduced flooding, reduced soil erosion, and increased aquifer recharging, which will result in overall more efficient water use and cleaner water;
- Improve forest health, which reduces fire risks;
- Tap the potential in managed and working forests as a carbon sink; and
- Increase soil biodiversity, improve wildlife habitats, and support work on endangered and invasive species.

Climate-smart forestry should include active forest management to improve the capacity of America's forests and forest products to sequester carbon, produce renewable fuels, and mitigate the effects of climate change. Management strategies focused on resilience include promoting species and age class diversity, actively managing for optimal forest health, and creating or retaining suitable pathways for species migration. The most effective way to encourage private forest landowners to voluntarily adopt climate-smart forestry practices is through technical assistance to educate landowners and equip them with the unbiased, science-based information they need to sustainably manage their forests now and into the future. **The best way to provide for increased technical assistance to landowners is by increasing funding and support for USDA conservation programs authorized in the farm bill that accomplish this work.**



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We believe in building educational capacity and outreach to ensure conservation delivery bridges research, technology transfer, demonstration and experience.

Couple technical assistance with capacity building by allocating funds for education and outreach programs tied to climate change. Structure conservation programs that encourage technology adoption and transfer, particularly on working agricultural lands. A one-size-fits-all approach to implementing federal conservation programs limits program effectiveness across our vast landscape. Program rules should be re-examined to allow greater flexibility, so that resource concerns identified at the local level can be more efficiently addressed. Conservation districts serve as the critical link between individual producers and federal/state governments that provide the confidence necessary for producers to voluntarily participate in government-funded conservation programs. As the members who voluntarily serve on local conservation district boards are often agriculture producers and landowners themselves, conservation districts are best positioned to communicate federal program needs to address resource concerns. Program rules should give each NRCS State Conservationist the flexibility to utilize federal conservation programs in a means that makes sense locally. Furthermore, this flexibility should be great enough to allow USDA to enhance federal programs at the state or local level with contributions from partners at those levels. The Conservation Reserve Enhancement Program (CREP) is a good example of how CRP has been enhanced effectively at state and local levels. This ability to “enhance” federal programs for climate purposes should be made available through other federal conservation programs.

ii. Use new strategies to deploy technologies to advance climate-smart agriculture and forestry.

Provide resources and funding that will develop educational and training programs for local partners.

There are many early adopters and conservation district experts who should be elevated and meaningfully compensated, to reach more farmers, ranchers, foresters and landowners. This can be accomplished by:

- Creating incentives for early adopters of conservation practices and historically underserved conservationists by developing a reward system that could be tied to educating others.
- Coupling technical assistance programs with a new education program that focuses on certifying producers as “conservation leaders” within their communities. This could include demonstration farms that conduct training programs annually as farmers sign up for NRCS conservation programs to increase their understanding of the value of conservation practices to their own communities.
- 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 local level helps spread new ideas and practices.

Leverage and grow the number of Soil Health Champions, or “Climate Champions.”

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 and is expanding the network to include producers in urban areas and those who manage forested land. Through classrooms and other volunteer opportunities, NACD’s Champions Network can focus more on capacity building, especially in underserved communities.

Further research, both through land-grant universities as well as through federal research agencies, with greater peer-to-peer outreach, will help further USDA’s program success in promoting conservation practices that will lead to healthier soils and meeting the potential of carbon sequestration capacity.



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At the beginning of FY 21, NRCS had close to 9,400 employees but had set a goal by mid-year to have 10,445 positions. Additionally, the agency has the authority to increase to 11,011 staff based upon workload projection models. While having the approval and authorization to hire is an important first step, the hiring process over the years has not kept pace with attrition. Direct hiring authority has been critical to the agency, and FY 20 hires exceeded FY 19 hires by 1,331. NRCS is making progress toward filling the hiring backlog that has persisted for several years, and additional flexibility and focus on NRCS staffing will ensure that the agency can meet the demand for conservation planning and implementation of farm bill conservation programs. Additional Conservation Technical Assistance funds provided to the agency in FY 22 will help with this progress, and a robust request in President Biden's FY 22 Budget can help toward realizing this increase. USDA should build capacity for farmers, ranchers, foresters and landowners to mobilize education and leverage existing relationships in the private and public sectors on a massive scale through a new conservation district program or in a robust funding mechanism for NACD's Soil Health Champions Network.

- iii. **Partner with stakeholders, including state, local and tribal governments and the private sector to work with USDA to advance climate-smart agriculture and forestry practices.**

Maximize the impact of conservation districts in helping landowners achieve climate-smart agriculture and forestry goals.

Conservation districts will serve a critical role in maximizing engagement across the landscape – from private farmland to tribal land, grassland and forestland – for all people who want to contribute to tackling climate issues. Diverse perspectives build a strong foundation. Uniqueness and regionality are built into the locally-led conservation model. Conservation districts work at the federal, tribal, state and local levels; thinking nationally with a local focus is our strength, and empowering the collective voice of conservation districts magnifies our influence. Inclusivity matters, and conservation districts work to serve all farmers, ranchers, foresters and landowners and operators – including early adopters, historically underserved populations, and those transitioning to regenerative agriculture.

Reduce bureaucracy.

USDA understands the value of cooperative and contribution agreements with its partners. The department is doing amazing work through these agreements with a wide array of partners. However, agency reorganizations, consolidation of business practices and new administrative processes that have been put in place in recent years have placed unnecessary hurdles in the way of executing these agreements, and more importantly, the work that they represent to get conservation delivered. The modern era requires less bureaucracy and better digital tools. An overhaul of the system in place to execute agreements and process payments to partners is certainly in order if the agency wishes to address climate-smart agricultural and forestry practices through conservation delivery.

Increase broadband access.

The future strength of rural communities depends on reliable access to broadband. Agricultural producers increasingly employ precision agriculture technologies that require access to dependable broadband utilities to effectively utilize and measure inputs and climate-smart practices.

Rely on NACD's established and experienced network to augment and fulfill national climate policy agenda.

Conservation districts have a rich history in public-private partnerships and have the trust of local communities. To capitalize on this history of credibility and trusted relationships, USDA should partner with NACD to work across sectors to fill in gaps, train, educate and include all stakeholders in the development of conservation programs that reflect local interests and the needs of the landscape. The credibility of conservation districts within farming, forestry and tribal communities is beneficial to



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advancing climate-smart practices, as is the evidence brought by research from scientists at USDA and land-grant universities. Together with conservation districts, USDA should partner with land-grant universities and the agriculture industry to build producers' capacity. These knowledgeable, trusted voices should be used to validate and transfer technology to end users. Conservation districts are in a high visibility role to be in the driver's seat between land-grants, federal agencies and the end users of farmers, ranchers, foresters and tribal communities. Couple research and outreach to support science that addresses gaps in information sharing.

- **An example is the conservation district-led STAR¹⁰ (Saving Tomorrow's Agricultural Resources) program for training and enhancing programming together:** The 5 Star Assessment awards points for the adoption of practices that have been identified locally as a priority for addressing local resource concerns. From improved nutrient management to cover crops to edge of field water treatment and even crop rotation or inclusion of livestock, a suite of practices can result in between one and five stars. Practices are verified by the farmer's retailer, strengthening the conservation conversation between the farmer, their retailer, and their conservation advisor.

b. Financial Assistance

To financially incentivize climate-smart conservation practice implementation, sufficient funding is acutely needed, and it cannot wait for authorization through the next farm bill. This funding can help create programs, financing capabilities and other authorities, and can address disparities in underserved communities. At a time when we need more people managing the land for food production, fire resiliency and economic vitality, we need to reach everyone, especially those who historically did not receive the resources they deserve. This is an area long overdue for new ideas, investment and attention.

Financial incentives should be large enough to align with the magnitude of work to be done and to compete with low commodity prices when producers may not have the funds to implement conservation practices on their own. Priority must be given to those who have been disadvantaged in the past.

i. Focus existing programs toward a climate-smart impact to meet current challenges.

Locally-led climate-smart agriculture and forestry should be prioritized across all programs. A specific action step that was encouraged in the 2018 Farm Bill is to require conservation district consultation and participation in Regional Conservation Partnership Program (RCPP) projects.¹¹ Encouraging potential RCPP applicants to consult with local conservation districts would ensure that local priorities are being met and that the project will truly work for producers in that area. CRP management flexibilities can be provided to maximize carbon sequestration potential. USDA should work across jurisdictions to fund federal programs that promote controlled burning. Incorporating the Cohesive Strategy into this effort for properly managing forests to highlight where barriers exist. (See Sections 2-3 for more details on forestry and wildfire financial assistance.)

Envision a "Climate-Smart Conservation Program" or better fund popular programs with an emphasis on climate change.

NRCS's existing programs like the Environmental Quality Incentives Program (EQIP) and Conservation Stewardship Program are popular and utilized by a range of communities, farming, ranching and forestry

¹⁰ See <https://starfreetool.com/>.

¹¹ 2018 Farm Bill Report, "Therefore, the Managers encourage potential project partners to engage with conservation districts within the boundaries of a proposed project for input and feedback on the natural resource priorities that have been identified. The Managers encourage NRCS to include conservation district engagement within its ranking criteria."



alike, but they are hugely oversubscribed. USDA could take a modern approach to the traditional model; in the absence of a large increase to these current programs, a new program with additional federal investments that combines the best in EQIP and CSP, such as a “Climate-Smart Conservation Program,” could be warranted to meet the scope of current challenges caused by climate change. Such a hybrid program should prioritize soil health outcomes and could be funded in the American Jobs Plan Act: If agriculture is responsible for roughly 10 percent of U.S. GHG emissions, then it should also receive 10 percent of the focus in the budget of the infrastructure-climate proposal. Whether through a hybrid Climate-Smart Conservation Program or through expanded funding, focusing on climate objectives in EQIP and CSP is critical. Similarly, climate goals may be better met by modernizing CRP to add GHG as a priority. Local Work Groups should be utilized in more meaningful ways with program decisions to help determine the emphasis on soil health and forestry outcomes in EQIP. If climate-smart agriculture and forestry are national priorities, soil health must also be a priority. USDA needs to work with land-grant universities to create standardized management practices based on current research that mitigate GHG emission and improve soil health.

Additionally, the 2018 Farm Bill explicitly authorized grazing as an allowed mid-contract management practice for CRP without a reduction in the rental rate. This natural management practice will not only add an economic benefit to the landowner but will reduce carbon emissions and improve the management of the land’s natural resources. NACD encourages the Farm Service Agency (FSA) to do more to encourage this option to ensure landowners are aware of this additional opportunity.¹² Conservation districts can make recommendations to maximize climate enhancement values in mid-term management.

USDA should develop a baseline from which to measure conservation delivery success, including carbon capture. Using COMET Planner technology developed by Colorado State University and NRCS, this baseline can reflect current soil conditions or reference some point in the past in order to measure the success of climate-smart practices. Creating this baseline based on random conservation implementation will be difficult and will require changes in USDA’s data management systems. It is expected that NRCS’s Conservation Assessment and Ranking Tool (CART) will be a means of better capturing and utilizing data, but this may not be enough. The COMET Planner and COMET Farm tools should complement CART to calculate carbon mitigation and sequestration benefits of USDA conservation practices. The National Conservation Planning Partnership (NCP) has explored this issue in great detail and can provide recommendations on improving USDA’s data management related to conservation delivery.

ii. Use new strategies for implementing climate-smart agriculture and forestry practices.

Evolve conventional agricultural practices.

Agricultural practices must evolve to be diverse and address climate change to ensure the long-term environmental and economic sustainability of the agriculture system and its ability to meet national and global food security and climate change challenges. USDA can lead the way and needs to revisit the old model construction of farming programs with new, future-oriented programs that are rooted in diversity and climate awareness.

Prioritize soil health in stacking ecosystem payments.

Voluntary ecosystem markets offer an enticing economic opportunity to our nation’s producers that can add additional conservation to the landscape and continue improving our nation’s soil health and water quality and increase carbon sequestration. The 2018 Farm Bill explicitly allowed a producer to receive an ecosystem market payment on top of any financial assistance through USDA conservation programs.

¹² See CRP Grazing – Section 2206, “(IV) grazing of all practices, outside the primary nesting season, if included as a mid-contract management practice under section 1232(a)(5).”



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Stacking USDA practice payments with voluntary carbon market payments improves the economic picture for farmers, ranchers and foresters who contribute to solving climate change.¹³

USDA should prioritize soil health while the rules of complex voluntary markets are in their nascent stages. “If we expect farmers to do good things for the planet, we should pay them for it.”¹⁴

NACD policy also supports the concept of a federal carbon bank authorizing climate-smart agriculture and forestry payments by the creation of a federal carbon bank may spur the voluntary carbon market.¹⁵ USDA’s role in aiding the development of new and additional carbon markets may be amplified by its expertise in incentivizing financial and technical assistance underpinning the main principles of soil health that result in carbon sequestration and abatement on natural lands. USDA should pursue the creation of a federal carbon bank and, if needed, consult with and receive authorization from Congress that carbon qualifies as a commodity under the Commodity Credit Corporation.

To gain scale in implementing practices, USDA should do what it can to increase financial incentives and provide leadership to Congress to view climate-smart agriculture and forestry as a critical component of our nation’s infrastructure. A large influx of capital to get a critical mass of acres focused on climate-smart agriculture and forestry should be viewed as an upfront investment to provide a large ROI for taxpayers. To move quickly, regionalize practices based on regional climate, soil type and cropping systems.

Paying farmers to adopt conservation practices that transition to meet the climate goals of this Executive Order will require bold action. NACD supports federal policy that promotes conservation practice adoption and carbon sequestration through the creation of a federal carbon bank.

As Congress continues to focus on various legislative proposals to support the potential opportunities provided by private voluntary ecosystems markets, it will be the responsibility of USDA to break down barriers for farmers, ranchers and foresters interested in participating in carbon markets so they can be rewarded for climate-smart practices. USDA may need to develop a preliminary set of high-quality guidelines for measuring, monitoring and verifying carbon changes, and USDA must ensure that conservation district expertise is taken into account.

USDA should consider creating low-interest incentive loans targeting beginning and historically underserved farmers by tying adoption of climate-smart agriculture and forestry practices called “Climate-Smart Bank Loans.” This will bring new commitments for the short- and long-term solutions for climate change challenges. Loan guarantees for carbon sequestration payments or ideas such as modeling a nature-based tax incentive on Section 45Q of the U.S. Tax Code¹⁶ should be pursued legislatively. A tax credit for carbon sequestration and abatement in the land sector could increase the ROI to landowners for carbon sequestration efforts, augment locally-led conservation efforts, and catalyze further efforts, such as participation in voluntary carbon markets. To appeal to the full spectrum of interested stewards, the tax benefit must be transferable or rebatable. Just as clean energy tax credits spurred investment, a similar agriculture and forestry credit could deliver benefits to climate and soil health, accelerating agriculture

¹³ Section 2503(o) “ENVIRONMENTAL SERVICES MARKET—..... The Secretary may not prohibit, through a contract, easement, or agreement under this title, a participant in a conservation program administered by the Secretary under this title from participating in, and receiving compensation from, an environmental services market.”

¹⁴ Craig, Jessica. “Soil Prof Hits Pay Dirt: \$250K Prize for Helping Farmers, Fighting Climate Change.” NPR 22 June 2020. <https://www.npr.org/sections/goatsandsoda/2020/06/22/880932230/soil-prof-hits-pay-dirt-250k-prize-for-helping-farmers-fighting-climate-change>.

¹⁵ See Bonnie, Robert, Leslie Jones, Meryl Harrell, Climate 21 Project USDA <https://climate21.org/usda/>.

¹⁶ Internal Revenue Code Tax Fact Sheet, 2019. <https://www.energy.gov/sites/prod/files/2019/10/f67/Internal%20Revenue%20Code%20Tax%20Fact%20Sheet.pdf>.



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and forests as a climate solution. **USDA's technical expertise will be critical in moving a tax credit for carbon sequestration and abatement forward.**

- iii. **Rethink new approaches and policy changes to encourage climate-smart agriculture and forestry adoption.**

Review farm bill programs with a climate lens.

It is important for USDA to re-imagine and articulate a new vision for the 2023 Farm Bill based on the role of conservation systems and climate-smart agriculture and forestry in addressing climate challenges. It is time to have a new structure for implementing and balancing conservation-based policies that ensure soil health, natural resources and food securities.

USDA could institute an advisory panel of external experts with on-the-ground experience to review all major farm bill programs through the lens of tangible and intangible costs and benefits of climate-smart agriculture and forestry.

Climate-smart agriculture and forestry systems are as efficient as conventional systems, and USDA can maximize carbon sequestration understanding through research agencies to support this point. USDA could engage farmers, ranchers and foresters and support new ideas and innovations relating to enhancing and adopting climate-smart agriculture and forestry practices.

Recalibrate programs to better incorporate new priorities.

Solicit input from stakeholders and partners, including utilizing Local Work Groups and State Technical Committees, to streamline existing conservation programs to be more efficient and effective in addressing climate change challenges. This means reducing bureaucracy and freeing up staff time for technical assistance, so that NRCS and conservation district employees can get in the field and focus on partnerships to maximize reach and impact.

- c. **Develop research, data and tools needed for USDA to effectively carry out climate-smart agriculture and forestry strategies.**

Invest and make the case for more investment from Congress.

Further investments from USDA are needed to better understand soil carbon dynamics and aid emerging voluntary markets to assess soil carbon at deeper depths. Given the variance in different soil types' abilities to hold carbon, this will improve our understanding of how conservation practices contribute to additional carbon sequestration and will reduce costs for producers to demonstrate and verify this benefit. Utilizing the COMET tool and changing USDA's data management system are crucial to measuring conservation success.

Streamline Data Collection.

The data space is ripe for multi-sector innovation, but siloed approaches to data collection create bottlenecks for the emerging ecosystem service values in natural resource management. This can be rectified by:

- Creating a national or shared and accessible database addressing the performance of different management practices in improving soil health, carbon storage, GHG emission mitigation and economic return of these systems.



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- Developing and/or summarizing economic data based on current research that addresses the tangible and intangible economic benefits farmers can use in the decision-making process of engaging carbon markets.
- Working with the agriculture industry to provide and share data with farmers, universities, NRCS, commodity groups and other interested stakeholders for building shared understanding of common practices and potential solutions.
- Providing collaborative funding to USDA ARS and land-grant universities to develop long-term research focusing on climate-smart agriculture through the country based on regional soils and climate conditions.

Forestry Inventory and Analysis Program.

The Forest Inventory and Analysis (FIA) Program provides crucial forest structure and volume information to federal and state forestry agencies, industry, academic and conservation organizations on a wide range of forestry-related topics. Increasingly, FIA is relied on to provide data on the state of the nation's largest carbon sink—our forests—making it an essential component of decisions regarding climate change mitigation and adaptation strategy. However, the demands for information on forest carbon are becoming more varied and at scales that are problematic to meet with the current design and capabilities of the program.

Additional statistical research capacity is required to develop and employ the complex cutting-edge statistical imputation and estimation procedures required to produce the level of accuracy that clients are demanding today for smaller geographic areas. The additional analytical capacity will focus research efforts to improve best applications and integration of remote sensing technologies within the FIA program and develop technologies to reduce costs and make it easier to measure and monitor forest carbon, especially for forest inventories and verification. Using imagery from advanced technologies, especially remote sensing platforms, would improve products for decision-making by policy makers and managers and enable forest owner participation in carbon crediting opportunities.

The role of the Resources Planning Act (RPA) Assessments should be strengthened.

The RPA Assessments and supporting technical reports produced by the Forest Service RPA research team represent a valuable set of scientific information that is underutilized by stakeholders interested in forests, carbon and climate. Additionally, stakeholder engagement with the RPA Assessments has been lacking in recent years. To enhance utilization and strengthen the role of the RPA Assessments, Forest Service leadership should prioritize engagement with external stakeholders to help direct more timely and responsive RPA research efforts on forest carbon projections and respond to specific policy-relevant questions from interested stakeholders.

A national database should be created to address the performance of different management practices in improving soil health, carbon storage, GHG emission mitigation and economic return of climate-smart agriculture and forestry systems.

A national database could also advance President Biden's Executive Order 14008, Section 222(a), which requires the Chair of the Council on Environmental Quality, within 6 months of the date of the order, to create a geospatial Climate and Economic Justice Screening Tool and annually publish interactive maps highlighting disadvantaged communities.

2. Biofuels, Wood and Other Bioproducts and Renewable Energy

Healthy forest products markets keep forests healthy.

Markets and financial opportunities are key for incentivizing landowners to practice good forest management. Don't treat symptoms; the cure is good forest management. Markets for wood are critical to



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maintaining the health and sustainability of forests and communities in the United States. They enable the economic, carefully planned harvest of trees to control stand density and create forests that have a more balanced diversity of age classes, which is important to wildlife habitat diversity, forest resilience, and providing a more even flow of sustainable wood fiber for harvesting. Healthy forests need healthy markets, and healthy markets need healthy forests. Forests that have value stay forests. The carbon stored in wood products needs to be included in the conversations around climate-smart forestry.

- a. USDA can utilize programs, funding and financing capacities, and other authorities to encourage greater use of biofuels for transportation, sustainable bioproducts (including wood products), and renewable energy.**

Support the research and development of new markets for wood fiber.

The national policy on fuel standards and the inclusion of the renewable fuel standard and development of the green energy standard should be facilitated by further investments in research on wood fiber and developed in collaboration with the Department of Energy (DOE). Having highly diverse markets for wood fiber increases the options for forestry management by encouraging landowners to remove trees of a certain size and/or species under plans that are more likely to result in improved health and vigor.

Continue funding of USFS Forest Products Programs and the National Institute of Food and Agriculture's Renewable Resources Extension Act.

USDA should advance USFS Forest Products Programs. The USFS supports several efforts that promote wood utilization, including the Forest Products Research Lab, the Wood Education and Research Center, Wood Innovation Grants, and the Mass Timber University Grant Program. These are all valuable efforts that should be retained and built upon. Several universities around the country include forest products technical assistance within their Extension programs. These are partially funded by the National Institute of Food and Agriculture (NIFA) under the Renewable Resources Extension Act Program. These programs will ensure that promotion of wood utilization will continue, and that information gained through forest product research and development efforts will be effectively transferred to end users.

- b. Incorporate climate-smart agriculture and forestry into biofuel and bioproducts feedstock production systems to support rural economies and green jobs.**

Standing timber in U.S. forests represents a critical natural resource for providing the nation's wood and paper products and directly supports over 3 million jobs – about 2 percent of all jobs. Wood should be harvested in a carefully planned manner using best management practices that embody sound science, represent community values, continue to provide important environmental benefits, and reflect responsible economics.

The adoption of climate-smart bioenergy production can play a significant role in crop and forestry production to support rural communities.

USDA should:

- Focus on creating localized bioenergy by-products, such as the production of biochar from forest woods or crop residue produced with climate-smart practices.
- Use research-based recommendations for residue removal for cellulosic ethanol production, biogas or bio-ammonia production through partnership between federal, state and private sectors.
- Encourage the adoption of integrating bioenergy feedstock on marginal land or highly erodible land for bioenergy generation and environmental services.



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- Support and encourage the use of livestock liquid manure for energy generation, as in swine and dairy facilities, by refitting manure collection to be used in anaerobic digestion.

Provide incentives or develop a policy with the support of the bioenergy industry to work with farmers and give them better premiums on their feed stock if they grow these feed stock in climate-smart agriculture systems.

USDA should tie production policy to market incentives that reward both industry and farmers through tax credits or product promotion related to social awareness. Provide low interest loans to new farmers who are exploring new technologies in renewable energy.

Increase the Use of Forest Biomass for Energy.

The mitigating effects of forest biomass energy on climate change hinge primarily on forest sustainability, which can be measured with a landscape-level analysis of net carbon sinks and emissions. Biomass made from wood residues and low-quality standing timber is generally accepted as a “climate-friendly” fuel. When forests that provide biomass for fuels are managed effectively over time, they can be a sustainable form of renewable energy. This may include wood pellets production, cellulosic biofuels, biochar, torrefaction and nanotechnology. In the western United States, many areas of low-quality standing timber are also at high risk of wildfire but may be difficult to access. It may be necessary to provide additional incentives to overcome this barrier and make accessing and hauling out more affordable, while also reducing potential fuel for wildfires.

3. Addressing Catastrophic Wildfire

Climate-smart forestry means managing to maximize the carbon benefits of healthy, growing and resilient working forests that produce wood products, while protecting private ownership rights to achieve management objectives for clean air and water, improved wildlife habitat, supporting local economies, and keeping forests as forests.

Our nation’s forests have a tremendous ability to sequester carbon, if managed properly to prevent GHG emissions.

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 soil. 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 and a new reality of a fire year, 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 and Good Neighbor Authority (GNA) 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.

An improvement to these contracts has been the extension of the current 20-year¹⁷ cap, which encourages greater participation in Stewardship Contracting, thus increasing the acres of public forests that are subject to regular management. USDA should work to ensure that all public forest acres are eligible for the 20-year cap.

¹⁷ “Stewardship End Result Contracting: Forest Service and Bureau of Land Management.” CRS 15 April 2019, stating, “In Section 207 of the FY2018 omnibus appropriations bill (P.L. 115-141), Congress authorized the Secretaries of Agriculture and the Interior to extend contract terms on a one-time basis to 20 years for lands in specified areas.”
<https://fas.org/sgp/crs/misc/IF11179.pdf>.



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- a. **Utilize programs, funding and financing capacities, and other authorities to decrease wildfire risk fueled by climate change.**

USDA, through the U.S. Forest Service and NRCS, must increase active forest management and cannot do it alone. Substantial increases in active forest management and fuel treatments across all landscapes and ownership boundaries are needed in the areas at greatest risk for unwanted wildfire.

Building a plan for full implementation of the “wildfire funding fix” will be a critical first step in addressing the wildfire emergency.

We need to commit to sustained investment in wildfire mitigation. Increased collaboration between federal and state agencies, tribes, non-government organizations, local communities and private landowners – bolstered by a sustained and unprecedented federal investment over the next ten years – is needed to make the difference.

Increased support for the State Fire Assistance and Volunteer Fire Assistance (SFA/VFA) programs has proven to significantly increase the amount of hazardous fuels acres treated and improve wildfire response capacity for state, local and volunteer departments across the country. Forest Stewardship Program and other landowner assistance programs ensure private landowners participate in this all-lands approach.

Encourage partnership with local farmers, ranchers and foresters in managing and utilizing dead wood by-products for energy and soil amendments such as biochar production.

Work with the Civilian Climate Corps to increase the use of prescribed fire. In partnership with conservation districts, the Civilian Climate Corps should increase the use of prescribed fire and the pace and scale of cross-boundary work.

There is an immediate need for the return of low intensity fire to our landscapes. Substantial increases in active forest management and fuel treatments across all landscapes and ownership boundaries are needed in the areas at greatest risk for unwanted wildfire. The appropriate use of prescribed fire makes our forests and communities more resilient to natural and necessary fire cycles. Increasing the use of prescribed burning depends on partnerships among the U.S. and state Environmental Protection Agencies and a shared understanding that small smoke emissions from prescribed fire pose less risk to human health than mega-emissions from uncontrolled wildfire. GNA projects are proven to increase the pace and scale of critical forest treatments, support cross-boundary projects and coordination, and provide job opportunities for rural communities.

b. Cohesive Strategy Implementation

USDA can accelerate action through a collaborative approach to fully implement the National Cohesive Wildfire Management Strategy (Cohesive Strategy) and combat America’s wildfire problem.

Without an increase in coordinated land management and planning across ownerships, catastrophic wildfires will continue to threaten the nation’s forests, destroy communities, and irrevocably alter American landscapes. While there has been an increased investment in the third leg of the strategy, the size, severity and extent of fires, along with the lengthening seasons, continues to push our resources to their limits. Escalating conditions require that we continue to increase our investments in all three goals of the Cohesive Strategy:

- Restore and Maintain Landscapes;



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- Fire Adapted Communities; and
- Safe and Effective Wildfire Response.

The Wildland Fire Leadership Council (WFLC) should continue to serve as the convening body for the broad group of partners vital to the National Cohesive Wildfire Management Strategy's (Cohesive Strategy) success. Convened by WFLC, these partners can explore increasing the capacity and involvement of non-governmental organizations and building a larger coalition to support this work at the national scale.

Wildfire management is inherently a partnership effort between federal, state, local and volunteer agencies and departments. Building workforce capacity in federal and state agencies, as well as among partner organizations, will need to be a key focus going forward. The need and priority planning are there; the last pieces of this puzzle are the dollars to get the work completed. This could build upon the Administration's proposal for a Civilian Climate Corps, or similar legislative proposals, which could increase capacity in the short-term and lead to increased interest in forest sector jobs, building long-term capacity.

All of these recommendations support overall ecosystem health across landscapes, but the highest risk areas surrounding communities will be a major focus. Prioritizing work in this strategic way will help communities become more resilient to wildfire threats.

Community Wildfire Protection Plans (CWPP) help mobilize individuals to take action to avoid wildfire damage to their homes and communities. With a CWPP in place, communities collaborate with state and local agencies to determine priorities for hazardous fuels projects in the WUI, and develop priorities that affect their ability to survive a wildland fire in their area.

Additional support for these important planning efforts will ensure communities are part of the solution. Homeowners, neighborhoods and communities need to be prepared for wildfire occurrences. Support for programs such as Firewise and the Fire Adapted Communities Learning Network can bring awareness and education to communities to ensure risks are mitigated and that they can live more safely with wildfire.

4. Environmental Justice and Disadvantaged Communities

There are numerous issues that create inequitable access to USDA programs for historically underserved, largely-minority landowners, both farmers and private forest owners. Priority should be given to those who have been disadvantaged in the past.

Farming and forestry assistance is best delivered at the local level by professionals with boots on the ground in the farms and forests and communities where USDA producers and landowners live. Partners like conservation districts and state forestry agencies are critical to USDA, providing adequate technical assistance and outreach to all landowners due to their experience and relationships. In their outreach, USDA should recognize the role of these entities and other partners that operate in landowner assistance and partner with them. These entities should work together to understand and address institutional barriers to all landowners accessing USDA programs.

- a. USDA can ensure programs, funding and financing capabilities, and other authorities used to advance climate-smart agriculture and forestry practices are available to all landowners, producers and communities in an equitable manner.**

Tie funding to social, economic and environmental justice outcomes.



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USDA can develop targeted program funding to reach underserved or underrepresented communities to correct any inequities in funding allocations. USDA should develop a task force or committee that will ensure equity and diversity in funding distribution and allocation, working closely with local conservation districts to develop locally driven programs. This effort can involve 1890 land-grant universities and colleges, tribal colleges and other land-grant universities in providing funding that will support research-based information, outreach information and programs for these communities.

Address issue of heirs property.

Heirs property, in which multiple heirs own property in common due to the absence of a will(s) in previous generations, is a significant barrier. It impacts access to USDA programs due to lack of clear title to the land, and in worst cases, leads to loss of farm and forestland for those whose families have been working the land for generations. USDA programs should recognize in their policies this long-standing institutional barrier to minority, including tribal land ownership. Assistance should be targeted to helping these historically underserved communities receive farming, ranching and forestry assistance, as well as legal assistance to fix title issues. In particular, the USFS Forest Stewardship Program can be a vehicle to support state forestry agencies and nonprofits working in this space to reach historically underserved landowners. An example of this important work is the Sustainable Forestry and African American Land Retention Program, a network of eight nonprofit organizations across the South working to help landowners address heirs property and land retention issues and understand the value of responsibly managing forest land.

- b. Technical Assistance, outreach and other assistance is necessary to ensure all producers, landowners and communities can participate in USDA programs, funding and other authorities relating to climate-smart agriculture and forestry practices.**

In addition to suggestions proposed in our comments in prior sections, USDA can provide more effective technical assistance to farmers and producers by directing local agencies, such as NRCS, to work closely with conservation districts in targeted communities and by working with farming community leaders in setting training and education programs that will enhance farmers' understanding of climate-smart practices. Also, as part of the effort to mobilize climate-smart knowledge transfer, USDA could provide incentives to absentee landowners and retired farmers to work with their tenants to implement conservation practices.

In summary, USDA should target young and diverse farmers, ranchers and foresters in providing financial and technical assistance to adopt climate-smart agriculture and forestry practices. Climate-smart agriculture and forestry is rooted in local needs and is not one-size-fits-all. This means conservation work takes a lot of people collaborating together, and USDA should cast the widest net possible to spur interest in agriculture as a profession at all levels and for all ages. One-third of America's farmers are over the retirement age of 65, and the average age is around 60. The value in knowledge transfer from current early adopters and climate-smart farmers, ranchers and foresters to the potential diverse and vibrant talent pool across rural and urban America should be maximized. USDA should rethink existing farm policies and programs that meet the short-term and long-term climate challenges and find ways to support the development of emerging climate solutions such as carbon credit markets based on sound science.

USDA must consider equity, access and opportunity in bringing the next generation into the agriculture and forestry sector and should encourage the related, numerous career opportunities as young professionals engage with and express passion about climate-smart work.

Thank you for the opportunity to submit these comments. Please rely on NACD and its member conservation districts to help USDA meet this moment. I personally want to use my time in service to see this Administration make a Roosevelt-, Truman- or Eisenhower-like step in climate-smart agriculture and



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forestry together. Our partnership with USDA is strong and stands ready to increase and deploy conservation practices locally.

Sincerely,

A handwritten signature in black ink that reads "Michael R. Crowder".

Michael R. Crowder
President
National Association of Conservation Districts

CC: Robert Bonnie, Nominee, Under Secretary for Farm Production and Conservation (FPAC), Deputy Chief of Staff and Senior Advisor on Climate, OSEC; Deputy Secretary Gloria Montañó Greene, FPAC; Administrator Zach Ducheneaux, Farm Service Agency; Acting Chief Terry Cosby, Natural Resources Conservation Service; Mike Schmidt, Senior Advisor to Secretary Vilsack; Bill Hohenstein, Director of the Office of Energy and Environmental Policy; Kelliann Blazek, Special Assistant to the President for Agriculture & Rural Policy; David Hayes, Special Assistant to the President for Climate Policy at the White House