



# National Association of Conservation Districts

## **Response to USDA Request for Information in Federal Register| Vol. 86, No. 187**

**Submitted by:** Michael Crowder, President, National Association of Conservation Districts

**Questions addressed:** 2, 3, 5, 8

**Description of NACD:** 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.

### **Partnerships with Federal, State, tribal, territorial, or local governments within the past 3 years that are relevant to this document:**

- NACD works closely with the USDA Natural Resources Conservation Service (NRCS), the National Conservation District Employees Association (NCDEA), the National Association of State Conservation Agencies (NASCA) and the National Association of RC&D Councils (NARC&Ds) to provide national conservation leadership under the National Conservation Planning Partnership (NCPD).
- The NCPD is committed to:
  - Fostering state and local partnerships among the partners' respective members;
  - Listening and responding to customers' local resource conservation needs;
  - Advocating a holistic, ecosystem-wide approach to conservation;
  - Maintaining and enhancing grassroots conservation delivery systems;
  - Building alliances with a wide variety of agencies and organizations; and
  - Fostering economically viable environmental policies.
- NACD has partnered with other federal government agencies including Department of Defense, USDA Forest Service, Environmental Protection Agency, Fish and Wildlife Service and Bureau of Land Management.
- NACD has entered into memoranda of understanding (MOU) with organizations representing tribal government including the Indian Nations Conservation Alliance (INCA).

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November 1<sup>st</sup>, 2021

Mr. Robert Bonnie  
Office of the Secretary  
Jamie L. Whitten Building  
1400 Independence Avenue, S.W.  
Washington, DC 20250

Re: NACD's Response to USDA Request for Information in Federal Register Vol. 86, No. 187

Dear Mr. Bonnie:

Thank you for your commitment to conservation and for considering opportunities for new or expanded markets for climate-smart commodities. Conservation districts serve as a critical link between individual producers and federal, tribal, state, and local governments and provide the confidence necessary for producers to voluntarily participate in government-funded conservation programs. While we recognize this RFI is not regarding a conservation program but a climate-smart commodity program, we see value in leveraging the federal-tribal-state-local partnership model currently in place for this new program to be successful. We encourage USDA to utilize existing capacities and infrastructure (human and structural) to grow the impact and lay groundwork for scaling a robust, equitable, future climate-smart commodity program.

*Response applicable to questions (2.), (3.) (5.), (8.)<sup>1</sup>*

**First, the core discipline of conservation planning sets the direction for impact of federal dollars spent on a proposed Climate-Smart Agriculture and Forestry Partnership Program.**

We've known since the first conservation districts were created in the 1930's, that soil can be restored and rejuvenated again. It happens in a system; healthfulness is a system – soil health is part of a climate-smart system. For example, in marketing a climate-smart commodity, the likely first thing to improve in the system is water infiltration. Requiring systems thinking is critical for resource management, and we believe that federal money should not go to farmers who do not have a conservation plan that takes a systems approach to agricultural, which includes forestry, production. Therefore, we also won't list practice recommendations because conservation is local.

***Details on conservation planning***

Conservation planning is a discipline that serves as the foundation for delivery of climate smart agriculture and forestry. While there is an established linkage between effective conservation planning

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<sup>1</sup> (2.) In order to expand markets, what should the scope of the Climate-Smart Agriculture and Forestry Partnership Program be, including in terms of geography, scale, project focus, and project activities supported? (3.) In order to expand markets, what types of CSAF project activities should be eligible for funding through the Climate-Smart Agriculture and Forestry Partnership Program? (5.) In order to expand markets, what criteria should be used to evaluate project proposals for receiving funding through the Climate-Smart Agriculture and Forestry Partnership Program? (8.) How can USDA ensure that partnership projects are equitable and strive to include a wide range of landowners and producers?



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and successful program implementation, resources available for conservation planning and technical assistance has lagged behind financial assistance programs.

Further, USDA's definition from the 1985 farm bill for Highly Erodible Land (HEL) should be updated to reflect growing science and knowledge of soils. Having outdated soil classifications makes it harder to support younger and more diverse farmers, foresters, and ranchers on the conservation journey. If a project farm does not have a conservation plan, then we would be concerned about climate-smart claims coming from that farm. We stand ready to work with local NRCS offices and our membership to expedite any conservation planning necessary for any pilot projects. The core discipline of conservation planning should allow for increased impact and efficiencies throughout this new program, maximizing technical assistance capacity and prioritizing local, on-the-ground, climate-smart agricultural and forestry expertise.

Conservation districts must be the preferred local source of conservation planning. Conservation district consultation should be a key component of any project, helping push forward implementation through local partnerships and the delivery system. The relationship with NRCS-conservation districts is as close to working with NRCS as a landowner can get. That historic relationship is critical for maximizing capacity to efficiently serve landowners and operators. This is the best place to get conservation planning processed, and we stand ready to scale to fit projects in this new program. Conservation districts are the only nationwide entities working with NRCS that provide conservation planning services and thus provide the quickest nationwide response.

One model to consider is the conservation district-led Saving Tomorrow's Agricultural Resources (STAR) initiative for training and enhancing programming together: STAR's approach is designed to be adaptable and scalable across geographies. Local stakeholders such as farmers, conservation professionals, and landowners identify the resource concerns (i.e., water quality, soil health, water quantity, fire suppression) in their area and adapt the practice-based STAR tool to award points for practices that have been identified as a priority for addressing the 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 a rating between one and five STARs. STAR opens the conservation conversation for the farmer, landowner, and conservation professional by providing a roadmap for improvement, as well as possible qualification for financial and technical assistance programs. Practices are verified by STAR, demonstrating the initiative's value for the farmer, landowner, and other partners. The STAR framework is well-established, enabling partnerships in this program to be leveraged in a straightforward, efficient, and timely manner.

### ***Farm Production and Conservation Business Center***

Under the current organization construction, the Farm Production and Conservation Business Center plays a key role. There must be functioning management within the Business Center's area of discipline as it pertains to climate-smart agriculture and forestry work at USDA. This role should be administrative, not programmatic.

### ***Data gaps***

Further investments from USDA are needed to market climate-smart commodities. We need 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



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understanding of how conservation practices contribute to additional carbon sequestration and will reduce costs for producers to demonstrate and verify this benefit. As USDA seeks to pay for climate outcomes, they must be measurable at an appropriate accountability level. The rigor behind measurement will determine the climate benefit. This rigor also helps establish the correct prescription (practices and conservation systems) for the cure (abatement and sequestration). Assessing soil carbon at deeper depths will allow the COMET tools and others being developed in universities and the private sector to more accurately measure the gains from conservation and soil health practices.

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. Conservation districts can work with USDA to rectify data issues 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.
- 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 a climate-smart commodity program.
- Working with the agriculture industry to provide and share data with farmers, conservation districts, tribes, universities, NRCS, commodity groups and other interested stakeholders for building shared understanding of common practices and potential solutions.
- Additional staffing research capacity is required for the Forest Inventory and Analysis Program to develop and employ the complex, detailed, and cutting-edge statistical imputation and estimation procedures required to produce the level of accuracy that clients are demanding today for smaller geographic areas. Similar concerns apply to the Natural Resources Inventory and Conservation Effects Assessment Project. The additional analytical capacity will focus research efforts to improve best applications and integration of remote sensing technologies within programs 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.

**Second, given the interest in climate-smart commodities, USDA will need an outreach and education strategy that is prepared for something so new in this critical time.**

Just as practice implementation occurs in a system, so does and should research, outreach, and education. We as an agricultural community are missing too many obvious connections between research and applicability to farming and nutrient density of food on top of our environmental management. We believe in building educational capacity and outreach to ensure conservation delivery bridges NRCS programs, research, Extension, conservation districts, technology transfer, demonstration, and experience while working with partners to deliver a new climate-smart commodity program.

***We recommend that these pilot projects look at the following factors:***

- Aligning the best available climate-smart agriculture and forestry research from USDA, land grants and the private sector, documenting the effectiveness of climate-smart agriculture and



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forestry practices in diverse cropping systems as well as assessing carbon credit quality, soil health and other ecosystem service outcomes, and sociological factors that encourage producers to transition to climate-smart practices.

- Assessing the economics of different practices such as soil health metrics economics, economic return of yield production of climate-smart commodities, economics of cover crops in enhancing ecosystem services, tangible and intangible outcomes of expanding markets for climate-smart commodities for three systems (cropland, grassland, and forest lands) to society at large. NACD and our partners have a well-established history of economic assessment of conservation practices and can leverage our experience.
- Encouraging and evaluating technology application such as decision tools that calculate ecosystem service parameters to seeding diversity to new equipment and software to nutrient application of time and methods. Here, we believe there are added products that can be developed as co-benefits of climate-smart commodities, such as through biochar production and green energy products. As you look to try new technologies, please select conservation districts to act as hubs to share tools and information with their communities and to specifically target historically underserved producers.
- 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 when pilots show promising progress. We encourage maximum creativity for working with early adopters in these pilot projects. We anticipate USDA may seek out early adopters as key participants, as climate-smart commodities will naturally come from early adopter farms. We recommend that in these pilot projects, USDA will:
  - Create incentives for early adopters of conservation practices and historically underserved conservationists by leveraging them and rewarding them for educating others.
  - Couple private sector initiative leaders with conservation districts who can lead within their communities, including through demonstration farms and by conducting training programs.
  - Prove value of this new program on the ground, locally to further adoption of climate-smart agriculture and forestry practices. Many producers watch what their neighbors do, and outreach at the local level helps spread new ideas, informational messaging around new programs, and best available information.
    - This program should consider diversity and inclusivity for all applicants with adequate resources and funding for advertising and marketing to all who have interest in such effort. Conservation districts can be key partners for advertising program opportunities.

### ***NACD Initiatives Such As Soil Health Champions Are Positioned to Help with Education and Outreach***

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 opportunities in this new program and in partnerships with the private sector, NACD's Champions Network can focus more on capacity building, especially in underserved communities. For example, these pilot projects could prioritize partnerships with educational institutions, including Land-Grant Universities, Tribal Colleges, Historically Black Universities and Colleges, Community Colleges, and



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others by providing internships for students from the local communities to work closely with research scientists, conservation districts, and farmers in these pilot projects.

## **Public-Private Partnerships**

NACD and conservation districts have an established model of working across public and private sector programs to deliver conservation assistance. One example is Field to Market: The Alliance for Sustainable Agriculture of which NACD has been a member since 2007 and in which multiple conservation districts participate as implementation partners.

As a member in Field to Market, we encourage USDA to leverage the fifteen years of shared learnings Field to Market can offer in providing both insights and potential solutions to inform the development of the Climate-Smart Partnership Program. The Alliance's diverse membership of nearly 150 organizations—representing every facet of the food and agriculture value chain—is eager to explore opportunities for deeper collaboration with USDA to design an effective and fruitful public-private partnership to scale climate-smart agriculture. In addition, Field to Market's convening platform, pre-competitive sustainability metrics, and Continuous Improvement Accelerator program offer USDA opportunities to test novel approaches to leveraging private-sector demand to support farmers in rapidly adopting climate-friendly practices at greater scale. Please reference Field to Market's formal comment submission for more detail.

There are many other examples of public-private collaboration in which conservation districts can and do play a significant role.

## ***Conclusion***

We are happy to see USDA's promotion of climate-smart market opportunities across the diversity of agriculture and forestry in the United States. USDA working on data gaps and education and outreach keeps the agency in its right role, as opposed to setting rules for the carbon markets. Where USDA sees opportunities to encourage outreach to conservation districts through partnerships with the business community, NACD expects USDA will do so. We know we are stronger together. There is more work to do than there is capacity, and conservation districts want to contribute, add value, and help build support for this new program.

Conservation districts have a rich history in public-private partnerships and have the trust of local farming, forestry, and tribal communities. To capitalize on this history of credibility and trusted relationships, USDA should leverage its partnership with conservation districts to deliver a new climate-smart commodity program. Conservation districts can work across public-private-tribal sectors to communicate, fill in local knowledge gaps, develop conservation plans, train, educate and include all stakeholders in the development of this new programs in an inclusive way that reflects local interests and the needs on the landscape. The associated benefits of climate-smart agriculture and forestry make this a worthwhile program beyond the climate benefits. We stand ready to partner with you and support this effort.

Sincerely,



National Association of Conservation Districts

Michael Crowder  
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