



National Association of Conservation Districts

December 5, 2022
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: NACD's Response to Notice of Request for Public Comment Docket ID No. EPA-HQ-OA-2022-0859:

Thank you for the opportunity to provide comments in response to the Environmental Protection Agency's (EPA) request for information to shape the development and implementation of the recently authorized Greenhouse Gas Reduction Fund. The Greenhouse Gas Reduction Fund will play an important role in reducing harmful emissions by providing competitive funding for financial and technical assistance to enable zero-emission technologies and projects to reduce or avoid greenhouse gas emissions and other air pollution, including in low-income and disadvantaged communities.

The National Association of Conservation Districts (NACD) is the 501(c)(3) nonprofit organization that represents America's 3,000 conservation districts and the 17,000 men and women who serve on their governing boards. Conservation districts are local units of government established under state law to carry out natural resource management programs at the local level.

NACD supports and advances EPA's environmental justice goals through the locally led conservation process. We acknowledge that there is no "one size fits all" approach to climate change mitigation and conservation. It is our belief that the landowners and operators, who know their lands best, are also best suited to make decisions relating to the responsible management and conservation of natural resources on the lands within their communities. Conservation districts engage their communities in the process of identifying and prioritizing local natural resource concerns through outreach, education, and technical assistance. We agree that all community stakeholders should have a say in development and implementation of solutions, as well as equal access to the decision-making process, providing a healthy environment in which to live, learn, and work.

Rising global temperatures pose serious threats to our farmland, forests, and food supply. 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 trillion¹. Soil degradation currently affects at least a quarter of all land², while severe wildfire, drought and flooding events have become regular occurrences that devastate communities across the world. Land degradation causes

¹ 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>.

² Gibbs, H.K. "Mapping the world's degraded lands" ScienceDirect February 2015. <https://www.sciencedirect.com/science/article/pii/S0143622814002793>.



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approximately \$490 billion in global damages each year, which exceeds the budget for action to prevent it³.

These statistics highlight the importance of implementing measures that reduce emissions, bolster soil health, and advance the sustainable management of our farms, rangelands, grasslands, and forests. **NACD encourages EPA to consider nature-based enablers as zero emissions technologies and invest in working lands conservation.** While agricultural activities account for approximately 11 percent of U.S. GHG emissions in 2020⁴, this sector also offers significant opportunities to mitigate climate change. Healthy soils and forests are our largest terrestrial carbon sinks and are important tools in the effort to reduce total emissions. Reduced soil productivity and poor forest management jeopardizes greenhouse gas emissions mitigation efforts, water quality, producer livelihoods, and international food security.

Section 1: Low-Income and Disadvantaged Communities

NACD encourages and supports EPA's efforts to focus on communities and individuals who have had inequitable access to government programs. NACD also applauds government-wide efforts to use data-driven approaches to define, identify, and invest in low income and disadvantaged communities. EPA's Environmental Justice maps and datasets are excellent tools that should be utilized to help Greenhouse Gas Reduction Fund grants reach low-income and disadvantaged communities. EPA should also consider the United States Department of Agriculture's (USDA) definition of historically underserved producers and socioeconomic data from the Census of Agriculture.

NACD recognizes that direct investments in low-income and disadvantaged communities are critical and recommends that EPA think holistically about structuring Greenhouse Gas Reduction Fund grants to best support these communities. We also suggest that EPA consider using the fund to support activities in areas surrounding low-income or disadvantaged communities. For example, upstream NO₂ reductions, erosion control, or reforestation efforts can yield improvements to air quality, drinking water, and recreational opportunities and benefit disadvantaged communities. .

Sections 2 & 3: Program Design and Eligible Projects

EPA should consider the agricultural sector and the role of working lands conservation in reducing and sequestering GHG emissions in the design of its GHG Reduction Fund grant program. Land use, land-use change, and forestry (LULUCF) removed approximately 13 percent of total U.S. greenhouse gas emissions in 2020⁵. There are many conservation practices that contribute to LULUCF acting a net sink for greenhouse gas emissions in the U.S., including reduced tillage, improved grazing management, and reforestation. Conservation practices and best agricultural management practices are also highly correlated to reductions in the overall carbon intensity of

³ Agriculture at a Crossroads, Soil Fertility and Erosion. Global Agriculture. <https://www.globalagriculture.org/report-topics/soilfertility-and-erosion.html>.

⁴ EPA's Inventory of U.S. Greenhouse Gas Emissions and Sinks

⁵ EPA's Inventory of U.S. Greenhouse Gas Emissions and Sinks



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crop-based biofuels. NACD suggests that EPA include the following types of investments in its grant program:

- Conservation or best management practices (BMPs) that avoid/reduce emissions, improve the health of our natural resources, and increase their natural ability to sequester GHG emissions.
- Innovative technologies or equipment needed to implement conservation or BMPs (e.g., feed additives that reduce methane emissions, roller crimpers or no-till coulters, which help soil retain carbon, rather than being released back into the air).
- Research and testing of innovative technologies and financial tools that advance implementation of nature-based solutions, making these options affordable and accessible to historically underserved producers and communities.
- On-farm green infrastructure (e.g., low-energy, solar, or electric technologies).

Voluntary incentives are the most effective way to encourage implementation of conservation systems. USDA Farm Bill programs, for example, offer tremendous benefits to producers. Programs like EQIP and CSP offer financial assistance to incentivize implementation of a broad range of conservation practices. Those programs, however, are oversubscribed and do not fully de-risk the transition to conservation-oriented production systems. We must also consider how voluntary incentives can mitigate producers' long-term, competitive risks.

There are several ways that EPA could support producers' efforts to reduce and sequester GHG emissions, while offering additionality and complementing existing programs. EPA could consider offering additional, outcome-based incentives to producers who can demonstrate that they have reduced the carbon intensity of feedstock production through conservation. The Department of Energy's GREET model could be used to quantify such reductions.

EPA could also consider supporting producer investments in innovative technologies and on-farm infrastructure, making it more affordable and mitigating their operational cost and competitive risks. Without financial assistance or incentives, historically underserved producers tend to be the last demographic group to invest in new, green technologies. New technologies and equipment are typically priced at a premium. Used equipment is typically the most affordable and economical option. Access to affordable capital and the ability to demonstrate land control (e.g., heirs property and titling issues) for program eligibility are additional barriers to being able to invest in conservation or low-emission technologies.

Using its State Revolving Fund program as a model, EPA should continue to offer forgivable loans or grants to historically underserved communities. EPA may also consider no-interest or forgivable loans/grants, with flexible sign-up processes and repayment plans, to individual landowners or operators. EPA may also consider investing in equipment lending programs and administering grants to entities, such as conservation districts, to manage such activities. This can provide producers access to a cache of shared equipment to implement practices that help achieve reductions in GHG emissions (e.g., forest management tools or equipment to test no-till practices).



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EPA should also consider investing in nature-based solutions in urban areas, such as through urban forestry, ongoing initiatives to clean up brownfields, or developing greenspaces and community gardens. Each of these initiatives which yield multiple environmental and social benefits, such as improved air and water quality, relief from excessive heat, increased access to fresh food sources, educational opportunities on nutrition and how food is grown, and recreational opportunities. EPA should also consider investments in nature-based solutions in surrounding or upstream communities, which negatively impact disadvantaged communities (e.g., forest watershed health that contributes to improved air and water quality).

Through USDA's Climate Smart Commodities program, the private sector has demonstrated significant interest in public/private partnerships. USDA's goal is to scale climate-smart production systems and practices, develop new and emerging markets, and quantify outcomes. EPA could leverage this as a model for advancing measurable nature-based solutions and technologies. This would potentially generate significant private sector interest and investment, while ensuring that disadvantaged communities and historically underserved producers receive substantial benefit.

Sections 4 & 5: Eligible Recipients and Oversight & Reporting

Farming and forestry programming is best delivered at the local level by professionals who work and live in the communities they serve. Partners like conservation districts, as well as their respective state/territory associations and agencies, can provide much-needed technical assistance and outreach to all landowners and operators.

Conservation districts have a long and proven history of working with a variety of federal, state, and local partners to help producers voluntarily implement conservation and land management practices that reduce emissions and enhance the quality of our air, land, and water. NACD encourages the EPA to consider conservation districts as eligible recipients of Greenhouse Gas Reduction Fund grants. Conservation district can play a key role in facilitating a variety of agriculture and land management conservation practices noted above to meaningfully reduce greenhouse gas emissions in the agriculture sector and increase LULUCF's role as net sink of greenhouse gas emissions. Districts already play an important role in providing the technical assistance required for producers, landowners, and land managers to plan and implement effective conservation practices on their operations.

State, Tribal, and local governments, as well non-profit organizations, could also help EPA administer large-scale technical and financial assistance programs. EPA Gulf of Mexico Division's Historically Underserved Farmer to Farmer Outreach grant program is a compelling and successful example of a pass-through grant program. NACD has extensive experience managing subgrant programs to conservation districts across the country. **This reduces EPA's overall administrative burden, advances the locally led conservation process, and advances environmental justice by providing tangible opportunities for community engagement and action.** Investing in short-term community programs without engaging community stakeholders does not yield lasting



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outcomes. NACD's subaward process provides for innovative, local solutions that engage communities in partnership building, ensuring that initiatives can be sustained by local leaders in the long-run.

Technical assistance, in the form of capacity building, education, and outreach, is also a key investment. Access to resources to apply for and manage grants can be a barrier for many communities. These investments must be considered when structuring technical assistance and considering eligible costs. This includes considering allowances for pre-award costs.

Final Considerations

Thank you again for your consideration of NACD's comments. We hope that EPA considers the impact of nature-based solutions in achieving net-zero. The 3,000 conservation districts across the U.S. and its territories are key partners in facilitating an inclusive approach in achieving environmental justice. This process engages community leaders and stakeholders to develop and implement local solutions that reduce and sequester GHG emissions. It also provides for local ownership, empowerment, and sustained outcomes.

Sincerely,

Michael Crowder
NACD President