



# National Association of Conservation Districts

June 28, 2024

Ms. Sasha Strohm  
Program Manager  
Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program  
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| 2024-114247 89 FR 46335

Dear Ms. Strohm:

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 help manage and conserve land and water resources across the country. NACD appreciates the opportunity to provide input to support the implementation of the Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program.

The importance of maintaining healthy agricultural soils and forests has been understood and prioritized since the first conservation districts were created in the 1930s following the Dust Bowl. The loss of soil productivity jeopardizes both the physical and biological health of these fragile resources.<sup>1</sup> Land stewards are already experiencing 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 in damages since 1980; the total cost of these 291 events exceeds \$1.9 trillion.<sup>2</sup> 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.<sup>3</sup> Extreme weather – including droughts and floods – have become regular occurrences.<sup>4</sup> More than a third of farmland in the Corn Belt – nearly 100 million acres – has lost its carbon-rich topsoil due to erosion.<sup>5</sup> The current cost of land degradation reaches about \$490 billion per year, much higher than the federal resources expended

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<sup>1</sup> 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>.

<sup>2</sup> 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>.

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

<sup>4</sup> 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>.

<sup>5</sup> 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>.



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to prevent it.<sup>6</sup> While advancements in areas such as genetics and fertilizers have sustained production, we must utilize more natural methods to increase soil health. The same is true in our nation's 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.<sup>7</sup> 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.

Conservation practices within the agriculture and forestry sectors are critical for productivity in a world of increased competition for land and water resources, which is intensified by urban expansion. Building healthy 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. Conservation districts work with land stewards in every part of the country to help them manage and protect land, water, and forestry resources on private, public, and tribal lands. In every local jurisdiction throughout the country, conservation districts promote practices such as prescribed fire, no-till or reduced till, cover crops, nutrient management, buffers, integrated livestock, silviculture, invasive species management, and other practices that reduce greenhouse gas emissions and increase plant, wildlife, and soil biodiversity.

### **Technical Assistance**

USDA, conservation districts, and other partners help land stewards understand and consider a wide range of proven conservation practices and ultimately utilize a system of practices that work together to best support production and long-term environmental benefits on unique operations. Producers' ability to access effective conservation planning from conservation districts and other local partners is an essential component to this "no one-size-fits-all" approach that supports the sustainability of our country's working lands. This approach underpins the implementation of many important conservation practices that mitigate and sequester greenhouse gas emissions in the agricultural sector. Voluntary Carbon Markets (VCMs) should be designed to work in tandem with existing government programs and our country's locally led conservation delivery system to contribute additional private sector funding to implement practices that reduce greenhouse gas emissions and support additional environmental benefits. While the reduction of greenhouse gas emissions provides many important benefits, carbon as a transacting unit should not replace the benefits of wholistic conservation planning and practice implementation. Supporting additional critical environmental benefits including biodiversity, soil health, fire mitigation, and water quality and quantity requires a whole-farm approach and a broader lens than focusing solely on carbon sequestration and mitigation. NACD urges any voluntary environmental credit market system and affiliated Technical Service Providers (TSPs) to not overlook the importance of a comprehensive conservation systems-based approach and requisite conservation planning.

Greenhouse gas sequestration quantification is highly technical and will require continued collaboration with experts to develop the most effective methodologies, protocols, and approaches. NACD believes that the systems employed should be robust enough to move beyond the incremental performance of individual conservation practices and assess the value and impacts of

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

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



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conservation systems that consider multiple resource concerns and all conservation practices implemented.

Conservation districts could also be utilized to provide educational support for TSPs. As more TSPs participate in the VCMs, NACD and districts should be leveraged to craft and distribute educational resources. Conservation districts can help to train and develop a new generation of TSPs that can support growing VCM markets. NACD believes that building educational capacity and effective outreach systems will be key to ensuring that VCM delivery bridges research, extension, technology transfer, demonstration, and experience.

### **Credit Transparency and Quality**

It is paramount that farmers, ranchers, and land stewards understand what any given carbon credit represents. USDA identifying the highest quality credits based on sound science will be very valuable to land stewards interested in participating in VCMs. The market – producers, conservation planners, buyers, and land stewards – need clear, accurate information to be able to easily discern the quality of credits and the exact benefits they offer.

### **Credibility of Vendors**

Quality VCM vendors are a critical component of a well-functioning market. From TSPs to third-party verifiers, protocol developers, verification bodies, and all other players in the supply chain – land stewards need to understand who they can trust. Transparency plays a key role in pricing credits and all transactions associated with VCMs. Information must be transparent for everyone involved to assess different options and models. How much does a credit or a service cost? How much is the Measurement, Monitoring, Reporting, and Verification (MMRV) fee? What percentage of the total credit value is ultimately paid to a producer? Who is paying for it? Answers to these and other relevant questions must be provided to ensure that USDA helps potential market participants understand which vendors are responsible and credible. While this is not solely USDA's responsibility, the agency can help to build and improve market-leading standards, such as the Integrity Council for the Voluntary Carbon Market.

Conservation districts have a long and successful history of working with local communities and stakeholders in every part of the country to achieve effective and long-lasting public-private partnerships. To best capitalize on these networks and the local expertise they represent, VCM actors should be encouraged to partner with conservation districts whenever possible to work across sectors to fill gaps, train, educate, and coalesce stakeholders in the development of markets that also help to address local resource needs. The credibility of conservation districts within farming, forestry, and tribal communities plays a large role in advancing climate-smart practices, which is reflected in research produced by scientists at USDA and land-grant universities.

### **Engagement with Conservation Districts and Data Management**

USDA should encourage the protocol development processes to include conservation districts and input from additional critical stakeholders and partners, including Local Work Groups and State Technical Committees. As practice-based information may be required to develop protocol and implementation processes, conservation districts understand which practices can effectively address resource concerns on the ground in every part of the country. As evidenced by our existing



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conservation delivery system, practice implementation is not uniform across the country, nor within state or even county borders. Conservation district and NRCS involvement also supports conservation practices and systems that encourage technology adoption and transfer, particularly on working agricultural lands. Consulting and relying on partners experienced in shaping and administering existing conservation programs will contribute to the successful implementation of VCM systems.

Durability is critical – conservation planning and implementation is an ongoing journey of continuous improvement by which farms, ranches, forests, and other landscapes can improve soil health, increase biodiversity, enhance water quality, sequester greenhouse gases, and accomplish additional important environmental goals. Encouraging protocol developers to seek input from and regularly coordinate with local partners will help to ensure that best practices are implemented, and errors are avoided.

### **Inclusivity and Support for Land Stewards**

A one-size-fits-all approach to implementing national conservation initiatives limits program effectiveness across our country's unique landscapes. As conservation district boards are often comprised of local agriculture producers, foresters, tribal members, and others community leaders directly managing land, they are well-positioned to advocate for conservation methods and tools that best address local resource needs and support their communities.

NACD believes that there is a risk VCM systems inappropriately focus on larger operations to scale the initiative more quickly. VCM providers and facilitators should be encouraged to include and support smaller farmers, foresters, and ranchers as well as historically underserved producers as markets develop. Many factors can exacerbate inequitable access to public and private programs for historically underserved land stewards and smaller operations. As technological advancements help to lower certain costs for participants, NACD encourages USDA and market facilitators to work with conservation districts to identify, reduce, and remove barriers to participation and help to ensure that all producers have a fair and easy access to VCM opportunities.

Technical assistance for farming and forestry is best delivered at the local level by professionals with boots on the ground in the communities they serve. Partners like conservation districts and state forestry agencies are critical to USDA and local communities in providing adequate technical assistance and outreach to all landowners. In their outreach on VCMs, USDA should take advantage of districts and other local partners' efforts to provide resources and tools to small and historically underserved producers to facilitate their participation in existing voluntary conservation programs. VCM facilitators and participants should work closely with all local partners to understand and learn from institutional barriers land stewards and producers have faced in accessing current USDA programs.

NACD believes it is important that producers and land stewards are the primary beneficiaries of VCMs. VCMs serve all communities by reducing harmful emissions in the forest and agriculture sectors, but it is critical that the value derived from VCM credits is provided to those who implement carbon reduction and mitigation practices on those lands. Ensuring land stewards are the primary beneficiaries of the value derived from credits will strengthen VCMs and encourage their longevity by incentivizing continued and additional participation.



## Stacking Incentives

As VCMs develop, NACD encourages improvements to markets that advance additional important metrics outside of carbon sequestration, including soil health and water quality. In tandem, we encourage the continued prioritization of soil health by “stacking” ecosystem payments. Voluntary ecosystem markets offer economic opportunity for our nation’s producers to implement additional conservation practices to the landscape and build on current efforts to improve our soil health, water quality, erosion mitigation, and many additional important environmental priorities. The 2018 Farm Bill explicitly allowed a producer to receive an ecosystem market payment in addition to financial assistance through USDA conservation programs. Allowing the stacking of USDA practice payments with voluntary carbon market payments bolsters economic opportunities for farmers, ranchers, and foresters who contribute to mitigating climate change.<sup>8</sup>

## Data and Analyses

As USDA continues efforts to improve quantification of greenhouse gases from agricultural sources, NACD encourages building on this work to facilitate the creation of shared and accessible databases conveying accurate information on how different conservation practices are proven to, or have the potential to improve soil health, sequester greenhouse gas emissions, and improve the economic viability of operations as a whole. Building on this data and making it more easily accessible by producers would facilitate a more comprehensive understanding of the environmental and economic benefits of conservation practices and helps producers decide whether to participate in VCMs. NACD cautions against siloed approaches to data collection, which can create bottlenecks for the emerging ecosystem service values in natural resource management. NACD also believes that maintaining data privacy is critical to the successful implementation of VCMs systems. We encourage USDA to collaborate with stakeholders and interested land stewards to ensure that personal and proprietary information is adequately protected.

Within forestry management, additional research capacity is required to develop and employ the complex statistical analyses and estimation procedures required to produce the level of accuracy clients are demanding today for smaller geographic areas. Additional analytical capacity should focus research efforts on improving best applications and integration of remote sensing technologies within the Forest Inventory and Analysis program and develop technologies to reduce costs to measure and monitor forest carbon, especially for forest inventories and verification. Using imagery from advanced technologies, especially remote sensing platforms, would also improve data interpretation and decision-making by agency leaders and lawmakers, further enabling forest owner participation in VCMs.

NACD appreciates the opportunity to provide input to inform the implementation of the Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program. VCMs present exciting opportunities for our country’s land stewards and can play a significant role in supporting and expanding the implementation of effective conservation practices to reduce harmful carbon emissions, while also supporting a host of additional critical environmental priorities. Bolstering

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<sup>8</sup> 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.”



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equity, access, and opportunities to include the next generation of agriculture and conservation leaders will be critical to the long-term success of this important initiative.

Sincerely,

A handwritten signature in black ink that reads "Kim LaFluer".

Kim LaFluer  
President  
National Association of Conservation Districts