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Submitted Via: Federal eRulemaking Portal

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National Climate Coordinator  
c/o Sara del Fierro  
Climate Change Mitigation Lead  
NRCS Climate Office, Office of the Chief, NRCS, USDA  
1400 Independence Avenue,  
South Building, Room 4613  
Washington DC 20250

***Re: Request for Information: Conservation Practices to Support Climate Change Mitigation and Adaptation – Docket ID NRCS-2024-0015-0001***

Dear Ms. del Fierro,

Thank you for providing the National Association of Conservation Districts (NACD) the opportunity to provide input to inform the improvement of the Natural Resources Conservation Services' (NRCS) Conservation Practice Standards (CPS). NACD recognizes the important role science-based CPS play in the effective delivery of conservation across our country's unique landscapes.

NACD commends NRCS for working to expand opportunities for producers to implement conservation practices that enhance adaptation. As noted in the solicitation, the Inflation Reduction Act (IRA) provided investments for Climate-Smart Agriculture and Forestry Mitigation Activities; conservation practices that provide climate mitigation benefits and quantify greenhouse gas emission reductions and carbon sequestration. NACD strongly supports continued expansion of the list of supporting practices to include conservation practices that increase resilience and enhance adaptation. Carbon and mitigation activities are typically one of many natural resource concerns landowners need to address to maintain healthy, resilient soils that yield multiple ecosystem service benefits. We support providing landowners maximum flexibility to implement conservation plans that achieve both mitigation and adaptation goals. NACD encourages NRCS and local producers to continue working with local conservation districts to provide technical assistance in the development and implementation of these practices on the ground, including identifying co-benefits and additional adaptation focused practices.

NACD applauds NRCS for ensuring the conservation planning process looks beyond individual practices and impacts, implementing a systems-based approach which considers both climate mitigation and supporting practices, allowing for practices that increase overall resilience to extreme climate events. While individual conservation practices can be targeted to address



## National Association of Conservation Districts

specific goals and resource concerns, a conservation systems-based approach focuses on incorporating a suite of effective practices that work in tandem to enhance results and achieve multiple co-benefits – including those that enhance mitigation, adaptation, and resilience – that can be sustained over a long period of time. Many CPS already have multiple benefits or are enhanced by additional practices. NACD encourages NRCS to continue to consider producer driven, site-specific systems-based approaches to maximize both mitigation and adaptation benefits.

For example, drainage water management is critical to supporting an effective systems-based approach to conservation. NACD supports comments submitted by the Ecosystem Services Exchange to broaden the Drainage Water Management practice to reflect both mitigation and adaptation benefits and to explore developing technical guidance to address key criteria and map out typical drainage scenarios. Working closely with conservation districts and local communities, NRCS can better identify and adjust to local needs as necessary and gain important insight to the specific needs of producers in the area.

NACD appreciates NRCS' efforts and the inclusion of adaptation benefits for comment and looks forward to ongoing discussion to ensure continued application of a systems-based approach.

Sincerely,

A handwritten signature in black ink that reads "Kim LaFleur". The signature is written in a cursive, flowing style.

Kim LaFleur,  
NACD President