



# National Association of Conservation Districts

Date: January 29, 2025

To: Brian Klippenstein, USDA Transition Team  
Steven Peterson, Acting Under Secretary, FPAC  
Louis Aspey, Acting Chief, NRCS

Subj: NACD requests exception to pause on Inflation Reduction Act (IRA) financial assistance funds

Ref: (1) Executive Order "Unleashing American Energy" dated January 20, 2025  
(2) Office of Management & Budget Memorandum M-25-13, "Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs"

The National Association of Conservation Districts (NACD) is appreciative of President Trump's comprehensive review of federal finances, including financial assistance vehicles such as grants, cooperative agreements, and contribution agreements. However, the subject Executive Order (EO) and recently rescinded OMB Memorandum M-25-13 have the potential to adversely affect thousands of conservation districts across the country, as well as the producers and communities they serve.

NACD respectfully requests that conservation districts and their associations be granted a waiver to the pause on Inflation Reduction Act (IRA) disbursements and receive express authorization to continue efforts under their current grants or agreements with USDA.

Conservation districts are local units of government established under state law to carry out soil, water and natural resource management programs at the local level. America's 3,000 conservation districts and the Natural Resources Conservation Service (NRCS) are the core of today's voluntary, locally led conservation delivery system. It is a partnership between individual landowners, local, state, and federal government, and partners such as land grant universities. It is designed to maximize technical assistance and support to individual landowners, ensuring they are equipped with the resources to make the best decisions for their lands and livelihoods. The locally led conservation delivery system has endured for nearly 90 years because it works and has earned the trust of landowners across the country.

Conservation districts conduct outreach and deliver technical assistance to farmers, ranchers and landowners. They also support their enrollment into Farm Bill programs such as the Environmental Quality Incentives Program (EQIP) and Conservation Stewardship Program (CSP). Because the definition for financial assistance established by 2 CFR 200.1 excludes assistance provided directly to individuals, NRCS programs such as EQIP and CSP are ongoing. **As such, NACD requests that USDA grant an exception allowing conservation districts and their associations to continue efforts under IRA funded grants and agreements with USDA.**



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Conservation district employees' salaries are typically funded by a combination of state, local, and federal dollars. Given conservation districts' limited financial reserves, pauses on disbursements impact their ability to meet employee payroll, potentially leading to furloughs or layoffs. This would significantly disrupt critical services to farmers, ranchers, and foresters, as well as the communities they serve. It also places more pressure on NRCS staff to handle workload that would otherwise be shared amongst partners.

It should also be noted that many of NACD's and conservation districts' agreements with NRCS are contribution agreements. This means that NACD, state agencies and conservation districts contribute 25% match to the program.

Thank you for your consideration of this request.

Handwritten signature of Kim Lafleur in black ink.

KIM LAFLEUR  
President

Handwritten signature of Gary Blair in black ink.

GARY BLAIR  
President Elect

Handwritten signature of Jeremy Peters in black ink.

JEREMY PETERS  
Chief Executive Officer

*NACD is a grassroots organization representing the 3,000 conservation districts established across 57 states and territories and their 17,000 locally elected boards of directors.*

*Conservation Districts' boards of directors are elected by the communities that they serve, ensuring that working lands conservation remains locally led, voluntary, and incentive-based and programs meet the needs of their communities.*