April 7, 2020

Mr. Seth Meyer

Chief Economist

Office of the Chief Economist

USDA

Washington, DC

Mr. Meyer:

The National Association of State Conservation Agencies (NASCA) is a 501(c)3 that represents each state’s soil and water conservation agency. In some states this function is housed with the State Department of Agriculture, in some states the Department of Natural Resources, and in other states an independent committee or commission. We work closely with USDA’s Natural Resource Conservation Service (NRCS) and the nation’s conservation districts to implement voluntary soil and water conservation practices on private working lands. These state conservation agencies contribute millions of dollars, thousands of staff members, and countless hours in their dedication to the delivery of voluntary, incentive-based, locally-led conservation. We are extremely proud of the work we have done during the last 80 years in partnership with USDA and conservation districts across the country.

State conservation agencies and conservation districts were established in state law, and although these statutes vary somewhat from state to state, they invariably delineate the responsibilities of these entities to assess and address natural resource concerns at both state and local levels. USDA programs have contributed considerably to these efforts over many years and have therefore helped these agencies and districts meet their conservation delivery goals mandated in statute. This unique federal/state/local government partnership delivers technical and financial assistance to cooperators on a targeted local basis rather than a broader one size fits all federal or statewide delivery approach. This delivery style, designed by USDA 80 years ago, remains wildly popular and effective.

NASCA appreciates USDA’s solicitation for ideas from stakeholders on developing effective approaches to climate-smart agriculture and forestry programs. We very much appreciate this administration’s focus on climate and resiliency, as we feel like our work has focused on these very issues for many years. We are therefore optimistic that moving forward we will see a greater federal commitment to the partnerships and programs that have been so beneficial to our cooperators and the natural resources they manage.

General Comments on Climate-Smart Program Strategy

An increased focus on climate and resiliency issues is admirable, but USDA should avoid attempting to “reshuffle” its program delivery in the name of change. USDA already has a number of climate-smart conservation programs that are not only effective but over-subscribed. Several examples are the Environmental Quality Incentives Program (EQIP), the Conservation Reserve Program (CRP), the Conservation Stewardship Program (CSP), the Agricultural Management Assistance (AMA) Program, and the Small Watershed Program. During past administrations, there has been an unwritten rule that authorizing additional funding to any of these programs can only come at the expense of other USDA conservation programs. We are optimistic that this administration, with a supportive Congress, can move beyond this antiquated thinking and fund conservation programs at the levels needed by our country’s landowners and cooperators. Conversely, developing new programs in the name of climate will certainly slow our progress toward climate goals by increasing administrative requirements to get these programs up and running. There is no need to recreate this wheel, but there is an immediate need to better fund the programs that our delivery system can effectively use without delay.

USDA understands the value of cooperative and contribution agreements with its partners. The agency is doing amazing work through these agreements with a wide array of partners. However, the agency has put new administrative processes in place, especially in the past few years, that have placed unnecessary and sometimes ridiculous hurdles in the way of executing these agreements, and more importantly, the work that they represent. An overhaul of the system in place to execute agreements and process payments to partners is certainly in order if the agency wishes to address climate-smart agricultural practices through conservation delivery.

Develop a baseline from which to measure conservation delivery success, including carbon capture. This baseline can reflect current conditions or reference some point in the past, but we need to be able to measure our success. Doing this based on random conservation implementation will be difficult. However, the establishment of this baseline and using it as a reference to gauge our successes will require changes in USDA’s data management systems. It is expected that the Conservation Assessment and Ranking Tool (CART) will be a means of better capturing and utilizing data, but this may not be enough. The National Conservation Planning Partnership (NCPP) has explored this issue in great detail and can provide recommendations on improving USDA’s data management related to conservation delivery.

USDA is in an excellent position to help define carbon markets, and thus influence the evolution of carbon credits. However, the idea of carbon banking should remain in the private sector. A carbon bank should be a self-sustaining entity. A carbon credit purchase exercise that is funded annually with taxpayer dollars is not a bank. It is simply another program that pays for outcomes rather than implementation. USDA should continue to provide technical and financial assistance to help landowners and operators implement conservation practices. If these practices yield outcomes of value, let that be determined by private sector markets.

There needs to be a greater emphasis placed on technical assistance. It is why our federal and state conservation agencies and conservation districts exist. The ability to offer financial assistance to provide cooperators with the financial ability to install conservation practices is very helpful, but it is of little value without the expert technical assistance required to install and manage these practices. We will never collectively reach our climate-smart goals without a greater emphasis on technical assistance and conservation planning.

Climate-Smart Agriculture and Forestry

A one size fits all approach to implementing federal conservation programs limits program effectiveness across our vast landscape. Program rules should be re-examined to allow greater flexibility, so that resource concerns identified at the local level can be more effectively addressed. Conservation districts serve as the critical link between individual producers and Federal/State governments that provide the confidence necessary for producers to voluntarily participate in Federal/State conservation programs (as the members who voluntarily serve on local District Boards are agriculture producers and landowners themselves). Therefore, these districts are best positioned to communicate federal program needs to address resource concerns. Program rules should give each State Conservationist the flexibility to utilize federal conservation programs in a means that makes sense locally.

Furthermore, this flexibility should be great enough to allow USDA to enhance federal programs at the state or local level with contributions from partners at those levels. The Conservation Reserve Enhancement Program (CREP) is a good example of how CRP has been enhanced effectively at state and local levels. This ability to “enhance” federal programs should be made available with other federal conservation programs.

Our national conservation partnership has been in the business of supporting climate-smart agriculture for many years, albeit the moniker is new. However, we lacked the ability to tout our success in terms typically associated with climate well-being. We are enthusiastic about USDA’s Comet Planner tool, which can be used to express a number of conservation practice outcomes in terms of contribution to climate stability. However, it is currently a stand-alone tool. This tool needs to be incorporated into CART, so NRCS data can be expressed in these terms as well. This will likely also require an expansion of the capabilities of Comet Planner in order to address all the types of completed practices accounted for in CART.

Biofuels, Wood and Other Bioproducts, and Renewable Energy

This is another area where one size fits all programming simply is not effective. Opportunities differ dramatically in different parts of the country, so programs must be flexible enough to accommodate these differences. USDA must also anticipate market evolution in these areas so that programs effectively provide solutions moving forward as opposed to addressing yesterday’s issues. Finally, we depend on conservation planners to be the face of our collective agencies and districts with cooperators across the country. To date, however, we have offered very little training to these individuals in the fields of alternative and renewable energy. If USDA is serious about these possibilities, this training must be developed and made available broadly.

The Conservation Innovation Grants (CIG) program provides funding for projects that will help the development and adoption of innovative practices. Additional funding for this program could be targeted for sustainable and renewable energy pilots on agricultural operations.

Addressing Catastrophic Wildfire

The sheer size of our national forested landscape is simply too large to allow us to comprehensively perform fuels treatment work. However, it is imperative to plan and prioritize fuels treatment across the landscape, especially since there are so many more structures in remote areas than there were a few short years ago. This will allow us to more effectively apply fuels treatment efforts to those areas that need it most. This work cannot stop at the boundaries of federally owned lands. It must also occur across privately held lands. Conservation districts can play a huge role in assisting with this fuel management planning work.

A greater investment in forest health across large landscapes is needed to effectively address wildland fire and carbon management concerns with forested stands. Stand health has a dramatic effect on carbon sequestration as well as the many other conservation benefits that forested acreage provides. Again, this work needs to be a priority not just on public lands but on private lands as well. On public lands, forest management practices need to be employed on a much broader scale than what we see today. It is a mistake to assume that leaving forested stands alone without management activities promotes forest health. The opposite is true.

USDA currently has programs like EQIP in place that can assist landowners in addressing fuel management and forest health projects. However, as stated earlier, these programs are underfunded and lack the flexibility to meet needs at the local level. Providing some level of forest management and forest health training to the conservation planners who implement these programs will be in order to better address wildfire and forest health needs.

Environmental Justice and Disadvantaged Communities

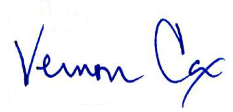
Many USDA financial assistance programs require some level of cooperator contribution. Certainly, there is value in a cooperator “having some skin in the game.” However, there should be a broader recognition of the values that our cooperators provide. Limiting the eligibility of those contributions often times precludes the ability of some cooperators, particularly socially disadvantaged ones, to participate with USDA programs. A much broader array of cooperator contributions should be recognized across the board so that programs are not inadvertently steered to our privileged cooperators.

It is also important that USDA program materials are available in a variety of languages. Local conservation district boards, who represent a democratically selected cross-section of the local community, can provide assistance in determining what languages would be appropriate for the local area.

Utilize enhanced data gathering abilities through CART and other sources to determine USDA’s effectiveness in reaching traditionally underserved communities. Where potential issues seem apparent, work with the local conservation district board to determine if the issue is real and what the best corrective course of action might be. Again, this is no place to apply a one size fits all approach, as the demographics of our 3000 conservation districts varies dramatically across the landscape.

On behalf of our membership, I am grateful to USDA for allowing NASCA to provide comments on these exceptionally important issues. We value the longstanding relationship we have had with USDA and look forward to working with the agency while constantly improving our collective efforts as we move forward. Please feel free to reach out any time we may be of service in any way!

Yours in Conservation,



Vernon Cox

NASCA President

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