

October 7, 2022

Undersecretary Robert Bonnie
Farm Production & Conservation
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Undersecretary Bonnie:

The undersigned members of the Theodore Roosevelt Conservation Partnership's Agriculture and Wildlife Working Group, which works to balance the needs of production agriculture and private landowners with those of fish and wildlife, would like to express our support for the Farm Bill Conservation and Conservation Technical Assistance funding within the Inflation Reduction Act (IRA). These investments will empower America's farmers, ranchers, and forest landowners to play an even larger role in reducing greenhouse gas emissions, sequestering carbon, and mitigating the impacts of climate change. Of equal importance, they do so within the time-tested and landowner supported framework of locally led, voluntary, incentive-based programs.

To assist the USDA in maximizing the positive impacts of this once in a generation opportunity, we offer the following principles and guidance:

- Wisely applied, IRA Conservation Technical Assistance funding can produce substantial climate benefits. Qualified staff, who have earned the respect of their local communities, are essential for program success. We encourage USDA and NRCS leadership to work with State Technical Committees to identify where these technical assistance funds can be targeted to fill pressing agency staffing gaps and enhance program delivery. Additionally, investments in a broad suite of climate-smart agricultural and forestry practice training, certifications such as conservation planning and wetland delineation, and competitive staff compensation are all necessary to meet our climate and broader conservation goals. Finally, we recommend that USDA expand technical assistance resources to support external partnerships with government and non-government partners. These partnerships strengthen USDA's landowner outreach capabilities and connect USDA Service Centers to broader external expertise and resources.
- Many, but not all, current USDA climate-smart agricultural conservation practices provide multiple wildlife, biodiversity, drought adaptation, and water quality benefits in addition to emissions reductions and carbon sequestration. These multi-beneficial practices, such as Range Planting, Upland Wildlife Habitat Management, Riparian Forest Buffers, and Riparian Herbaceous Cover should be prioritized in IRA implementation, as should multi-beneficial practices that are not currently categorized as climate-smart such as Wetland Restoration, Wetland Enhancement, and Prescribed Burning.
- Effective and practical climate-smart agricultural practices and supporting practices vary based on climate, soil type, and agricultural system. NRCS should consider using regionally developed, ecologically appropriate lists of IRA qualifying practices and scenarios with guidelines and payment rates designed to effectively reach the goals stated in the statute. These lists should be vetted to maximize their climate benefit and avoid incentivizing practices that negatively impact fish and wildlife.
- To implement the IRA equitably and with appropriate urgency, non-statutory match and cost-share requirements should be reduced or waived whenever necessary. These requirements are a barrier to

implementation in many areas, but especially among historically underserved communities. NRCS should immediately broaden their definition of significant partner contributions and reiterate that there are no financial match requirements within the Regional Conservation Partnership Program (RCPP).

- The RCPP has the potential to create innovative, partner-driven climate solutions, but is currently hamstrung by administrative barriers. To reach this program's potential, alternative funding arrangements and granting authority should be emphasized, practice standards should be flexibly applied, and project agreement approval and renewals should be streamlined. In addition, Supplemental Partner Agreements should be used consistently. Currently, allocations are open to interpretation and costs associated with Hourly Rate Charges are unrecoverable, which discourages program participation.
- The value of conservation easements for achieving the IRA's climate goals can be best realized by recognizing that maintaining stored carbon, including on wetlands and grasslands of special significance, and avoiding conversion of farmland, rangeland, and forestland to residential and urban development are as important as creating additional sequestration. Targeted Agricultural Conservation Easement Program (ACEP) easement acquisitions will maximize the IRA's return on investment, as will using a portion of IRA RCPP funding to acquire easements.
- Wherever possible, practices scientifically supported by the Conservation Effects Assessment Project should be prioritized. We recognize that innovative approaches should also be tested, especially within the RCPP and through Conservation Innovation Grants (CIG), but most of this experimentation can be accomplished through the Partnerships for Climate Smart Commodities program.
- Despite its outsized potential for carbon sequestration and emissions reduction, the Conservation Reserve Program (CRP) did not receive IRA support. USDA should work to fully implement the CRP through its existing authorities, and should apply IRA funding to lasting grassland, wetland, and forest restoration and management projects through other programs wherever possible.
- In all funded programs, the IRA provides a significant opportunity to increase the incentives for and the use of native plants, where ecologically appropriate, to increase climate resiliency, forage availability, groundwater and aquifer recharge (water security), and provide habitat for wildlife and pollinators. USDA Plant Materials Centers play a key role in enabling these outcomes, as do local and community-based nurseries and seed producers, most of which are currently unable to meet demand. Support for these crucial research and production entities is needed to achieve IRA climate goals.
- Pressure to achieve ambitious goals may tempt staff to ignore conservation compliance requirements. USDA leadership should clearly and consistently communicate that Highly Erodible Land, Sodsaver, and Swampbuster provisions must be enforced in accordance with statute. Failure to do so will directly counteract the IRA's climate goals.

We recognize that realizing this incredible opportunity will require a great deal of work and ingenuity within USDA and among partner organizations, and we appreciate the public servants who are making it happen. We also understand that IRA implementation will be an adaptive process and stand ready to provide additional and more detailed support as you move forward.

Sincerely,

California Waterfowl

The Conservation Fund

Delta Waterfowl

Ducks Unlimited

Isaac Walton League of America

Land Trust Alliance

National Alliance of Forest Owners

National Deer Association

National Wild Turkey Federation

National Wildlife Federation

The Nature Conservancy

Pheasants Forever

Quail Forever

Theodore Roosevelt Conservation Partnership

The Wildlife Society

CC:

Thomas Vilsack, Secretary, U.S. Department of Agriculture

Terry Cosby, Chief, Natural Resources Conservation Service