



December 21, 2022

Terry Cosby
Chief, Natural Resources Conservation Service
1400 Independence Avenue SW
Washington, D.C. 20250

Dear Chief Cosby,

On behalf of the AGree Coalition, we thank you for the opportunity to provide input on the Natural Resources Conservation Service's (NRCS) implementation of funds received under Sections 21001 and 21002 of the Inflation Reduction Act (IRA). The deployment of conservation practices on US farms, ranches, and forestlands and the quantification of resulting changes in greenhouse gas emissions are critical to advancing positive environmental outcomes, farmers' profitability, and successful farming communities. We applaud NRCS's effort to collect public input on the implementation of IRA funds to achieve these important goals.

The AGree Coalition is a bipartisan coalition of farmers, farm groups, NGOs, researchers, and food companies who collaborate to drive adoption of conservation practices through developing federal policy recommendations, commissioning research, and developing tools and frameworks. Our recommendations for IRA implementation come from consensus-based policy deliberations and data-driven research projects. We recommend NRCS improve data collection, interoperability, and sharing, and create more flexibility in establishing partnership agreements to enhance program delivery, practice adoption, and emissions quantification associated with the implementation of IRA funds.

1) What systems of quantification should NRCS use to measure the carbon sequestration and carbon dioxide, methane, and nitrous oxide emissions outcomes associated with activities funded through IRA?

Consistent, accurate, and accessible information about the number and scope of conservation practices being implemented across the country and their associated impacts is key to quantifying the benefits of activities implemented through IRA funding. However, data on conservation practice adoption and impacts is currently siloed in different NRCS programs and across government, private sector, public sector, and academic institutions. We encourage NRCS to assess its own data assets and programs to understand where existing datasets can be used to measure changes in carbon sequestration and greenhouse gas emissions, advance data interoperability and data sharing with other government agencies and relevant outside entities, and work to improve the quality of its own data collection.

To advance data sharing and collaboration between USDA agencies and with outside institutions and researchers, NRCS can:

- Establish an integrated data infrastructure for more effective data acquisition, management, and use. The white paper [Modernizing Agriculture Data Infrastructure to Improve Economic and Ecological Outcomes](#) by AGree and the Data Foundation presents four potential models for USDA to better store, integrate, and share agricultural data.

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- Create mechanisms and protocols for voluntary data sharing to take advantage of data collected by public and private entities outside of the department. For example, NRCS could develop memorandums of understanding with operators of private sector carbon market programs that wish to share data, models, and templates with NRCS.
- NRCS can also build upon digital tools (such as the [Conservation Assessment and Ranking Tool](#) [CART] and the [Resource Stewardship Evaluation Tool](#)) to facilitate two-way data transfer for NRCS programs. For example, anonymized underlying CART data could be shared with researchers, and researchers could contribute their research and data useful for refining the CART model with NRCS researchers in a mutually beneficial exchange of information.
- Update CART to make it more farmer friendly, transparent, and allow farmers to access their data submitted to the program. Many CART users do not understand how the program calculates the environmental impacts and benefits of projects. USDA should share information about the model used by CART to make greenhouse gas estimates. CART should also allow farmers to pull their data from CART to support their long-term recordkeeping.

To improve the collection and quality of NRCS data for the purposes of measuring adoption of conservation practices funded by the IRA and their associated impacts, NRCS can:

- Improve the rigor and transparency of climate models and measurements. AGree's [Recommendations to Strengthen USDA's Support of Research and Science for Climate-Smart Agriculture](#) provide further detail on how this can be accomplished, including the following ideas.
 - Link the National Soil Web Survey and the National Resources Inventory to better leverage these tools for monitoring changes in soil carbon storage.
 - Coordinate and improve USDA, DOE, and ARPA-E SMARTFARM programs to better quantify the net greenhouse gas footprint from different practices.
- Determine an effective method for getting annual practice data on a field-by-field basis, either through more robust and consistent data collection efforts through local USDA offices (e.g., using existing data entry format on cover crops), or by use of remote sensing data with some verification of the remote sensing analysis through on-the-ground observations.
- Standardize and synchronize time periods for reported crop management practices and results. This recommendation includes updating data sets to reflect what practices were effectively implemented rather than on stated intentions to adopt a crop or practice.
- Explore use of robust available sources of weather data to match annual weather conditions to geographic land unit by constructing appropriate data layers in the system.
- Evaluate how to develop more consistency in gathering relevant data at the geographic unit and reporting with the same geographic identifiers, with cross-compatibility between agency databases tied to the geographically identified unit for each mapping layer of interest.
- Develop an approach that leads to one common data set for each land unit (e.g., common land unit, field, latitude/longitude grid, etc.) so that it is easier for both USDA staff and

cooperators to do accurate and thorough analyses of USDA data, including how conservation management is affecting crop performance.

5.) How can NRCS expand capacity among partners to assist in providing outreach and technical assistance to support the implementation of IRA funding?

NRCS should engage partners in the public and private sector to deliver effective technical assistance and maximize the effectiveness of IRA investments. Private partnership agreements to deliver technical assistance to producers have produced some of the most successful conservation adoption programs. However, current processes to write agreements and partnership projects with private technical assistance providers are burdensome and difficult to navigate. Existing policies and programs should be altered to remove obstacles to, and establish a strong network of, private providers of technical assistance. One model for creating these opportunities through USDA programs is the [NRCS Grazing Lands Conservation Initiative](#), which enlists state committees and grassroots coalitions that find opportunities to increase technical assistance and create public awareness of activities that maintain or enhance grazing land resources. This model could be replicated to leverage the knowledge and experiences of early adopters to build trust and expand climate-smart agricultural practices. To better leverage partners for the implementation of IRA funding, NRCS can:

- Utilize IRA funding to expand use of partnership approaches to meet technical assistance needs—especially to fill gaps in NRCS expertise and to expand understanding and adoption of regionally specific and ecologically appropriate approaches and systems. Additional capacity could be explored under the Intergovernmental Personnel Act. Likewise, NRCS could expand the use of cooperative agreements and block grants to provide more flexibility and efficiency in partnering with non-federal partners. Cooperative agreements and block grants have the benefit of avoiding the complexity of the current Technical Service Provider (TSP) process and Regional Conservation Partnership Program (RCPP).
- Invest in training and technology dissemination for NGOs, the conservation community, extension, and NRCS personnel. There is an immediate and urgent need to train NRCS field staff and technical assistance cooperators on conservation issues, programs, policies, and emerging technologies that can help drive adoption of conservation practices on working lands.
- Expand funding for technical assistance providers that already work with small and beginning producers, and producers of color, to help them enroll in NRCS programs. NRCS faces a critical gap in effectively reaching and engaging Tribes and Native Nations to keep up with Tribal and national conservation needs. NRCS can leverage IRA funding to address part of this need by improving understanding of what programs are available and how Tribes and Native Nations can access those programs. NRCS should create a clearinghouse dedicated to communicating with Tribes and Native Nations, cataloging clearly what programs tribes and native led organizations can apply for, what those programs provide, how to apply, what funding is available, and who to contact for assistance. NRCS should also appoint additional staff to serve as liaisons for those submitting applications and in need of assistance.

- Improve the pipeline for implementing innovations and lessons learned from NRCS innovation programs (such as the Conservation Innovation Grant or Partnerships for Climate-Smart Commodities programs). Developing a more systematic way for innovations to be deployed by NRCS agents and field offices, or the private sector, would increase the return on investment for NRCS innovation programs and ensure technical assistance keeps pace with the latest innovations in conservation delivery.

The resources provided by the IRA represent an unprecedented opportunity for NRCS to continue its critical mission by accelerating the adoption of conservation practices and improving systems to quantify emissions reduction outcomes. In summary, NRCS can focus on improving infrastructure for data collection, interoperability, and sharing to quantify emissions outcomes associated with activities funded by the IRA. Likewise, NRCS can expand access and increase the efficiency of program delivery by creating more flexibility and funding in establishing partnership agreements to deliver technical assistance.

We appreciate your leadership in USDA's conservation efforts and look forward to continued collaboration to create positive environmental outcomes and improve the economic resilience of farming communities.

Sincerely,

The AGree Coalition