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December 21, 2022

Terry Cosby
Chief
Natural Resources Conservation Service
1400 Independence Avenue, SW
Washington, DC 20250

RE: Docket ID: NRCS-2022-0015

Dear Chief Cosby,

Thank you for the opportunity to comment on the NRCS request for information related to the implementation of the Inflation Reduction Act (IRA) funding for conservation programs (Docket ID: NRCS-2022-0015). The National Association of Wheat Growers (NAWG) is a federation of 20 state wheat grower associations and industry partners that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and works in areas as diverse as federal farm policy, trade, environmental regulation, agricultural research, and sustainability.

As NRCS works to deliver the IRA funding, we want to stress the need for any system to be farmer friendly and not overly burdensome for the farmers. The locally led approach that NRCS has followed for many years should continue and this new funding should not take a top-down approach that does not recognize the local needs of different geographies, cropping systems and weather conditions. A dryland wheat operation located in an area of minimal rainfall does not have the same needs as a wheat operation located in other areas of the country. Winter Wheat, even when harvested for grain, provides longer-term soil cover and living roots compared to many other options and should be recognized as providing comparable benefits to cover crops. USDA must take these benefits into consideration as growers are also providing a valuable food crop to domestic and foreign customers.

While implementing this funding, NRCS must keep in mind the ongoing constraints on the workforce. NAWG understands NRCS is actively hiring and seeking to fill vacant positions, but with low staffing levels and the increased funding for program delivery, we encourage NRCS to ensure there is adequate staffing, training, mentoring and direction to field staff. The locally led approach to program delivery has

allowed conservation programs to meet local priorities and work with different cropping systems, livestock operations, and forestry operations, all while providing improved soil, water, air, and habitat.

NAWG believes that USDA should be involved in collaborative efforts to develop a standardized carbon measurement model and or tools that include geographic variability with engagement from Land Grant Universities in the effort. We do see a role for commodity organizations to be involved in the development of this measure. State and local partners such as Agriculture Extension programs, state departments of agriculture and local conservation districts could provide valuable, local information through testing and verification of the carbon measurement approach.

Specifically, NAWG would like to offer comments on the following question:

- (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?*

NAWG recommends that NRCS utilize existing measurement tools including COMET Farm and COMET planner and continue to build on and refine the existing tools that USDA is currently utilizing and has under development with other USDA partner agencies. These tools must work for different production systems across the US and reflect real world farming systems, including dryland operations and wheat production systems. Small grain operations with diverse rotations should be able to utilize these tools with the same level of confidence as corn/soy rotations in the Midwest.

NRCS must also review and expand the eligible conservation practices to achieve additional greenhouse gas mitigation benefits. For example, the current list of climate-smart practices posted on the [website](#), is missing several practices that have climate benefits, including indirect benefits such as reduced fuel use for reduced equipment passes through the field. Practices, such as Integrated Pest Management/Pest Management Conservation System (595), improve growers' efficiency and provide more targeted application of crop protection tools resulting in climate benefits. NRCS must continue to review all practices to consider the multiple benefits of the conservation practice. The current list of NRCS Climate-smart practices is also missing practices that NRCS documents show as having a climate benefit through carbon sequestration or reducing greenhouse gas emissions. For instance, Conservation Crop Rotation (328) is not included in the climate-smart practice list, but the cover crop practice is included. To achieve the stated objective, the list of eligible practices must be as broad as possible and capture incremental benefits across diverse regions. We encourage NRCS to continue seeking farmer and local input to develop a wide-ranging list of eligible practices.

The list of climate-smart practices also has limited options for farmers that are already undertaking no-till and have diverse crop rotations. Practice options should not only be available to growers that have not yet undertaken conservation practices but should also include early adopters of conservation practices. Allowing those early adopters to continue to build on their conservation practices will help them maintain existing practices and continue to expand climate benefits. Maintaining existing practices provides continual environmental benefits and should be financially supported.

The availability of climate-smart practices that work for producers across the U.S. should also be taken into consideration by NRCS as the IRA funding is implemented. Many wheat farmers have been practicing conservation tillage for over 20 years. As growers look to expand their conservation practices, and look to the climate-smart practices, NRCS must ensure that there are opportunities for them to participate in NRCS programs. Opportunities should be available to all growers including beginning farmers, early adopters of conservation practices and systems, small farms, and large farms. All operations can have an impact and they should all have an opportunity to participate in the NRCS programs funded through the IRA.

- ***What methods should NRCS use to quantify carbon sequestration and carbon dioxide, methane, and nitrous oxide emissions?***

NAWG recommends that NRCS account for indirect benefits in models, such as number of passes in the field and resulting reduced fuel use. Precision agriculture and efficiency practices target a grower's use of crop protection tools and reduce the trips equipment make across the field, just as conservation tillage results in reduced fuel use and carbon sequestered. This technology is not just a single investment and includes pest management with smart sprayers, planting with variable rate technology, and yield mapping during harvest. All the benefits – both direct and indirect need to be included in NRCS models and environmental outcomes quantified.

- ***What types of field-based data should be collected and analyzed to assess carbon sequestration and reduction in carbon dioxide, methane, and nitrous oxide emissions outcomes associated with agricultural and conservation activities?***

USDA should work within existing program structure and delivery and not require additional field-based data from growers. Based on program contract information and location of the practice implemented, USDA should have sufficient information to model the impacts of the conservation practices as they do today through the COMET tools and the Conservation Effects Assessment Project assessments.

- ***How should USDA monitor and track carbon sequestration and greenhouse gas emissions trends and the effects of NRCS supported activities?***

USDA should use existing models and assessments and continue to refine the research, especially as it relates to dryland operations and crops that are grown over winter, such as winter wheat.

(2) How can NRCS engage the private sector and private philanthropy to leverage the IRA investments, including for systems of quantification?

NAWG recommends building upon existing tools developed by USDA (COMET) and working with land grant universities to verify the effectiveness of the tools and continue to expand the tools. These tools must reflect different cropping systems and be sensitive to reflect that diversity in crop production and real-world cropping scenarios.

(3) How should NRCS target IRA funding to maximize improvements to soil carbon, reductions in nitrogen losses, and the reduction, capture, avoidance, or sequestration of carbon dioxide, methane, or nitrous oxide emissions, associated with agricultural production?

NRCS should begin by addressing the current backlog of valid applications awaiting program funding. Each year, NRCS has more interest in conservation assistance than they can provide with the limited program dollars, and this infusion of conservation program funding should allow NRCS to address the backlog of applications in both EQIP and CSP. The existing backlog of contract applications could be reviewed to determine the effectiveness of the practices in meeting greenhouse gas emissions reductions and carbon sequestration and those contracts should be prioritized for funding.

NRCS should utilize all types of contracts and program authorities when delivering the IRA funding. Cost-share and incentive payments through EQIP and enhancements and bundles in CSP should be utilized to provide a variety of options to growers seeking assistance with maintaining and expanding conservation practices including EQIP Conservation Incentive contract language created by the last Farm Bill as a way to help those who have already undertaking climate smart ag practices such as no-till and cover crops but who may be struggling with high input costs and supply chain issues. NRCS must recognize the challenges that growers are facing and take these external pressures into account when providing assistance. For example, as the price of crop protection tools increases, a lower-cost short term solution to address weeds in a field would be to till the field. With assistance from NRCS, growers could be supported to maintain their no till systems. Taking into account the additional costs to maintain a conservation system will be important to maintain sequestered carbon and ensure those benefits are not lost during challenging growing seasons.

NAWG encourages NRCS to implement this funding with maximum flexibility and looking to all actions that have benefits that contribute to reduced GHG emissions and sequestering carbon. While the adoption of no-till and cover crops have become the popular approach and many of the Climate-smart Commodity Grants will be working with growers on these practices, we encourage NRCS to continue to provide opportunities to a variety of farming operations and farming systems and ensure that practices such as improving irrigation systems that result in energy savings in addition to nutrient management practices.

Most importantly, there need to be expanded conservation options for producers. As stated earlier, NRCS must ensure that there are opportunities for dryland farming operations to adopt climate-smart practices and mitigate the impact of drought. Expanded conservation options should include new technologies that are demonstrating climate-smart benefits for growers. NRCS should continually expand the conservation options available for cost-share, incentives, and enhancement payments.

(4) How should NRCS streamline and improve program delivery to increase efficiencies and expand access to IRA funded programs and projects for producers, particularly underserved producers?

NRCS should maintain the voluntary, locally led approach to delivering and implementing conservation program assistance. Practices should be farmer friendly – working cooperatively within a grower’s operation to help maintain their cropping systems and production of a quality crop while providing natural resource benefits. Improved program delivery should include streamlining the paperwork needed and the decision timeline to fund applications. The shortened timeframe of this funding availability should translate into a more streamlined approval process for contracts to allow farmers to have a response on their application and begin implementing the practice quickly.

Most importantly, we suggest NRCS avoid an overly complicated application process that asks for too much information. This will result in making a cumbersome program which will dissuade farmers from participating.

It is important to remember that one size doesn’t fill all. Each operation will have a different resource concern they are seeking to address and will need to have practices and an approach that fits for that farming operation. Not all areas of the country are the same – rotations, local climate, soils, and production practices are all different.

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

NAWG encourages NRCS to utilize the existing conservation delivery system of working through the conservation districts, Technical Service Providers, and cooperative agreements with state conservation agencies. NRCS should keep customer service at the forefront of the delivery system and ensure that NRCS employees and partners delivering conservation assistance have a farmer customer service mentality and approach to working with growers. As mentioned earlier, farming operations will vary greatly and understanding the local crop rotations and challenges for maintaining viable farming operations will facilitate a better working relationship with farmers. Flexibility in delivering assistance and remembering that one size does not fit all when it comes to implementing different practices on an active farming operation will be important to the successful delivery of this funding.

NRCS must continue to train and educate employees on the programs as well as the local farming systems in the area. Employees should understand the flexibility that allows for local implementation and working with farmers. Well trained, knowledgeable staff with an interest in working cooperatively with farmers will make the programs and the farmers more successful in achieving these natural resource benefits.

NRCS has a long history of working cooperatively with farmers to achieve natural resource goals, provide environmental benefits and maintain viable farming operations. We look forward to working with NRCS on the implementation of the IRA funding.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nicole Berg", with a long horizontal flourish extending to the right.

Nicole Berg
President
National Association of Wheat Growers