



NATIONAL ASSOCIATION OF STATE FORESTERS

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December 21, 2022

Terry Cosby
Chief, Natural Resources Conservation Service
U.S. Department of Agriculture
1400 Independence Ave, SW
Washington, D.C. 20250

Docket ID: NRCS-2022-0015; Document Citation: 87 FR 70770

Dear Chief Cosby,

The National Association of State Foresters (NASF) is pleased to provide comments in response to the United States Department of Agriculture (USDA) Natural Resources Conservation Service's (NRCS) November 21, 2022 Federal Register notice, *Request for Information: Implementation of the Inflation Reduction Act (IRA) (NRCS-2022-0015)*.

NASF represents the directors of forestry agencies in all 50 states, U.S. territories, nations in free association with the U.S., and the District of Columbia. Among state foresters' most important constituents are private forestland owners, hence our vested interest in successful implementation of the IRA and advancing opportunities and support for these landowners and climate-smart forestry practices through NRCS Farm Bill conservation programs.

To help ensure implementation of the IRA funding for NRCS conservation programs will be successful in the long-term, NASF respectfully submits the following comments:

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?

The Forest Inventory and Analysis (FIA) program provides crucial information to federal and state forestry agencies, industry, academic, and conservation organizations on a wide range of forestry-related topics. Increasingly, FIA is relied on to provide data on the state of the nation's largest carbon sink—our forests—making it an essential component of decisions regarding climate change mitigation and adaptation strategy. However, the demands for information on forest carbon are becoming more varied and at scales that are problematic to meet with the current design and capabilities of the program.

Additional statistical research capacity is required to develop and employ the complex cutting-edge statistical imputation and estimation procedures required to produce the level of accuracy

Executive Director
Jay Farrell

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that clients are demanding today for smaller geographic areas. The additional analytical capacity will focus research efforts to improve best applications and integration of remote sensing technologies within the FIA program and develop technologies to reduce costs and make it easier to measure and monitor forest carbon (especially for forest inventories and verification). Using imagery from advanced technologies, especially remote sensing platforms would improve products for decision making by policy makers and managers and enable forest owner participation in carbon crediting opportunities.

The Resources Planning Act (RPA) Assessments and supporting technical reports produced by the Forest Service RPA research team represent a valuable set of scientific information that is underutilized by stakeholders interested in forests, carbon, and climate. Additionally, stakeholder engagement with the RPA Assessments has been lacking in recent years. In order to enhance utilization and strengthen the role of the RPA Assessments, Forest Service leadership should (1) prioritize engagement with external stakeholders to help direct more timely and responsive RPA research efforts on forest carbon projections and (2) respond to specific policy-relevant questions from interested stakeholders. In addition, USDA should continue to seek guidance from the expertise of modelers within the USDA Forest Service (Forest Service) that specialize in combined ecological/economic “futuring.” The modeling work of these scientists is the best way to gauge the carbon impacts of proposed USDA policies in a way that adequately assesses potential economic feedbacks.

Additionally, USDA’s Technical Bulletin 1939, published in July of 2014 titled, *Quantifying Greenhouse Gas Fluxes in Agriculture and Forestry: Methods for Entity-Scale Inventory* is currently being updated. The revisions to this technical report will provide a resource to help align NRCS and Forest Service recommendations related to quantifying carbon sequestration on forestland, to deliver consistency across the country, regardless of the agency.

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

Rules around using federal programs that enhance carbon sequestration should allow for landowners to realize a return on that enhancement through participation in carbon markets.

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?

Where there is a ranking process for landowners to qualify for assistance, enhancing carbon benefits should be a priority, or at least equal to other conservation benefits.

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?

The most effective way to encourage private forest landowners to voluntarily adopt climate-smart forestry practices is through technical assistance that equips landowners with the unbiased, science-based information they need to sustainably manage their forests now and into the future. Forestry assistance is best delivered at the local level, by professionals with boots-on-the ground in the forests and communities where USDA producers and landowners live. In their outreach, USDA should recognize the role of state forestry agencies and other partners that operate in landowner assistance and partner with them for the purpose of providing forestry technical assistance and approval of forestry practices including agroforestry practices (windbreaks, shelterbelts etc.) for financial assistance programs. NRCS should develop strong cooperative relationships with willing state forestry agencies that allow for those agencies to act in NRCS' stead. These entities should work together to understand and address institutional barriers to all landowners accessing USDA programs.

Forest landowners would be better served through increased coordination and information sharing between NRCS and state forestry agencies to better identify where their respective work is taking place through NRCS conservation programs and the Forest Stewardship Program, the primary Forest Service program for supporting landowners in making sustainable management decisions on their forest land. In addition to delivering technical assistance directly to forestland owners, the Forest Stewardship Program serves as a gateway to other landowner financial assistance programs like the USDA Environmental Quality Incentives Program (EQIP), and other NRCS conservation programs, that can help landowners keep their forests working and intact. NRCS should consider developing an online working portal where state forestry agency and NRCS staff could share information to enhance interagency coordination and better serve landowners.

The EQIP program helps landowners pay for conservation practices, such as tree planting and timber stand improvement, which both serve to increase carbon sequestration. Importantly, the program also pays for prescribed fire, which helps manage forest resources for greater resilience. EQIP dollars allocated to forestry practices in recent years has amounted to roughly 7% of total EQIP funding. If combatting the effects of climate change is a national priority, funding forestry practices within EQIP should play a larger role. NASF advocates for establishing a threshold for EQIP forestry practices at 15% of total IRA EQIP funding.

There are numerous issues that create inequitable access to USDA programs for historically-underserved, largely minority forest landowners. The issue of heirs property, in which multiple heirs own property in common due to the absence of a will(s), is a significant barrier to keeping forests intact. Heirs property issues also affect access to USDA programs (due to lack of clear title to the land), and in the worst cases, lead to the loss of a farm or forestland that may have been in a family for several generations.

USDA programs should recognize in their policies this long-standing institutional barrier to minority land ownership. Additionally, USDA assistance should be targeted to help historically underserved communities receive both farming and forestry assistance, as well as legal assistance

to resolve title issues. The Forest Stewardship Program can be a vehicle to support state forestry agencies and non-profits working in this space to reach historically underserved landowners. An example of this important work is the [Sustainable Forestry and African American Land Retention Program](#), a network of eight non-profit organizations across the South working to help landowners address heirs property and land retention issues and responsibly manage their forests.

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

One way to increase capacity to serve NRCS conservation programs would be to dedicate IRA funding toward partnership agreements between NRCS state offices and state forestry agencies to tap into the technical assistance network state forestry agencies provide. Through support from partnership agreements, state forestry agencies could direct their service foresters time toward serving NRCS programs by developing federally funded time limited positions.

Providing private forest landowners with technical assistance is at the core of most state forestry assistance programs. State forestry agencies employ roughly 7,850 trained foresters, providing an essential network of support to delivering USDA technical assistance to landowners. Capacity should be realized at the state forestry agency and NGO partner level to increase delivery of forestry programming. More underserved landowners could be reached by building state forestry agency and partner capacity.

Additionally, NRCS should closely examine the current process for certifying Technical Service Providers (TSP's) and find ways to simplify it. NASF encourages NRCS to explore further aligning TSP payments with local economic conditions. In addition, we encourage NRCS to put more funding towards TSP training and formalize the training process at the state level. All TSPs would benefit from more training on the NRCS Conservation Planning Process (i.e. CPA, DIA, CEMA) to increase efficiency and effectiveness.

We appreciate the opportunity to provide input and look forward to the continued dialogue.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kacey, KC', with a long horizontal flourish extending to the right.

Kacey, KC
NASF President
Nevada State Forester