



Office of the Secretary
Washington, DC 20250

September 27, 2024

MR. JOHN DEVNEY
Vice-Chair
Hunting and Wildlife Conservation Council
5275 Leesburg Pike, MS:OC
Falls Church, VA 22041

Dear Vice-Chairman Devney:

Thank you for your letter of May 2, 2023, regarding your support for the U.S. Department of Agriculture's (USDA) leadership in implementing the Inflation Reduction Act (IRA) and conservation practices, and for your suggestions on ways to maximize the environmental and climate benefits of these investments.

USDA's Natural Resources Conservation Service (NRCS) responded to feedback received from conservation partners like the Hunting and Wildlife Conservation Council, producers, and NRCS staff across the country. NRCS considers and evaluates activities based on scientific literature demonstrating expected climate change mitigation benefits, including reduced greenhouse gas emissions or increased carbon sequestration. In fiscal years 2024 and 2025, NRCS has increased their listing of Climate-Smart Agricultural and Forestry Mitigation Activities eligible for IRA funding through the Environmental Quality Incentives Program (EQIP) and Conservation Stewardship Program (CSP). New activities include prescribed burning, biochar production from woody residue, restoration to enhance floodplain connectivity, wildlife habitat for nesting and brooding in non-cropped areas, improved grazing management for enhanced plant structure and composition for wildlife, and restoration of sensitive coastal vegetative communities.

NRCS working definition for climate-smart agriculture and forestry closely aligns with the Food and Agriculture Organization definition: Climate-smart agriculture and forestry is an integrated approach that enables farmers, ranchers, and forest landowners to respond to climate change by reducing or removing greenhouse gas emissions (mitigation) and adapting and building resilience (adaptation), while sustainably increasing agricultural productivity and incomes.

NRCS has implemented all of the Government Accountability Office (GAO) recommendations directed at the agency, including that NRCS use a risk-based approach for its annual compliance check. Details on each action can be found in the [GAO's status update for the Recommendations for Executive Action](#). These include the following NRCS improvements to wetland determinations:

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- Development of quality control checklists for state quality reviews.
- Development of template letters which include a summary report explaining the technical basis for each of the three wetland diagnostic factors.
- Issuance of NRCS Technical Brief No. 22-01 The Consideration of Normal Circumstances as it relates to Wetland Identification for Food Security Act Purposes, which includes detailed guidance on evaluation of Best Drained Conditions.
- NRCS has updated the National Food Security Act Manual Part 518, Compliance Review, to incorporate a risk-based approach to the sample selection process used to select tracts for annual compliance reviews.
- NRCS continues to emphasize to its staff that it is to follow the policy at National Food Security Act Manual Part 520.7, Incorrect Information by a Person, when observing potential violations. This policy details actions that are taken when providing services to a person and a potential violation is observed.

We appreciate your recommendations for strengthening our efforts in climate-smart agriculture, conservation technical assistance, and improving wetland determinations. We will continue to take your recommendations into consideration as our programs grow and develop.

Again, thank you for your letter and for your thoughtful recommendations.

Sincerely,

THOMAS J. VILSACK
Secretary