



National Association of Conservation Districts

Memo

To: NACD Officers, Executive Board, Board Members, Presidents and Executive Directors of State/Territory Associations, Members

From: Jeremy Peters, NACD CEO

A handwritten signature in blue ink that reads "Jeremy Peters".

Date: February 28, 2025

Re: NACD Update on Recent Executive Actions

I am writing to provide an update on recent Executive Actions.

IRA and Funding Actions

On February 20, U.S. Secretary of Agriculture Brooke Rollins announced that USDA would honor existing contracts with producers and released \$20 million in Environmental Quality Incentives Program (EQIP), Conservation Stewardship Program (CSP), and Agricultural Conservation Easement Program (ACEP) funds. USDA will continue to assess federal obligations and make additional announcements.

On February 21, NACD issued a press release to commend this important first step, encourage USDA to provide more certainty for future producer contracts, and request that the agency commit to distributing financial assistance through conservation programs funded by the Inflation Reduction Act (IRA) and Partnerships for Climate Smart Commodities (PCSC).

NACD understands that many grant payments resumed the week of February 24, once USDA payment systems (FMMI) were back online. Exceptions included payments under agreements funded by IRA, Infrastructure Investments & Jobs Act (IIJA), and PCSC.

As of February 28, members have reported conflicting guidance from USDA. As of the release of this memo, NACD is not aware of USDA freezing payments, with the exception of those listed above. We also understand that payments for expenses incurred through February 25, 2025 under Regional Conservation Partnership Program (RCPP) and PCSC will be released shortly.

Grant Terminations

On February 14, USDA began issuing letters formally terminating grants and agreements, particularly those funding diversity, equity, inclusion, and accessibility initiatives. As the Secretary continues to review grants and agreements, additional termination letters may be issued for initiatives or programs that are not aligned with the administration's priorities.

On February 26, President Trump issued an [executive order](#) directing each federal agency to coordinate with the Department of Government Efficiency (DOGE) to:

1. Establish a system to record every payment issued by the agency pursuant to each of the agency's covered contracts and grants, along with justification for each payment.

Note: NACD understands that USDA is continuing to make payments under grants or agreements with COTA and non-IRA Farm Bill funding. While we anticipate that additional



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*RCPP and PCSC funds will be released today, it is our understanding that payments under grants or agreements with IRA or IJA funds are still on hold. However, USDA continues to assess and justify each grant and agreement to determine whether it aligns with the administration's priorities and provides benefit. **NACD encourages districts to reach out to their federal program administrators to share the positive impacts grants and agreements are providing for producers, local communities, and environmental health.***

2. Conduct a comprehensive review of each agency's contracting policies, procedures, and personnel, and to issue guidance on signing new contracts or modifying existing contracts to promote efficiency and alignment with the administration's policies.

Note: NACD contacted FPAC's Grants and Agreements Division to understand if there are opportunities for appeal, based on the initial round of grant terminations on February 14, 2025. USDA's general terms and conditions allow the government to terminate a grant or agreement when its priorities change. As such, there is no room for administrative appeal. The appeals process only applies if the agency makes the claim that the recipient is not fulfilling their commitments (e.g., poor performance, missed deliverables). Recipients were required to submit their final payment request along with final financial and progress reports to complete closeout.

3. Identify all termination rights agencies may have under existing leases of government-owned real property. The order does allow agencies, in coordination with DOGE, to make exclusions.

Note: NACD has raised our members' concerns regarding lease terminations and impacts on their customer service to producers, partnerships with USDA, and district operations.

Federal Layoffs:

Since February 14, it is estimated that as many as 220,000 federal employees have been terminated, most of whom were probationary staff.

- The Natural Resources Conservation Service (NRCS) issued ~1,200 termination letters to employees.
- The U.S. Forest Service (USFS) has issued termination letters to ~ 3,400 federal employees on probationary status across every level of the agency. Public safety employees at USFS are exempt.
 - It has been reported that the USFS is identifying a "small" number of terminated employees to be rehired and that managers may have an opportunity to request the return of additional staff.
- The Department of the Interior (DOI) has issued termination letters to ~ 2,300 federal employees on probationary status, including 800 from the Bureau of Land Management and 420 from the Fish and Wildlife Service.
- The Environmental Protection Agency has issued termination letters to ~ 388 federal employees.

On February 20, NACD issued a [press release](#) highlighting the severe impacts recent federal layoffs are having on producers and the delivery of locally led conservation. The release also calls for immediate action to mitigate these harmful effects. There are reports of a small number



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of employees being rehired within some agencies, including USDA. To our knowledge, this has not yet included NRCS.

On February 22, Office of Personnel Management (OPM) sent an email with the subject “What did you do last week” to anyone with a “.gov” email. The recipient was asked to reply to the email with a summary of their accomplishments for the week. Many conservation district employees, contractors, and other non-federal employees received this email. NACD met with USDA leadership and confirmed that as non-federal employees, conservation district partners and their associations are not required to respond. Subsequently, the USDA Office of the Assistant Secretary for Administration communicated that any response to the email is not required and considered voluntary.

On February 26, the Office of Management and Budget (OMB) and OPM sent a [memo](#) to federal agencies providing guidance to achieve portions of a [previous executive order](#). The memo requires agency heads to develop Agency Reduction in Force (RIF) and Reorganization Plans (ARRP) to reduce full-time staff, real property footprints, and topline budgets. Agency leaders are directed to submit the first phase “focused on initial agency cuts and reductions” of the ARRP by March 13. The memo includes an exemption for “*agencies or components that provide direct services to citizens.*” NACD has not yet confirmed that NRCS employees and additional federal conservation employees and partners qualify for this exemption.

On February 27, a federal judge ordered OPM to rescind directives initiating mass firings of probationary workers across the government on the basis that OPM does not have the authority to terminate employees within other agencies. The administration argues that OPM issued guidance, not a directive, to terminate employees. It is unclear what the immediate impact of this ruling will be and how it will affect federal workers already terminated. A written order is expected later, and the judge scheduled a court hearing on March 13.

Forest Service:

On February 26, Forest Service Chief Randy Moore announced his retirement in a letter to agency staff. The letter is posted in the [Inside the Forest Service newsletter](#) and his retirement is effective March 3, 2025.

On February 27, Secretary of Agriculture Brooke Rollins appointed Tom Schultz as the new Chief of the Forest Service. Schultz has more than 25 years of land management experience and previously worked for the Idaho Forest Group, the Idaho Department of Lands, and Montana’s Department of Natural Resources and Conservation.

Environmental Protection Agency (EPA):

Section 319 Nonpoint Source Management Program funds and Clean Water State Revolving funds not funded by IRA or IJA are expected to be released soon if still frozen. EPA and IJA and IRA funding is still under review.

Department of the Interior:

Pursuant to the January 20 Executive Order titled “Unleashing American Energy,” Secretary Burgum has announced plans to prioritize the mapping of all potential energy resources (oil, gas, and critical minerals) on Federal Lands.



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- **Bureau of Land Management (BLM):**
Kathleen Sgamma, head of the Denver-based Western Energy Alliance, has been nominated to be the Director of BLM. There is no date set for Sgamma's Senate hearing. For more information on BLM specific inquiries, please contact your state or regional office.
- **Fish and Wildlife Service (USFWS):**
Brian Nesvik, recently retired Director of the Wyoming Game and Fish Department, has been nominated to serve as Director of the USFWS. Nesvik's Senate hearing has not yet been scheduled. Fish and Wildlife staff remain committed to partnerships with NACD and local districts. They are working to determine ways they can assist at the local and regional level.

NACD Call for Action

NACD issued a [survey](#) to all members to better understand the local impacts of executive actions. We have received more than 350 responses and appreciate your candid input. Thank you to those who have completed the survey, and we encourage all districts to share local impacts and updates as the situation develops. NACD staff are reviewing each submission and contacting those who requested a response. This survey is anonymous. **You can view NACD's first [survey report here](#), which includes anonymized responses from conservation districts across the country.**

On February 18, NACD issued a letter template to assist conservation districts and their associations in sharing stories and impacts of administrative actions with members of Congress. Thank you to those who have reached out to your representatives. We encourage all districts to share specific local impacts with lawmakers and send updates as the situation develops.

Summary

Executive orders continue to be introduced, and the impacts of many recent actions are still unclear. Federal agencies are still working to interpret and implement these orders and will share additional guidance as soon as possible.

NACD encourages members to contact NACD's Director of Government Affairs, Chris Young (chris-young@nacdnet.org) to share updates and concerns related to the impacts of recent executive actions. This information will inform NACD's engagement with agency and congressional leaders.