



# National Association of Conservation Districts

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April 2, 2014

Mr. Michael T. Scuse  
Under Secretary, Farm and Foreign Agricultural Services  
U.S. Department of Agriculture

Docket No. FSA-2014-0002

**Re: Comments for the Farm Service Agency / Risk Management Agency 2014 Farm Bill  
Implementation Listening Session**

Dear Under Secretary Scuse:

On behalf of the National Association of Conservation Districts (NACD), thank you for the opportunity to submit comments in reference to the Farm Service Agency (FSA) and Risk Management Agency (RMA) updates to the Conservation Reserve Program (CRP) and conservation compliance linkage to crop insurance provided by the Agriculture Act of 2014. In addition to our brief comments here, you will find our Farm Bill Principles attached. These Principles apply to all Farm Bill Conservation program implementation.

NACD represents America's 3,000 locally led conservation districts working with millions of cooperating landowners and operators to help them manage and protect land and water resources on private and public lands in the United States. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies, and private sector interests to provide technical, financial, and other assistance to help landowners and operators plan and apply conservation to the landscape.

NACD strongly encourages FSA and RMA to give priority to environmentally sensitive acres within the CRP and to ensure that acres coming out of the program enroll in conservation plans. In order to account for the wide range of soil, water, air, and habitat benefits of the CRP, NACD encourages the use of voluntary conservation programs through NRCS for acres no longer fitting under the CRP program caps.

NACD would like to maintain an open dialogue with FSA and RMA during the rule writing period for re-linking conservation compliance to crop insurance. The compliance linkage should be administered like current compliance requirements, with FSA and NRCS maintaining their respective roles. NACD recommends that the rules pertaining to conservation compliance reflect the legislative intent of the Agriculture Act of 2014. Specifically, there should be no denial of premium assistance until all USDA appeals are exhausted with no claw back on any years' premium assistance prior to the passage of the 2014 Farm Bill. Compliance should be as uncomplicated for producers as possible. The process of filing for and complying with an AD-1026 should be seamless between agencies (FSA, RMA, NRCS) so that producers do not face duplicate paperwork. NRCS offices should receive added resources to respond to producer requests associated with AD-1026 filings. Specifically, Farm Bill Conservation Technical Assistance (CTA) should be available to implement these new measures. The Secretary of Agriculture should exercise the discretion provided in the 2014 Farm Bill in determining TA allocations for NRCS, FSA, and RMA to incorporate new compliance requirements as well as planning and implementation of conservation practices.

Thank you for your consideration of our position on these issues as they pertain to conservation in our nation.

Sincerely,

A handwritten signature in cursive script that reads 'Earl Garber'.

Earl Garber  
NACD President

## **Farm Bill Task Force Principles**

**NACD's mission is to serve conservation districts by providing national leadership and a unified voice for natural resource conservation. To that end, the NACD Farm Bill Task Force has developed the following principles to guide our Farm Bill work.**

### **Principle 1 – Resource-driven and locally-led**

NACD believes agriculture operations must be economically viable. The installation of conservation practices depend on that viability. We support a strong agriculture base across the country, U.S. territories, and insular areas. All landowners and operators should apply conservation practices appropriate for their operations and resource needs.

Farm Bill conservation programs should be resource-driven and locally-led with sufficient flexibility to direct funding to local priorities and concerns. Program delivery must be tailored to the natural resource needs in the states and local areas. State Technical Committees and Local Work Groups must help identify local needs, apply limited financial assistance, and maximize conservation benefits.

### **Principle 2 – Fully fund technical assistance needs**

The demand for technical assistance continues to increase from all constituencies. Farmers, ranchers, producers who manage rangelands and grasslands, forest landowners, small acreage owners, and new landowners are requesting technical assistance. Technical assistance funding must be provided to generate a wide range of soil, water, air, and habitat benefits. The Conservation Technical Assistance Program and each of the Farm Bill conservation programs are necessary to implement conservation practices that effect proper land and water management.

- We support full funding for NRCS to meet the growing need for technical assistance to deliver Farm Bill conservation programs, acting in concert with conservation districts, technical service providers (TSPs), and other partners.
- An increased investment in conservation programs has not generated a corresponding increase in staff needed to deliver sufficient assistance to utilize all Farm Bill funds awarded to NRCS. The full return on our conservation investment will be achieved only with additional technical assistance resources.
- Currently, Conservation Technical Assistance funding is used for pre-contract work, while program dollars for technical assistance are available only after a contract is signed. We support the allocation of Farm Bill program technical assistance and financial assistance funding to more accurately reflect the true cost of implementing Farm Bill conservation programs.
- Technical service providers are a key component of the conservation delivery system and an important tool to implement conservation programs. The TSP program should be expanded to help meet the significant workload needed to implement Farm Bill programs. Expanding the use of TSPs in states lacking sufficient NRCS personnel to fully apply the conservation program resources available to them is particularly important.
- The program should provide expanded opportunities for TSPs to do conservation planning. Currently, TSPs only provide post-contract, implementation assistance.
- An increase in conservation delivery system capacity can be realized if NRCS expands the use of grants, cooperative and contribution agreements, and contracts.

### **Principle 3 – Continue 2008 Farm Bill conservation program funding**

The 2012 Farm Bill conservation programs should be funded at or above 2008 Farm Bill levels. Regional equity should be maintained. Opportunities to streamline and improve efficiency within the program options should be identified.

- NACD supports consolidating conservation programs to improve efficiency, simplify the application process, and better utilize available program funding.
- NACD supports reauthorizing and continued funding of the Small Watershed Rehabilitation Program.

### **Principle 4 – Easily accessed by customers**

The conservation program delivery system must be easily accessed by conservation program customers. The signup process must be simple, easy to understand, completed with reasonable effort, and reach a broad customer audience.

- Conservation programs should be sufficiently flexible so they can be tailored to meet local resource needs and concerns.
- NACD supports continuous signup for USDA conservation programs.

### **Principle 5 – Education and outreach**

Successful delivery of the Conservation Title of the 2012 Farm Bill requires educating and reaching out to landowners, producers, and the general public. Landmark legislation in the 1930s assigned local conservation districts responsibility to lead the nation's conservation education, outreach, and demonstration processes. Farm Bill Conservation Title funds should supplement these important district efforts.

### **Principle 6 – Commitment to working lands**

Conservation programs address resource needs on various landscapes. They must provide a balance of support for both those that set land aside for conservation priorities and those that provide incentives and cost share for working lands. Given the projected increase in world population, programs must provide assistance to implement or maintain conservation practices on working lands that produce much-needed food, feed, fuel, and fiber.

### **Principle 7 – Support sustainable and renewable energy from agriculture and forestry**

NACD supports developing sustainable and renewable energy from woody biomass, forest byproducts, new and traditional crops, and agriculture byproducts. Such development must also protect natural resources, provide conservation, and/or wildlife benefits. Incentives to encourage participation in renewable energy programs, assist with project start-up costs, and facilitate increased research and development should be available to landowners.

Farm Bill energy programs should help landowners conserve energy.

- Energy conservation strategies should be included in conservation programs cost share and ranking processes.
- Continued research and incentives to assist landowners to implement the most energy-saving methods for their use should be supported.

### **Principle 8 – Support Forestry Title**

NACD continues to support a Forestry Title to address the unique complexities of forestry on non-industrial, private forest land.

- Expand capacity to provide technical assistance and outreach to non-industrial private forest owners, especially landowners not currently engaged in conservation or managing their lands. Government entities, non-government organizations, and TSPs should be utilized to deliver program assistance to underserved forest landowners.
- Maximize program capabilities to address forest issues, especially those identified by state forest resource assessments and strategies, and state wildlife action plans. Continued support for regular updates to these state-level efforts should be given.
- Increased participation by forest owners in the Conservation Stewardship Program (CSP) should be allowed.

### **Principle 9 – Develop new approaches to deliver conservation**

Congress should promote and facilitate developing new and alternative approaches, such as ecosystems services, to deliver conservation practices and programs on privately-owned land and municipalities through the next Farm Bill.

### **Principle 10 – Support new conservation technologies**

NACD supports both new and proven technologies in all conservation programs. NACD supports research to develop new technologies.