



June 13, 2017

Office of Budget and Program Analysis  
United States Department of Agriculture  
Jamie L. Whitten Building Room 101-A  
1400 Independence Ave. SW.  
Washington, DC 20250

RE: Comments on "Improving Customer Service" (Federal Register Number: 2017-10063)

Secretary Sonny Perdue,

On behalf of the National Association of Conservation Districts (NACD), thank you for the opportunity to provide public comments on the actions identified in the May 11, 2017 announcement to move the Natural Resources Conservation Service (NRCS), along with the Farm Service Agency (FSA) and the Risk Management Agency (RMA), into a new mission area led by the newly created undersecretary for Farm Production and Conservation.

In its current configuration with NRCS located in the Natural Resources and the Environment mission area, USDA has successfully engaged producers and landowners to identify and address their natural resource concerns. Absent a reorganization, conservation delivery would continue to be successful and we do not want to see the reorganization undermine this work or reduce capacity at NRCS. Simply stated, we believe that the current voluntary conservation delivery system works.

NACD represents America's 3,000 locally led conservation districts which work 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, as well as private sector interests to provide technical, financial, and other assistance to help landowners and operators plan for and apply conservation to the landscape.

NACD's comments have four principles that should be taken into consideration when moving forward on USDA's reorganization plans:

- Accommodating NRCS' unique physical needs for local offices that that are unlike other agencies;
- Providing for the needs of USDA's customers;
- Maintaining NRCS' important and unique mission; and
- Soliciting further conservation district input.



Our comments on the reorganization proposal are shaped by decades of shared history between conservation districts and NRCS. Created in 1935, the Soil Conservation Service (SCS), now called NRCS, was formed to promote soil conservation through demonstration projects and ensure farmers had access to trained soil conservationists to advance the science behind erosion control and prevention. After the creation of the SCS, “USDA managers began to search for ways to extend conservation assistance to more farmers. They believed the solution was to establish democratically organized soil conservation districts to lead the conservation planning effort at the local level.”<sup>1</sup>

At that time, USDA Assistant Secretary M.L. Wilson believed that in order to increase engagement, “farmers had to feel that they had an active role in promoting soil conservation if they were to accept it as a goal and ultimately a regular part of their farming operations.”<sup>2</sup> In 1937, upon the recommendation of USDA, the President transmitted a draft “Standard State Soil Conservation Districts Law” to the 48 state governors and legislatures. Over the next few legislative sessions, all 48 states passed Soil Conservation District legislation to enable the creation of entities of state government at the local level to be the local link to the federal and state governmental agencies working on soil conservation. The first district was organized in the Brown Creek watershed of North Carolina later that year. The creation and implementation of locally led districts, now in all 50 states and U.S. territories, is widely acknowledged as one of the key reasons for the success of private lands conservation.

Over the last 80 years, state conservation agencies and local conservation districts have successfully worked as local partners with NRCS to help administer and deliver USDA conservation programs, assist farmers and ranchers in developing conservation plans, and inform landowners on the availability of federal conservation programs and other technical assistance available to them. In order to create a seamless conservation delivery system that reduces the burden on producers, conservation districts are often physically co-located with NRCS field offices and all conservation districts have an assigned NRCS conservationist to facilitate access for the producer customers to all of USDA programs.

Conservation districts also lead the Local Working Group process which informs NRCS and State Technical Committees on what the greatest resource concerns are at the local level. It is the local aspect of the voluntary conservation delivery system that has helped lead to the successes this nation has achieved resulting in a world renowned approach to land and water conservation. At the very least, we would hope relocating NRCS to a new mission area should do nothing to change this decades-long focus to assist our nation’s producers of food, fuel, and fiber.

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<sup>1</sup>[https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/about/history/?cid=nrcs143\\_021392](https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/about/history/?cid=nrcs143_021392)

<sup>2</sup>[https://www.blogs.nrcs.usda.gov/wps/portal/nrcs/detail/national/about/history/?cid=nrcs143\\_021394](https://www.blogs.nrcs.usda.gov/wps/portal/nrcs/detail/national/about/history/?cid=nrcs143_021394)



## Unique Physical Requirements of NRCS

Vital to this focus is the physical location of NRCS field offices and the ability for producers to easily work face-to-face with the trained NRCS technical staff. For this reason, NRCS' ability to create highly specialized conservation plans is only possible if the NRCS office is geographically close to producers and their operations. NRCS technical staff must physically walk the fields in order to make the assessment of what conservation practices are needed in that particular field. Consolidating NRCS offices undermines the local, personal aspect of conservation planning that is critical to conservation delivery and cannot be replicated or replaced by the private sector. Technological improvements can only supplement, but not replace, the boots on the ground resource inventories and evaluations that trained NRCS staff conduct using the nine-step conservation planning process.

The 2018 USDA Budget Explanatory Notes for Committee on Appropriations describes the relationship between NRCS and conservation districts as cooperative: "NRCS' Conservation Delivery System provides services directly to the landowner or land manager in cooperation with conservation districts. Conservation districts are units of local government created by State law and exist in every county and territory of the United States. Conservation districts are responsible for providing guidance to the agency on local resource concerns and serving as the voice of the local community on resource issues... By bringing together groups that have a common and vested interest in the local landscape, community, or watershed, NRCS facilitates collaboration among groups that collectively support sustainable agriculture and maintain natural resource quality."<sup>3</sup>

As NRCS and FSA review their field office locations and administrative functions, it is imperative that both NRCS' unique need to be accessible by landowners, as well as the necessity for NRCS staff to be close to the land they service, are taken into account. Additionally, our comments about office structure are preliminary and only based upon the information we currently have as announced on May 11th. Therefore, it is vital that this report be made available to the public and should the Department propose actions based upon this review, it is important that conservation districts are allowed further input.

Conservation districts are unique stakeholders and full partners in this public and private sector system. Not only are districts on the ground, but because they are many times co-located, districts many times would be directly affected by any proposed change. Decision makers at USDA should have a full appreciation for how these changes may affect the current conservation delivery system, and this can't occur without further and continued conservation district input. Conservation Districts are the local face that offers leverage to the federal programs in the community.

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<sup>3</sup><http://www.obpa.usda.gov/27nrcsexnotes2018.pdf>



## Providing for the Needs of USDA's Customers

While NACD has concerns with the reorganization, there are certainly opportunities to streamline conservation delivery and enhance customer service to producers across the country. The stated goal of the new mission area – to “provide a simplified one-stop shop for USDA’s primary customers, the men and women farming, ranching, and foresting across America”<sup>4</sup> – is an admirable one that we hope can be achieved. Bringing together agencies under one roof can improve customer service and conservation outcomes. In order for producers to participate in conservation programs, they will need a farm serial number provided by FSA and for those minority situations where both NRCS and FSA aren’t currently located together, there could be some efficiencies achieved for both the federal government and for the customer.

However, we must acknowledge that simply reducing the number of USDA offices won’t also reduce workload. Instead, having fewer locations will force both NRCS staff and producers to travel more, stretching an already thinly spread workforce thinner in a time where state and local government funding for conservation efforts are just now returning to pre-recession levels.

## NRCS' Important and Unique Mission Cannot Be Replaced

While we are hopeful that the reorganization can reduce some of the paperwork burdens shared between the two agencies and improve the experience for producers, NRCS and FSA have very different missions and must continue to operate as separate, if complementary, agencies. Currently, when customers walk into an office where NRCS and conservation district staff are co-located, the producer sees no difference in customer service when speaking with either staff and conservation can still move forward. FSA personnel, however, have unique program responsibilities and are not sources of conservation technical assistance or facilitators in signing producers up for USDA conservation programs outside of the Conservation Reserve Program. FSA and NRCS have already established protocols for working together to administer program requirements that involve both agencies. Having a producer rely on only FSA personnel in an office where NRCS or conservation district staff are no longer located would complicate conservation delivery.

Again, USDA’s budget explanatory notes explains the unique nature of NRCS employees and the conservation delivery this way: “Personalized, one-on-one service is provided by NRCS employees located in Service Centers or specialized offices. This service delivery constitutes a majority of NRCS employees who are largely technical in nature. Service centers and specialized offices support customers to prevent, or solve, natural resource concerns on private lands and in their communities. Service center staff work side-by-side with employees

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<sup>4</sup> <https://www.usda.gov/media/press-releases/2017/05/11/secretary-perdue-announces-creation-undersecretary-trade>



of local conservation districts and other state conservation agencies to address resource concerns.”<sup>5</sup> NRCS is a trusted source of technical assistance for farmers. This assistance is based on proven scientific data developed in coordination with many of our Land Grant Colleges, Universities and other technically sound sources. The collaboration between scientists, conservationists, and farmers is needed to maintain and improve upon the integrity of this technical assistance. This technical and scientific expertise cannot be replicated or assumed by FSA employees.

### **Further Input Must Be Solicited**

As the reorganization efforts at USDA move forward, we hope that this will not be the last time that USDA solicits input on future changes at the department. USDA should continue to engage interested and affected stakeholders around the planning and implementation of any proposed restructuring of Service Center offices. Without robust, sustained engagement, NRCS and districts will struggle to maintain the current quality of service and coordination that producers rely on, damaging USDA’s credibility and significantly limiting conservation outcomes.

In the end, both USDA and NACD’s combined goal is to ensure that voluntary conservation continues. The current system of voluntary conservation delivery – where local NRCS office staff, in conjunction with conservation districts, work directly with landowners to create specialized conservation practices to meet that land’s needs – has worked and will continue to work. Moving NRCS under the same undersecretary as FSA and RMA may certainly provide benefits to customer service, but it must not adversely affect the actual operation or mission of USDA agencies in the process. We are confident that USDA agrees with this statement and look forward to continue working together to protect our nation’s natural resources.

Sincerely,

Brent Van Dyke  
NACD President

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<sup>5</sup> <http://www.obpa.usda.gov/27nrcsexnotes2018.pdf>