



National Association of Conservation Districts

May 15, 2019

Chief Matthew Lohr
Natural Resources Conservation Service
1400 Independence Ave. SW
Washington, DC 20250

Dear Chief Lohr,

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. 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 interest groups to provide technical, financial and other assistance to help landowners and operators apply conservation to the landscape.

The Regional Conservation Partnership Program (RCPP), created in the 2014 Farm Bill, has been a great success for many conservation districts. This program matches Natural Resources Conservation Service (NRCS) funding with non-federal funding and in-kind support to implement targeted conservation projects using farm bill conservation programs. Projects have been awarded to producer groups, state agencies, academic institutions, nonprofit organizations, water and irrigation districts, municipal water treatment entities and local governments. In the first five years of the program, a district or state association has been the lead partner on an impressive 93 out of a total of 365 projects – over 25 percent of all projects. This does not account for the many projects where districts work as partners but are not the lead sponsor. We hope that this participation will only grow in future years, especially with the 2018 Farm Bill's encouragement of conservation district engagement in project proposals.

Despite this success, NACD has heard from our members that the RCPP application process is long and difficult. NACD was glad to see that the 2018 Farm Bill made several important changes to streamline and simplify RCPP, including explicitly calling for a more simplified application process. To help NRCS implement this provision, NACD asked conservation districts that had been successful RCPP applicants for their feedback on the application process. Districts offered several suggestions that would dramatically improve their application process. Specifically, NACD recommends that NRCS:

- Shorten or eliminate the pre-proposal process;
- Shorten the time between project award and project start;
- Refine questions requiring speculation by the applicant;
- Increase year-to-year consistency in the application; and
- Clarify roles around technical assistance.

Shorten or Eliminate the Pre-Proposal Process

The application pre-proposal process is a complicated and redundant exercise when compared with the rest of the application. The pre-proposal asks many of the same questions as the full proposal. Of 16 total questions in the full proposal, only three are not already addressed in the pre-proposal. If the pre-proposal is truly used to weed out applications that are unprepared for the full proposal, it should be dramatically scaled back so that it is a short abstract, rather than a nearly full proposal. If the pre-



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proposal is not being used to weed out unprepared applicants, then it should be eliminated. In this case, it is an unnecessary and redundant step.

Shorten the Time between Project Award and Project Start

There is an extended period of time between the announcement of RCPP awards and signing a formal agreement to begin a project. This lag can take up to a year. Although our members noted there were negotiations between NRCS and the lead partner taking place during this time, our members were still surprised at the lag time and delays that exist. This lag time is particularly problematic when matching funding is considered. Partners may be asked to commit matching funds but wait a considerable length of time before those funds can be expended. This puts a strain on the relationship between partners in a project.

NACD is heartened to see a provision in the 2018 Farm Bill allowing partners to count work completed during this period as a part of the partner's match contribution. NRCS should implement this provision quickly and with clear guidance for the partner. However, reducing this lag time is an important and complementary step as well.

Refine Questions Requiring Speculation by the Applicant

Several of the application questions ask for information that is difficult to measure or quantify. These questions include:

- "Estimate how many eligible producers, in the planned project area, are likely to participate. How was this calculated?"
- "How will you measure and document project success? What measurable natural resource concern changes will occur from this project?"
- "Is your project innovative?"
- "Describe the cost effectiveness of the approach. Were other alternatives considered, including a no action alternative? Are project costs in line with current regional averages? When measuring outcomes, is there a reasonable cost per unit of progress?"

Although these questions seek important information, they are difficult to quantify. Asking for the number of eligible producers likely to participate and measures of success both require the applicant to estimate outcomes in the face of many unknown or changing variables. Although applicants may be able to develop answers for these questions, these are not estimates in which the applicant can feel confident. NACD urges NRCS to reexamine these questions and look at whether there might be a better way to ask these questions. In particular, NRCS should look to measurement and success metrics that do not involve specialized research outside the ability of a practitioner.

Asking about innovation and cost-effectiveness is also vexing for applicants. There are real, significant limitations to what activities can be conducted within the confines of existing NRCS programs. The new farm bill eases this requirement somewhat by calling for the existing programs to be used as a guide. NACD hopes that this will allow additional innovation, though many constraints will remain. Asking about innovation and cost-effectiveness puts applicants in the difficult position of trying to demonstrate these values without overstepping the program rules. NACD acknowledges these are important, meaningful issues to address. NACD hopes NRCS will examine ways to address these issues while easing the burden on applicants as well.



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Increase Year-to-Year Consistency in the Application

Several partners, including conservation districts, have applied for and been awarded projects over multiple years. NACD is glad to see partners interested in leading multiple projects and continuing to address new facets of conservation. However, there has been substantial change in the application and expectations from year-to-year. Partners would benefit from clear, consistent processes and guidance. Although it is important to continue to refine RCPP and correct new issues that arise each year, NACD hopes that NRCS can strive for year-to-year consistency now that the program is well-established.

Clarify Roles around Technical Assistance

One issue that is missing from the application is contracting responsibility. The application does not ask how the producer applications, contracting and planning will be completed or who will be responsible for this part of the project. This could fall on a conservation district, NRCS staff, a technical service provider or other entity. Understanding this issue is important for project planning. Additionally, this work may fall on conservation districts, regardless of whether they were involved in developing the application or not.

Thank you again for the opportunity to provide input as you and your team begin the rulemaking process and for your commitment to voluntary, locally-led conservation.

Sincerely,

A handwritten signature in cursive script that reads "Tim Palmer".

Tim Palmer
President
National Association of Conservation Districts