



National Association of Conservation Districts

March 13, 2025

The Honorable Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Re: NACD Recommendations and Comments on Development of USDA Agency Reduction in Force and Reorganization Plans

Dear Secretary Rollins:

The National Association of Conservation Districts (NACD) thanks you for your commitment to supporting America's producers, agricultural communities, and locally led conservation efforts. As the USDA develops its Agency Reduction in Force (RIF) and Reorganization Plans (ARRP), NACD requests that the Department consider maintaining staffing levels for positions at the Natural Resources Conservation Service (NRCS) that serve producers in every county across the United States and its territories. NACD also requests that USDA considers the current and potential future impacts further reducing local NRCS staff and office locations will have on local producers and agricultural communities.

NACD represents America's 3,000 conservation districts, their state and territory associations, and the 17,000 locally elected men and women who serve on their governing boards. Conservation districts work with cooperating landowners and operators as well as local communities to manage and protect natural resources on private and public lands across the United States. NACD's partnership with USDA dates back to the Dust Bowl when local conservation districts and the USDA's Soil Conservation Service (now NRCS) were created.

NRCS programs, such as the Environmental Quality Initiatives Program (EQIP), provide important assistance for producers to invest in conservation practices that increase productivity and profitability, while also providing enormous benefits for local communities including improving water quality, controlling erosion, and bolstering soil health. NRCS and conservation districts provide on-the-field technical assistance to develop and implement conservation plans, as well as enroll producers in federal and state cost-share programs. NRCS conservation programs and our country's voluntary, locally led conservation delivery system have been resoundingly successful and popular since their establishment. In Fiscal Year 2024, despite reaching a record number of producers, NRCS turned away thousands of producer applications for EQIP, the Conservation Stewardship Program (CSP), and the Agricultural Conservation Easement Program (ACEP).

NACD appreciates USDA's recent actions to release conservation funding and rehire some recently terminated staff. We urge you to consider the impacts additional staff terminations and office closures will have on producers and the ability of our country's locally led conservation delivery system to operate efficiently. While developing ARRPs, NACD encourages USDA to consider the following notes and recommendations:



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- Untargeted reductions to NRCS and additional high-impact local service providers will hinder the agency’s ability to effectively serve producers across the country. Untargeted elimination of staff in these local positions will:
 - **Exacerbate service backlogs.** Many local NRCS offices have a significant wait list of producers authorized to receive technical assistance or funding. By reducing field staff, key positions such as district conservationists or soil conservationists are strained and often required to concurrently serve as office managers, contract administrators, and conservation planners. Stretching staff workloads and responsibilities pulls them away from their core duties of working with producers in their fields to find solutions. With recent office closures and staff terminations, districts in every part of the country have reported that local NRCS offices do not have the capacity to serve producers in a timely manner.
 - **Have long-term impacts on local staffing.** Filling key positions, such as engineers and district conservationists, often requires years of service and training within NRCS. NRCS field offices report that new employees are increasingly difficult to hire, while the future conservation workforce pipeline depends on these critical positions. Focusing terminations on new hires and probationary employees means that there will be significant knowledge and talent gaps within just a couple of years. It is also worth considering that many district staff have reported that high-performing NRCS field staff were terminated solely because they were still in their probationary period. Consistent with current government employment guidelines, individual performance should be considered as opposed to tenure.
- USDA has many administrative areas that could benefit from technology modernizations, automation, and process improvements. Administrative functions and services should be assessed for redundancies and potential for streamlining prior to making workforce reductions.
- To be effective and best serve producers, NRCS employees need to act as the “boots on the ground” to assess natural resource concerns on farms and develop effective conservation plans. Producers in many remote and rural communities already experience long drives to reach NRCS offices and vice versa. Closing offices can add time and expense to this commute and impact NRCS’ ability to provide timely services to producers.

We know that serving producers is a top priority, as is achieving greater efficiency within USDA. During President Trump’s first administration, NRCS and the Farm Service Agency collected millions of data points to inform optimal staffing levels and locations of USDA offices. Analyses were conducted to examine USDA workload, anticipated producer demand, and community characteristics such as the locations of banks, Farm Bureau offices, grocery stores, and other retail clusters. We strongly encourage USDA to continue this data-driven approach that balances customer experience, producer needs, productivity, and efficiency.



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NACD appreciates the Administration's commitment to eliminating redundancies, streamlining services, and improving the stewardship of taxpayer dollars. We look forward to working with the Administration, USDA, and other federal partners to examine where conservation services may be restructured and improved.

Thank you for your attention to this request. We look forward to continuing working with you on this and many other important issues.

Sincerely,

A handwritten signature in black ink that reads "Gary A. Blair". The signature is written in a cursive, flowing style.

Gary A. Blair
NACD President