

White River Natural Resources Conservation District
Request for Information: Implementation of the Inflation Reduction Act Funding
December 2022
Orange/Windsor County Local Work Group
Contact: Jennifer Byrne, whiterivernrcd@gmail.com

Tracking number: **lby-hxok-jriu**

Please financially support our existing locally-led conservation infrastructure via Conservation Districts to help equitably implement the IRA supplemental funding. Investing in Conservation Districts and Local Working Groups would be a sustainable, cost-effective investment in the American food system. In order to build the resiliency, efficiency, and effectiveness of our democratically organized, locally-led conservation delivery system, please fund Conservation Districts to help them fulfill their unfunded community engagement mandates, and direct attention toward improving the efficiency and accessibility of the Conservation Stewardship Program (CSP) for diversified farming types. Also, please consider instructing the 70 grant recipients of Climate Smart Commodity Grants to work directly with Conservation Districts, which have held long-term relationships with farmers and land stewards for over 80 years.

Locally-led conservation. Conservation Districts chair the Local Work Groups, in accordance with the federal directives found here: <https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=27718> Local Working Groups are tasked with conducting Local Needs Assessments and creating and implementing Conservation Action Plans for their watershed. Currently, these are largely unfunded mandates.

Title VI of the Civil Rights Act of 1964 and Environmental Justice principles demand that we increase meaningful participation in environmental decision making. Funding the Local Working group process is an easy way we can support our locally-led conservation delivery system. This is a fundamental, long standing mechanism for community engagement that focuses on bringing local knowledge into natural resource decision making processes.

How we do this work in Vermont: This year Vermont introduced Locally-Led Funding Pools, which is an exciting way to allow for local decision making to influence how funding is spent in a watershed. This model exists in several states and should be promoted in the Farm Bill as a model for meaningful community engagement. The locally-led funding pool process needs strengthening via investment in Conservation District capacity.

Requested consideration Funding could be distributed by the NACD via their TA grants, or in collaboration with the NCPP (National Conservation Planning Partnership), which recently produced a handbook on local work groups:

CSP:

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How we do this work in Vermont: Vermont is piloting a state enhancement to CSP, which will be rolling out this year. There will be lessons to be learned through this process, but some initial ideas for Farm Bill edits to CSP include:

Requested consideration

- Increase minimum annual payment. CSP contracts can range from \$1,500-40,000 annually. Farms with more acreage receive larger payouts from this program. Increasing the base minimum payment from \$1,500 to \$5,000 will improve equity of this program by making it worthwhile for smaller scale, regenerative and diversified farms.
- Increase enhancement payment for CSP bundles
- Incentivize rollout of the CCP (Comprehensive Conservation Plan). The 2018 Farm Bill included a CSP enhancement called CCP, which would allow for a farm to get a payment for doing a whole-farm comprehensive plan. The USDA has not yet put out any guidance for rolling out CCPs, so it has not been deployed yet.
- Link CSP enrollment to subsidies for Whole Farm Insurance. Promote interoperability of data so that it can be shared across platforms.
- Include CEMAs in CSP contracts. Conservation Evaluation and Monitoring Activities (CEMAs) are exciting new ways to monitor long term effects/outcomes of conservation practices. CEMAs would complement CSP contracts nicely, but are currently only available under EQIP.

RCPP:

Requested considerations

- Emphasis on **partnerships**. RCPP is incredibly cumbersome on administrative partners, and often grants are developed without deep connection or engagement with partners on the ground. Encourage RCPP applicants to have deep partnerships prior to applying for funding. The Local Work Groups could be leveraged in this process.
- Use the locally-led conservation delivery infrastructure to make decisions about RCPP programs. Define roles of Conservation Districts as Conservation Planners so that we do not have to bid on every grant that comes our way.
- Make one pot of \$ for conservation planning across all grants. It is a particular challenge when we are funded to do outreach and planning on one particular program, when all of these programs are not in a silo, and often we are consulting on numerous FA opportunities at once, and cannot truly say we are “only” working on RCPP when we visit a farm.
- Create iterative structures to learn from and catalog the positives and negatives of RCPP and CIG projects.
- Address limitations on NRCDs to deliver this key partnership program within USDA offices.

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Technical Assistance:

Requested considerations

- Increase field office level NRCS staff pay scales to encourage local knowledge to stay local. We need viable Conservation Careers. Currently, experienced NRCS staff are incentivised out of the field and into administrative roles. Some of the most valuable members of an NRCS office are often the lowest paid employees, such as the Program Assistants and Engineering or Soil Conservation Technicians. The salary structures of NRCS field level positions should be reconsidered and realigned to reflect the goals of the agency: Helping People Help the Land. The folks in the field should be valued the most.
- More funding for training Conservation District staff to become certified conservation planners. Make one pot of money for conservation planning services.
- Provide upfront payments to encourage farmers to go through all 9 steps of the conservation planning process. (instead of entering at step 6 and leaving at step 8) CPAs go part way in doing this.
- Increase access to AgLearn and Conservation Boot Camp for Conservation Districts and TSPs, especially those without federal laptops.
- Allow co-housed Conservation Districts to be TSPs for CPAs and DIAs. We are well poised to do this work (trained, certified, have the equipment) but we are blocked from the process if we are cohoused with the NRCS, due to the perception of an unfair advantage. According to the NRCS website: In the late 1930s, “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.” It is the CD’s mandated duty to conduct this work, it only makes sense for us to be able to provide these types of planning and design services, now referred to as CPAs and DIAs, even if we are cohoused with the NRCS. This is the way the system was set up to work and the current policy seriously restricts our ability to fulfill this duty and generate income.

Technology + Data

- Invest in farmers.gov as a forward facing resource for farmers. Make a “one stop shop” portal.
- Require use of Open Source technology, especially of the 70 Climate Smart Commodity grant recipients. Please view this letter for more detail.
- Look at section 1619 privacy clauses to make it easier for state / federal data sharing across geospatial platforms
- Explore formalizing and adopting use of farmOS as an open source software where a farmer’s data can be securely stored, accessed, and shared with the farmer’s permission. This method will allow for farmers to have more ownership and autonomy with their farm’s data, and the data will not disappear after a farmer completes a program. This will reduce redundancies for

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technical assistance staff and will keep data securely stored with the farmer who owns it, and transferable to other programs. There are several examples of federal contracts using the farmOS platform across the US. We should invest in this infrastructure that could have real longevity and interoperability.

As a Conservation District manager, I work with dozens of farms in a coordinated Farm Team approach, to develop and implement Conservation Plans and help farms access technical and financial assistance (TA and FA) from private, state, and federal programs. Currently, my staff uses 7 different tools and databases to upload farmer data, such as soil type, crop type, soil and manure test results, slope, field boundaries, and management decisions, often for the same farm. In effect, we are paid multiple times to do the same job, when our time would be better spent in the field providing direct TA to farms, and the government's money would be better spent in direct FA to farmers. We are extremely frustrated by the lack of coordination across these existing tools, and fear that unless the USDA requires interoperability of new and existing tools, the result will be increased burdens on farmers and inefficiencies in federally funded conservation programming. We want to encourage you to develop and adopt standards for a common data management system and an open source methodology for data collection.

We implore you to consider mandating that technology developed under the Climate Smart Commodity grants and IRA funding be compatible with an open source, common data entry system such as FarmOS and collaboratively developed open standards such as the Data Food Consortium. This assures that the solutions intended by this grant will fit into a network of interoperable systems and the money will not be wasted across dozens of incompatible platforms, and continue to cause frustration and inefficiencies for farmers. Our current conservation delivery system is hindered by difficult and inefficient tools, lack of funding for Conservation District and field level NRCS staff, and program policies that are not iterative or informed by on-the-ground expertise. This financing is an opportunity to implement a modern, open source system that cultivates innovation and reduces redundancies.