



# ORGANIC FARMING RESEARCH FOUNDATION

*Fostering the improvement and widespread adoption of organic farming.*

May 12, 2020

Matt Lohr  
Chief, Natural Resources Conservation Service  
U.S. Department of Agriculture  
Washington, DC 20250

Dear Chief Lohr:

Thank you for the opportunity to review and provide comments on the Interim Final Rule for the Regional Conservation Partnership Program (RCPP). On behalf of the Organic Farming Research Foundation (OFRF, <https://ofrf.org>), and the nationwide constituency of USDA certified organic and transitioning-organic farmers and ranchers whom OFRF serves, we would like to offer the following comments and recommendations.

OFRF works nationwide to foster the improvement and widespread adoption of organic farming systems through research, education, and federal policies that bring more farmers and acreage into organic production. OFRF awards small grants to producers, university researchers, and other agricultural professionals to explore and develop innovative, resource-conserving approaches to organic production. In addition, OFRF has conducted an extensive review of USDA funded organic agricultural research (2002-present), which provided the basis of a series of practical guidebooks on Soil Health and Organic Farming, Risk Management, and Climate Resilience. These reports are available at <https://ofrf.org/research/reports/>.

OFRF conducts surveys of organic and transitioning-organic producers every five years to identify current research priorities, most recently summarized in the 2016 National Organic Research Agenda (NORA, also available at the above URL). At that time, 74% of survey participants cited *soil health* as a high priority for research, and 66% cited *nutrient management*. In addition, *resilience to weather extremes and climate change* was cited as an emerging concern that has since grown ever more urgent. Because organic production excludes the use of synthetic fertilizers and pesticides, organic producers rely to a particularly great degree on healthy, living soil and ecosystems for crop nutrients, crop protection, and yield stability, and thus strive to take the best possible care of soil and other natural resources. Thus, OFRF places high priority on realizing the full potential for NRCS programs to help organic producers reach their soil health and resource conservation goals.

From this perspective, we offer the following recommendations to NRCS regarding the Interim Final Rule for the RCPP, and implementation thereof.

## **1. NRCS should list “soil quality degradation” as a Priority Resource concern for all eight Critical Conservation Areas (CCAs)**

Healthy, biologically active, and stable soils lose far less nutrients, sediment, and other pollutants to nearby surface and ground waters than do soils that have undergone quality degradation of any degree or kind. Soil conditions, including erodibility, degree of compaction, nutrient retention vs nutrient “leakage,” and vegetative / residue cover year round lie *upstream* of the water quality resource concerns prioritized in seven of the eight CCAs. Therefore, funding RCPP project proposals that focus on soil health and/or prevention of soil erosion will directly benefit water quality, as well as the water quantity and fish/wildlife habitat degradation concerns listed for several CCAs.



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Currently, only one of the eight CCAs – the Colorado River Basin – has “soil quality degradation” listed as a priority resource concern, with a limited focus on concentration of salts and other chemicals. Yet, region-wide projects that focus on preventing erosion, enhancing quantity and quality of soil organic matter, improving soil structure (aggregation), soil biodiversity and habitat for soil life would bring major regional benefits to the quality and ecological integrity of major water bodies (Chesapeake Bay and Great Lakes) and rivers (Mississippi, Columbia, and Colorado River Basins). Since building healthier, less-erodible soils redounds to the benefit of both producer and regional water and wildlife resources, producers, especially organic and aspiring organic farmers and ranchers, would be highly motivated to participate in RCPPs that focus on the soil resource concern. Furthermore, as soil health improves, carbon is sequestered, the loss of nitrogen as the powerful greenhouse gas nitrous oxide diminishes, and farming and ranching ecosystems become more resilient to drought and other weather extremes which have become more prevalent due to climate change.

Therefore, we strongly urge NRCS to make soil erosion and soil quality degradation Priority Resource Concerns applicable to all eight CCAs.

## **2. Ensure effective RCPP program outreach and delivery to historically underserved producers, including small-scale, limited resource, beginning, and socially disadvantaged farmers and ranchers, and Indian Tribes engaged in farming.**

In the 2018 Farm Bill, subsection (d) of section 2706 under Subtitle G Regional Conservation Partnership Program states:

“HISTORICALLY UNDERSERVED PRODUCERS.—To the maximum extent practicable, in carrying out the program, the Secretary and eligible partners shall conduct outreach to beginning farmers and ranchers, veteran farmers and ranchers, socially disadvantaged farmers and ranchers, and limited resource farmers and ranchers to encourage participation by those producers in a project subject to a partnership agreement or funding agreement under 1271C(d).”

The Preamble to the Interim Final Rule states that “priority consideration will be given to proposals that provide for outreach to and engagement of” these groups of farmers as well as Indian Tribes “within the area covered by the project.” However, this topic is not addressed elsewhere in the Rule, thus giving State NRCS offices and field staff limited guidance on how this mandate will be fulfilled.

In addition, while the eight Critical Conservation Areas (CCA) to which 50% of RCPP funding is targeted cover nearly three-quarters of the continental US, several key regions in which African-American, Latinx, and native American producers; limited resource producers; and/or smaller scale diversified farmers account for a large fraction of the farming population fall outside of the CCAs. These include the Black Belt across central Mississippi and Alabama, the Rio Grande Valley of Texas, much of the Intermountain West, all of Alaska and Hawaii, most of southern and central Appalachia, and all of New England. In order to participate in RCPP, farmers in these areas must apply to RCPP contracts funded through the State and Multistate Funding Pool, which can to some degree limit access to the program.

Thus, it is especially important to ensure effective program outreach to beginning, veteran, limited resource, Native American, and other socially disadvantaged producers throughout the RCPP. We urge NRCS to:



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- Provide NRCS State and field offices additional guidance regarding outreach to all of these historically underserved producer constituencies.
  - In requirements for partnership agreement proposals (Section 1464.20, subsection (b)) require a statement of the project's plans to ensure inclusion of beginning, veteran, socially disadvantaged, limited resource, and small to midscale producers in the project.
  - In Section 1464.21 ranking considerations and proposal selection, modify paragraph (b)(2) to read: “Have a high percentage of producers in the area to be covered by the agreement, with at least proportional representation of small scale, limited resource, socially disadvantaged, and other historically underserved producers in the area.”
- 3. Ensure that the RCPP serves small, diversified producers as well as larger scale producers and land owners. Toward this end, place a reasonable payment limit on NRCS funding available to an individual producer participant through an RCPP contract.**

RCPP is unique among USDA conservation programs in that it does not place a limitation on payments to a participating farmer or rancher under an RCPP contract. In contrast, CSP contracts are limited to \$200,000 for five years while EQIP contracts are limited to \$450,000 (limits doubled for “joint operations”). Furthermore, both Farm Bill and the RCPP Rule allow the agency to waive the Adjusted Gross Income (AGI) limit of \$900,000 for participation in the program if “the Chief determines that the waiver is necessary to fulfill the objectives of the program.”

This approach will favor the largest-scale land owners and partner organization working therewith, and will tend to exclude smaller scale, diversified producers from participation in the RCPP. OFRF strongly urges NRCS to reconsider this position, because participation of all producers within a given region or watershed is vital for maximizing water quality protection and other desired conservation outcomes within the region. We suggest that a per-producer payment limit of \$450,000 under an RCPP, same as the EQIP, would make the program available to a wider range of farmers and ranchers. The waiver of the AGI limit should be invoked only after a project has ensured full access to smaller scale and historically underserved producers within the project’s geographical area, and then only if participation of these larger and wealthier producers is clearly essential to the conservation objectives of the project.

Note that ensuring participation by small as well as larger scale operations will increase the number and diversity of “early adopters” of key conservation practices, including certified organic producers, for whom USDA organic standards already require a high level of resource stewardship. This wider participation will enhance the efficacy of RCPP in promoting region-wide adoption of effective conservation practices to address soil health, water quality, water conservation, and other resource concerns, both within and outside of Critical Conservation Areas.



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We believe that the above recommendations would enhance the efficacy and cost-efficiency of the RCPP. Thank you again for the opportunity to provide input on the Interim Final Rule and implementation of the Regional Conservation Partnership Program.

Sincerely,

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Organic Farming Research Foundation

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