

May 12, 2020

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Re: Regional Conservation Partnership Program Interim Rule, NRCS-2019-0012 (Fed. Reg. Vol. 85, No. 30, FEB. 13, 2020, page 8131)

To Whom it May Concern:

Taxpayers for Common Sense appreciates the opportunity to provide comment to the Natural Resources Conservation Service regarding implementation of changes to the Regional Conservation Partnership Program (RCPP) directed by the Agriculture Improvement Act of 2018 (2018 Farm Bill).

Taxpayers for Common Sense is a nonpartisan budget watchdog serving the American taxpayer. We support a federal safety net for American farming and ranching businesses, provided tax dollars are invested wisely and efficiently. Federal investments should focus on assisting those farmers and ranchers in need of financial assistance, be directed only at risks that are too costly or complex to manage independent of Washington, and when investments have a tangible, quantifiable impact on achieving critical public resource concerns.

The Regional Conservation Partnership Program has the potential to provide significant returns to both taxpayers and agricultural producers. Through RCPP, projects are prioritized to achieve and measure environmental and economic outcomes. Yet the interim final rule as written fails to maximize taxpayer and producer return on investment. The rule allows the NRCS Chief to waive the payment limit and adjusted gross income (AGI) means test if the Chief determines that the waiver is necessary to fulfill the objectives of the program. This will limit the pool of available funds as well as raise accountability concerns. The rule also fails to make soil health a priority resource concern through the eight Critical Conservation Areas (CCA) within the RCPP. This will hinder the ability of RCPP to become an effective tool for producers to build their individual physical and financial resilience to increasingly volatile production conditions throughout the United States.

An increasing body of evidence is documenting that adoption of conservation practices can make farmers and ranchers more physically and financially resilient to production and price risk, increasing their profitability while also protecting the environment. While the specific benefits derived from conservation practices depends on a complex interaction of variables including conservation practice, soil type, operational efficiency, and length of application, a wealth of USDA and private sector research is clearly showing that producers focused on building soil health end up building financially healthier businesses. There are, however, barriers to conservation adoption. Conservation practices require investments leading to immediate costs but not necessarily immediate returns. Practices can be outside the technical capabilities of some producers. Education, adoption, and maintenance require time and financial commitments for producers that are already stretched. RCPP has the potential to tackle this.

The greatest barrier is the failure to focus USDA conservation programs on helping farmers help themselves. Despite evidence showing soil health increases farm and ranch resilience as well as benefits the environment, only one CCA (the Colorado River Basin) includes soil quality as a priority resource concern. With healthy soil proven to reduce runoff, soil quality should be a priority resource concern for the Mississippi River Basin CCA. The failure to include soil quality in the interim rule is unfortunate because making it a priority resource concern would enable producers that voluntarily participate in the program to take steps to increase the viability of their operations that they may otherwise be incapable of taking without support from the RCPP.

Giving the NRCS Chief the authority to waive the payment limit and AGI for select operations will also limit taxpayer returns from this program by concentrating benefits on a smaller number of farming and ranching businesses. Which would lead to less opportunity for smaller operations to take part in the program.

Thank you for the opportunity to comment on implementation of the Agriculture Improvement Act of 2018. Through proper implementation, NRCS can help create a more cost-effective, accountable, transparent, and responsive farm safety net. To do this, conservation programs must be focused on helping a larger number of operations help themselves to becoming more environmentally and financially resilient. If you have questions, please feel free to contact me at 202-546-8500 or josh [at] taxpayer.net.