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***Attention – Comments Regarding the NRCS Request for Public Input about Implementation of the Inflation Reduction Act Funding; Docket ID #: NRCS-2022-0015***

## **I. Introduction**

Thank you for this opportunity to provide feedback to the U.S. Department of Agriculture (USDA) regarding the Request for Information (RFI) on how the Natural Resources Conservation Service (NRCS) will implement funds received under the Inflation Reduction Act (IRA). Our feedback highlights the important roles agricultural cooperatives, and their farmer-owners have in the conservation space and the agricultural economy.

Since 1929, the National Council of Farmers Cooperatives (NCFC) has been the voice of America's farmer-owned cooperatives. NCFC members include regional and national cooperatives, which in turn consist of nearly 2,000 local farmer cooperatives across the country. Farmer cooperatives—businesses owned, governed, and controlled by farmers and ranchers—are an important part of the success of America's agricultural supply chain that includes suppliers of goods and services to the country's working lands, the farmers and ranchers responsible for the abundance that comes from those lands, and the processing, manufacturing, packaging, marketing and sale of that abundance to agriculture's customers. More information about NCFC can be found at [www.ncfc.org](http://www.ncfc.org).

NCFC has a very diverse membership, which we view as one of our sources of strength – our members our located throughout the country, provide agronomy and other technical expertise and services, supply nearly every agricultural input imaginable, drive innovation, develop new technologies, provide credit and related financial services, and market a wide range of commodities and value-added products. Many of our members are currently capable and available to assist NRCS with the implementation of key program aspects of the IRA, and we encourage NRCS to work with NCFC to take advantage of this available capability. We discuss this below in addition to addressing the questions asked in the RFI.

## II. IRA Questions Answered – Partnering with Farmer Cooperatives

### Partnership Agreements

NCFC encourages NRCS to consider forming “*Partnership Agreements*” with cooperatives to maximize the impact of the IRA funding. The first agreement would be with NCFC to serve as the link between NRCS and farmer cooperatives and enable NCFC to help those cooperatives work with NRCS to develop the second part of this foundation, individual *Partnership Agreements* at the state or regional level with farmer cooperatives to provide the services described below, as appropriate.

### Technical Assistance - Mobilize Cooperative-based Staff

Many farmed-owned cooperatives have some of the most skilled and talented technical assistance staff in American agriculture. Many have teams of agronomists and other life science trained professionals assisting farmers on the ground every day. By partnering with cooperatives to provide these services, USDA will be able to maximize the use of the new conservation and technical assistance funding provided by the IRA.

### Trusted Advisor to Producers

Cooperatives are in a position today to help producers prepare applications for assistance under the Environmental Quality Incentives Program (EQIP), the Conservation Stewardship Program (CSP), and the Regional Conservation Partnership Program (RCPP). We note the close overlap between many of the most important and commonly used climate smart practices (conservation tillage, cover crop adoption, advanced nutrient management, etc.) and soil conservation and related programming to reduce nutrient losses to protect water quality and increase soil health. Farmer cooperatives are already very familiar with working with growers on the use of these triple-purpose agronomic practices.

Cooperatives can work directly with growers to help them develop program applications requesting financial assistance for climate smart practices under the IRA. They can then provide the growers with the technical assistance to implement the agreement with NRCS should their application be accepted. For this reason, we urge NRCS to expedite designating cooperative staff in position to do that work as Technical Service Providers.

### Logistical Coordination

Cooperatives are uniquely positioned to help coordinate multiple projects for a grower by addressing the unique needs on their operations, reducing grower confusion, and increasing their confidence in the credibility of their chosen partners. Doing so maximizes both the possible climate smart benefits and financial assistance to participating growers. Farmer cooperatives are ready to serve as a clearinghouse, navigating this process for the growers in their service area.

To serve in this capacity, cooperatives should be given access to NRCS farm and field IDs to assist the grower completing the sign-up for conservation programs. This will allow the grower to sign-up at the time the original commitment is given. It also will decrease the number of contacts needed to enroll a grower, likely leading to increased participation in NRCS programs.

### Enhanced Communication

To drive and sustain grower interest and participation in NRCS programs, effective and efficient communication should be available to farmer cooperatives so that they can accurately provide information to the growers. The sign-up dates for NRCS programs should be made publicly available and easy to access on the NRCS website. NRCS should create and maintain a dashboard or provide some other means of timely updates on how many remaining funding acres are available for any given program. Having this data and communication available will allow cooperatives to better advise growers on their options and this will help drive program participation.

#### *Reduce the Backlog of Quality Conservation Program Applications*

It is important that USDA prioritize reducing the amount of back logged conservation program applications. The USDA conservation programs have been oversubscribed for some time and this increased funding serves as a unique opportunity to allow stakeholders to implement conservation practices.

#### *Streamlined and Modern Conservation Programs*

The length of time between program enrollment and cost-share payout serves to dissuade many growers from enrolling in NRCS programs. Rather than require as-applied data be submitted at the end of the season, cost-share payments should be provided after program enrollment and plan submission, and then an enhanced system of spot-check reviews on a percentage of NRCS contracts can be used to ensure plan compliance.

#### *Leverage the Regional Conservation Partnership Program*

NRCS should leverage the Regional Conservation Partnership Program (RCPP) to the maximum extent possible. RCPP is one of the most effective conservation programs because it locally driven and partner led. It provides a unique avenue for USDA to push a large portion of the new funding out in a streamline and effective way. NCFE would like to see the partnership contribution amounts reduced to allow greater participation.

Many farmer cooperatives have direct and practical working relationships with growers and can develop RCPP project proposals involving multiple farmers and thousands of acres of working lands to submit to NRCS for consideration. We note that RCPP authorizing language in the Food Security Act of 1985 (FSA) provides that an entity that has a partnership agreement with NRCS that is not funded through an alternative funding arrangement or grant agreement under RCPP can receive from USDA in advance “reasonable amounts of funding for not longer than 90 days for technical assistance to eligible partners to conduct [RCPP] project development and outreach activities in a project area.” Functionally, such funding could serve as “planning grants” farmer cooperatives who have partnership agreements with NRCS, as prescribed above, can then work with growers to conduct the outreach and development work needed to submit an RCPP project proposal. We encourage NRCS to take advantage of this FSA authority to help farmer cooperatives develop high quality, climate smart RCPP project proposals for submittal.

#### *Reimbursement to Plan Providers*

In the case, that a cooperative does not have a NRCS partnership agreement to assist growers prepare applications for conservation program assistance, growers should be allowed to recover their associated costs. For example, growers should be able to use NRCS cost-share dollars to reimburse providers for the preparation of applications for all NRCS programs. Allowing this reimbursement will incentivize plan providers to utilize the close partnerships, trusted adviserships, and logistical coordination with growers to drive program enrollment.

### Consider All Forms and Regions of Agriculture Production in Selecting Applications

NCFC urges USDA to consider all forms and regions of agriculture production in the selection of applications or projects selected to benefit from the increased conservation and technical assistance funding. It is also important for USDA to be intentional about how the diverse range of crops and livestock produced in the United States can benefit from the increased funding and ensure maximum climate outcomes.

### Data Coordination and Improving Cybersecurity

Cooperatives are actively collecting farm data and working with third-party vendors to create environmental assessments. USDA should work directly with cooperatives to leverage this data in a way that maximizes impact and reduces burdensome redundancy.

Similarly, data privacy is of utmost importance as USDA begins to gather and collect large amounts of business specific information. Agriculture specifically has been the target of recent cyber-attacks raising the need for a heightened level of care. NCFC urges USDA to use the highest level of secure practices to ensure the safety and confidentiality of the potential unique business information obtained through future data collection.

### Early Adopters

NCFC believes it is critical to the extent possible under existing USDA authority to recognize the conservation and environmental stewardship of producers commonly referred to as “early adopters.” There has been a huge shift to market driven incentives for producers who can demonstrate the greatest amount of GHG reductions or similar environmental benefits. However, there is still a need to reward those trailblazers who have been integrating best practices for decades and are now likely to miss out on future gains.

## **III. Food and Agriculture Climate Alliance**

Since 2020, NCFC has co-chaired the Food and Agriculture Climate Alliance (FACA) which consists of more than 80 organizations representing farmers, ranchers, forest owners, agribusinesses, manufacturers, the food and innovation sector, state governments, sportsmen and sportswomen, and environmental advocates. Our organizations have come together to develop and promote shared climate priorities.

As a founding member of FACA, we are proud to be part of the solution by supporting voluntary, market- and incentive-based policies, advancing and accelerating science-based outcomes, and promoting resilience and helping rural economies better adapt to climate change.

FACA has submitted independent comments, which NCFC supports.

#### IV. Conclusion

Farmer-owned cooperatives are uniquely positioned to assist USDA with facilitating the increased conservation funding and ensuring successful outcomes American agriculture. NCFC appreciates the opportunity to provide feedback and remains available for further discussions with the agency if additional input is needed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ch F Conner', written over a light gray rectangular background.

Charles F. Conner  
President & CEO