

For further information contact Lorette Picciano, Rural Coalition at lpicciano@ruralco.org

August 11, 2009

VIA email

Norman Widman, National Agronomist
United States Department of Agriculture
Natural Resources Conservation Service
Conservation Practice Standard Comments
P.O. Box 2890
Washington, DC 20013

Dear Mr. Widman:

Re: Comments on Conservation Practice Technical Assistance, 74 Fed. Reg. 112
(June 12, 2009)

The Farm and Food Policy Diversity Initiative, the Rural Coalition and the undersigned partners and allies, submits these comments concerning the preliminary review of the Conservation Practice Technical Assistance standards as published at 74 Fed. Reg. 112 (June 12, 2009).

The Farm and Food Policy Diversity Initiative (FFPDI) includes diverse partner organizations with deep roots in the civil rights and rural and urban movements to secure land and justice. They work to ensure that organizations serving people of color in the food system have the opportunity to develop and support their own initiatives to improve equity in food and farm policy. The DI has successfully advocated for policies to increase USDA transparency and accountability, halt land and farm loss by eliminating the factors that cause it, and to increase prosperity in the food system by expanding opportunities and access to agriculture programs for the nation's diverse farmers and farmworkers.

The Rural Coalition is an alliance of more than 80 regionally and culturally diverse organizations working to build a more just and sustainable food system. Its programs include advocating for national policies which support these goals, as well as economic development efforts such as bridging the digital divide, and helping our diverse members market the products of their farms.

NRCS Should Clearly Communicate Project Specifications Before Contracts With Producers Are Signed.

It is essential for NRCS to clearly communicate project specifications in detail before contracts with producers are signed, and before the contract holder disburses funds. It is also critical that NRCS engage in dialogue about any changes to the project specifications that the producers might believe are necessary. There have been instances, in NRCS contracts, when producers have completed projects and disbursed funds, only to be told after the fact that the project does

not meet NRCS specifications. This results in the producers being required to return the disbursed funds, sometimes with a penalty. Additionally, NRCS should ensure that the project being carried out by the producer is one that makes sense in regards to the producer's operation; and that the conservation activity is initiated and desired by the producer, rather than by NRCS.

Finally, NRCS should assure that socially disadvantaged and beginning farmers and ranchers are advised of advance payment and additional cost share provisions that may increase their ability to complete projects.

NRCS Should Do Outreach and Education about Expediting Revisions to Conservation Practice Standards.

We believe that this provision of NRCS is a fair and just one. The option to expedite revisions will be important for farmers to understand, especially producers of color and specialty crop producers, as they run into barriers or conservation practice standards that are not well-suited to their farming operations. Most producers do not know that they can seek a variance from a conservation practice, or that they can ask the state technical leader to revise the conservation practice at the state level. NRCS must now inform farmers about these rights and how to exercise them.

NRCS Should Consult With Small And Medium-Sized Producers About The Types of Cover Crops That Should Be Available For NRCS Funding.

Small and medium-sized farms can often be overlooked in terms of their cover crop and crop rotation needs to increase their soil conservation and nutrient management practices. NRCS must address the issue of resources for small farmers who wish to institute beneficial cover crops and crop rotations that are not explicitly covered under NRCS practice standards.

NRCS Should Allow Cost-Shares For More Types of Fencing To Prevent Animal Destruction Of Crops.

Fencing is an issue of the utmost importance to farmer and ranchers. Without adequate fencing, it is practically impossible to grow commercial crops. NRCS must address the necessity of alternate pest management structures to keep large animals away from farms and fields. NRCS should allow cost-shares for more types of fencing to prevent the destruction of crops by deer and other large predators.

NRCS Should Allow Cost-Shares for Hoophouses and Greenhouses.

Hoophouses and greenhouses are an important step for the sustainable participation of small and disadvantaged producers in agricultural production. They not only increase the viability of small farm enterprises by lengthening the growing season, but they also decrease the amounts of fertilizers and pesticides that leak from the field to the water table or to other water sources. These structures allow for the contained and accurate applications to plants of fertilizers and pesticides, which help to preserve our land and water resources. NRCS should consult with farmers about the full benefits of these activities and seek to make them eligible for cost-share through NRCS's list of approved conservation practices.

Comments on Conservation Practice Technical Assistance Standards

August 7, 2009

Page 3 of 3

Thank you for your consideration of these comments.

Sincerely,

Rural Coalition/Coalición Rural, Washington, DC

Federation of Southern Cooperatives/Land Assistance Fund, Atlanta, GA

Indian Nations Conservation Alliance, Twin Bridges, MT

Markham Center, Monpelier, VT

National Latino Farmers and Ranchers Trade Association, Washington, DC

New American Sustainable Agriculture Project, Lewiston, ME

Oklahoma Black Historical Research Project, Oklahoma City, OK

Rural Advancement Fund, Orangeburg, SC

Southwest Indian Agricultural Association, AZ