
November 13, 2019

The Honorable Bill Northey
Under Secretary for Farm Production and Conservation
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Under Secretary Northey:

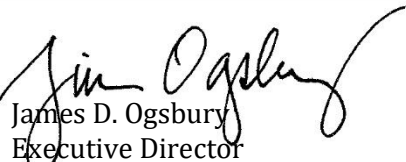
Western Governors note that the Administration's Unified Agenda of Regulatory and Deregulatory Actions includes several Farm Production and Conservation (FPAC) rulemakings affecting Farm Bill conservation programs. Our previous correspondence (attached) communicates Governors' support for various Farm Bill conservation programs, including the Environmental Quality Incentives Program, Conservation Reserve Program, Conservation Stewardship Program, Agricultural Conservation Easement Program and Regional Conservation Partnership Program.

As the Natural Resources Conservation Service (NRCS) and Farm Service Agency (FSA) consider regulations to implement Farm Bill conservation programs, WGA urges you to develop implementing regulations expeditiously and collaboratively with Western Governors and state agencies concerned with wildlife conservation, natural resources management and agriculture. These entities will provide valuable feedback on the optimal use of FPAC funds to address critical conservation challenges facing working lands in western states. These challenges include, but are not limited to, conserving sensitive species and wildlife migration corridors, controlling invasive species, promoting drought resilience, and mitigating the effects of natural disasters.

FPAC conservation programs provide critical support to agricultural producers and are among the most effective conservation tools available to resource managers in the West. Mounting threats to western working landscapes include those posed by wildland fire, invasive species infestation and wildlife habitat fragmentation. In this environment, NRCS and FSA are vital partners in promoting the long-term viability of working lands in the West.

Western Governors appreciate the positive contributions that FPAC programs make in supporting healthy ecosystems and communities across the West. Please let WGA know how we may be of assistance as you finalize changes included in the 2018 Farm Bill.

Respectfully,



James D. Ogsbury
Executive Director
Western Governors' Association

Attachment

February 28, 2019

The Honorable Bill Northey
Under Secretary for Farm Production and Conservation
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Under Secretary Northey:

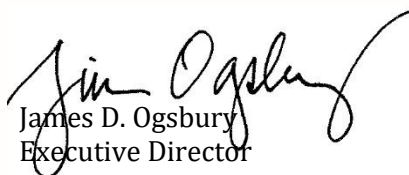
On behalf of Western Governors, I appreciate the opportunity to provide comments on implementation of the 2018 Farm Bill, which includes many provisions to support working lands across the West. Many of these Farm Bill programs will be implemented or supported by the Natural Resources Conservation Service (NRCS). As outlined in our previous correspondence (attached), the NRCS is a critical federal partner of western states, as the conservation programs it manages provide needed leverage for private landowners to engage in beneficial agricultural production and conservation activities.

The NRCS plays a key role in implementing a variety of Farm Bill programs, including the Environmental Quality Incentives Program, Conservation Reserve Program, Conservation Stewardship Program, Agricultural Conservation Easement Program, and Regional Conservation Partnership Program. These programs help landowners maintain their working lands and achieve a wide range of related objectives, from water quality protection, to habitat conservation and improvement, to wildfire mitigation.

The Farm Bill acknowledges the importance of conducting landscape-scale restoration on both state and private land in cross-boundary projects, which is often a challenge in the West due to “checkerboard” ownership patterns of federal, state, and private lands. The NRCS addresses this challenge by synchronizing federal land management actions with similar efforts on private land. NRCS’s engagement with private landowners helps ensure that conservation actions have demonstrably positive effects across the landscape and that western producers can continue to operate productive agricultural lands.

Western Governors appreciate the high value of NRCS programs throughout the West and urge your favorable consideration of these comments.

Respectfully,



James D. Ogsbury
Executive Director

Attachment

June 5, 2018

The Honorable Bill Northey
Under Secretary for Farm Production and Conservation
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Under Secretary Northey:

Western Governors appreciate the dialogue and the growing relationship we have enjoyed with the U.S. Department of Agriculture (USDA) under Secretary Perdue's leadership. Thank you for taking the time to discuss issues of mutual concern on a recent conference call with the Staff Advisory Council of the Western Governors' Association (WGA). We are optimistic that your engagement with western states will lead to greater state-federal collaboration and redound to the benefit of our shared constituents.

We applaud your efforts to streamline the operations of Farm Production and Conservation (FPAC) agencies. This should result in greater efficiency for programs of the Farm Service Agency, Natural Resources Conservation Service (NRCS), and Risk Management Agency. We hope your initiative will result in greater programmatic value and better service to agricultural producers and private landowners. Please consider the following as you proceed to implement operational changes.

Intergovernmental Collaboration: Through WGA's National Forest and Rangeland Management Initiative, we have experienced the benefits of working together to address the land management challenges in western states. The Governors' leadership brought together state foresters, NRCS, the U.S. Forest Service (USFS), and the Department of the Interior (DOI) to examine land management practices and reforms. These land managers were joined by a wide range of non-governmental organizations, private landowners, and agricultural and other business interests. The initiative produced 48 discrete [recommendations](#), which our state foresters and land managers, along with our federal partners, are presently implementing. Both USFS and NRCS have been invaluable contributors to the initiative, and Western Governors hope both agencies will continue to be an integral part of this productive effort.

Conservation Flexibility and Multiple Use: NRCS has been adept at using its various conservation programs to address a wide range of land management needs, from forest restoration to water quality enhancement, and from habitat conservation for imperiled species to reducing the threat of invasive species. These conservation tools help western agricultural lands retain their working status, providing economic benefits for rural communities and ensuring that land management needs are properly addressed. Western states expect that NRCS will continue to contribute to western working lands in effective and practical ways.

The Honorable Bill Northey

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NRCS Leveraging Capability: NRCS conservation programs are among the few existing mechanisms for states and federal agencies to engage private landowners on cross-boundary land management priorities. They empower private landowners to work with states and the federal government on large-scale management issues across areas with different land ownerships. The ability to leverage the resources and involvement of private landowners and provide informed technical assistance to those landowners significantly enhances the value of the agency to western states.

Agency Cooperation: Under the previous management structure, NRCS and USFS both reported to the same Under Secretary, making it relatively simple for the agencies to identify opportunities for cross-boundary cooperation. The Joint Chiefs Initiative between NRCS and USFS reinforced this collaboration between the agencies. We encourage you to consider continuing this effort or instituting a similar mechanism to ensure cooperation between the agencies. In fact, it may be useful to expand this effort beyond USDA to include relevant DOI agencies, including the Bureau of Land Management, which has extensive land management responsibilities in western states and is a critical partner in cross-boundary activities.

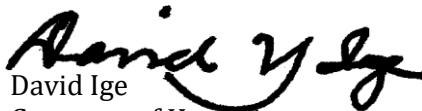
NRCS programs help western landowners achieve multiple agricultural production and conservation objectives. Working lands conservation programs, developed through locally-led partnerships, improve soil health and drought resiliency on the West's croplands, rangelands, pastures and forests. Conservation easement programs preserve working lands and help maintain agriculture's positive contributions to rural economies. NRCS technical assistance helps landowners improve the efficiency and effectiveness of land management practices. Finally, ensuring that producers conduct their work deploying responsible land use practices is critical to responsible stewardship of our natural resources.

We look forward to strengthening the relationships between our states and USDA and partnering to assist western agricultural producers in contributing to our rural economies while conserving natural resource values. To that end, Western Governors would be pleased to have you join us at the WGA annual meeting to be held in Rapid City, South Dakota, from June 24-27, 2018. We would also welcome you to any of our states to see firsthand the role that conservation programs play in western agriculture. If you are interested in such opportunities, please contact Jim Ogsbury, WGA's Executive Director, who would be more than happy to coordinate your participation.

Sincerely,



Dennis Daugaard
Governor of South Dakota
Chair, WGA



David Ige
Governor of Hawaii
Vice Chair, WGA