

---

January 27, 2020

The Honorable Abigail Spanberger  
Chair  
Subcommittee on Conservation and Forestry  
Committee on Agriculture  
House of Representatives  
1301 Longworth House Office Building  
Washington, DC 20515

The Honorable Doug LaMalfa  
Ranking Member  
Subcommittee on Conservation and Forestry  
Committee on Agriculture  
House of Representatives  
1010 Longworth House Office Building  
Washington, DC 20515

Dear Chair Spanberger and Ranking Member LaMalfa:

On behalf of Western Governors, I thank you for conducting the Subcommittee's January 28, 2020 hearing to Review Implementation of Farm Bill Conservation Programs. Programs authorized by the Conservation Title of the Farm Bill, particularly those implemented or supported by the Natural Resource Conservation Service (NRCS), are critical to agricultural production and resource conservation in western states given the "checkerboard" land ownership patterns of federal, state and private lands.

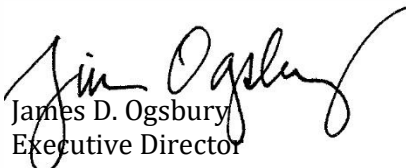
In advance of the Subcommittee's hearing, attached please find three items communicating Western Governors' policy regarding Farm Bill Conservation Programs:

- WGA Policy Resolution 2017-09, *Western Agriculture*;
- WGA Policy Resolution 2017-10, *National Forest and Rangeland Management*; and
- Western Governors' Association (WGA) comments to the U.S. Department of Agriculture regarding the status of several Farm Production and Conservation rulemakings affecting Farm Bill conservation programs.

I request that you include these documents in the permanent record of the hearing, as they articulate Western Governors' policy positions and recommendations on this important issue.

Please contact me if you have any questions or require further information. In the meantime, with warm regards and best wishes, I am

Respectfully,



James D. Ogsbury  
Executive Director



## Western Governors' Association Policy Resolution 2017-09

### *Western Agriculture*

#### A. BACKGROUND

1. Agriculture and forestry in the western states and territories are significantly different than in other regions of the country. We have greater variations in soil, climate, terrain, commodities and production practices, and water availability.
2. Farms, forests, and rangelands are important contributors to the economies and quality of life of western states. Among other important values, western agricultural and forest lands are primary sources of open space, wildlife habitat, water supplies, and diverse rural economic opportunities in the recreation, food, fiber, energy and bio-based product industries.
3. Trade promotion plays an important role in ensuring that western agricultural products and food have an opportunity to compete with products produced and subsidized internationally.
4. Western states have seen some of the most significant increases in per-capita veteran populations since 2000, including surges in returning veterans under the age of 25. It is estimated that nearly 25 percent of all veterans live in rural areas. These veterans have slightly lower rates of employment compared to veterans living in urban areas and to their non-veteran rural colleagues.
5. Responsible management of federal lands is a significant concern for Western Governors. Western states include more than 75 percent of our national forest and rangeland ecosystems. These public lands serve as critical economic drivers, and they provide numerous conservation benefits, water supply, and recreational opportunities for Western communities and the nation.
6. The West's network of land-grant universities and colleges, including Cooperative Extension Service programs, continue to provide national leadership in research to develop more resilient seeds and crops, manage soil health, advance technology deployment in the bio-based economy and conduct on-farm research experiments that help farmers and ranchers be more effective and efficient.
7. Western Governors recognize that nutrition assistance programs can meet the needs of children and the most vulnerable, while creating economic opportunity across the

agriculture supply-chain from the store where food is purchased, all the way back to the farm. Western Governors acknowledge recent efforts to reduce rates of nutrition program fraud and abuse, deliver programs under budget, and improve program effectiveness.

8. Many agricultural producers in the West rely on irrigation water delivery systems that are shared among multiple producers and operated by an irrigation district, canal company, or mutual ditch company.

## **B. GOVERNORS' POLICY STATEMENT**

1. Western Governors support funding for the U.S. Department of Agriculture (USDA) Market Access and Foreign Market Development Programs to promote opportunities for western producers to increase export revenues and encourage trade agreements that maximize benefits for the West's farmers, ranchers and forest landowners.
2. Western Governors support adequate funding for the USDA Specialty Crop Block Grant Program (SCBGP) that provides critical research, education, and promotion tools to the fruit and vegetable producers.
3. Western States have experienced sharp declines in farm income and farm prices since 2013. Western Governors support a farm safety net that recognizes past deficit reduction contributions of the agricultural sector and maintains funding for other key commodity, conservation, crop insurance, research, energy, and export promotion programs. In particular, Western Governors note that the Conservation title of the 2014 Farm Bill contributed to deficit reduction, saving taxpayers \$6 billion by consolidating 23 programs into 13, streamlining and targeting delivery to farmers, ranchers, and foresters. Western Governors support farm bill funding levels based on need rather than baseline budget targets.
4. Western Governors encourage the expansion of programs that can meet the unique educational, training, technical and financial needs of new, beginning and veteran farmers and ranchers and other USDA programming that can help returning veterans develop and expand business opportunities in rural communities.
5. Western Governors continue to support collaborative, targeted and voluntary conservation to address locally identified natural resource issues for farm, range, and forest resource concerns on private and public lands, such as soil health, air and water quality, drought and wildfire resilience, wildlife habitat conservation and invasive species. Western Governors support the role of conservation title programs in providing voluntary solutions to threatened and endangered species, water quality impairments, groundwater recharge, and other regulatory concerns potentially facing producers.

6. Western Governors support an increase in the role that state and local governments have in managing public lands for multiple uses, including agriculture.
7. Western Governors continue to urge Congress to provide a comprehensive solution for the current approach to budgeting for wildland fire for the Departments of Interior and Agriculture. Any fire budget solution must address the chronic problem of the rising costs of wildfire and the complicating problem of mid-season budget transfers when appropriated funding becomes insufficient. A comprehensive fix is needed to address capacity constraints and allow for a predictable program of work for agencies to fulfill their management responsibilities.
8. Western Governors acknowledge significant progress toward achieving forest restoration goals by using authorities granted in the 2014 Farm Bill. Western Governors support permanent authorization of the Insect and Disease designation provisions of section 602 of the 2014 Farm Bill and the elimination of project constraints from section 603 for condition class or fire regimes outside of the Wildland Urban Interface (WUI). Western Governors also support creating additional flexibility to Good Neighbor Authority to address conflicting language on road construction and reconstruction and the uses of program income. The lack of flexibility restricts opportunities for states to partner in shared stewardship work across boundaries.
9. Within the context of comprehensive wildland fire budget reform, existing law and forest plans, Western Governors support the use of new tools to streamline environmental analysis to increase the pace and scale of restoration activities. Specifically, Western Governors support creation of a new pilot program to prioritize landscape-scale environmental analysis for restoration projects envisioned over geographies greater than 100,000 acres. This pilot program should allow for predictable project-scale implementation and adaptive management. Western Governors believe federal agencies should develop guidance to build consistency in environmental analysis and bring agency practice in conducting environmental assessments (EAs) more in line with the administrative policy intent of streamlined, summary documents. Western Governors affirm that Congress should resolve outstanding issues with potential requirements to reinstate endangered species consultations following the adoption, amendment or revision of an appropriate management plan.
10. Western Governors support Congress establishing a restoration categorical exclusion (CE) based on a record of analysis from the past five years of projects where agency analysis and a decision recognized a finding of no significant environmental impact. Western Governors support allowing federal agencies to analyze only the action and no-action alternatives when a project is collaboratively developed, unless a third alternative is proposed during scoping and meets the purpose and need of the project. Western Governors also support rewarding successful implementation of collaborative projects

through funding, retained-receipt authority, or other capacity to pursue subsequent projects.

11. Western Governors support efforts to expand research funding to address drought, a changing climate and extreme weather risks facing western producers.
12. Western Governors encourage the effective use of extension and other partnerships to deliver practical tools, technologies and information to farmers, ranchers and forest landowners.
13. Nutrition assistance programs should continue to allow flexibility for states to respond to unique economic conditions, serve all eligible participants without drastically reducing benefits, and encourage continued pursuit of transparency and accountability in program administration.
14. Western Governors support changes to Conservation Title programs that remove existing contracting barriers for western producers, and make the Farm Bill's conservation title programs more accessible and relevant to western producers and their associations.
15. Western Governors support coordinated state and federal action to expand markets for wood products that can achieve forest and rangeland restoration objectives and foster rural employment and income opportunities. Western Governors support coordinated financing and grant support from USDA Rural Development programs and the USDA Forest Service to advance wood product business development, infrastructure, and demonstration products in the areas of mass timber construction and biomass energy.
16. Western Governors support the USDA, Animal and Plant Health Inspection Service (APHIS) and Agriculture Research Service (ARS). APHIS works in partnership with state departments of agriculture to monitor, prevent and control infestations of invasive pests and diseases and curtail or minimize wildlife conflicts, which can cause widespread environmental and economic damage and safety hazards. APHIS works in cooperation with other federal agencies, states, territories, counties and private entities to implement management programs. ARS conducts research to develop and transfer solutions to agricultural problems of high national priority, and shares information to ensure high quality, safe food and other agricultural products. ARS research helps sustain a competitive economy; enhance the natural resource base and the environment; provide economic opportunities for rural communities and society as a whole, and; provide the necessary infrastructure to create and maintain a diverse workplace.
17. Western Governors support the continued efforts of the Rural Utilities Service to provide financial assistance for drinking water, wastewater facilities and broadband connectivity in rural and remote areas, particularly in communities that have minimal or

no such infrastructure. Expanding broadband access to rural America will allow citizens to compete in a global market and have access to IT health care, education and public safety resources.

18. Western Governors support the recommendations identified over the course of the WGA National Forest and Rangeland Management Initiative, and incorporate those recommendations related to the reauthorization of the Agricultural Act into this resolution by reference.

**C. GOVERNORS' MANAGEMENT DIRECTIVE**

1. The Governors direct WGA staff to work with Congressional committees of jurisdiction, the Executive Branch, and other entities, where appropriate, to achieve the objectives of this resolution.
2. Furthermore, the Governors direct WGA staff to consult with the Staff Advisory Council regarding its efforts to realize the objectives of this resolution and to keep the Governors apprised of its progress in this regard.

*Western Governors enact new policy resolutions and amend existing resolutions on a bi-annual basis. Please consult [www.westgov.org/resolutions](http://www.westgov.org/resolutions) for the most current copy of a resolution and a list of all current WGA policy resolutions.*



## Western Governors' Association Policy Resolution 2017-10

### *National Forest and Rangeland Management*

#### A. BACKGROUND

1. The American West encompasses a huge landmass representing 2.4 million square miles or over two-thirds of the entire country. Over 112 million people live in these states and they reside in large, densely populated cities, smaller cities and towns and in rural areas.
2. Perhaps more than any other region, terrain, forces of nature, and land ownership patterns in the West underscore the purpose and vital need for a more active federal role in forest management. Western states include more than 75 percent of our national forest and grassland system. These public lands serve as critical economic drivers, and they provide numerous conservation benefits, water supply, and recreational opportunities for Western communities and the nation.
3. States have a particular interest in improving the active management of federal forest lands. State governments have trust authority over water, wildlife and forest resources, along with primary authority and expertise to protect community health and safety. Poorly managed forests can have significant and broad impacts on the landscapes and communities of the West, including negative impacts to air quality and public health, degradation of rivers and streams and associated water quality (including drinking water), reduced forage for domestic livestock, impaired habitats for wildlife and fish, and the loss of forest products and associated jobs.
4. Relative to decades past and other forest landowners, forest managers today operate under a constrained decision space as they work to address contemporary issues such as climate change, invasive pests and diseases, habitat diversity, fuel build-ups and fire risk, and legacy impacts. Adding to this challenge are concerns about the economic and social vitality of rural communities that experience impacts from reduced timber supply and compromised forest health. Displaced workers, declines in school enrollment, aging demographics, property loss, business closures and revenue impacts due to wildfire, and high unemployment are not uncommon to these communities.
5. States are managers as well, and many Western states own extensive public land holdings that require forest products infrastructure to achieve community vitality and land management goals, including ecological restoration objectives and healthy and resilient forests.

6. The U.S. Forest Service business model has historically been based on a combination of federal appropriations that were supplemented with revenue from resource sales and fees. Until the early 1990s, the Forest Service was a net contributor to the Federal Treasury. Over the past 20 years, timber sales have dramatically declined.
7. In addition, the last decade has seen several large, very expensive wildfires, which have increased the U.S. Forest Service wildfire suppression costs from 13 percent of the agency's FY 1991 budget to nearly 50 percent over the last several fiscal years. Consequently, under the current agency budgeting framework, forest management, hazardous fuels reduction, habitat improvement, and outdoor recreation programs have been negatively impacted across national forests and Department of Interior lands.
8. An April 2015 study by the U.S. Forest Service, the *Collaborative Forest Landscape Restoration Program 5-Year Report, FY 2010 – 2014*, found that the past century of wildfire suppression and legacy management practices have contributed to forests being overstocked and primed for larger and more intense blazes, and that changes in land use and increasing social pressures make it difficult for the agency to let fire play its natural role of clearing the forest understory in certain forest types. Active forest management has historically played a pivotal role in the growth and mortality cycle of forests to manage fuel loading, which in turn can reduce fire-fighting costs and improve habitat resilience. Today, the U.S. Forest Service estimates that roughly 90,625 square miles – an area larger than Utah – is at high or very high risk of severe wildfire and in need of treatment.
9. Insect infestation and disease have damaged many of the forests throughout the West. Severe drought conditions that are impacting western states, particularly California, have only exacerbated insect infestations and tree mortality. The impacts go well beyond fire risk, and timber and fiber production are negatively impacted, threatening the viability of the surviving forest product infrastructure. The significant decline in forest health has also created serious threats and challenges to watershed integrity, wildlife and fisheries habitats, recreational uses, businesses and tourism. All of these impacts present substantial challenges for forest-dependent communities across the West.
10. The dire forest conditions, unmet management needs, and the failure to provide lasting protections for some landscapes have brought diverse stakeholders together to find solutions. Community collaboration on forest health projects is robust in numerous places across the West forging broad agreements among diverse stakeholders on projects that encompass fuels reduction, fiber production, habitat restoration, long-term protection for critical areas, and other community objectives. It is not uncommon to find mill owners, hunters and anglers, loggers, small business owners, conservationists, and local elected leaders working together around the table.



11. Collaborative planning and project implementation across National Forests and state and private forest lands on a larger scale allows for more diverse interests to address their particular needs for a landscape or a watershed. Taking a broad look at a landscape for planning purposes minimizes the challenges associated with managing lands for the benefit of a particular species or to address a specific need. Well-planned projects that are strategically placed across a landscape can result in a higher level of benefits than those that are more randomly or opportunistically placed. Processes associated with planning and implementing a project have become so time consuming and expensive for National Forests in particular that a disincentive often exists for their managers to proceed with management actions that are needed to attain desired ecological, social, and economic objectives.
12. Collaborative efforts have shown initial successes in reaching consensus, but there is a shortage of formal mechanisms that encourage their creation in areas with conflict or reward their success within the context of public process. Further, there is little to no formal incentive for the management agencies and collaboratives to ensure collaborative work happens in a timely and efficient manner that achieves a pace and scale of management that matches the ecological, social, or economic needs of public and private forestlands and surrounding communities.
13. Despite this good work the full benefits of these collaborative efforts have not been realized on the land. Working constructively with collaborators requires resources to be productive and the federal agencies often lack the necessary staff and funding. In addition, the federal agencies have sometimes been reluctant to embrace collaboration, because they either have unclear legal authority to favor collaborative efforts or don't welcome the input.
14. Further, and even when collaborative forest health projects enjoy broad support from diverse stakeholders and the agencies, administrative objections and litigation remain a too frequent outcome. One result is that community collaborative efforts become fatigued, and future opportunities are lost. Another outcome is that Forest Service restoration projects often go through exhaustive, time-consuming analysis, driving up costs and preventing the agency from scaling up management to meet the scope of the problem.
15. Today the costs associated with planning and implementing a management project on National Forest lands are significantly more than those of the private sector. This cost, along with the time associated with drafting, analyzing, incorporating public involvement, and responding to appeals and/or litigation at the project level, lead many federal managers to focus their limited staff, funds and time on projects with the least likelihood to be challenged. This approach does not adequately address the larger socio-economic and ecological needs of our National Forests and dependent communities.

16. The 2014 Farm Bill provided the Forest Service with several new tools to accelerate forest restoration. A Governor could nominate landscapes substantially affected or threatened by insects and disease to the Secretary of Agriculture for designation as Priority Areas for expedited NEPA and administrative process and judicial review. 16 Western Governors nominated areas for this designation, the vast majority of which were approved by the Secretary of Agriculture.
17. In addition, the new Farm Bill authorities provided for a categorical exclusion (CE) for insect and disease projects on areas as large as 3,000 acres that are the product of a collaborative effort. The new CE has the potential to greatly magnify the role of collaboration and strengthen the results of those efforts, and to reduce the time and cost for forest health projects, resulting in on-the-ground restoration work that is accomplished more quickly and across a larger landscape. Not yet in wide use, the Farm Bill also added expanded "Good Neighbor" authority that enhances the ability of states to partner with the Forest Service and implement projects on federal land.
18. The shortcomings of federal forest management have also impacted local governments directly. In 1908, when Congress created the National Forest System, it also passed the National Forest Revenue Act in 1908 directing the Forest Service to share 25 percent of gross revenues with local governments. Then in 1976, Congress passed "Payments in Lieu of Taxes" (PILT) legislation providing federal payments to local governments regardless of gross revenues that result from timber harvest and other forest management activities. After revenues from the sale of timber dropped substantially, Congress passed the Secure Rural Schools and Self Determination Act (SRS) in 2000, allowing counties to choose between a payment based on historical average and the 25 percent revenue share. SRS has expired several times, and PILT has been subject to funding uncertainty as well. Western Governors support efforts to ensure counties and states continue to receive payments under the Secure Rural Schools program, and that these payments should be based upon historic federal land management receipts. These payments are vital to providing state and county public goods and services, such as roads, emergency response, and wildlife and natural resources protection in communities adjacent to federal lands.
19. There have been several efforts in Congress to reform federal forest management, and recent legislation reflects the continued frustration of Congress as it attempts to find a path forward to address this issue in a productive, bipartisan manner.

**B. GOVERNORS' POLICY STATEMENT**

1. Western Governors support sound forest management policies that maintain and promote ecologic, economic and social balance and sustainability.

2. Today, the Forest Service's forest management program is primarily a byproduct of restoration projects intended to reduce wildfire risk and/or improve forest resilience, water quality, watershed health, key wildlife habitat, and/or intrinsic value. Western Governors recognize and support these forest values, but also believe it is reasonable to expect that some portion of the federal landscape will be focused on long-term, ecologically-sound forest management — where jobs, forest products, and revenues are priorities and generated through sound stewardship.
3. Western Governors encourage the Forest Service to develop and help fund new technologies and wood based markets for some non-traditional products. USDA's Forest Products Laboratory is a hub for research and innovation. We should continue to encourage the application of their knowledge and experience in a practical way in the western United States so that some of the federally funded infrastructure that develops from such efforts could first be demonstrated on private lands. Also, since federal forests are now more focused on large landscape forest health projects, there is a good opportunity to ensure we have a broader suite of outlets, in addition to traditional sawmills and existing biomass facilities.
4. We can achieve sustainable forest management across every acre of our federal and nonfederal forestlands while including an equitable mix of uses to meet many ecological, social, and economic needs.
5. Western Governors believe that our citizens are capable of rolling up their sleeves and working together with the federal agencies to address difficult issues such as forest management, and that not enough is done to incent and reward the current collaborative work that is occurring across the West.
6. It is important to retain citizens' rights to question governmental decisions through administrative and legal means. However, there are situations where the threat of litigation is a key factor resulting in either delay of agency activity and progress or the stifling of productive collaborative work. The lack of funding and resources for federal agencies is also a significant factor. Western Governors believe an effort needs to be made to better understand the scope and scale of this problem. There may be an opportunity to further streamline appeals and litigation associated with National Forest decision making in association with other changes designed to incent collaboration and provide more certainty as to outcomes.
7. The 2014 Farm Bill authorities are significant expansions of Forest Service authority and are powerful new tools to boost forest management, promote collaboration, and limit the impacts of administrative objections and litigation. Western Governors encourage federal agencies to fully implement the tools provided in the 2014 Farm Bill.

8. Western Governors are on record as strong supporters of ending the practice of fire borrowing, and Congress should pass legislation to fund federal wildfires off-budget as many states already do, and ensure the Forest Service budget for forest restoration, recreation, road maintenance, hazardous fuels reduction, and wildlife/watershed protection is fully restored.
9. Western Governors believe clear, coordinated and consistent application of federal vegetation management practices is integral to maintaining the health of western forests, preventing dangerous and damaging fires, and maintaining grid reliability. The Governors support effective and efficient cross-jurisdictional coordination that enables utilities to undertake necessary vegetation management actions on federal transmission rights-of-way – and to do so without fear of strict liability imposition for necessary vegetation management actions taken adjacent to transmission rights-of-way.
10. Western Governors are well-suited to engage in a productive and bipartisan dialogue on the broader topic of federal forest management reform, engaging westerners and examining on the ground realities across western landscapes. Western states are land owners and managers and well understand the challenges associated with forest management under changing social, economic and environmental conditions.
11. A meaningful and successful discussion of forestry reform in the West will require a transparent and inclusive process that engages those diverse interests who have a direct stake in forest management outcomes. The impacts of forest management are felt most directly by those who live, work and recreate in and adjacent to those forests, so the discussion needs to begin there. This is perhaps where Western Governors can provide the most productive bipartisan contribution to this national discussion. Our nation’s forests belong to all Americans, and in the end and through their elected representation all Americans will determine the scope and success of any efforts to reform forest management.
12. There is significant dissatisfaction in the West among many stakeholders with the current level of National Forest management. There is a general sense that the current level of forest management is not meeting anyone’s needs, whether it’s putting logs on trucks, protecting water quality, addressing fire risk, protecting key habitats and landscapes, providing for recreation, or other important community needs. Successful forest management reform will achieve a balance among all of these important objectives, and provide the opportunity for certainty such that diverse interests will be encouraged to work together to achieve shared outcomes.
13. It is time to reconsider the business model of the U.S. Forest Service. Western Governors believe it may be possible to reform the Forest Service business model in a manner that reduces project planning costs, sources funds from non-federal partners and recognizes that the agency no longer generates large revenues from commodity programs.

14. Any discussion of forest management reform must include consideration of the financial relationship between the Federal and local governments, the existence of PILT, and the limited tax base for counties with significant federal ownership.
15. Western Governors support the recommendations identified over the course of the WGA National Forest and Rangeland Management Initiative, and incorporate the recommendations into this resolution by reference.

**C. GOVERNORS' MANAGEMENT DIRECTIVE**

1. The Governors direct the WGA staff, where appropriate, to work with Congressional committees of jurisdiction and the Executive Branch to achieve the objectives of this resolution including funding, subject to the appropriation process, based on a prioritization of needs.
2. Furthermore, the Governors direct WGA staff to develop, as appropriate and timely, detailed annual work plans to advance the policy positions and goals contained in this resolution. Those work plans shall be presented to, and approved by, Western Governors prior to implementation. WGA staff shall keep the Governors informed, on a regular basis, of their progress in implementing approved annual work plans.

*Western Governors enact new policy resolutions and amend existing resolutions on a bi-annual basis. Please consult <http://www.westgov.org/resolutions> for the most current copy of a resolution and a list of all current WGA policy resolutions.*

---

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:

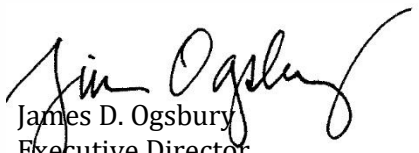
Western Governors note that the Administration's Unified Agenda of Regulatory and Deregulatory Actions includes several Farm Production and Conservation (FPAC) rulemakings affecting Farm Bill conservation programs. Our previous correspondence (attached) communicates Governors' support for various Farm 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:

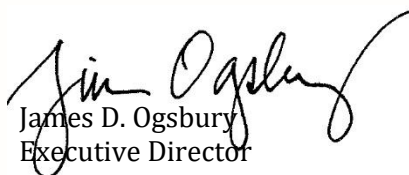
On behalf of Western Governors, I appreciate the opportunity to provide comments on implementation of the 2018 Farm Bill, which includes many provisions to support working lands across the West. Many of these Farm Bill programs will be implemented or supported by the Natural Resources Conservation Service (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

June 5, 2018

Page 2


**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.

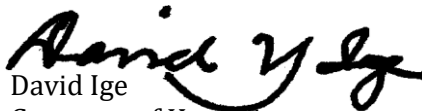
NRCS programs help western landowners achieve multiple agricultural production and conservation objectives. Working lands conservation programs, developed through locally-led partnerships, improve soil health and drought resiliency on the West's croplands, rangelands, pastures and forests. Conservation 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