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May 24, 2018

Under Secretary Bill Northey
U.S. Department of Agriculture
Washington, D.C. 20250

Dear Undersecretary Northey,

The Western Agriculture and Conservation Coalition (WACC) is focused on finding solutions to sustain the viability of the rural West for agriculture and conservation. To this end, we focus on Farm Bill reauthorization and implementation, the Endangered Species Act, and sustainable water use. Within the USDA, we have maintained close ties with the Natural Resources Conservation Service (NRCS) for the six-year life of our group.

We support the Administration's effort to make delivery of services to USDA's stakeholders more efficient through consolidation of the NRCS, Farm Service Agency, and Risk Management Agency into the Farm Production and Conservation (FPAC) mission area. Our primary focus throughout the process is to support the conservation integrity of NRCS decisions in the consolidated mission area.

We have two areas of specific interest as it relates to conservation decision-making:

- 1. USDA budgets have been relatively flat in recent years. We urge you to authorize the agency to use available funds to hire staff to replace the attrition that has occurred. Staffing levels should be adequate to enable the agency to continue delivering conservation services in response to locally-led identification of conservation needs. The goal is for professionals with conservation training to be making conservation decisions for the agency.
 - By the same token, we recognize the FPAC Business Center should be adequately staffed to ensure it does not become an obstacle to the timely delivery of agency services.
- 2. NRCS State Conservationists should be allowed to continue obligating the agency in partnership agreements without the substantive involvement of the FPAC Business Center. Presumably, the goal of the consolidation is to make it easier for USDA to deliver services to stakeholders, not to add a layer of review that will slow down delivery relative to the current arrangement. We recognize FPAC will be involved in the business side of delivering NRCS' programs and services.

We appreciate your attention to our concerns and look forward to assisting you to achieve our common programmatic goals. If you have any questions regarding this letter or WACC's activities, please feel free to contact Jeff Eisenberg, coalition director, or any of the members of the coalition. Jeff can be reached at jeffeisenberg@rockspringrs.com or 571.355.3073.

Sincerely,

Members of the Western Agriculture and Conservation Coalition

<u>Steering Committee:</u> Arizona Cattle Growers Association, California Farm Bureau Federation, Environmental Defense Fund, Family Farm Alliance, Irrigation Association, The Nature Conservancy, Public Lands Council, Trout Unlimited, Wyoming Stock Growers Association

<u>Members:</u> California Agricultural Irrigation Association, Montana Stock Growers Association, National Audubon Society, Farmers Conservation Alliance, Oregon Water Resources Congress, Western Growers Association

Cc: NRCS Chief, Leonard Jordan

Robert Stephenson, Farm Production and Conservation