

Remarks to the Chesapeake Bay Commission on Opportunities to Improve RCPP

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Thank you for the invitation to come here today to share with you our experience with NRCS programs, particularly the Regional Conservation Partnership Program or RCPP.

Although there are issues regarding reduced technical assistance from NRCS to Soil and Water Conservation Districts in Virginia, the assistance of the Virginia NRCS Office with our RCPP project, once it was awarded, has been reasonably good.

However, there are considerable problems with RCPP rules that work against the partnerships that this program is intended to encourage.

While accountability for public funding is extremely important, with Chesapeake Bay states striving to meet year 2017 and 2025 nutrient and sediment reduction targets, some of the Farm Bill program rules could benefit from being relaxed specifically for RCPP in order to empower partners to more easily assist in this endeavor.

Farmers need more “on farm time” by conservation professionals who can work with producers, especially those who have never participated in federal or state conservation programs. Participation in federal programs should not be a prerequisite to federal assistance under RCPP. Several additional observations regarding the Program include the following:

- There have been a number of unexplained rules throughout the RCPP approval process – e.g. No prior notification (in the 2014 initial round of applications) that NRCS would take such a significant portion of each award for technical assistance they provide to RCPP projects. This is for services they routinely provide. If this carve out of funds is necessary for support of their services, it should come out of the combined pool of funding before individual awards are made.

- We also suggest that technical assistance grants should not be restricted to solely work on Farm Bill projects. If NRCS is receiving a piece of each award for technical assistance they provide, why are others prohibited from working on other farms? For this reason, Virginia DCR ceased preparation of our application to RCPP in 2015.
- There have been Inconsistent messages from different NRCS offices e.g., state, local, and headquarter offices regarding program rules, their interpretations, and how to implement them.
- We have also found that reimbursable technical assistance activities are overly restrictive. Virginia had a key partner, CBF, terminate their sub-recipient agreement last week because it was too difficult for them to qualify for any reimbursement from RCPP even though they were prior approved. Despite this, we cannot convert technical assistance dollars into additional Financial Assistance dollars.
- Consideration should also be given to expanding allowable technical assistance providers for RCPP, e.g. any state certified nutrient management planner should qualify for such practices. An NRCS recognized “Technical Service Provider” should not be required for NMPs.
- We also note that while the pre-application process is simple, the final application process is quite time intensive. We recognize that this is often the case for many federal grants although it certainly is a deterrent to participation in the RCPP application process.
- The state pool has only allowed for one award per year (in Virginia). We suggest modifying the current national, regional, state pool setup. Either make funding available by grouping states together into pools, e.g. Mid-Atlantic, Mid-Western, etc., and/or reduce the number of pools to just two, regional and state.
- We have also observed that it has taken too long to get approval to get underway in some cases. Virginia applied (via Maryland as lead applicant) in summer/fall of 2014, although approved in early 2015, applications from producers could not be approved until March 2016, over a year after grant approval.
- We certainly recognize the importance of sound fiscal and administrative oversight; however, we do suggest that the Program could benefit from a reduction in paperwork, including in the tracking requirements.

Additional Observations Regarding Service from NRCS

The following observations and suggestions might be specific to Virginia and may or may not be experienced elsewhere.

Assistance by Virginia NRCS, both to our 47 Soil and Water Conservation Districts (Districts), and to Virginia DCR, has declined in a few ways, since late 2013, when the State Office discontinued Engineering Job Approval Authority (EJAA) for Districts in Virginia. While recognizing the need for NRCS to adjust programs to meet declining revenue and increasing program obligations, the federal/ state partnership has unfortunately suffered.

As an additional example, Virginia NRCS, since late 2014, due to their concerns over many District staff not using NRCS's Toolkit application for conservation plan development, caused mainly due to limited access for many District staff no longer co-located with NRCS, the decision was made to only accept six new District staff per year into their Conservation Planning training curriculum. However, any District staff who wished to maintain their certifications could continue to do so.

These two actions have resulted in considerable additional expense to Virginia due to the need to create and staff two new conservation programs, Engineering Services, and Conservation Planning and Certification. It also helped lead to Virginia DCR's decision, in September 2014, to not renew grant agreements with Virginia NRCS, for technical assistance to Districts, in the amount of \$200K/yr.

- Engineering assistance varies across Virginia. In some of the four delineated NRCS areas in Virginia, staff continues to provide the same level of service for agricultural Best Management Practices (BMPs), while other areas provide no to very limited service.
- Application of NRCS agricultural BMP design standards varies from one NRCS office in Virginia to another.

- Due to the fact that Virginia's agricultural BMP Program in recent years has been much larger than EQIP in Virginia, District staff need EJAA, which Virginia DCR is working to reestablish on our own.

While recognizing some of these programmatic challenges, DCR and the Commonwealth will continue to seek ways to rebuild relationships with NRCS so that we may collaboratively work towards meeting Virginia's conservation needs.