



March 28, 2023

The Honorable Debbie Stabenow
Chairwoman
U.S. Senate Committee on Agriculture
328-A Russell Senate Office Building
Washington, DC 20510

The Honorable Glenn "GT" Thompson
Chairman
U.S. House Committee on Agriculture
1301 Longworth House Office Building
Washington, DC 20515

The Honorable John Boozman
Ranking Member
U.S. Senate Committee on Agriculture
328-A Russell Senate Office Building
Washington, DC 20510

The Honorable David Scott
Ranking Member
U.S. House Committee on Agriculture
1301 Longworth House Office Building
Washington, DC 20515

Dear Chairwoman Stabenow, Ranking Member Boozman, Chairman Thompson
and Ranking Member Scott:

On behalf of America's 3,069 counties, parishes and boroughs, the National Association of Counties (NACo) is committed to working with our Congressional partners to develop a Farm Bill that will strengthen America's counties. As a key intergovernmental partner, we welcome the opportunity to work with our federal counterparts toward the passage of a bipartisan, comprehensive and long-term Farm Bill that achieves our shared priorities of invigorating rural communities, providing access to affordable and healthy foods, supporting more robust forest management through initiatives like the Good Neighbor Authority, investing in clean energy security, and supporting farmers and ranchers that stimulate the economy and feed our nation.

Therefore, America's counties submit the following recommendations for consideration as you progress toward the drafting and passage of the 2023 Farm Bill:

Cross-Title Recommendations

Improve ease of access and flexibility of Farm Bill programs: Cumbersome regulations and statutory requirements restrict many communities from accessing the resources we need to thrive. Counties support legislative action to streamline application processes and reporting requirements for Farm Bill programs, as well as efforts to adopt more equitable funding award structures for programs targeting rural communities by using competitive grants over loans. In turn, counties support adding additional flexibility for eligibility, usage requirements, and federal match requirements that force rural communities to secure additional funding before unlocking much-needed resources.



Program-specific recommendations:

- Ensure program eligibility for local governments under rural development programs, especially for those areas suffering from chronic poverty.
- Adopt grants-based funding structures instead of direct and guaranteed loans, particularly for programs targeting rural infrastructure and community development.
- Provide long-term certainty for communities seeking to utilize federal resources authorized in the Farm Bill by adopting multi-year funding terms for federal funding opportunities.
- Recognize the diversity of rural places across the country by incorporating greater flexibility for eligible uses for federal rural development resources into existing statutes.
- Minimize or eliminate local matching requirements.

Provide stronger support for small and mid-size producers: According to the U.S. Department of Agriculture (USDA), small farm operations constitute almost 90 percent of the nation's farms. Despite the vital role these producers play in their communities and the broader economy, small farmers often need help accessing the affordable sources of financing they need. An increasing number of these operations rely on off-farm sources of income to make ends meet. This trend has corresponded with a troubling decline in family farms. **Counties support efforts to enhance resources that support beginning, small, and mid-size producers.**

Program-specific recommendations:

- **Maintain and improve farm safety net programs** for new, beginning and underserved agricultural producers, including broader crop insurance coverage and improved technical assistance for small and mid-sized producers.
- **Reauthorize the Farming Opportunities Training and Outreach (FOTO) Program**, which would provide critical sources of financing and technical assistance for new, beginning, and socially disadvantaged producers.
- **Increase funding for Local Agriculture Market Program (LAMP)** to assist counties in developing more resilient local food systems and support local producers.

Title II: Conservation

Maintain and expand Farm Bill conservation programs: Protecting our nation's most sensitive ecosystems starts with the voluntary conservation efforts of American farmers, ranchers and foresters. Voluntary agricultural conservation programs provide valuable resources and expertise to support ongoing local-level conservation initiatives. These programs are timely as they are important. According to the 2023 *Farms and Farm in Lands Report*, the United States lost over 4,800 acres of working agricultural land every day from 2015 to 2022. From 2021 to 2022 alone, total land in farms decreased by 1,900,000 acres. Voluntary agricultural conservation programs, coupled with a strong relationship with USDA's Natural Resource Conservation Service (NRCS), give communities the support they need to take the lead in conservation efforts and preserve working lands for future generations. **Counties support maintaining or increasing funding levels for Farm Bill conservation programs that empower farmers and ranchers to voluntarily engage in projects that serve the needs of their communities.**



Program-specific recommendations:

- **Ensure funding for voluntary conservation programs** appropriated through the Inflation Reduction Act (IRA) is sustained. Relevant programs that received additional funding through the IRA include the Environmental Quality Incentives Program (EQIP), Conservation Stewardship Program (CSP) and Agricultural Conservation Easements Program (ACEP).
- **Secure increased and long-term funding for NRCS Watershed Programs** to provide communities with the resources and certainty needed to effectively plan and carry out conservation efforts in local watersheds, as well as additional resources to protect watersheds from natural disasters.
- **Reauthorize producer-led voluntary conservation programs** administered by NRCS, including the Regional Conservation Partnership Program (RCPP), Environmental Quality Incentive Program (EQIP), Conservation Reserve Program (CRP) and Conservation Stewardship Program (CSP).

Title IV: Nutrition

Strengthen SNAP to combat hunger among county residents: As the front line of the social safety net, counties are key partners with the federal government in developing, implementing and administering food and nutrition programs that combat hunger at the local level. **Ten states, accounting for 32 percent of total program participants, delegate the administration of the Supplemental Nutrition Assistance Program (SNAP) to county governments:** California, Colorado, Minnesota, New Jersey, New York, North Carolina, North Dakota, Ohio, Virginia, and Wisconsin. In these states, counties often contribute substantial local funds for administrative and supplemental costs toward the program. Given our unique role in SNAP administration, counties recognize the critical role that this program plays in helping vulnerable county residents avoid hunger and access employment and training opportunities. **We encourage you to ensure the Farm Bill reauthorization strengthens and protects SNAP.**

Program-specific recommendations:

- **Increase the options available to state and local administrative bodies** in streamlining SNAP applications and administrative processes with the ultimate goal of reducing barriers to entry for participants and reducing program churn.
- **Combat food insecurity among active-duty service members** by excluding the Basic Allowance for Housing from income eligibility determinations.
- **Ensure SNAP benefit adequacy**, especially for families with children, and create a more gradual phase-out from the SNAP program to ease the transition from benefits to income, especially for families.
- **Provide greater flexibility in the SNAP work requirements** and time limit for Able Bodied Adults Without Dependents (ABAWDS) to allow counties and states to meet the individual needs of our caseloads and more effectively support individuals in accessing sustainable employment. This includes lengthening the time limit for ABAWDs, allowing for increased training to make employment goals more realistic, allowing counties to apply directly for ABAWD area waivers and creating tax incentives for employers who hire ABAWD SNAP participants. Counties also support increased funding for SNAP E&T and further integration with existing federal, state and local workforce programs.
- **Support the promotion of healthy diets** by strengthening incentives and infrastructure to encourage more fruit/vegetable production and consumption.

- **Address the specific obstacles rural communities** face in ensuring access to healthy foods, including additional administrative flexibilities targeting rural states and counties.

Title VI: Rural Development

Invest in the capacity of rural counties: Rural counties and the communities we serve often lack the resources and expertise needed to access federal support. Although almost 70 percent of America's counties are rural, county governments have been historically denied eligibility for most rural development resources authorized in the Farm Bill. These decisions were often made under the assumption that rural counties can access additional financial resources outside the purview of programs authorized in the Farm Bill, such as the collection of property taxes.

Counties are severely constrained in their capacity to raise revenue by state mandates that restrict the types of taxes counties may impose, limits on tax rates and total revenues collected, and an obstacle-strewn approval process. These restrictions are compounded by high rates of poverty across much of rural America. Of the 353 counties that experience persistent poverty, 85 percent are rural. This has corresponded with a 0.6 percent decline in overall rural population over the 2010s, the first instance of rural population decline in U.S. History. Rural population decline is strongest among working-age adults, threatening the continued economic resilience of rural communities. Despite these limitations, counties must still deliver essential services to our residents and visitors. Such services include road and bridge maintenance, law enforcement, medical care, community water systems, emergency services, fire protection and waste management.

By investing in rural capacity building and preparedness, Congress can ensure rural counties have access to the same community development resources already available to larger municipalities that are tailored to meet the specific needs of rural America. Counties support efforts to secure additional funding for rural capacity building in the Rural Development title of the 2023 Farm Bill. **Robust investment in the expertise and capacity of rural counties will empower rural policymakers to plan and execute locally-led community development strategies.**

Program-specific recommendations:

- **Provide at least \$1 billion dollars in mandatory funding** for a grants-based rural capacity-building program. Funding distributed through this program would invest in the expertise and capacity of rural counties to plan, implement, and measure the impact of locally-led community development strategies. Counties call for a set-aside in this grant funding allotment that would be reserved for enhancing the capacity of local governments.
- **Extend eligibility for the Community Facilities Direct Loan & Grant Program** to rural county governments to provide financial assistance to county-operated public facilities.
- **Increase population thresholds where possible** when considering eligibility for rural development programs while inserting language that would prioritize low-population counties.

Bridge the digital divide: Access to high-speed internet connectivity is critical to rural America's economic and social vitality. According to the Federal Communications Commission (FCC), approximately 14.5 million Americans lack access to broadband speeds of at least 25 Mbps download and 3 Mbps upload, with 11 million of these Americans residing in rural areas. Universal deployment of high-speed internet to rural counties would bring major benefits, including improved health care services through



telemedicine services, increased ability for remote education and closing of the homework gap, and the promotion of quality economic development through the ability to support remote work opportunities.

Counties support utilizing the Farm Bill as a mechanism to provide long-term funding support, including digital literacy, for the universal deployment and adoption of high-speed broadband services in rural America that will help build resilient and future-ready communities in the 21st century. Counties further support the inclusion of the USDA's ReConnect Program in the reauthorization of the Farm Bill, which brings grant funding in support of high-speed and future-proof internet technology to rural counties across the country.

Program-specific recommendations:

- **Authorize the ReConnect Program** for long-term funding support through the Farm Bill. Prioritize program objectives that will ensure funded project service areas remain rural in character through a minimum percentage of rural households served to reach at least 50%. The ReConnect program should also include a goal of deploying high-speed internet technology that can meet a 100 Mbps symmetrical speed standard where geographically and economically feasible. The ReConnect program should permit a project speed standard of 100 Mbps download, and 20 Mbps upload only where geographic and economic conditions prove a 100 Mbps standard to be unattainable.
- **Reauthorize the Distance Learning & Telemedicine Program**, which supports rural communities that use the unique capabilities of telecommunications to connect to each other and to the world. The Distance Learning & Telemedicine program will allow counties to expand on goals of connecting county residents to telemedicine and remote learning opportunities through robust broadband infrastructure support.
- **Reauthorize the Community Connect Grant Program** to continue investments in community-oriented connectivity, fostering economic growth and delivering enhanced educational, health care, and public safety benefits.

Expand opportunities for rural entrepreneurs: The Farm Bill authorizes several important programs to catalyze rural communities' economic development and business creation. Counties support the maintenance or expansion of USDA Rural Business programs that have empowered rural entrepreneurs across the country. Continued investment in these programs in the 2023 Farm Bill is crucial to securing new economic opportunities for rural communities.

Program-specific recommendations:

- **Reauthorize the Rural Business Development Grants Program** to invest in local entrepreneurs in rural communities.
- **Reauthorize the Rural Investment Stronger Economy (RISE) Grant Program**, which helps localities strengthen the local economy through job accelerator partnerships with the private sector and institutions of higher education.

Close the wastewater access gap: The critical water and wastewater infrastructure deployment remains a priority for many rural communities. According to the Environmental Protection Agency, more than two million Americans lack access to basic running water. Despite this need, the cost of building, maintaining, and upgrading local water systems is a challenge for many small towns and rural counties. Beyond public health interests, clean and reliable water is a necessity to spur economic growth. Counties



call on Congress to continue our partnership in addressing rural Americans' water and wastewater infrastructure needs by increasing funding for USDA RD's Water and Environmental Programs (WEP) in the 2023 Farm Bill.

Program-specific recommendations:

- **Increase grant funding for the Rural Water, Waste Disposal and Wastewater Facility Grants Program**, which assists rural communities in providing residents with access to clean, affordable water sources.
- **Reauthorize the Rural Water and Wastewater Circuit Rider Program**, which is a crucial source of technical assistance to rural water systems.

Title VIII: Forestry

Elevate the county role in federal land management: County governments are a leading voice in the intergovernmental partnership with federal lands management agencies, and the 2023 Farm Bill poses an opportunity to build on that partnership. Counties support efforts to expand federal land management authorities to allow for more robust conservation and stewardship agreements with county governments. In addition to improving forest health and reducing wildfire risk, expanding the partnership between counties and federal land management agencies will generate more revenue for the federal government and critical services provided by counties, while promoting job creation and economic growth in counties across the nation. **To strengthen this partnership, counties call on Congress to expand the Good Neighbor Authority (GNA) to enhance the ability of the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) to partner with counties on federal forest restoration and management projects.**

Since Congress amended GNA to extend eligibility to counties in the 2018 Farm Bill, counties have entered into 46 Good Neighbor Agreements with USFS and BLM. However, counties and tribes are not afforded the same authority as states to retain GNA project receipts, reducing a significant incentive to partner with federal land management agencies. Additionally, the 2018 Farm Bill removed the ability for restoration services to take place off federal lands. Consequently, adjacent state, county, and tribal land that is essential to the health and productivity of National Forests can no longer be restored as comprehensive landscapes. **Standardizing eligibility and use requirements for GNA funds will help counties support forest management projects and facilitate better land management decisions based on local impacts and needs.**

Program-specific recommendations:

- **Fully extend Good Neighbor Authority** eligibility to counties and tribes.
- **Secure receipt-sharing with county governments** for Stewardship End Result Contracting and Good Neighbor Agreements.
- **Reauthorize Stewardship Contracting Authority**, which allows counties to collaborate with land management agencies on land management projects within their jurisdictions.
- **Support more robust cross-boundary landscape management practices** by reauthorizing the Collaborative Forest Landscape Restoration Program (CFLRP) and the Landscape-Scale Restoration (LSR) Program.



- **Streamline the appointment process for U.S. Forest Service and Bureau of Land Management Resource Advisory Committees (RACs)** to ensure that RAC appointees are promptly approved.

Title XII: Miscellaneous

Advance comprehensive farm labor reform: Half of the nation’s hired farmworkers, roughly 1.2 million individuals, lack legal immigration status. Farmers and ranchers – both in rural and urban counties – depend on these workers, who are vital to the economic health of the United States agriculture sector. Counties support similar legislative actions to those under the Farm Workforce Modernization Act, which would reform the H-2A program and provide more flexibility for employers while ensuring critical protections for workers.

Program-specific recommendations:

- **Secure the inclusion of farm labor reforms** that would significantly simplify administrative requirements for employers, address critical labor shortages in the agricultural sector, provide temporary legal status and protections for migrant farm workers, and create pathways for farmworkers to obtain permanent legal residence in the United States.

Conclusion

Thank you for your consideration of county priorities for the 2023 Farm Bill. America’s counties stand ready to work with Congress to ensure a bipartisan and long-term Farm Bill reauthorization that advances the interests of the communities we serve is signed into law.

Sincerely,



Matthew D. Chase
CEO/Executive Director