



National Sustainable Agriculture Coalition

April 8, 2009

Gregory Johnson, Acting Director,
Financial Assistance Programs Division
USDA Natural Resources Conservation Service
1400 Independence Ave., SW,
South Building Room 5241
Washington DC 20250-2890

Submitted via <http://regulations.gov>

RE: Comments on Cooperative Conservation Partnership Initiative Notice of Request for Proposals; Request for Public Comments, 74 Fed. Reg. at pp. 10225-10231 (March 10, 2009)

Dear Mr. Johnson:

I am submitting these comments on behalf of the National Sustainable Agriculture Coalition (NSAC) on the Cooperative Conservation Partnership Initiative (CCPI) Notice of Request for Proposals (RFP). NSAC represents family farm, rural, and conservation organizations from across the U.S. that share a commitment to federal policy that promotes sustainable agriculture production systems, family-based farms and ranches, and healthy, vibrant rural communities. Many of our member organizations have representatives on NRCS State Technical Committees. A complete list of our represented members is appended to these comments.

NATIONAL SUSTAINABLE AGRICULTURE COALITION COMMENTS ON THE COOPERATIVE CONSERVATION PARTNERSHIP INITIATIVE REQUEST FOR PROPOSALS

1. NSAC concurs with the choice to not include the Conservation Stewardship Program (CSP) in the CCPI RFP for 2009, but recommends that all materials related to CCPI on the NRCS national and state websites and in printed materials include reference to CSP being part of CCPI from 2010 forward.

The interim rule and start of the continuous sign-up for CSP will occur too late in fiscal year 2009 for CCPI this year. However, as required by statute, the program should be part of the

initiative in all future years. The lack of reference to CSP in the RFP, even as a signal that it will be included in future years, is a bit distressing. We urge you to send the proper signal by amending all printed and electronic materials about the CCPI to include CSP.

2. NSAC supports the program flexibility language.

The 2008 Farm Bill provides for adjustment to underlying program rules for CCPI projects “to better reflect unique local circumstances and purposes” and “to provide preferential enrollment to producers who are eligible for the applicable program and to participate in the Initiative.” The Conference Report provides this additional instruction:

"The Managers intend that resources made available under CCPI be delivered in accordance with the basic program rules and mechanisms relating to basic program functions, such as appeals, payment limitations, and conservation compliance. The Conference substitute allows the Secretary to make certain programmatic adjustments better fit the local circumstances and goals and objectives of the special project identified for funding under the initiative. Proposed adjustments may be part of the application from the conservation partnership and forwarded to the State Conservationist or the Secretary for consideration. The Conference substitute provides for adjustments to provide producers preferential enrollment in the applicable program as part of the special project."

The RFP makes note of this flexibility provision in the final paragraph of the background section. For future RFPs, the statement in this year's RFP that such adjustments must be "within the scope of the applicable programs' statutory and regulatory program authorities" could be usefully clarified by the addition of the word "general" before "scope" and by additional language contrasting "basic program functions" such as appeals, payment limitations, AGI, and compliance, with other features such as resource concerns, practice standards, practice suites, payment rates, enhancements, and monitoring and evaluation.

We also support the language in the last paragraph under the section of the RFP on submitting proposals that makes it clear that individual farmer proposals to participate must meet program specific eligibility requirements "as adjusted by any approved flexibility." This is a critical element of the program, and we trust that NRCS State and local offices as well as CCPI partner groups and agencies will do the necessary producer education and outreach to ensure that farmers and ranchers know about any flexibility provisions that apply to a specific CCPI project. This is very important -- farmers cannot be expected to know about something that is not advertised and for which they are not receiving appropriate information and technical assistance.

We also support the language in (k) under the Proposal Criteria heading providing a place for the submission of proposals for program adjustments. We urge NRCS to be as liberal as possible with adjustments provided that the purpose of the adjustment is to further the purposes of the project and enhance conservation and environmental benefits.

3. NSAC recommends that NRCS direct State Conservationists to seek advice from NRCS State Technical Committees in developing and ranking CCPI projects in the state.

The 2008 Farm Bill reaffirms the role of NRCS State Technical Committees in providing advice to NRCS on the implementation of provisions of the Farm Bill's Conservation Title.¹ This advice encompasses not only technical standards for the implementation of Farm Bill conservation programs but also the designation of resource concerns and other issues related to targeting USDA conservation funding and technical resources. NSAC observed that NRCS State Conservationists in many states constructively utilized their State Technical Committees in developing and ranking projects under the 2002 Farm Bill's Partnerships and Cooperative Initiative, the precursor to the 2008 Farm Bill CCPI.

Although the Federal Register notice for the CCPI RFP includes a definition of State Technical Committees, there is no provision for a role for the State Technical Committees elsewhere in the RFP. We are happy to see that CCPI has been included in the standard operating procedures for State Technical Committees issued by NRCS in the Federal Register on April 7, 2009. We recommend that NRCS take steps to ensure their State Conservationists know to seek advice from their State Technical Committee on developing and ranking state CCPI projects. This step in the process should be included in future RFPs.

4. NSAC approves of the priority in the CCPI RFP for projects that provide outreach to, and participation of, beginning farmers or ranchers, socially disadvantaged farmers and ranchers, limited resources farmers and ranchers, and Indian Tribes.

NSAC is pleased to see that the CCPI RFP Ranking Considerations includes a priority for projects that provide for outreach to, and participation of, beginning farmers and ranchers, socially disadvantaged farmers and ranchers, limited resource farmers and ranchers, and Indian Tribes within the area covered by the agreement. We have also note with approval the inclusion by NRCS of this Farm Bill administrative requirement for participation incentives in other conservation programs.

5. NSAC urges NRCS to give a priority in the RFP Ranking Considerations to projects that fund innovative conservation practices for specialty crops and organic production and the delivery of conservation services for specialty crop and organic crop producers as required by the 2008 Farm Bill.

The 2008 Farm Bill provision for the CCPI includes a specific purpose of funding the development of innovative conservation practices and delivery methods, including those for specialty crop and organic production and precision agriculture producers.² NSAC is particularly supportive of the priority for organic (all crops and livestock) and specialty crop production, a priority included not only in the CCPI but also in a new EQIP organic transition measure, new measures in CRP for transition of land to organic agriculture systems, and a new

¹ Section 2711 of the Food, Conservation, and Energy Act of 2008 (hereinafter 2008 Farm Bill), amending sections 1261 and 1262 of the Food Security Act of 1985, as codified at 16 U.S.C. §§ 3861 and 3862.

² Section 2707 of the 2008 Farm Bill, amending Section 1243 of the Food Security Act of 1985, to be codified at 16 U.S.C. § 3843(b)(4).

Farm Bill title for Horticulture and Organic Agriculture -- all of which reflect the high level of support in Congress for the promotion of specialty crop and organic farming of all types.

The background information provided in the Federal Register announcement of the FY2009 CCPI RFP expressly restates this legislative priority for specialty crop and organic farming but the priority is not included in the Ranking Considerations of the RFP. NSAC urges that NRCS work with NRCS State Conservationists to ensure that they encourage the submission of CCPI project applications for projects involving specialty crops and organic systems. State Conservationists should also be directed to provide a ranking consideration commensurate with the express priority in the 2008 Farm Bill for CCPI projects that promote specialty crop and organic production. In FY2010 and subsequent years, the CCPI RFP should provide a clear priority for such projects.

6. NSAC recommends the inclusion of a priority for projects which simultaneously provide major conservation and environmental benefits *and* community and economic benefits.

Conservation projects can improve water quality, wildlife habitat and other amenities of rural areas that allow the development of fishing, hunting, birding, boating and other recreational activities that support new businesses and bring additional revenue to rural communities. Wetland and water conservation projects can also serve to create indirect community and economic benefits such as water retention and flood control. Another example of such win-win projects are those focused on improving surface and groundwater quality that can protect rural water resources and reduce the costs of providing clean water to rural residents, while also providing recreational amenities.

NRCS should promote CCPI projects that have high environmental benefits but at the same time produce community benefits as well, including but not limited to those that involve farmers, ranchers and foresters who agree to allow public access to improved recreational resources in return for recreational easements or other incentives provided by CCPI partners. These win-win “green projects” can advance important common objectives in a cost-effective manner. They also provide an economic base whose incentive for conservation extends beyond the 5-year term limit of a CCPI partner agreement.

NSAC urges NRCS to provide a Ranking Consideration in 2009 and in future RFPs for projects that simultaneously provide major conservation and environmental benefits that can underpin longer community and economic benefits and support enterprises that diversify rural incomes.

7. NSAC recommends that NRCS direct State Conservationists to give a priority in EQIP, WHIP and CSP each year for funding farmers and ranchers who sign up for existing CCPI projects.

Congress directed in the 2008 Farm Bill that the CCPI focus on funding multi-year projects.³ Many of these projects will be structured so that additional new farmers and ranchers are added

³ Section 2707 of the 2008 Farm Bill, amending Section 1243 of the Food Security Act of 1985, as codified as 16 U.S.C. §3843(e)(2).

to a project after the first year of the project. In order to ensure a project's success, NRCS should ensure that farmers and ranchers enrolled after a project's first year, as provided in the partnership agreement for the project, will be receive conservation funding as appropriate from EQIP, WHIP and/or the CSP sufficient to meet the project's enrollment goal.

NSAC is concerned that NRCS has not clearly provided in the RFP that program funding for the enrollment of additional farmers and ranchers in such multi-year CCPI projects will be available. The RFP states that “. . . the partnership will not obligate funds.”⁴ We understand that the position of NRCS is that the agency can only obligate the relevant conservation program funding for farmers and ranchers enrolled in the first year of a project based on CCPI funds available for that year. Funding for subsequent enrollment of additional farmers and ranchers, even if critical to the success of a project, might not be guaranteed because Congress in the yearly appropriations process could decrease the funding for the CCPI in a subsequent year to a level which would not support full implementation of existing projects.

We recommend, therefore, that NRCS use its discretionary authority to give a priority in EQIP, WHIP and CSP to provide funding to farmers and ranchers enrolled in existing state, national and multi-state CCPI projects to ensure full implementation of the CCPI projects. NRCS has already noted in the preamble to the CCPI RFP that the agency's authority to carry out the CCPI includes the authority to make adjustments to an applicable conservation program's ranking process where a partner has identified the producers approved to participate in a CCPI project.⁵

The establishment of a general priority in the CCPI-relevant conservation programs (CSP, EQIP & WHIP) for participants in a CCPI project will help meet a number of the overall goals of the CCPI reflected in the statutory priorities for selecting CCPI applications.⁶ These goals include having a high percentage of producers involved and working agricultural or nonindustrial private forest land in the area cover by the agreement. These participation levels may be best reached by a gradual ramp up of participation over the life of the project, requiring that not all potential participants be enrolled in the first year.

Another priority is for projects that significantly leverage non-Federal financial and technical resources and coordinate with other local, State, and Federal efforts. This CCPI priority of leveraging of non-federal resources will be difficult if NRCS cannot assure CCPI partners that NRCS is committed for the life of a CCPI project.

In addition, priority is given for CCPI projects that deliver high percentages of applied conservation to address state, regional or national conservation initiatives. The most important contribution of NRCS to a CCPI partnership agreement is the agency's expertise in delivering applied conservation, which is another reason NSAC recommends that NRCS take steps to help ensure that the agency can fulfill its commitment to the successful implementation of CCPI projects.

⁴ Commodity Credit Corporation, Cooperative Partnership Initiative, 74 Fed. Reg. at p. 10229 (March 10, 2009).

⁵ Commodity Credit Corporation, Cooperative Partnership Initiative, 74 Fed. Reg. at p. 10228 (March 10, 2009).

⁶ Section 2707 of the 2008 Farm Bill, as codified at 16 U.S. § 3843 (f)(2).

8. NSAC recommends that NRCS establish a ranking priority for CCPI projects that dovetail with Conservation Reserve Enhancement Program areas or Wetlands Reserve Enhancement Program areas.

The conference report for the Farm Bill states “It is also the intent of the Managers that applicants may propose projects for consideration by the State conservationist or the Secretary that might work in tandem with the enhancement programs under CRP or WRP. ” The CCPI could be used for projects on working agricultural and forest land which adjoins, or whose use has potential adverse impacts, on land included in CREP or WREP acreage. NRCS State Conservationists should work actively with the State Technical Committees and potential CCPI partners to develop CCPI projects that can help increase the conservation and environmental benefits of land enrolled in CREP and WREP. We recommend specific reference to this potential option in a guidance document to the State Offices for 2009 and also in all future CCPI RFPs.

9. NSAC supports the RFP’s allowance for CCPI projects that combine the resources of EQIP and WHIP (and in future years CSP) and recommends greater clarify on this point in future RFPs.

The 2008 Farm Bill conference report states that “The Managers intend that applications may propose projects for consideration by the State Conservationist or the Secretary that include innovative combinations of covered initiative programs, if such combinations aid significantly in meeting the goals and objectives of the project.” The 2009 RFP does in fact provide for combination proposals in the Partnership Agreements section, but that comes at the very end of the RFP, and the reader therefore needs to hunt for that possibility rather than being told about it in an upfront and forward manner. It is almost as if the RFP is purposely trying to hide that option from prospective CCPI partners. We urge you to ensure that NRCS State and local offices are aware of the combined program option for 2009 projects and that future RFPs provide clearer information on this point in the Background section and the Submitting Proposals section as well as the Partnership Agreements section.

10. NSAC recommends that NRCS State Conservationists ensure that sufficient technical assistance will be available in CCPI geographic areas for participating producers by establishing “flying squads” of NRCS staff with technical expertise appropriate for the CCPI project.

Through recent conversations with NSAC member organizations and others, NSAC understands that some NRCS State Conservationists may be discouraging CCPI project proposals with more than a few farmer or rancher participants who will be seeking technical assistance from NRCS. Apparently these State Conservationists are concerned that NRCS staffing at the district level for a geographically targeted CCPI project may not be sufficient to meet the needs of a large group of participants.

NSAC urges NRCS headquarters to advise NRCS State Conservationists that rather than discourage CCPI applicants, State Conservationists develop “flying squads” of appropriate

NRCS staff to advise farmers, ranchers and foresters who participate in CCPI projects. This process would be similar to that used by NRCS to meet the needs of implementation of the 2002 Farm Bill's Conservation Security Program on a watershed basis, where a relatively large number of farmers were seeking technical assistance in a concentrated geographic area.

The CCPI provides NRCS with a great opportunity to leverage non-federal funds and the assistance of willing conservation partners and participants to use the conservation programs to implement landscape level conservation improvements. NRCS State Conservationists should be encouraged to organize staffing in more creative ways to implement the CCPI.

11. NSAC recommends that NRCS clarify that the definition of landowners and operators eligible for EQIP and WHIP funding (and in future years, CSP funding) for a CCPI project is determined by the criteria for participating producers provided in the CCPI applicant's proposal and the partnership agreement.

The CCPI RFP requires that CCPI proposals include a list of criteria to be used by NRCS to prioritize individual producer applications to ensure that applications "most aligned" with the proposals objectives receive "priority." NSAC recommends that the CCPI RFP provide for and make clear that the CCPI partners may provide much greater specificity as to requirements for participants. For example, a CCPI project could require that participating farmers monitor the presence of an endangered or threatened species on their property or allow a CCPI partner to cross their land to take water samples. Merely providing criteria for applications for EQIP and WHIP funding "most aligned" with a project's objectives may not suffice to ensure that specific individual farmers, ranchers or foresters who have agreed to take specific actions regarding the success of a project should have a priority for conservation program funding for which they are otherwise eligible. NRCS should work actively with its CCPI partners to ensure that conservation program funding availability is well-matched to the needs of the CCPI project.

12. NSAC Recommends Appropriate Use of Cooperative Agreements for Project Planning, Implementation, Monitoring, and Evaluation

NRCS should encourage cooperative agreements with appropriate CCPI project partners, especially non-governmental partners, to enable worthy projects to move forward that may not have access to adequate sources of funding. Aligning NRCS cooperative agreements with CCPI projects will help ensure the public is getting the maximum bang for the buck for cooperative agreement funding. This will be critical to the success of the initiative. It is important to emphasize that the farm bill prohibits funding for "administrative and overhead costs" of CCPI partners, but not for actual direct work with producers to plan, implement, monitor and evaluate projects.

In addition, as CSP is brought into the CCPI in 2010 and beyond, we urge NRCS to explore creative ways to combine the CSP option for on-farm research and demonstration with both CCPI monitoring and evaluation activities and CEAP and CEAP-like larger evaluation efforts. CSP is uniquely designed to allow for the farmer option of on-farm research and demonstration, an option that will be further enhanced by combining it with other farms in a geographic area or other farms of a similar type on a statewide or multi-state basis through either a CCPI state or

multi-state project award. The FY 2010 RFP should specifically request such proposals. Where possible, NRCS Headquarters should also request CEAP projects to consider what role they could play in helping to make CCPI-CSP projects like this happen and how in turn the CEAP project might benefit from data from the CCPI special project.

13. NSAC recommends that Technical Assistance provided to the farmer or rancher include the clear option of providing funds that can pay for a TSP and/or cooperative agreement organization associated with one of the CCPI partners to provide the TA.

There is nothing specifically in the RFP to address this critical issue. In fact, oddly, the long list of Proposal Criteria includes an estimate of financial assistance needed for the project but proposes no similar information about technical assistance. This is an oversight that must be corrected. Technical assistance lies at the heart of all conservation assistance and is even more important for the type of innovations that CCPI projects will hopefully be pursuing.

We recommend that all future RFPs contain an item for technical assistance in the list of Project Criteria. That will be a good start. However, to ensure practical application of CCPI projects on the ground, it is critical that the needed resources to provide that technical assistance which will not be provided for directly by NRCS employees is written into the project agreements. It is also critical that the payments to farmers and ranchers to pay for non-NRCS technical help be adequate to actually secure the assistance. We urge that immediate guidance be sent to NRCS State and local offices to ensure that appropriate steps are being taken on this issue as the 2009 submissions and awards get made.

14. NSAC Recommendations on CCPI Contribution To Energy, Climate Change, and Carbon Sequestration.

NRCS in the preamble to the CCPI has requested comments on the potential for the CCPI to contribute to energy savings and production, climate change measures, and carbon sequestration.

a. Do not fund any CCPI project proposals which include breaking into uncultivated land.

Unbroken soils, including forestland, are the nation's single greatest reservoir of CO₂ sequestration. NSAC urges that NRCS prohibit the funding of any CCPI project that entails agricultural production on previously unbroken soils. The limited resources of the CCPI should be targeted to projects that provide demonstrable improvements in the CO₂ sequestration of land under cultivation.

b. Promote implementation of organic farming systems to increase carbon dioxide (CO₂) sequestration and lower levels of nitrous oxide (N₂O) emissions.

There is a growing body of scientific research that indicates that organic production systems which use regenerative, organic practices that include cover crops, composting and crop rotation are effective in reducing atmospheric CO₂ by pulling it from the air and storing it in the soil as carbon. Organic production systems also have the added benefit of avoiding use of synthetic

nitrogen fertilizers, which are produced with a high consumption of fossil fuels and whose use also results in emissions of N₂O.

Studies showing the effectiveness of organic production systems in reducing greenhouse gas (GHG) levels include long-term side-by-side comparisons of organic and conventional cropping systems conducted by the Rodale Institute and corroborated by research centers at the University of California at Davis, University of Illinois, Iowa State University and USDA research facilities at Beltsville, Maryland.⁷

c. In cooperation with other USDA agencies, particularly the Agricultural Research Service, undertake an assessment of the data on the effect of conservation tillage on carbon sequestration before funding CCPI projects for conservation tillage whose purported goal is increased soil organic carbon.

Conservation tillage practices are recognized as one of a number of conservation practices that can help reduce soil erosion. Over the last decade, the view that conservation tillage is also a means for net sequestration of soil organic carbon has also gained credence. Recent analysis of the studies on which this view is based, however, has raised questions about whether conservation tillage actually results in net increase in SOC throughout the soil profile. A team of soil scientists, led by USDA Agricultural Research Service scientist John M. Baker, found that conservation tillage may actually change the distribution of soil organic carbon to a higher level in the soil profile, while conventional tillage practices have higher soil organic carbon levels in deeper soil layers.⁸

The extent to which no-till systems sequester carbon is of particular importance because of developing emission-trading arrangements. An assumption is being made in some of these arrangements that a farmer who merely switches from conventional tillage to a no-till system - without doing more to increase soil organic carbon such as incorporating cover crops - will be increasing the overall carbon sequestered in the soil profile. Based on this assumption, these trading systems allow industrial CO₂ emitters to offset their CO₂ emissions by purchasing carbon credits presumably generated by no-till soil organic carbon sequestration. If the assumption is incorrect, the trading schemes will do little or nothing to increase carbon sequestration.

Note that NSAC is not questioning the potential role that conservation tillage may play as part of a suite of practices to reduce soil erosion. But we do question whether there is sufficient research for NRCS to give a high ranking *for carbon sequestration* to a CCPI project proposal which relies *solely* on conservation tillage.

⁷ For a recent summary of these studies, see Tim J. LaSalle & Paul Hepperly, Regenerative Organic Farming: A Solution to Global Warming (Rodale Institute)(2008)(posted on the web at http://www.rodaleinstitute.org/files/Rodale_Research_Paper-07_30_08.pdf).

⁸ John M. Baker, Tyson E. Ochsner, Rodney T. Venterea, and Timothy Griffis, Tillage and Soil Carbon Sequestration – What Do We Really Know?, 118 Agriculture, Ecosystems and Environment 1-5 (2007).

d. For CCPI projects involving the production of biomass feedstocks, promote CCPI projects that involve the planting of perennial biomass stocks on land in row crop production or, for projects that involve annual crops, the on-farm demonstration of resource-conserving crop rotations, conservation tillage, cover crops, and strategically located conservation buffers related to the sustainable production of biomass feedstocks for the emerging bio-economy.

The recent boom in biofuel production, particularly the production of corn-based ethanol, has resulted in increased pressure on the nation's agricultural soil resource. NRCS should take great care that CCPI projects involving biomass feedstock production are designed to increase the conservation performance of agricultural and forest land. NRCS should not approve any CCPI project proposal that includes breaking into any unbroken land, most especially native prairie.

For CCPI projects targeting land under already in row crop cultivation, NRCS should target the CCPI resources first to projects that involve the planting of perennial biomass feedstocks on land in row crop production and second to projects that provide for significant and measurable improvements in the conservation performance of land in row crop production. Improvements in row crop production could be achieved with CCPI projects that provide for the on-farm demonstration of resource-conserving crop rotations, conservation tillage, cover crops, and strategically located conservation buffers related to the sustainable production of biomass feedstocks for the emerging bio-economy.

e. Undertake a full assessment of the GHG emissions implications of conservation program funding, including CCPI funding, that includes incentives for CAFOs, particularly CAFO methane digesters.

NSAC has long urged NRCS to undertake a full environmental assessment of incentives for confined animal feeding operations (CAFOs) in the farm bill conservation programs, particularly EQIP. To date, NRCS has contended that it does not even know how many CAFOs have received EQIP incentives for waste lagoons, methane digesters and other structural elements.

Large-scale CAFOs use large amounts of fossil fuel energy, especially for heating, cooling and ventilation. They also require huge volumes of feed produced in row crop systems using synthetic fertilizer. This feed production results in releases of CO₂ and nitrous oxides. The storage of CAFO manure wastes in large-scale lagoons and other systems can result in increased levels of methane production. Even if the levels of methane are partially reduced using methane digesters, the CAFO must still account for phosphorus and other potential pollutants contained in the remaining post-digestion wastes. In addition, the large subsidies provided to CAFOs by NRCS set up an uneven playing field for farmers and ranchers who use smaller scale, grass-based and pasture systems for livestock production which are best suited to GHG emission reduction and overall use less energy. Any environmental assessment for CAFOs should include comparisons of environmental impacts with these production systems.

NSAC urges that NRCS prohibit the use of CCPI funding for projects that include incentives for CAFOs until NRCS has undertaken sufficient environmental assessment of CAFOs systems to

measure the overall effects of CAFO production on all GHG gas emissions, including increased GHG emissions related to land conversion for CAFO feed.

In conclusion, NSAC thanks the NRCS for this opportunity to comment on the CCPI RFP for FY2009. We look forward to working with the agency in FY2010 when, with a Conservation Stewardship Project regulation will be in place and CSP funding and acres will be available for the Cooperative Conservation Partnership Initiative.

Sincerely,
Martha L. Noble
Martha L. Noble
Senior Policy Associate

**National Sustainable Agriculture Coalition
Represented Member Organizations**

Agriculture and Land Based Training Association (ALBA) - *Salinas, CA*
Alternative Energy Resources Organization (AERO) - *Helena, MT*
California Certified Organic Farmers (CCOF) - *Santa Cruz, CA*
California Farmlink - *Sebastapol, CA*
C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture) - *Hereford, TX*
Center for Rural Affairs - *Lyons, NE*
Community Alliance with Family Farmers - *Davis, CA*
Dakota Rural Action - *Brookings, SD*
Delta Land and Community, Inc. - *Almyra, AR*
Ecological Farming Association - *Watsonville, CA*
Flats Mentor Farm - *Lancaster, MA*
Florida Organic Growers - *Gainesville, FL*
Food Animal Concerns Trust - *Chicago, IL*
Georgia Organics - *Atlanta, GA*
Grassworks - *Wausau, WI*
Illinois Stewardship Alliance - *Rochester, IL*
Institute for Agriculture & Trade Policy – *Minneapolis, MN*
Iowa Environmental Council - *Des Moines, IA*
Iowa Natural Heritage Foundation - *Des Moines, IA*
Izaak Walton League - *St. Paul, MN*
Just Food - *New York, NY*
Kansas Rural Center - *Whiting, KS*
Kerr Center for Sustainable Agriculture - *Poteau, OK*
Land Stewardship Project - *White Bear Lake, MN*
Land for Good - *Keene, NH*
Michael Fields Agricultural Institute - *East Troy, WI*
Michigan Integrated Food and Farming System - *East Lansing, MI*
Midwest Organic and Sustainable Education Service (MOSES) - *Spring Valley, WI*
National Catholic Rural Life Conference (NCRLC) - *Des Moines, IA*
National Center for Appropriate Technology - *Butte, MT; Fayetteville, AR; Davis, CA*
New Mexico Acequia Association - *Santa Fe, NM*
Northeast Organic Dairy Producers Alliance (NODPA) - *Deerfield, MA*
Northern Plains Sustainable Agriculture Society - *Fullerton, ND*
Ohio Ecological Food and Farm Association (OEFFA) - *Columbus, OH*
Organic Farming Research Foundation (OFRF) - *Santa Cruz, CA*
Rural Advancement Foundation International, USA (RAFI-USA) - *Pittsboro, NC*
Sierra Club Agriculture Committee
Union of Concerned Scientists Food and Environment Program - *Washington, DC*
Virginia Association for Biological Farming - *Lexington, VA*
Washington Sustainable Food and Farming Network (WSFFN) - *Mount Vernon, WA*
Wild Farm Alliance - *Watsonville, CA*