



March 29, 2019

Scott Hutchins  
Deputy Under Secretary  
Research, Education, and Economics  
U.S. Department of Agriculture  
1400 Independence Ave, SW, Suite 214-W  
Washington, D.C. 20250-0110

**Re: NSAC Comments on the 2018 Farm Bill Implementation for REE Mission Area**

Submitted via Regualtions.gov (FR Docket Number: ARS-2019-0001)

We are pleased to have this opportunity to provide feedback and comment on important programs being implemented by the Research, Education, and Extension (REE) Mission Area of the U.S. Department of Agriculture (USDA) as required by the 2018 Farm Bill.

The National Sustainable Agriculture Coalition (NSAC) presents these recommendations in keeping with the directives of our 45 family farm, rural development, conservation, and environmental organizations<sup>i</sup> from around the United States that share a commitment to federal policy that promotes sustainable agriculture production systems, family-based farms and ranches, and healthy, and vibrant rural communities. NSAC worked with a range of stakeholders, including farmers, to ensure that the 2018 Farm Bill provided funding for agriculture research, supported sustainable farming systems organic, beginning and socially disadvantaged farmers., and provided farmers with the tools needed to be successful and competitive in a changing agricultural economy.

First, we would like to formally express our concerns about the proposed relocation of ERS and NIFA and the reorganization of ERS. NSAC strongly believes that uprooting the agencies will serve to sever key partnerships with other federal research agencies and stakeholders. There is also the likely loss of highly experienced and educated staff who will not be able to move with the agencies, as well as Congress' reduced ability to oversee the agencies from a distance. Further, relocating the agencies will undermine USDA funding of research. Therefore, we urge the agency to reconsider its plans for relocation and reorganization.

The following recommendations are being made to the Agricultural Research Service (ARS), the National Institute for Food and Agriculture (NIFA), and the National Agricultural Statistics Service (NASS) and are based on the priorities of NSAC members.

We thank you for your serious consideration of these recommendations and welcome any further feedback or discussion.

Sincerely,



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Interim Policy Director



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Policy Specialist

## NIFA RECOMMENDATIONS

### *Agriculture Food and Research Initiative - 2018 Farm Bill Section 7504*

The Agriculture Food and Research Initiative (AFRI) is the largest competitive federal grants program for agricultural research. The program was established and authorized to be funded at \$700 million a year in the 2008 Farm Bill. Administered by the National Institute of Food and Agriculture (NIFA), AFRI supports a broad range of both basic and applied research priorities. The 2018 Farm Bill expanded AFRI's statutory priorities to also include soil health and address barriers and bridges to entry and farm viability for young, beginning, socially disadvantaged, veteran, and immigrant farmers and ranchers, including farm succession, transition, transfer, entry, and profitability issues.

#### **1. Clarify grant eligibility criteria for integrated projects.**

We support AFRI-funded research that promotes long-term, sustainable agriculture solutions to food security and climate change, and that enhance human health, our environment, and the viability of family farms. To support these, we recommend the agency take long overdue steps to clarify grant eligibility criteria to ensure that each AFRI Request for Applications (RFAs), including integrated programs, are fully competitive and open to all eligible applicants – including academic, private, non-profit, and government researchers. That is, revise current interpretation of the term “integrated” to mean projects that include at least two out of the three research, education, and extension components. This is in keeping with Section 406 (7 U.S.C. 7626) of the Agricultural Research, Extension, and Education Reform Act of 1998 to fund integrated, multifunctional agricultural research, education, and extension activities, where applicants are required to address research, education, or extension only, or a combination thereof, in their projects. Limiting competition for roughly 40 percent of AFRI's annual budget to solely academic institutions directly contradicts Congressional intent and AFRI's authorizing language to establish the broadest, most comprehensive, and fully competitive research program that solicits the most innovative and forward-thinking proposals from the widest variety of researchers and institutions.

#### **2. Create separate research priorities for cultivar development research.**

Further, we urge the agency to prioritize research that focuses on plant breeding and regionally adaptive cultivar development that are part of the public domain. Specifically, breeding research that incorporates the development of publicly available cultivars that are adapted to the soils, climates, and farming systems from all regions should be prioritized. To this end, we recommend the development of separate priority areas to solicit research proposals that address this current research need. Specifically, we urge NIFA to create one program priority area within the AFRI Foundational Program that focuses on conventional breeding research and another on plant genetics and genomics. Two distinct programs will ensure that these different types of plant breeding research have the opportunity to be evaluated and funded. Given the new reporting language in the 2018 Farm Bill which calls for an analysis of the current state of plant breeding research and the identification of research gaps (discussed below), AFRI is in a position to seriously begin meeting those research gaps that currently exist.

#### **3. Focus on strategies and tools that help small and medium-sized farms, organic agriculture and other ecologically-managed systems.**

We urge the agency to continue to include a focus within AFRI on strategies and tools that assist small and medium-sized farmers in making decisions about participating in livestock or crop production contracts as this issue continues to be extremely relevant especially for producers within the livestock sector.

We also recommend an emphasis on research relevant to organic systems. Given the continued growth of the organic sector in recent years, we urge NIFA to expand other AFRI program areas to specifically solicit research on a variety of production systems, including organic cropping and livestock methods and innovations. Research that helps develop innovative management practices to expand ecosystem services in actively managed ecosystems, including social, economic and behavioral barriers to adoption should also be prioritized. We recommend these vital issues are integrated in all AFRI areas of work.

Overall, we urge AFRI to include and strengthen emphasis on research, education, and extension that supports sustainable farming systems throughout all its programs. Specifically, NIFA should increase the focus on, and grants for, research related to soil health, water quality, and agricultural diversification within the AFRI Foundational RFA's program. Given that soil health was added as a new research priority, specific calls for research proposals that seek to advance our understanding of the role that soil plays in agricultural production should be issued immediately.

### ***Organic Agriculture Research and Extension Initiative (OREI) – 2018 Farm Bill Section 7210***

#### **1. Solicit stakeholder input in prioritizing increased investments in future grant funding.**

The Organic Agriculture Research and Extension Initiative (OREI) is vital to ensuring that farmers have tools to address and overcome challenges. The program supports research, education, and extension activities that support organic agriculture and processing. The 2018 Farm Bill increases funding for OREI. The program will now receive mandatory funding of \$20 million for 2019 and 2020; \$25 million for 2021; \$30 million for 2022; and \$50 million for 2023 and each fiscal year afterward. The 2018 Farm Bill also includes soil health as a new area for research funding.

Since the Farm Bill doubles the funding capability of OREI over the next five years, it is critical that the agency develop a comprehensive plan outlining how these new funds will be spent, and which research priorities will be included or expanded, in addition to soil health from its current roster. This can include convening a panel or symposium to solicit input from relevant stakeholders: organic farmers, scientists, advocates, etc, that identifies both current and future needs for organic research. The results of this stakeholder engagement process can help inform the agency on which priorities require additional support, or whether new research goals need to be considered over the next five years and more.

#### **2. Move quickly to integrate farm bill changes into the FY 2019 Request for Applications.**

While the farm bill does not include significant changes to OREI, we urge NIFA to move forward quickly with integrating any policy changes into the upcoming RFA. With regards to the matching requirements for OREI, the program reverts to matching requirements that were in place prior to the 2014 Farm Bill. As a result, the agency has the discretion to waive matching funds requirements if it meets certain broad criteria. We encourage the agency to apply the waiver to projects sponsored

by non-governmental and limited resource organizations whose work will directly benefit the organic farmers they serve.

***Beginning Farmer and Rancher Development Program  
- 2018 Farm Bill Section 12301***

**1. Move quickly to implement the farm bill changes into the FY 2019 Request for Applications.**

The 2018 Farm Bill includes several programmatic changes to BFRDP which we urge NIFA to integrate into the FY 2019 RFA. These include: 1) the addition of new grant priorities on food safety and succession planning; 2) clarification that grant projects may now be targeted towards retiring farmers and non-farming landowners so long as the ultimate aim of the project is to increase opportunities for beginning farmers; and 3) the expansion of EET grants to support not just new farmer curriculum development, but also the development of other types of educational programs and workshops, or training and technical assistance initiatives (including train-the-trainer initiatives for service providers that work directly with beginning farmers).

**2. Apply a consistent and broad definition of “underserved populations” in evaluating requests to waive the matching requirements.**

The farm bill authorizes NIFA to grant a waiver to the matching funds requirement for applicants who work with underserved areas or populations. We encourage NIFA to use as broad of a definition as possible with respect to what constitutes “underserved populations.”

For example, the Farm Service Agency defines “underserved” to mean “individuals, groups, populations, or communities that USDA Agencies have not effectively protected, supported, or promoted in the delivery of programs and services on a fair and equitable basis. Historically, the underserved are minority and women farmers and/or ranchers, farm workers, and land owners and/or operators that have limited resources; other minority groups including Native American and Alaska Natives; persons under the poverty level, and persons that have disabilities.”

However, there are other communities that have also been historically underserved by USDA programs – including beginning farmers, veterans, organic farmers, farmers producing for local and regional market, and diversified farmers. We encourage NIFA to use this broad definition for what constitutes “underserved populations” when considering whether to waive the matching requirement.

**3. Require documentation of beginning farmer project involvement in any submitted applications.**

The new farm bill adds a new evaluation criteria that requires the “consultation of beginning farmers and ranchers in design, implementation, and decision-making” relating to a proposed project. While criteria has been included to some extent in the peer review process, we encourage NIFA to require documentation in all submitted application materials, integrate this new criteria into the formal evaluation criteria and provide guidance to reviewers on how to evaluation farmer involvement. BFRDP projects are the most successful when driven by demonstrated needs of farmers and done so in a way that is accessible and appropriate to beginning farmers. This is especially important when

targeting programming to a specific demographic or community of farmers (i.e. tribal, non-english speaking, African-American growers, etc). We encourage NIFA to work with other programs like the Community Food Projects and the Organic Agriculture Research and Extension Initiative to share best practices on how best to demonstrate and evaluate stakeholder involvement in project design, implementation, and evaluation.

**4. Provide stronger guidance and oversight to ensure priority is given to partnerships with community-based organizations (CBOs) and non-governmental organizations (NGOs), and increase NIFA reporting on these partnerships.**

The 2018 Farm Bill maintains the statutory priority on partnerships with non-governmental and community-based organizations. We are concerned that sufficient priority is not being given to these partnerships, as required by law.

In FY 2018, both a greater number (and greater total dollars) were awarded to university-led projects than in previous years – continuing an increasing trend since 2016. In total, academic institutions led 44 percent of projects, compared to 33 percent last year. And while funding in FY 2018 is roughly split equally between nonprofits and universities, it is concerning that the most recent round of awards marks a shift back towards a greater focus on university led projects. In the creation of BFRDP in the 2002 Farm Bill, Congress included a specific legislative priority to partnerships with non-profit and community-based organizations – recognizing the important role that these partners can play in training the next generation of farmers.

FY 2018 marks the first year since the program’s first round of grants that the number of projects led by nonprofits fell below 60 percent. This sudden shift raises concerns within the beginning farmer training community about whether or not nonprofit organizations are adequately receiving the priority intended in BFRDP’s founding legislation. Certainly, many of the projects led by universities may involve non-profit partners, but the support roles that partners play in designing and implementing a project is often very different from that of being the lead project manager.

For FY19, we urge NIFA to provide more clarity and guidance (both in the RFA and in the peer review process), and to evaluate recommended proposals closely to ensure priority is being given to partnerships led by non-profit and community-based organizations. Since the second year of funding, BFRDP has consistently awarded 60 to 75 percent of grants to projects led by CBO/NGOs, which we believe is keeping with the statutory intent to give priority to projects led by these valuable partners. We also urge NIFA to better track and evaluate partnerships with NGOs and CBOs and report this information in a consistent way – either through the CRIS database or annual reports on grantees.

**5. Maintain emphasis and funding towards projects that serve socially disadvantaged, limited resource, and immigrant farmers and farmworkers.**

Historically, a significant portion of BFRDP grants have focused on the needs of socially disadvantaged farmers, and has far exceeded the minimum funding requirement outlined in statute. We were pleased that roughly 64 percent of overall grant funding in FY18 (up from roughly half in FY17) supported projects serving socially disadvantaged, limited resource, immigrant, and refugee farmers in some fashion, well above the 5 percent set-aside that was maintained in the 2018 Farm Bill.

And while the number of projects serving these communities has remained high, there has been fluctuation from year to year in terms of the number of projects serving socially disadvantaged farmers. While the overall emphasis on serving these communities is commendable, NIFA should continue to encourage applications from organizations working with socially disadvantaged farmers, and should provide targeted assistance and outreach to potential applicants serving these communities. With the new waiver to matching grants in place, which has been a barrier for many organizations working with underserved communities, we expect a greater number of applications focusing on socially disadvantaged populations. We would urge NIFA to maintain the emphasis in the RFA and strengthen pertinent instructions in the peer review process.

#### **6. Ensure at least a sixty (60) day application window for FY 2019 and subsequent years.**

Given the delay in passing a new farm bill and the subsequent government shutdown, we understand the reasons for the delay in releasing an RFA for FY 2019. And while we urge NIFA to release the FY19 RFA for BFRDP as soon as possible, we also urge the agency to restore consistency in the timing of the release of future RFAs. We have appreciated that previous RFAs were released in the late fall and allowed a three-month application window for applicants to prepare their grant applications. This application window gives organizations (especially limited resource and lower capacity non-profit and community based organizations) sufficient time to prepare necessary application materials, better coordinate with partners, and secure the necessary matching funds. This timing also coordinates with the end of the growing season when many organizations have more staff time and resources to devote to grant-writing, rather than being out in the field working with farmers.

With permanent farm bill funding now in place, we urge NIFA to adhere to this consistent program schedule by releasing the RFA in the late fall or early winter, allowing a 60 day minimum application period, coordinating the peer review panel for late winter or early spring when farmers are most likely to be able to participate, and obligating the funding by the end of each Fiscal Year, or earlier if possible. This program schedule allows maximum participation from community-based and farmer driven non-profit organizations – which are an important and targeted component of the program.

### ***National Food Safety Training, Education, Extension, Outreach, and Technical Assistance Program - 2018 Farm Bill Amendments***

The 2018 Farm Bill made several changes to the National Food Safety Training, Education, Extension, Outreach, and Technical Assistance Program, otherwise known as the Food Safety Outreach Program (FSOP). The 2018 Farm Bill amendments to FSOP are applicable for FY 2019. NSAC encourages NIFA to include all of these changes in the FY 2019 FSOP RFA, as required by law, which includes the repeal of the limitation on grant funds prohibiting an entity from receiving funding after three years, and the prioritization of projects that focus on beginning, socially disadvantaged, and veteran farmers.

#### **1. Repeal the limitation of three years of funding per entity.**

Section 7301 of the 2018 Farm Bill repeals the language that prohibited an entity from receiving more than three years of FSOP funds. NSAC commends NIFA for allowing organizations that had already received three years of funds to list a new Principal Investigator on their application to avoid

this three-year limitation. Fortunately, this new language in the 2018 Farm Bill removes the prohibition that restricted NIFA from providing additional grant funding once an “entity” had received three years of grant funds. Instead, it changes the language of 7 U.S.C. § 7625(e)(3) to limit a grant term to three years.

For FY19, NSAC encourages NIFA to allow the same Principal Investigators to apply for a grant, regardless of if the individual has previously received three years of funds, if a new project is submitted and meets all of the requirements within the RFA for that type of project. The new proposal should be reevaluated and meet the requirements for each type of project, including:

- *Pilot Project Requirements:* The project must support the development of food safety education and outreach programs in local communities that address the needs of small, specialized audiences whose education needs have not previously been adequately addressed. Pilot Projects should focus on building the capacity of local groups to identify very specific needs within their communities, and to implement appropriately-customized food safety education and outreach programs to meet those specific needs.
- *Community Outreach Projects:* The project must support the growth and expansion of already existing food safety education and outreach programs currently offered in local communities; including previously funded, successful Pilot Projects. In addition, the project must enable existing programs to reach a broader target audience, provide technical assistance and/or to expand to new audiences.

The same principal investigator that previously received funding for a project should be able to apply for both a new Pilot Project or a Community Outreach Project, regardless of what project type they were previously awarded.

## **2. Continue to prioritize projects that serve small-scale operations, as well as beginning, socially disadvantaged, and veteran farmers.**

Section 12306(e) of the 2018 Farm Bill adds veterans to the FSOP priority requirements. NIFA should continue to follow Congress’s intent and prioritize FSOP funds for projects that provide food safety education and training to small, mid-sized, beginning, socially disadvantaged, and veteran farmers. There should be a significant percentage of overall ranking points for projects that target priority categories. NIFA should also collect data from FSOP award recipients to ensure projects are serving these audiences. NIFA should require award recipients to document who their programs are serving to ensure the project is targeting the priority categories.

### ***Gus Schumacher Nutrition Incentive Program - Section 4405***

In order to better support the implementation of the Gus Schumacher Nutrition Incentive Program, Subsection (e) instructs the Secretary to establish 1 or more “Nutrition Incentive Program Training, Technical Assistance, Evaluation, and Information Centers,” in consultation with NIFA. The purpose of establishing Information Centers is to support increased technical assistance and training for communities and organizations interested in establishing and expanding nutrition incentive



programs (including produce prescriptions programs, as authorized in subsection (c), and Supplemental Nutrition Assistance Program incentives). The Information Center(s) also include functions related to improved evaluation and reporting on the impacts of nutrition incentive programs.

NSAC recommends that the establishment of the Information Center(s), both in terms of design and management be done in a manner that includes robust input from stakeholders with direct experience in developing and implementing nutrition incentive programs.

In addition, to date, the vast majority of the public research available on nutrition incentives focus on food security and health impacts; in carrying out Congress' directives to evaluate and report on the impacts of nutrition incentives, NSAC recommends that the Information Center(s) look beyond just food security and health impacts and explore the impact nutrition incentives have on local and regional food systems and agricultural producers. Furthermore, in evaluating the impacts of nutrition incentives on local and regional food systems the Information Center(s) should also strive to identify barriers and solutions to increased utilization of locally- and regionally-producer food in retail groceries and other outlets participating in nutrition incentive initiatives.

### ***Urban, Indoor and Other Emerging Agricultural Production Research, Education and Extension Initiative - Section 7212***

Section 7212 creates a new competitive research and extension grant program to make grants to support research, education and extension activities for the purposes of facilitating the development of urban, indoor, and other emerging agricultural production, harvesting, transportation, aggregation, packaging, distribution, and markets. Section 7212 also provides the new urban agriculture research and extension grant program with \$10 million in mandatory funding in the form of one lump-sum to be spent over the life of the 2018 Farm Bill.

Related, Section 12302, instructs the Secretary to create a new "Office of Urban Agriculture and Innovative Production." As part of the creation of the "Office of Urban Agriculture and Innovative Production," subsection (b) provides for the creation of a twelve person "Urban Agriculture and Innovative Production Advisory Committee" to help guide the USDA's internal, cross-agency and external activities around urban agriculture and innovative forms of production.

As recognized by the managers, "methods of agriculture production are changing and evolving across the country," including urban agriculture. Not only is urban agriculture a changing and evolving space when it comes to methods of production it is also a diverse space with many different approaches, from community-based efforts to address food insecurity to indoor-technology-heavy entrepreneurial approaches and everything in between. This evolving and diverse nature of urban agriculture production systems is an area for which the USDA has a relatively limited track record compared with more traditional row crop, livestock, and specialty crop production systems. Therefore, NSAC recommends that the USDA wait to publish any RFAs or obligate funding from the program until the "Office of Urban Agriculture and Innovative Production" and the associated advisory committee has been established to help guide the implementation of the competitive research and extension grant program created by Section 7212.

In addition, due to the diverse nature of urban agriculture production systems and approaches, NSAC recommends that when developing criteria and guidelines for the urban agriculture research and extension program, that the USDA take a broad approach to the types and scales of research and extension related projects that it funds.

Lastly, with the mandatory funding for the new research and extension grant program being provided as one lump-sum instead of being annualized, NSAC recommends the USDA obligate those research funds through multiple RFAs instead of just one RFA. This is particularly important in light of the evolving and changing nature of urban agriculture production, and the relative lack of extensive research in the field. The power of agriculture research and extension activities comes in part from the iterative nature of it, obligating the \$10 million in mandatory funding in multiple RFAs instead of just one will provide opportunities for the iterative power of agriculture research to be brought to bare on the subject matter; furthermore, it is likely that research projects funded by the new program will identify new challenges or topics worthy of further research and having additional rounds of funding to explore could be quite beneficial.

## **ARS RECOMMENDATIONS**

### ***Plant Breeding Research and Reporting - 2018 Farm Bill Section 7205 and 7206***

We support the prioritization of research that focuses on plant breeding and regionally adaptive cultivar development that provides farmers with seeds that are resilient to their local growing conditions and changes to climate. The 2018 Farm Bill included new language for the National Genetics Resources Program and Advisory Council on data reporting and metrics regarding the state of plant breeding in the U.S. Specifically, the Farm Bill states in Section 7206:

- “the advisory council shall include recommendations on
- (i) the state of public cultivar development, including—
    - (I) an analysis of existing cultivar research investments;
    - (II) the research gaps relating to the development of cultivars across a diverse range of crops; and
    - (III) an assessment of the state of commercialization of federally funded cultivars;
  - (ii) the training and resources needed to meet future breeding challenges...”

We believe ARS has a unique role in spearheading this area of research, ensuring farmers have the right tools at their disposal that support sustainable, resilient agricultural systems. To this end, we recommend the agency finalize their plan and timeline for completing this analysis and making it available to the public. Plant breeding research and goals that include the development of publicly available cultivars well suited to organic and other low external input sustainable production systems should also be a part of the agency’s analysis. The current state of breeding efforts that improve crop productivity, efficiency, quality, performance, and/or local adaptation; cultivar development; participatory breeding and field-based plant breeders must be known to establish baseline, and reporting on the progress being made to meet targets, create lists of cultivars developed, meet existing gaps in breeding and future public cultivar development research investments needs is necessary.

In addition to Section 7206, the 2018 Farm Bill also reauthorizes and stipulates that the agency develop and implement a national strategic germplasm and cultivar collection assessment and utilization plan (Section 7205) for the National Plant Germplasm System. We believe this assessment should include specific recommendations and guidance to the Secretary on USDA funding levels for the revitalization of national germplasm collections, public cultivar development, the state of our crop genetic diversity and vulnerabilities, and resources needed to sustain the next generation of public cultivar developers. Further, the agency should make publicly available its work plan and timeline for the completion on this work.

## **NASS RECOMMENDATIONS**

### ***Farmland Data Initiatives - 2018 Farm Bill Section 12607***

#### **1. Develop and conduct a follow-on survey to the Census of Agriculture focusing on the specific challenges and operations of beginning farmers.**

The 2018 Farm Bill authorizes a new data collection initiative that directs USDA to “develop surveys and report statistical and economic analysis on farmland ownership, tenure, transition, barriers to entry, profitability, and viability of beginning farmers and ranchers, including a regular follow-on survey to each Census of Agriculture.”

With the 2017 Census of Agriculture to be released this spring, we urge NASS to begin the planning stages for an inaugural special follow-on study focusing on beginning farmers. While there are some data trends that NASS can decipher by disaggregating data collected from beginning farmers in the Census of Agriculture, additional information is needed to better understand the primary challenges, barriers to entry, land ownership and transition issues. Additionally, NASS should explore other ways to collect data from beginning farmers who are no longer farming to better understand the barriers they faced in maintaining successful and profitable farming operations. NASS could also consider including additional questions targeting beginning farmers in the Agricultural and Resource Management Survey (ARMS).

#### **2. Solicit stakeholder input on the Tenure Ownership and Transition of Agricultural Lands (TOTAL) survey; and build TOTAL into NASS’s ongoing data collection efforts.**

More information is needed to better understand and anticipate future ownership trends of our nation’s farmland into the future in order to design effective public policies to address land access issues facing the next generation of farmers. The 2018 Farm Bill includes specific reference to ongoing efforts to conduct TOTAL, and requires NASS to include additional survey questions that capture data on:

- The extent to which non-farming landowners are purchasing and holding onto farmland for the sole purpose of real estate investment;
- The impact of these farmland ownership trends on the successful entry and viability of beginning farmers and ranchers and socially disadvantaged farmers and ranchers;
- The extent to which farm and ranch land with undivided interests and no administrative authority identified have farms or ranches operating on that land; and
- The impact of land tenure patterns, categorized by race, gender, and ethnicity; and region.

In addition to these changes, we urge NASS to solicit input from stakeholders on additional changes needed in the upcoming TOTAL survey. We would also urge NASS to produce additional analysis and summary materials, rather than require data users to pull this data directly from the QuickStats Database, which is often cumbersome and time-consuming to effectively utilize.

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<sup>i</sup> Agriculture and Land-Based Training Association Salinas, CA; Alternative Energy Resources Organization Helena, MT; CCOF Santa Cruz, CA; California FarmLink Santa Cruz, CA; C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture) Hereford, TX; Catholic Rural Life St Paul, MN; Center for Rural Affairs Lyons, NE; Clagett Farm/Chesapeake Bay Foundation Upper Marlboro, MD; Community Alliance with Family Farmers Davis, CA; Community Involved in Sustaining Agriculture South Deerfield, MA; Dakota Rural Action Brookings, SD; Delta Land and Community, Inc. Almyra, AR; Ecological Farming Association Soquel, CA; Farmer-Veteran Coalition Davis, CA; Florida Organic Growers Gainesville, FL; FoodCorps, OR; GrassWorks New Holstein, WI; Hmong National Development, Inc. St Paul, MN and Washington, DC; Illinois Stewardship Alliance Springfield, IL; Institute for Agriculture and Trade Policy Minneapolis, MN; Interfaith Sustainable Food Collaborative Sebastopol, CA; Iowa Natural Heritage Foundation Des Moines, IA; Izaak Walton League of America St. Paul, MN/Gaithersburg, MD; Kansas Rural Center Topeka, KS; The Kerr Center for Sustainable Agriculture Poteau, OK; Land Stewardship Project Minneapolis, MN; MAFO St Cloud, MN; Michael Fields Agricultural Institute East Troy, WI; Michigan Food & Farming Systems – MIFFS East Lansing, MI; Michigan Organic Food and Farm Alliance Lansing, MI; Midwest Organic and Sustainable Education Service Spring Valley, WI; Montana Organic Association Eureka, MT; The National Center for Appropriate Technology Butte, MT; National Center for Frontier Communities Silver City, NM; National Hmong American Farmers Fresno, CA; Nebraska Sustainable Agriculture Society Ceresco, NE; Northeast Organic Dairy Producers Alliance Deerfield, MA; Northern Plains Sustainable Agriculture Society LaMoure, ND; Northwest Center for Alternatives to Pesticides Eugene, OR; Ohio Ecological Food & Farm Association Columbus, OH; Oregon Tilth Corvallis, OR; Organic Farming Research Foundation Santa Cruz, CA; Organic Seed Alliance Port Townsend, WA; Rural Advancement Foundation International – USA Pittsboro, NC; Union of Concerned Scientists Food and Environment Program Cambridge, MA; Virginia Association for Biological Farming Lexington, VA; Wild Farm Alliance Watsonville, CA; Women, Food, and Agriculture Network Ames, IA.