



September 18, 2015

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AMS, Transportation and Marketing Program
Room 4552-S
1400 Independence Ave., S.W.
Washington, D.C. 20250-9410

**Re: NSAC Comments on the Farmers Market and Local Food Promotion Program 2015
Request for Applications**

Submitted via Email to: Trista.Etzig@ams.usda.gov

On behalf of our 43 Represented Members¹, we offer the following recommendations regarding the forthcoming 2016 Request for Applications (RFA) for the Farmers Market and Local Food Promotion Program (FMLFPP). The National Sustainable Agriculture Coalition (NSAC) designed the legislation to create Farmers Market Promotion Program (FMPP) in 2001 and led the campaign to secure the addition of FMPP to the 2002 Farm Bill. We also led the charge to provide mandatory funding in 2008.

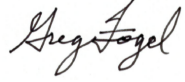
More recently, we crafted and secured legislative champions for the Local Farms, Food, and Jobs Act (LFFJA), a marker bill that included, among other provisions, the expanded FMLFPP. NSAC's advocacy led to several LFFJA provisions, including FMLFPP, being included in the final 2014 Farm Bill conference report.

We appreciate the opportunity to provide comments. If you have any questions, please feel free to contact us.

¹ Agriculture and Land Based Training Association, Alternative Energy Resources Organization, California Certified Organic Farmers, California FarmLink, C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture), Catholic Rural Life, Center for Rural Affairs, Clagett Farm/Chesapeake Bay Foundation, Community Alliance with Family Farmers, Dakota Rural Action, Delta Land and Community, Ecological Farming Association, Farmer-Veteran Coalition, Flats Mentor Farm, Florida Organic Growers, Grassworks, Hmong National Development, Illinois Stewardship Alliance, Institute for Agriculture and Trade Policy, Interfaith Sustainable Food Collaborative, Iowa Natural Heritage Foundation, Izaak Walton League of America, Kansas Rural Center, Kerr Center for Sustainable Agriculture, Land Stewardship Project, MAFO, Michael Fields Agricultural Institute, Michigan Integrated Farm and Food Systems, Michigan Organic Food and Farm Alliance, Midwest Organic and Sustainable Education Service, National Center for Appropriate Technology, Nebraska Sustainable Agriculture Society, Northeast Organic Dairy Producers Alliance, Northern Plains Sustainable Agriculture Society, Northwest Center for Alternatives to Pesticides, Ohio Ecological Food and Farm Association, Oregon Tilth, Organic Farming Research Foundation, Republic Food Enterprise Center, Rural Advancement Foundation International – USA, Union of Concerned Scientists Food and Environment Program, Virginia Association for Biological Farming, Wild Farm Alliance.

Sincerely,

Greg Fogel



Senior Policy Specialist

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cc:

Arthur Neal, Deputy Administrator, Transportation and Marketing, AMS

RECOMMENDATIONS

1. Program Structure

Recommendation: FMLFPP should be run as an integrated and comprehensive program with a single RFA rather than having separate RFAs for FMPP and LFPP.

We recommend that there be a single Request for Applications for the program. The RFA can then state the common and integrated elements that apply to the whole program, yet also be divided into specific details about the direct and non-direct marketing portions of the program, and divided as well, when appropriate, between different categories of funding types and opportunities. As with many other USDA competitive grants programs, there can be multiple deadlines for different elements of the program and different review committees and evaluation criteria, as needed, to run the program efficiently and effectively.

In the first year of the program, it was necessary to offer two separate RFAs in order to reach direct-marketing applicants as early in the season as possible. However, we did not support the continued separation of the intermediated and direct marketing projects into LFPP and FMPP in the FY 2015 RFA. We stress in particular that this is not only *our* view, but the view of the congressional champions who helped secure FMLFPP in the 2014 Farm Bill. They have pleaded with us to consolidate and not subdivide programs, and we in turn plead with you to cease the unnecessary and politically very risky strategy of running two programs where Congress authorized a single, integrated program. Do not continue to bite the hand that feeds you!

In addition, FMLFPP should be as comprehensive as possible in supporting the wide variety of direct and intermediated marketing channels used to distribute foods locally and regionally. Further, the program should be much more than a program to support farmers markets and food hubs. As important as those particular venues and enterprises are, farmers markets and food hubs are only a portion of what constitutes direct and local and regional marketing and what will be needed for farmers and communities to thrive through new market development. Other examples of potential projects that can support new market development are community-supported agriculture, farm stands, pick-your-own operations, agritourism operations, farm-to-institution, mid-tier value chains, and networked food coops. The FMLFPP should strive for a balanced, comprehensive, and innovative portfolio.

2. Farmer Focus

Recommendation: In each of the Project Evaluation Criteria, add the words “including farmers and/or ranchers” after each mention of project “beneficiaries.”

Among the main purposes of FMLFPP is “to develop new market opportunities for farm and ranch operations serving local markets, by developing, improving, expanding, and providing outreach, training, and technical assistance to, or assisting in the development, improvement and expansion of² both direct-to-consumer marketing outlets and infrastructure supporting local and regionally produced food products.

² Agricultural Act of 2014, Public Law 113-7, Section 10003, Pages 772-773.

As a program that, at its core, seeks to benefit farmers serving local and regional markets, FMLFPP should continue to focus on assisting farmers with economic opportunities. At a minimum, funded projects should demonstrate a direct benefit to farmers and emphasize and prioritize direct farmer participation in all elements of the project, including project development, implementation, and evaluation. These projects of course should be of mutual benefit to consumers, without whom there is no market.

The next RFA should also clarify that interim and final performance reports must describe how producers have been involved with and benefited from the project. Direct benefits to farmers should be a regular part of program reporting and evaluation, including simple post-project surveys asking participating or affected farmers whether they have experienced increases in numbers of customers, volumes sold, sales, and/or income and if so, of what magnitude.

3. Priority Consideration

Recommendation: In order to demonstrate meeting the criteria for priority consideration, projects should be allowed flexibility in using various mapping tools and resources.

The FY 2015 RFA requires that, in order to meet the criteria for the limited-access priority consideration, projects must qualify based on one of four ERS Food Environment Atlas maps. NSAC opposes the decision to limit the number of possible mapping tools so severely.

Much like CDFI applicants for the CDFI Fund's Healthy Food Financing Initiative, the next FMLFPP RFA should allow applicants seeking priority consideration for projects benefiting underserved communities to use a variety of mapping tools, including the USDA's ERS Food Environment Atlas, Farm to School Census data, and more nuanced analyses such as qualitative assessments, including community food assessments and assessments performed by nonprofit organizations such as The Food Trust,³ in order to demonstrate that a community is located in an area "of concentrated poverty with limited access to fresh locally or regionally grown foods."⁴

ERS Atlas maps are sufficient for identifying low-access areas based on certain criteria; however, the maps do not have anything more granular than county level data, which are not useful for many urban areas. In many areas, it will only be possible to accurately assess food access, health outcomes, and poverty rates at the census tract or block group level.

4. Review Criteria

Recommendation: When reviewing farmers market project proposals, consider the level of community support as well as whether the proposal voluntarily includes in-kind match.

The review criteria for the FY 2015 FMPP RFA provide ranking points for support letters that demonstrate reliable, appropriate and effective partnerships. In addition to rewarding strong partnerships, the FY 2016 RFA should provide ranking points for proposals that include letters of support from the community and individuals that will benefit from the project. The RFA should

³ For more information, see:

http://foodtrust-prod.punkave.net/uploads/media_items/hffhandbookfinal.original.pdf

⁴ Included in definition of "underserved communities" in Agricultural Act of 2014.

also allow reviewers to award ranking points for proposals that voluntarily offer in-kind match.

Proposals with strong community support and in-kind match are likely to be more sustainable than projects without such support and capacity.

5. Match Requirement for Local Food Projects

Recommendation: For local food promotion projects, the match requirement should be 25 percent of the grant funds rather than 25 percent of the total project cost.

The FY 2015 RFA required LFPP applicants to provide a cash and/or in-kind match of 25 percent of the total project cost. This requirement is overly burdensome for smaller organizations and those working with underserved communities. We recommend that applicants for local food projects instead be required to provide a match of 25 percent of grant funds.

The Farm Bill requires a 25 percent match of the total cost of the project in cash or in-kind donations. USDA should interpret this provision to mean 25 percent of the total grant amount. The National Institute of Food and Agriculture (NIFA) uses a similar interpretation for implementing the Beginning Farmer and Rancher Development Program (BFRDP) – in cases where the total project is larger than the portion of the project funded by the grant, NIFA requires a 25 percent match of the funds provided by the grant as opposed to total project costs.

This change for FY 2016 will satisfy the requirements of the statute while allowing better, fairer access to the program by smaller organizations and producer networks.

6. Definition of “Locally and Regionally Produced Agricultural Food Product”

Recommendation: Adopt the standard definition of “locally or regionally produced agricultural food product” that exists in the 2008 Farm Bill.

The FY 2015 RFA for LFPP included the farm bill definition of locally or regionally produced agricultural food product; however, the RFA for FMPP did not. We recommend that the farm bill definition be adopted for the entire program.

In Section 6015 of the 2008 Farm Bill, “locally or regionally produced agricultural food product” is defined as an “agricultural food product that is raised, produced, and distributed in the locality or region in which the final product is marketed so that the total distance that the product is transported is less than 400 miles from the origin of the product; or the State in which the product is produced.”

By adopting this widely recognized definition, AMS would minimize confusion on the part of applicants, reviewers, and USDA program staff.

7. Use of Funds as Capital

Recommendation: Allow for innovative uses of capital as eligible uses for program support.

Among the main purposes of FMLFPP is to “develop new market opportunities for farm and ranch

operations serving local markets, by developing, improving, expanding, and providing outreach, training, and technical assistance to, or assisting in the development, improvement and expansion of' local and regional food businesses. This implies a wide variety of uses for grant funds.

Local and regional food enterprises have a wide range of needs for assistance. Acquiring and using capital is nearly always a need of local and regional food enterprises, and could, in some instances, be considered an eligible use of program assistance. Innovative uses of capital might includes forming a cooperative and helping to purchase shares, or starting a revolving loan fund for local and regional food businesses, or having a food hub or a community kitchen or packaging facility run a small micro-loan fund for new business start-ups. Such activities could assist in the development and the expansion of local and regional food businesses. The FY 2016 RFA for FMLFPP should clarify that these types of projects allowing for innovative uses of capital are eligible uses of grant funding.