



May 12, 2020

Karen Fullen  
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Natural Resources Conservation Service  
9173 W Barnes Dr., Suite C  
Boise, ID 83709

Re: NRCS-2019-0012-0001, Federal Register Vol. 85, No. 30, February 13, 2020

Dear Natural Resources Conservation Service:

Thank you for the opportunity to discuss the implementation of the Regional Conservation Partnership Program (RCPP). The Illinois Corn Growers Association (ICGA) represents the interests of the thousands of corn farmers in Illinois who routinely utilize Farm Bill programs (CSP/EQIP) to employ conservation practices on their farm. ICGA also has two active RCPP awards (2014 Farm Bill) and is currently working with farmers in Illinois and Kentucky to increase implementation of best management practices.

ICGA values the financial and technical assistance NRCS RCPP provides directly to farmers. RCPP could be improved with more access to assistance and simpler procedures.

Currently, farmers cannot implement long-term cover crops without restrictive guidelines on seeding rates and methodology. We also hope for more farmer flexibility on a systems approach without having obligations that make the contract cumbersome and sometimes prevent farmers from signing up all together.

Secondly, access to a Technical Service Provider (TSP) limits farmer participation in NRCS programs. ICGA is uniquely positioned to aid farmers in the selection and implementation of best management practices through our network of technical experts, but only NRCS certified TSP's can advise farmers who wish to receive NRCS TA funding. This is extremely prohibitive. More flexibility in the TSP program would allow programs like ours, Certified Crop Advisors, and others to provide timely expertise to farmers unable to access overworked local NRCS offices.

ICGA is grateful for the updated RCPP rules in the 2018 Farm Bill. The program has given farmers access to additional federal cost share and they have used the funds to employ cover crops and conservation tillage methods, as well as lessen runoff of water, soil, nutrients, and pesticides. These farmers have prevented erosion and protected aquatic ecosystems and water quality. They have been able to reduce greenhouse gas emissions and improve soil health. We have the RCPP program to thank for our success.

The additional flexibility and access to expertise will improve the program for farmers, making the conservation gains even more significant in the future.

Thank you for the opportunity to comment on the 2018 Farm Bill updated RCPP rules.

Sincerely,

William L. Leigh, President