



July 15, 2021

Secretary Tom Vilsack
United States Department of Agriculture
1400 Independence Ave SW, Washington, D.C. 20250
Submitted via public participation portal to: <https://www.regulations.gov/commenton/USDA-2021-0006-0001>

RE: Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA

Dear Secretary Vilsack,

The Rural Voices for Conservation Coalition (RVCC) and the Heart of the Rockies Initiative (HOTR) appreciate the opportunity to provide the U.S. Department of Agriculture with the following comments in response to the request for input on 'Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA.

RVCC is a coalition of rural community-based nonprofits who engage with a diverse network of community leaders, researchers, and land management practitioners across the West. Building on the wisdom, experience and innovation of those working on the ground, our coalition endeavors to find and support collaborative, place-based solutions that recognize the inextricable link between the long-term health of the land and the well-being of rural communities. Many of the nonprofits in our coalition work in underserved rural communities across the West and frequently use and engage with USDA partnership tools and programs such as cooperative agreements, the Regional Conservation Partnership Program, and the Collaborative Forest Landscape Restoration Program.

HOTR is a network of 26 local land trusts working together for better local results. Those local results add up across the landscape into vital outcomes for communities, economies, natural systems, and wildlife populations. Our member land trusts work with private landowners across the Rocky Mountains in Wyoming, Idaho, Montana, and portions of Washington and Utah. In 2019, HOTR launched its Rural Development Program on the premise that private lands conservation is interwoven with the economic health of rural communities. Our program has served more than eight communities in western Montana and Idaho and assisted in overcoming

barriers to accessing state and federal resources. The HOTR RD Program has cultivated a close partnership with our State USDA RD Office. Assistance to rural communities has resulted in grants advanced by the local municipality or county on behalf of community leaders and projects are carried out through public-private partnerships. Our role at HOTR involves coordinating project collaborators and providing technical assistance and support to grant applicants. It is our observation that local capacity is a key obstacle to developing eligible projects and HOTR is assisting conservation partners in offering communities the assistance they are seeking.

Given our organizations' collective experience, we focus our comments on how USDA can advance equitable access for people living in rural areas and for organizations working with historically underserved rural communities. Both of our organizations have observed first-hand the challenges facing transitioning rural economies and natural resource-dependent communities. Rural communities face disproportionate economic hardships, relatively limited public and private resources, and massive deferred maintenance and infrastructure needs.^{1,2,3} They also face certain barriers in accessing federal funding and programs that their urban counterparts do not.⁴ Additionally, rural communities are among those most directly affected by the challenges facing America's public and private lands, including growing risk of severe wildfire in the West, insect and disease epidemics, declining rangeland conditions, and decaying agricultural and recreation infrastructure. Climate change exacerbates these already critical challenges and threatens to transform entire landscapes, disrupting the ecological and social communities that depend on them.

In the face of these difficult circumstances, communities are looking to reinvent their workforces and reimagine community health. USDA programs are often crucial sources of financial and technical support in this work, helping kickstart emerging restoration economies, support local conservation partnerships, and fund infrastructure improvements needed to attract businesses and support rural entrepreneurs. We believe that producing more equitable outcomes for rural economies and landscapes will require increased investments in USDA programs and staff capacity, paired with reforms in how investments and opportunities are designed and allocated. Importantly, we also wish to acknowledge that more generalized references to "underserved communities" may not adequately recognize the unique position of tribes, which are and must be regarded as sovereign entities requiring unique recognition and consideration.

¹ Semega, J., Kollar, M., Shrider, E.A., and Creamer, J.F. (2020). Income and Poverty in the United States: 2019 (P60-270). United States Census Bureau. <https://www.census.gov/library/publications/2020/demo/p60-270.html>

² Pender, J. (2015). Foundation Giving to Rural Areas in the United States Is Disproportionately Low. U.S. Department of Agriculture Economic Research Service. <https://www.ers.usda.gov/amber-waves/2015/august/foundation-giving-to-rural-areas-in-the-united-states-is-disproportionately-low/>

³ The Ford Family Foundation. (2017). Rural Infrastructure Needs. <https://www.tfff.org/community-vitality/spring-2017-issue-1/rural-infrastructure-needs>

⁴ Vilsack, T., Donovan, S., Munoz, C., & Zients, J. (2016). Rural strategies that work: Lifting up Federal policies that are responsive to the assets and challenges of rural America.

Policy Recommendations

Leveraging

- Matching requirements often present a major hurdle for partners and communities with fewer financial resources. Consider ways to revise agency matching requirements to more frequently allow and value in-kind contributions and allow for unsecured match in application stages. Grant application information, including fact sheets and toolkits, should explicitly include the allowance of in-kind match and a description of how in-kind match is scored by grant reviewers.
- Increase opportunities for waivers or modifications of matching requirements for projects or partners that are considered historically underserved or demonstrate disadvantaged status.

Flexibility

- Allow for more flexibility in reporting requirements to account for the fact that under-resourced partners and funding recipients may not have long-term datasets, monitoring resources, or other typical means of evaluating progress and outcomes. We also see benefit in assigning value to metrics such as network-building or increased community engagement and ownership of a project that may be equally important to the impact of USDA programs or funding in underserved communities.
- Give more flexibility to agency staff in considering performance measures related to grantmaking and service provision. Measuring agency staff or program performance by outputs disadvantages rural communities which often show a higher per-capita cost for services given dispersed population geography and greater travel time.
- Encourage innovative approaches to evaluating and prioritizing funding and program applications, making eligibility determinations, and evaluating match. Considering intangible or harder-to-measure factors like cultural and social capital; “ripeness” for economic opportunity; and strength of relationships and networks can increase accessibility to rural partners that, due to limited public and philanthropic resources, may score lower on typical evaluation metrics. Very rural communities with populations of 5,000 or less, for example, have few if any government staff to execute and manage contracts. Project applications are often coordinated, developed, and carried out by aging volunteers.
- Allow more flexibility for states to shift funding from under-prescribed to over-subscribed USDA programs. Underserved communities vary across the country. States are better positioned to identify their underserved populations, recognize their needs, and match initiatives with USDA resource availability.

Capacity

- Allocate more federal funding to support coordination, administration, and capacity-building functions such as worker training, partnership development, and data collection, but not at the expense of project dollars. Doing so would enable greater participation from entities such as small municipalities and community nonprofits that may not have other ways of covering the costs of these core functions, while also helping develop stronger partners and partnerships in places where they may not exist.
- Dedicate more agency positions to supporting partnerships and helping partners work through grants and agreements. The administrative processes and requirements associated with grants and agreements are currently a barrier to less-resourced, lower capacity, and less experienced partners.
- Recognize the important role of community-based organizations that work directly with underserved and under-resourced communities. These organizations are often well-positioned to apply for and help deliver government programs in small communities, bring in outside philanthropic investment, and fill gaps in service delivery between government programs. These organizations also play a key role in engaging with local communities and fostering inclusive strategies for decision-making. Consider direct capacity funding for such groups, as well as preferential selection when awarding work.

Access

- Allow for multiple rounds of funding annually, allowing applicants to correct minor errors or issues in their applications and re-apply in a timely manner. Bi-annual application schedules allow for more flexibility for leveraging funding sources. Applications are time intensive. If applications are worthy of USDA consideration but lacking small details, or if USDA staff capacity is temporarily insufficient to assist underserved communities, a bi-annual timeline will result in more access.
- Some grantmaking programs institute minimum grant sizes in a bid to increase the per-grant efficiency of administration, but in doing so make their programs less feasible for rural communities and partners unable to meet the associated matching and administration requirements, for example. We recommend removing minimum grant sizes for programs of importance to rural communities and people. Rural communities also will benefit from increased micro-grantmaking to meet small, but critical needs.
- Offer trainings several months in advance of a program due date. USDA encourages applicants to work closely with USDA staff on application development. Underserved communities and community-led initiatives involve a large number of public and private partners and often result in even more complicated grant applications, including multiple match sources and the coordination of local organizations and businesses. Grant requirements are substantial and require more than a month of preparation to be successful. A productive grant application development relationship between the community and USDA should be initiated more than a month before the grant deadline.

- Allow for discretionary points for returning grant applicants. A number of USDA grants only allow for discretionary points for first-time applicants, creating a disadvantage for underserved communities accessing a program more than once.
- Remove internal obstacles to USDA Community Facilities program utility for recreation infrastructure. Recreation infrastructure includes parks, pools, trails, and playgrounds that are essential for community health. These facilities are disproportionately unavailable in underserved communities and are proven to spur job growth and entrepreneurship.
- Emphasize the value of green infrastructure across the agency. Green infrastructure includes trails, parks, community forests, and facilities that contribute to community health, clean water and transportation for all community members.
- Recognize the unique opportunities associated with USDA grant programs, as opposed to loans. For those unable to access capital, loans do not meet the moment or the needs of underserved communities. People in underserved communities have been marginalized and experienced discrimination through USDA programs. Trust needs to be rebuilt through direct assistance to communities before USDA can expect underserved entrepreneurs to engage in the complex lending process.

General Support for Rural Communities

- Recognize the potential impact of definitions of “rural.” While we appreciate that rural communities are included in the definition of “underserved communities,” it is equally important to keep a definition of “rural” that meaningfully captures disadvantaged communities. Consideration should also be given to defining “remote” or “frontier” rural communities - those communities with the least access to capital and the most interdependence with public lands.
- Better align the work of different agencies within USDA. More coordination between Forest Service, Natural Resources Conservation Service, and Rural Development staff could help align opportunities to accomplish desired projects while helping to build and grow the rural workforce and organizations needed to accomplish the work.

Increase support for programs that work

We recognize that USDA programs already demonstrate and incorporate some of these recommendations and we encourage greater support for those programs. The Rural Business Development Grant Program (RBDG) provides one particularly promising model for enabling more equitable access and providing flexibilities that better match diverse needs of rural communities. For example, the program uniquely allows applicants to leverage in-kind contributions, has a wide range of eligible activities, and is available to nonprofit as well as public institutions as applicants. The program is also tied directly to job growth in rural communities. In Montana and Idaho, Heart of the Rockies Initiatives has been able to assist six rural (less than 5,000 population) communities on community health, local food, and recreation economy initiatives. Most of these communities were receiving federal funding for the first time

for these types of projects and were able to leverage state funding that is also not typically accessed by communities of their size. The key to scaling up and replicating these types of projects across our western landscape is to increase capacity at USDA, expand technical assistance network support, and increase program funding to exemplary programs like the USDA RBDG that are currently overprescribed. Montana and Idaho receive approximately \$300,000 annually for this program, and yet Montana USDA RD alone had over \$1 million in applications in 2021. USDA RD should consider increasing the annual allocation to at least \$1 million per state and offer a bi-annual application periods for this program.

Thank you for the opportunity to comment on this important issue.

Sincerely,

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