

October 22, 2020

Mr. Kevin Norton, Chief (Acting)
Natural resources Conservation Service
US Department of Agriculture
1400 Independence Ave., SW, Room 6149-S
Washington, DC 20250

Dear Chief Norton:

The undersigned organizations respectfully ask that the Natural Resources Conservation Service (NRCS) suspend its transition to the use of the Water Erosion Prediction Project (WEPP) in its conservation services delivery system. Instead, we encourage the agency continue its longstanding reliance on the Revised Universal Soil Loss Equation, Version 2 (RUSLE2) until such time a new tool is developed that draws from the strengths and advantages of RUSLE2 and WEPP. We also encourage the agency, once such a new tool is developed, to adopt it under a transition plan that is developed with the full support and involvement of our members as well as other stakeholders such as the state agencies that currently rely heavily on RUSLE2 in their work with our members and others. We stand ready to work with NRCS in any effort to find a way forward that takes advantage of both RUSLE2's and WEPP's complementary strengths and capabilities, such as development of a new WEPP-RUSLE2 hybrid model, and to assist the agency to ensure a smooth and lawful transition to the use of the resulting new tool.

We find that there are simply too many great and unexplained discrepancies between WEPP and RUSLE2's erosion estimates to allow WEPP to replace RUSLE2. We foresee great confusion, controversy and problems that would result if that were done, not only for the landowners and managers that are our members, but for the numerous other state and federal programs that currently rely on RUSLE2 in their work with our membership. The credibility of the agency's conservation programs would likely be badly damaged as a result.

We know that the agency is well-aware of the results of multiple analyses of WEPP and RUSLE2 conducted since NRCS's announcement of the intent to transition to WEPP in 2016. These analyses have shown there to be large differences in the two tools' erosion estimates for individual farm fields across varying soil types and conservation practices. Over time these analyses have become more refined and precise to control for external factors like weather that were thought to be contributing to these differences. Yet despite these refinements, very sizable and disturbing differences in their erosion estimates persist. This is doubly disturbing since the researchers and the agency are unable to explain the reasons for these differences.

We welcome and support NRCS's commitment to the development, adoption and use of more efficient and accurate tools that can help the agency provide better services for farmers, ranchers, forest landowners and others. We wish such efforts to continue but we encourage your engagement with the agricultural community as you do so. We make the above request relative to WEPP in that spirit.

American Farm Bureau Federation
Agricultural Retailers Association
American Sugar Beet Growers Association
Illinois Farm Bureau
Indiana Pork Producers Association
Iowa Farm Bureau Federation
National Association of Wheat Growers
Minnesota Agricultural Water Resources Council

National Cotton Council
National Council of Farmer Cooperatives
National Corn Growers Association
National Pork Producers Council
The Fertilizer Institute
United Egg Producers
Virginia Farm Bureau Federation

cc: Dr. Chavonda Jacobs-Young, Administrator, USDA-ARS