

To: Tom Vilsack, Secretary-Designee, U.S. Department of Agriculture
From: National League of Cities
Re: Policy Areas of Importance to Cities, Towns and Villages
Date: January 29, 2021

As the voice of America's cities, towns and villages, representing more than 200 million people across the country, the National League of Cities (NLC) looks forward to working with the Biden-Harris Administration and with the team at the U.S. Department of Agriculture (USDA). Local governments are key partners in nutrition assistance and conservation programs. Further, many municipalities are located in rural communities, and USDA's Office of Rural Development provides a critical lifeline to infrastructure development and maintenance in these locations.

As cities look to partner with the Administration in the first 100 days and beyond, we hope that the following areas will be taken into consideration:

Direct Fiscal Relief to Cities, Towns and Villages

Cities are the engine of our nation's economy and essential to America's economic recovery. From infrastructure like roads and water to libraries and schools, to workforce development centers and childcare, cities towns and villages create the conditions that drive new business, spur innovation, and attract talent and investment. However, America's communities are hurting. As the findings of NLC's 2020 [City Fiscal Conditions report](#) reveals, America's cities are experiencing the fiscal consequences of the coronavirus pandemic-downturn at an unprecedented speed – and like recent recessions, it will take years for municipal budgets to recover from the impact of COVID-19. Additionally, NLC's latest [survey data](#) of over 900 cities, towns and villages found that 71% believe their government's fiscal condition will worsen if Congress doesn't pass another stimulus package. Cities, towns and villages across our country need direct fiscal relief to communities of all sizes to ensure that essential city services and important community-anchoring programs can remain in operation.

Regular Communication with Stakeholders

Local leaders are committed to intergovernmental partnership, through federalism, requiring a cooperative partnership among local, state and federal governments that must be strengthened through all levels of government. Local leaders look forward to working collaboratively with the Biden-Harris Administration and in a manner that recognizes the importance of a federal-local partnership. As such, we hope that USDA will institute regular stakeholder meetings, as well as include local leaders and their national associations, such as NLC, at the table when rules are being crafted to provide important perspective and to ensure that rules are effective, implementable, offer local flexibility, avoid a "one-size-fits-all" approach and avoid any unfunded mandates.

Commitment to Racial Equity and Environmental Justice

The coronavirus pandemic [exposed the inequities](#) that long existed in communities, particularly evident in Black, Indigenous, Latin/Hispanic and other communities of color. As local leaders look to reimagine government policies, procedures and processes to build more equitable communities, NLC's [Race, Equity And Leadership \(REAL\)](#) department helps city, town and village leaders strengthen their knowledge and capacity to learn about the impact of historical inequities and design programs that dismantle structural and system racism. NLC aims to achieve this goal by centering racial equity in our all

our work including our direct technical assistance and research. NLC calls on the federal government to prioritize federal investments in communities that have been left behind, specifically our BIPOC communities, which have been disproportionately impacted by the effects of COVID-19, food and health inequities, and historical policies and under-investment.

Nutrition Programs and Emergency Food Assistance

Before the COVID-19 pandemic, more than 37 million people across the United States, including more than 11 million children, lived in a food-insecure household, meaning they lacked consistent access to enough food for an active, healthy lifestyle. As cities continue to respond to the pandemic and its health and economic shockwaves, it is vital to revisit and bolster food access plans. NLC supports programs and policies that ensure that all people have access to health, affordable and locally grown food.

Supplemental Nutrition Assistance Program

The Supplemental Nutrition Assistance Program (SNAP) is an essential tool helps families put food on the table and to reduce poverty. Over the long-term, these impacts lead to improved health outcomes. As such, NLC supports keeping Categorical Eligibility for this program at its current state and continue to support access to the increased number of residents across cities, towns and villages that need access to this vital program. NLC also strongly encourages that the administration addresses the impact of the Public Charge Rule on accessing critical benefits such as SNAP. While a federal district court has ruled that if there is a declared national health emergency related to COVID-19 the public charge rule may not go into effect, the Administration should consider the broad implications of the rule beyond the pandemic. Recent changes to the definition of public charge have a direct negative impact to the economic vitality of cities, towns and villages, both to local businesses and the workforce, and would endanger the health and well-being of our residents. Access to public benefits provides a critical path to economic mobility and security for many residents in our communities, including immigrant families. Restricting access to these benefits impedes an immigrant's ability to reach their full economic potential, severely limits the ability of farmers and local business to hire workers and causes long-lasting harm to local economies. Providing access to Medicaid, Medicare, SNAP, housing and other public assistance programs to immigrants reduces burdens on safety-net hospitals, eases the strain on local food pantries, and enables farmers, retailers and businesses to hire the workforce they need to improve our economy.

School Meals

USDA should explore the expansion of direct certification through Medicaid and other programs to link eligible children to school meals while reducing the administrative work for our school district partners while improving program integrity. Additionally, the administration should utilize USDA authority to extend nationwide school nutrition program and out of school time program waivers through September 30, 2021 to allow schools to support program operations through the fiscal year. This will allow school districts and cities to continue to work together to feed our youngest residents.

Healthy, Local Foods

NLC supports programs that promote local and regional food systems and strengthen communities with farm to table investments and increased access to healthy, local foods. Healthy food nutrition programs such as the Seniors Farmers Market Nutrition Program, the Healthy Food Financing Initiative, and the Food Insecurity Nutrition Incentives, help promote food equity by helping to eliminate food deserts and incentivizing low-income consumers and seniors to buy fresh produce from farmers markets. Moreover, these programs benefit regional economies by increasing and strengthening direct producer-to-

consumer channels. NLC encourages USDA to grow these programs as households nationwide face deeper challenges with food insecurity as a result of the coronavirus pandemic and economic impacts.

Rural Development

Water and Wastewater

America's water infrastructure is aging, beyond the 50-75 year life span, with some infrastructure 100-150 years old. While local government investments account for nearly 98% of all water and sewer infrastructure spending, including more than \$130 billion in 2018, according to the U.S. Census Bureau, there remains a large infrastructure spending gap to address the nation's capital needs and modernize systems for the 21st century. The challenges facing America's rural communities and utilities are even more pronounced. The federal government should recommit to being a significant partner in investing in our nation's water infrastructure and provide robust funding and financing through programs such as the Rural Utilities Service Water and Waste Disposal Program. Finally, the Rural Utilities Service Technical Assistance and Training Program enhance the ability of small towns to invest in critical water upgrades, public health and safety facilities that are necessary to build a prosperous rural economy.

Broadband

USDA should remove its self-imposed limitations on eligible service areas for programs like ReConnect that are intended to prevent "overbuilding." While the effort to maximize federal dollars is admirable, by rendering areas that have received other state or federal broadband funding, or have some locations with 10/1 Mbps service (which has proven seriously inadequate during the pandemic for multiple household members learning or working remotely) barred from participation in ReConnect or future programs modeled on it, residents are cut off from potentially better service.

Housing and Development

The Administration should support scalable innovation and financing for cities, towns and villages. Every U.S. city, town and village relies on strong regional partnerships with USDA, HUD or both for capacity building and access to capital to better serve the housing needs of their residents. The federal government is often the only feasible source of technical assistance and access to capital for the 20 percent of the U.S. population that lives in small and rural communities. The Housing Assistance Council, in Congressional testimony, put it best: "Rural housing markets are not just smaller versions of urban ones, and [federal housing programs] do not necessarily translate to the benefit of rural places. The few programs and modest federal spending on rural-specific programs are simply not enough to maintain a level playing field with other parts of the country."

USDA should seek increased funding for rural-rental programs and improve alignment with HUD rental-assistance programs. For many rural communities, housing instability and unavailability are compounding broader economic crises that have been decades in the making. These situations require a variety of approaches to overcome. At the same time, economic recovery cannot begin without housing stability.

USDA should offer federal assistance for rural home construction and credit for rural homebuyers. Homebuyers in small and rural communities often face challenges similar to impoverished urban neighborhoods, like inadequate access to mortgage credit, aging and declining housing stock and higher costs for housing construction and rehabilitation. Federal-homebuyer assistance should be available and flexible for use in both urban and rural communities.

Conservation

Conservation programs such as the Regional Conservation Partnership Program (RCPP) connects partners with producers and private landowners to design and implement voluntary conservation solutions that reduce nutrient pollution and runoff. Under the program, USDA, state agencies and non-governmental organizations work together to provide financial and technical assistance to farmers to install conservation activities to tackle priority natural resource concerns in a state or region. RCPP helps producers install and maintain conservation activities like cover cropping and nutrient management in selected project areas. Incentivizing conservation programs is essential to promoting cleaner water, soil, air and proper wastewater disposal at the local and regional level. Furthermore, addressing nonpoint source pollution will support local government efforts in reaching Total Maximum Daily Load and Water Quality Standards. NLC supports federal effort to better coordinate and focus federal resources to address water quality and achieve nutrient reduction goals where there is a surplus of nitrogen and phosphorus in waterbodies.

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