WESTERN LANDOWNERS ALLIANCE
STEWARDSHIP WITH VISION

The Western Landowners Alliance advances policies and practices that sustain working lands, connected landscapes and native species.

April 8th, 2026

Economic Research Service
1400 Independence Avenue SW
Mail Stop 1800
Washington, DC 20250-1800

*Re: USDA Request for Information on Statistical Data, Analysis, and Research*

Dear Mr. Hutchins and Mr. Benavidez:

The Western Landowners Alliance (WLA) appreciates the opportunity to provide input on USDA's economic and statistical products and their role in supporting agricultural producers, land managers, and rural communities across the West.

WLA is a landowner-led organization that advances policies and practices that sustain working lands, connected landscapes, and native species. Our members are proud stewards of the Western landscape, including BLM, USFS, state and private lands. Across our network, there is a strong need for data that reflect Western ecosystems. While USDA produces a wide range of valuable datasets, important gaps remain particularly in capturing the costs of wildlife interactions, the true costs of conservation program participation, and the limitations of existing data used to estimate grazing land values in the West. As a result, programs often do not reflect the on-the-ground realities producers face. We respectfully submit the following comments on ways to improve USDA data collection:

**What gaps exist in the agricultural data produced?**

First, there is a lack of consistent, reliable data on the costs associated with wildlife. Producers often bear substantial, uncompensated costs related to wildlife, including forage loss, livestock depredation, fence damage, water infrastructure impacts, disease transmission risks, and time spent on management and monitoring. These costs are rarely captured in national datasets, yet they directly affect profitability and management decisions. NASS data collection should better capture this information so that ecological impacts and benefits can be quantified. This will aid in policies and programs reflecting these ecological costs.

Second, current data collection does not adequately reflect the true cost of participating in conservation programs. While program payments (e.g., EQIP, CSP) are tracked, there is limited data on:

- Upfront capital investments required to implement practices
- Ongoing maintenance and management costs
- Administrative burden and time required to apply for and comply with programs
- Opportunity costs, including foregone production or flexibility

Third, NASS surveys, while important for collecting agricultural information, should not be the sole basis for determining grazing land values. The current USDA approach for determining Grassland CRP rental

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rates relies primarily on county-level pasture cash rent estimates collected through NASS surveys. While this provides a consistent national data source, it does not accurately reflect grazing land values across the West for several reasons.

Firstly, pasture rental markets in the state are relatively thin (few transactions), and NASS estimates are often based on a limited number of observations, increasing the potential for measurement error or volatility in reported values. Secondly, NASS pasture rents are self-reported and reflect a wide range of lease arrangements that differ in contract length, risk sharing, and responsibilities for infrastructure or herd maintenance (e.g., fence or water development repair, or herd movement). Because these contractual characteristics are not fully captured in the survey data, reported rental rates may not be directly comparable across operations. Grazing leases in the region are also typically negotiated on a per–animal unit month (AUM) basis rather than per acre, and rangeland productivity varies widely across western landscapes due to differences in precipitation, soils, and management. Thirdly, most "pastures" in the west cover extensive areas composed of a highly fragmented mix of private and public (mostly BLM and state land) lands. Public lands generally have minimal grazing fees, which likely further clouds producer-reported rental rate data. Finally, grazing lease rates may not fully reflect the economic value associated with Grassland CRP enrollment, which compensates landowners for maintaining working grasslands and the ecosystem services they provide rather than simply the market value of forage production.

We were pleased that the USDA for the first time allowed states, county offices, and partners to submit alternative Grassland CRP rental rates (see FSA Notice CRP-1079). This allowed groups like ours to initiate a white paper from agriculture economists at the University of Wyoming, attached. The white paper developed alternative rate estimates using two models. One alternative rental rate model estimates grazing land values derived from Wyoming's Land Valuation Study, which uses an income-based approach to estimate land values based on AUM assumptions for different land types. The second alternative rate model estimated the cost of foregone development values by modeling residential development risk for agricultural parcels across Wyoming using a propensity score based on parcel-level characteristics such as soil quality, distance to towns, and land cover to estimate the likelihood that an agricultural parcel would transition to residential use.

Both models produced substantially higher estimates than NASS and offer a more accurate reflection of grazing land values for Grassland CRP. We encourage USDA to continue allowing this type of input from states and partner organizations. We also urge USDA to give strong consideration to alternative rate estimates developed by university economists using publicly available data.

While we appreciate the opportunity to engage at this level with rate estimation, we recognize the burden this places on many state and county offices that do not have university economists at their disposal. It would be helpful for the national office to provide accessible data sources and defensible methodologies for deriving rental rate estimates to state offices. While there is no "one size fits all" approach, in the absence of strong NASS data, there is a real need for consistent, practical alternatives that states and counties can rely on.

**What new topic areas should USDA prioritize for data products?**

As noted above, NASS surveys and other USDA data products should expand to better capture ecological services and their economic implications for producers. In particular, USDA should prioritize data on wildlife–agriculture interactions, including both the costs (e.g., depredation, forage loss, infrastructure damage, and disease risk) and the benefits of maintaining habitat and biodiversity. These dynamics are especially important in the West and are currently underrepresented in national datasets.

USDA should also prioritize data on the value of ecosystem services provided by working lands, such as carbon sequestration, water management, soil health, and habitat connectivity. Improved data in this area would help inform conservation program design, support emerging markets, and ensure producers are fairly compensated.

WLA is grateful for the opportunity to comment on the importance of data and gaps. USDA's statistical and economic research plays a foundational role in supporting agricultural decision-making and program implementation. Continued investment in improving these data systems is essential. WLA welcomes continued opportunities to work with the USDA to ensure that data and research efforts meet the needs of producers managing agricultural operations that benefit both people and wildlife.

Sincerely,

Shaleas Harrison

Shaleas Harrison
Policy Manager, WLA