

April 13, 2020

Bill Northey, Undersecretary of Agriculture
for Farm Production and Conservation
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Richard Fordyce, Administrator
Farm Service Agency
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Dear Undersecretary Northey and Administrator Fordyce,

We the undersigned, representing a broad swath of the sportsmen's and conservation communities, write regarding implementation of the Conservation Reserve Program (CRP). We were encouraged to see that the Farm Service Agency (FSA) has accepted 3.4 million acres of lands during the recent general signup period. Enrolling these lands will not only improve soil, water, and habitat health, but also improve the economic and environmental resiliency of agricultural operations and rural communities nationwide.

The 2018 Farm Bill made several changes to CRP in order to accommodate landowner interest in the program, including raising the acreage cap to 27 million by Fiscal Year (FY) 2023. In addition to this increased cap, contracts on 12.4 million acres are set to expire between now and FY2022. This presents a significant opportunity for landowners and rural communities alike to enroll more acres into this highly successful program. It also presents a significant risk of ending up far below the cap. Now more than ever it is critical that CRP be administered to maximize enrollment in the program and ensure the benefits of CRP will continue for years to come. To that end, our organizations urge FSA to consider the following recommendations prior to the next general signup:

- Allow adjustments for soil productivity both above and below the county soil rental rate. The 2018 Farm Bill limits CRP soil rental rates for general CRP to 85% of the estimated NASS rental rates for the county, but still allows for "adjustments relating to specific practices, wellhead protection, or soil productivity." Despite this, FSA made the discretionary decision to cap soil productivity factors at 1.0, which has had a negative impact on landowner interest under recent signups. Fully restoring rate adjustments would alleviate concerns surrounding rental rates that have been repeatedly raised since the CRP interim rule was published, while still keeping with the intent of Congress to reduce rental rates to avoid CRP-driven market distortions.
- Restore cost-share for mid-contract management activities. In authorizing grazing as a mid-contract management (MCM) activity, the 2018 Farm Bill stipulates that it would not be eligible for the mid-contract management cost-share. The interim rule, however, interprets the statutory language as eliminating the cost-share entirely. Doing so serves to disincentivize the quality management of conservation practices and lessens landowner interest in enrolling or reenrolling in the program.

- Publish a public timeline of expected CRP signup periods. Making such information publicly available well ahead of time will allow farmers and landowners to be best suited to make informed decisions about land use and planting. It will also allow non-governmental partners and organizations with an interest in the program to better assist USDA in program delivery and outreach to landowners.

We believe the acceptance of 3.4 million acres into CRP during this recent signup period is a significant step in the right direction for maximizing enrollment in the program, which is a stated goal of Secretary Perdue. With 5.4 million acres expiring this coming fall, however, we recognize that there is much work to be done between now and October. Without further significant enrollment in the program, we are concerned that dwindling acreage will result in future funding reductions and a decrease in the effectiveness of CRP. We believe the above recommendations, as well as previously stated recommendations including increasing incentive payments under continuous signups, are critical steps that must be taken in order to achieve the shared goal of full CRP enrollment.

Again, we greatly appreciate the faithful work of FSA staff in implementing the significant changes made to CRP under the 2018 Farm Bill. We look forward to continuing to work with the agency to ensure the future success of CRP and stand ready to help in any way possible to achieve that goal.

Sincerely,

American Fisheries Society
Association of Fish and Wildlife Agencies
Boone and Crockett Club
California Waterfowl
Delta Waterfowl
Ducks Unlimited
Izaak Walton League of America
National Alliance of Forest Owners
National Bobwhite Conservation Initiative
National Deer Alliance
National Wild Turkey Federation
National Wildlife Federation
North American Grouse Partnership
Pheasants Forever
Quail Forever
The Nature Conservancy
The Wildlife Society
Theodore Roosevelt Conservation Partnership
Western Landowners Alliance
Wildlife Management Institute
Wildlife Mississippi