



October 19, 2009

CRP SEIS

ID#: FSA\_FRDOC\_0001-0109

c/o TEC Inc.

8 San Jose Drive, Ste 3-B

Newport News, VA 23606

Dear Sir or Madam:

The Izaak Walton League of America is a private, non-profit conservation organization that for 87 years has supported strong federal conservation policies on private lands, especially agricultural lands. Our nationwide membership lives, works and recreates in rural communities. We have a decades-long record of support for farm families and collaborative efforts to achieve conservation that sustains agriculture, habitat, and all natural resources.

Since enactment in 1985, the Conservation Reserve Program (CRP) has long been regarded as the premiere and foundational conservation program established by the U.S. Department of Agriculture. In fact, it was in 1937 that the Izaak Walton League first proposed program principles and goals now contained in CRP. And the success of CRP can not be denied:

- Restored 2 million acres of wetlands and adjacent buffers;
- Restored over 8 million acres of valuable grassland and forest habitats;
- Reduced soil erosion by more than 40 percent;
- Protects 170,000 miles of streams;
- Sequesters 48 million tons of carbon dioxide;
- Produces 13.5 million pheasants each year; and
- Supports 2.2 million ducks per year in the Prairie Pothole Region.

#### **Supplemental Environmental Impact Statement (SEIS)**

As USDA's Farm Service Agency, on behalf of the Commodity Credit Corporation, conducts the SEIS process, the Izaak Walton League of America urges a continued commitment to key principles and components while enhancing the overall effectiveness of CRP:

#### ***Rental Rates***

The payment structure for CRP should be modernized to compete with the many land use opportunities that face producers. USDA should carry out the annual survey of farmland

rental rates as required by the 2008 Farm Bill, and should use the results of that survey to update the rental rates it offers on CRP contracts every year.

### ***Economic Use***

We support managed grazing and haying on CRP lands where and when it is consistent with the conservation of soil, water quality, and wildlife habitat; at intervals that are compatible with wildlife needs (even during emergencies such as droughts) including avoiding the nesting season and brood-rearing seasons for birds. These seasons and intervals were negotiated within each state and published in Notice CRP-537, and we request that these provisions continue. As USDA considers what economic uses can be allowed on CRP contract acres, it should ensure that any economic use allowed promotes the statutory purposes of the Program—soil, water, wildlife, and implementing conservation initiatives—and it should consider each suggested use separately. Haying, grazing, biomass harvest, and wind energy each can have very different impacts on wildlife that depend on CRP fields for habitat.

### ***Vital land and long-term options***

We support providing willing landowners with the option to protect and enhance important wetlands and adjacent buffers, sensitive land, and high-value habitat into permanent (perpetual) or at least long-term (30-year contracts or easements) protections.

### ***Acreage cap criteria***

The Continuous Conservation Reserve Program (CCRP) and the Conservation Reserve Enhancement Program (CREP) are designed to address specific conservation issues, such as buffers along streams and rivers and important wildlife habitats. We recommend that these programs and practices be exempted from the county acreage cap of 25 percent for general CRP.

### ***Conservation Plans***

Mid-contract management is a crucial element of CRP success in both conservation and economic terms. Poorly managed contract acres detract from the purpose and the appeal of the program. We support careful examination of alternative management options to enable the most effective conservation results, with a possible goal of eliminating rental rate reductions for practices including managed harvesting or routine or prescribed grazing if site-specific benefits can be assured.

### **SEIS Action Alternatives**

Finally, in addition to the preceding principles and enhancements urged by the Izaak Walton League of America, the primary issue for our members in the proposed action alternatives is the authorized acreage enrollment. We support Action Alternative 1 on this basis.

We support full enrollment of the CRP, and we believe that producers should be given ample opportunity to decide whether enrolling their land in the CRP is appropriate for their operation. We strongly recommend that FSA authorize an open enrollment—at least once each year—for the CRP. Furthermore, we strongly oppose any efforts to allow the early release of CRP acres without penalty. USDA should maintain CRP enrollment at the 32 million acre level authorized by Congress.

We want to emphasize that altering CRP national acreage totals obviously has no effect on the actual national acreage totals of Highly Erodible Land (HEL) and critical wildlife habitat. This obvious point is important for the fact that the League worked diligently during the most recent reauthorization of the Farm Bill to address the GAO-documented problem of Good Faith determinations being provided to approximately 80 percent of HEL (and Wetland Conservation) violations.

We worked with congress to establish Sections 2002 and 2003 in the Food, Conservation and Energy Act of 2008 to address the issue of the vast majority of HEL and WC violations receiving Good Faith waivers. As later addressed in CP-638, FSA has established a process we hope equitably assures appropriate, effective, and accurate use of Good Faith determinations. More importantly, we hope all parties—land owners, COCs, FSA, NRCS, etc.—work to ensure erosion and water quality impacts are reduced from unsustainable levels presently experienced throughout the nation.

The League views the issue of CRP enrollment and HEL (and WC) compliance as intractably linked. Where the 2008 Farm Bill already reduced the CRP acreage total from the pre-2008 authorization of 39.2 million acres to 32 million acres, more HEL acres are unquestionably at greater risk than when in permanent cover. It is incumbent upon FSA to ensure that erosion protections are stringently guarded on these millions of former CRP acres.

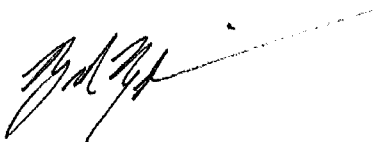
At the same time, the importance of allowing sufficient, regular sign-ups for CRP enrollment to maintain the 32 million acres authorized is equally critical for the verified and superior erosion (and wetland) protections provided by CRP. In the absence of CRP contracts, USDA is left with the responsibility to directly enforce required HEL conservation plans—and to directly confront and penalize non-compliant producers.

For these reasons, the League opposes any proposal to reduce the level of CRP authorized enrollment further, and instead advocate an increase.

### **Conclusion**

We thank you for your consideration of these comments on the future of the CRP. Please direct any inquiries regarding this submission to Brad Redlin, IWLA Agricultural Program Director, [bredlin@iwla.org](mailto:bredlin@iwla.org), (651) 649-1446 ext. 13.

Sincerely,



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