

February 4, 2020

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



RE: Conservation Reserve Program Interim Final Rule
Federal Register, 06 December 2019, 84 FR 66813-66833

Dear Administrator Fordyce,

The Izaak Walton League of America is one of our nation's oldest national conservation organizations, and we have been working to defend our soil, air, woods, waters, and wildlife since 1922. Our 40,000 members hunt, fish, hike, camp, canoe, conserve, and greatly appreciate and enjoy the great outdoors. Our work on agricultural policy dates back at least to the 1930's, when the League proposed a national program to protect fragile fields and streams in high mountain valleys by restoring cropland back to grassland. In the 1950's, the League's Walton Soil Plan presaged the federal Soil Bank Act of 1956, the precursor of the Conservation Reserve Program in the 1985 Farm Bill. Over the decades, the League has supported better farm and ranch stewardship through voluntary conservation programs and common sense provisions like Sodbuster, Swampbuster, and SodSaver.

Our state divisions and over 220 local chapters are engaged in conservation at the community level. We see the benefits of the Conservation Reserve Program (CRP) on the landscape. The CRP has been one of America's biggest and most successful conservation programs, and we would like to see that long tradition continue, providing soil erosion, water quality and wildlife benefits for years to come. We identified three key issues with the U.S. Department of Agriculture implementation of the Conservation Reserve Program, and urge you make the following changes in the CRP Interim Final Rule and in the way USDA implements the program.

1. Restore incentive payments for farmers willing to adopt high-value buffer strips, windbreaks, wetland restoration, wildlife habitat, and similar conservation measures through CRP Continuous signup practices, Conservation Reserve Enhancement Program contracts, and State Acres For Wildlife Enhancement (SAFE) contracts. That includes:

- Restoring the Practice Incentive Payments (PIPs) to at least 40% or 50%. Although USDA in its Interim Final Rule allows for Practice Incentive Payments of up to 50%, in implementing the program USDA reduced the PIP to just 5% and is offering it on fewer CRP practices.
- Restoring rental rate incentive payments to at least 20% for high-value water quality and wildlife practices. Those payments help address the reality that most farmers are enrolling just a few acres into the program to provide critically important practices like buffer strips, filter strips, and windbreaks, and the total payment under such a contract is relatively small.

2. Restore all State Acres For Wildlife Enhancement (SAFE) projects as Continuous Signup CRP options, not just the SAFE projects focused on water quality. That would allow PIPs, 90% rental rates, and rental incentive payments to be paid for practices that benefit targeted fish and wildlife species.

Lesser prairie chicken, bobwhite quail, sage grouse, rare bats and frogs, ducks, and many grassland birds all see huge benefits from carefully targeted SAFE projects. SAFE projects can leverage considerable state or local matching funds, and they should all be eligible for continuous signup and for the higher rental rates and payment incentives provided for other Continuous CRP practices.

3. Promote state, local, and Tribal partnerships. The Conservation Reserve Enhancement Program (CREP) leverages state and other funding to focus CRP contracts where they will do the most good to solve state-level water, soil, and wildlife problems. USDA's rule would adopt a presumption that all CREP agreements will include at least 30% state/local match, and would require a minimum amount of that match to go for direct payments to landowners. USDA should not impose standards more stringent than those already in the statute that could make it difficult for state, local, or Tribal entities to participate.

USDA should also work cooperatively with state and local agencies to re-open enrollment under the many CREP agreements in place, including those that recently expired because USDA refused to negotiate extensions or to re-open signup where enrollment was temporarily halted. CREP agreements leverage substantial state and private resources to solve difficult natural resource problems and they target federal and other dollars where they will have the most benefit. USDA should actively encourage, not discourage, CREP projects around the country.

Thank you for the opportunity to provide comments on the CRP Interim Final Rule.

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Arlington-Fairfax Chapter, Virginia, Izaak Walton League of America
Arlington-Fairfax Juniors Chapter, Virginia, Izaak Walton League of America
Bethesda-Chevy Chase Chapter, Maryland, Izaak Walton League of America
Bill Cook Chapter, Wisconsin, Izaak Walton League of America
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Commonwealth Chapter, Virginia, Izaak Walton League of America
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National Headquarters, Maryland, Izaak Walton League of America
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Wildlife Achievement Chapter, Maryland, Izaak Walton League of America
Winchester Chapter, Virginia, Izaak Walton League of America
Wisconsin Division, Izaak Walton League of America
Woodmont Chapter, Maryland, Izaak Walton League of America