

RE: CRP Transition Option

October 19, 2009

The Honorable Tom Vilsack
Secretary of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Dear Secretary Vilsack,

We, the undersigned organizations, applaud your efforts to address the particular needs of beginning and socially disadvantaged farmers and ranchers. We are writing to you with an urgent request that concerns the Conservation Reserve Program Transition Option—a program that was created in the 2008 Farm Bill to specifically address beginning and socially disadvantaged producers' access to land.

The new transition option provides incentives for CRP landowners who do not intend to extend their CRP contracts or re-enroll land back into the CRP to transfer the land through sale or lease to beginning or socially disadvantaged farmers or ranchers who are willing to return the land to production using sustainable or organic grazing, cropping, or mixed cropping-grazing systems. In return for the preference shown to beginning or minority farmers or ranchers, the landowner will receive an additional two years of payments. The new beginning or minority farmer or rancher also gets the options for organic certification and for re-enrollment of conservation buffers into the CCRP. The transition option was fully paid for through mandatory CCC dollars in the 2008 Farm Bill.

Incentives to assist new farmers and ranchers in gaining access to land in the coming years are critically important. The 2007 Census of Agriculture found that the number of operators 75 years and older grew by 20 percent from 2002, while the number of operators under 25 years old decreased by 30 percent. The future of the nation's rural communities will depend on the next generation of farm families having access to land and farming that land in a way that is consistent with conservation or organic production systems goals.

Currently, certain portions of the 2008 Farm Bill changes to CRP are included in the interim final rule (CRP "part 1"), while all the remaining 2008 Farm Bill CRP changes, including the transition option, will not proceed to rulemaking (CRP "part 2") for a very considerable length of time while an environmental impact statement is finalized.

We urge you to work with the agency to move the transition option from part 2 of the IFR to part 1 and to quickly issue an interim rule for the transition option. The USDA Budget Request shows that the Department and OMB believe that land in CRP will decline by about 4.3 million acres in 2009 and 2010 with declines tapering off thereafter. Waiting to implement the transition option after these 4.3 million acres goes back into production, with much of it changing hands, is a wasted opportunity and a complete defeat of congressional intent.

We believe it is quite clear that an option to transfer land coming out of the CRP to beginning or minority farmers with strong conservation parameters and the option for

certified organic production is clearly better for the environment than the transfer of the land without the option. Without the option it is likely that most former CRP land will go to the highest bidder with little or no conservation protection.

Indeed, the Farm Service Agency has reached the same conclusion. In the draft Programmatic Environmental Statement, issued for comment on September 9, 2009, both alternatives for implementing the 2008 Farm Bill changes to CRP include the transfer option. Therefore, the CRP transfer option is being held up by an environmental assessment that will have little or no impact on implementation of this important provision of the Farm Bill. Tying up the transition option in an environmental assessment process during the very period of time when the most land is about to be transferred undermines the environmental values the National Environmental Policy Act is supposed to protect. It is also a huge waste of taxpayer money that ensures that this hard won farm bill provision will be of little or no consequence during this farm bill cycle.

Moreover, delaying the CRP transfer option is a missed opportunity to provide the new generation of sustainable and organic farmers badly needed access to land. And the delay is at odds with the many provisions provided by Congress in the 2008 Farm Bill to assist beginning and minority farmers and ranchers.

In summary, we urge you to issue an interim final rule for the CRP transition option quickly, as part of the CRP “part one” rulemaking. We also urge you to actively promote the transition option to beginning and minority farmers and ranchers and to the owners of the over 4 million acres expected to leave CRP this year and next. Thank you for your consideration of our request.

Sincerely,

Appalachian Sustainable Development	Abingdon VA
Alberts Organics	Bridgeport NJ
American Grassfed Association	Denver CO
Ashland Food Coop	Ashland OR
Berkshire Co-op Market	Great Barrington MA
Bird Conservation Network	Evanston IL
Bountiful Cities Project	Asheville NC
California Certified Organic Farmers	Santa Cruz CA
Casa del Llano	Hereford TX
Center for Rural Affairs	Lyons NE
Center for Sustainable Communities	Stelle IL
City Seed	New Haven CT
Community Food and Agriculture Coalition	Missoula MT
Community Pharmacy Cooperative	Madison WI
Cornucopia Institute	Cornucopia WI
Crawford Stewardship Project	Steuben WI
Dakota Rural Action	Brookings SD
Farm Aid	Somerville MA
Farm Fresh Rhode Island	Providence RI
Florida Certified Organic Growers & Consumers, Inc.	Gainesville FL
Food Democracy Now!	Clear Lake IA
Georgia Organics	Atlanta GA

Grow Food.Org	Albany NY
Honest Weight Food Coop	Springfield IL
Illinois Stewardship Alliance	Washington DC
Institute for Local Self Reliance	Ames IA
Institute for Rural America	Des Moines IA
Iowa Environmental Council	Vineyard Haven MA
Island Grown Initiative	New York NY
Just Food	Lawrence KS
Kansas Rural Center	Missoula MT
Land Link Montana	Minneapolis MN
Land Stewardship Project	Grayslake IL
Liberty Prairie Foundation	Springfield NJ
Little Mountain Community Foundation	
Madison Area Community Supported Agriculture Coalition (MACSAC)	Madison WI
Maine Organic Farmers and Growers	Unity ME
Maine Sustainable Agriculture Society	Bangor ME
Marche, LLC	Eugene OR
Michael Fields Agricultural Institute	East Troy WI
Michigan Farmers Union	Sparta MI
Michigan land Use Institute	Beulah MI
Moore Farms	Woodland AL
National Farmers Organization	Washington DC
National Sustainable Agriculture Coalition	Washington DC
Nebraska Sustainable Agriculture Society	Hartington NE
New England Farmers Union	Shelburne Falls MA
New Entry Sustainable Farming Project	Lowell and Boston MA
New Jersey Conservation Foundation	Far Hills NJ
NOFA CT	
NOFA Interstate Council	
NOFA MA	
NOFA NH	
NOFA NJ	
NOFA NY	
NOFA VT	
Ohio Ecological Food and Farm Association	Columbus OH
Oregon Tilth	Salem OR
Organic Consumers Association Washington	Washington DC
Organic Farming Research Foundation	Santa Cruz CA
Pesticide Action Network North America	
Rural Life Committee, North Dakota	
Conference of Churches	
Slow Food USA	Brooklyn NY
Sustainable Highlands NJ, Inc.	Hackettstown NJ
The Carrot Project	Somerville MA
United Farmers USA	
Vermont Grass Farmers	Burlington VT
Vermont Vegetable and Berry Growers Association	Brattleboro VT
Virginia Association for Biological Farming	Lexington VA
Women, Food and Agriculture Network	Ames IA

CROPP/Organic Valley
Field to Table, Inc.
Michigan Organic Food and Farm Alliance
National Catholic Rural Life Conference
NM Food and Agriculture Policy Council
Practical Farmers of Iowa
Tilth Producers of Washington
Washington Sustainable
Food & Farming Network

LaFarge WI
Greenfield MA
Lansing MI
Des Moines IA
Santa Fe NM
Ames IA
Seattle WA
Mount Vernon WA