

October 19, 2015

Mike Schmidt
Associate Administrator for Programs
Farm Service Agency
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Associate Administrator Schmidt,

Thank you for the opportunity to provide recommendations regarding implementation of the Continuous Conservation Reserve Program (CCRP). In response to your request for input on the future direction of CCRP, we offer the following recommendations regarding program structure, conservation planning, ranking criteria, conservation practices, pollinators, and mid-contract management.

Conservation Planning for Working Grasslands

- All CRP Grasslands enrollments should have a robust, comprehensive conservation plan (or Resource Management System plan) that addresses soil, water, and wildlife concerns, as well as grazing, haying, and other authorized uses.
 - For haying uses, conservation plans must describe the timing, frequency, and acreage of harvest, as well as stubble height, in order to maximize benefits to wildlife, especially during primary nesting seasons.
 - For grazing uses, conservation plans must describe grazing management activities, including planned rotations and stocking rates consistent with sustaining or improving habitat and protecting water and soil.
- Where the CRP working grasslands option is being used to reestablish pastures impacted by drought, conservation plans should require that affected acreage is re-planted to the greatest extent possible with drought-tolerant native forages (including, if possible, palatable forbs and legumes, and that restoration should be supported by incentive or cost share payments).¹

Ranking Criteria for Working Grasslands

- The national ranking criteria should continue to prioritize expiring CRP grassland acres, particularly those acres that also contain diverse native covers.
- 1.6 million acres expired from CRP on September 30. Yet, the first enrollment period for CRP working grasslands did not begin until September 1. Given the short turnaround and limited outreach capacity, it is doubtful that most of the producers with land that expired on

¹ While FSA is currently not providing C/S for restoration work, we feel that in this instance it's necessary in order for producers to meet federal resiliency mandates to mitigate drought and climate change impacts.

September 30 were aware of the grassland option during the month of September. We therefore urge you to prioritize these recently expired acres alongside the statutory priority for *expiring* CRP acres during the first enrollment year.

- The national ranking criteria should prioritize enrolling native grasslands over introduced grasses, and multi-species mixes over monocultures. Native grassland without a cropping history should receive a high priority.
- The national ranking criteria should assign ranking points for grassland acres that are most likely to be tilled for crop production or development. Large tracts of threatened grasslands should receive more ranking points than smaller tracts of threatened grasslands.
- The national ranking criteria should assign ranking points for grassland acres that provide high quality habitat for a broad diversity of priority wildlife species, including but not limited to those which are declining, candidate, threatened, or endangered, or those deemed to be economically-important.

Modifications to Existing Practices

- Continue highly erodible lands initiative, but enhance focus on establishing suitable cover which provides benefits to a broad diversity of species, including nesting birds, pollinators, and others, in addition to managing for water quality and soil erosion.
- Maximize ecological benefits of all CRP practices by requiring that minimum cover diversity standards equally address soil, water and wildlife needs. These standards should include the use of ecologically adapted native plants wherever possible.
- Prescribed burning: when determining burn deadlines, delegate authority to states, use biologically driven dates to manage wildlife and pollinator habitat based on primary resource concerns rather than coupling with arbitrary primary nesting season dates.
- FSA should work with partners to identify and promote appropriate seed mixes and seeding rates to producers.

Mid Contract Management

- For producers enrolled in CCRP or CREP, FSA should provide full or partial cost share for mid-contract conversion to habitat that benefits pollinators, candidate, threatened, or endangered species.
- Eliminate the annual cap on mid-contract management cost-share and set a life-of-contract cap.
- Eliminate time frame restrictions within CRP contracts as they fail to address different growing regimes around the country (e.g. CRP contracts in wetter areas with longer growing seasons need earlier and more frequent management.) Contract lifespan cost share caps make annual caps and time frames restrictions unnecessary, and current FSA software makes it unenforceable.

- Implement a 10 percent spot check rate of all CRP contracts to promote compliance with annual maintenance and mid contract management agreements. Where possible, work with outside contractors to leverage resources and expertise.

Program Structure, Enrollment, and Incentives

- Based on available program acreage, move to retain at least one third of total CRP acres in CCRP, both new enrollments and re-enrollments, for all types of continuous enrollments.
- Raise enrollment caps for the most successful initiatives.
- Use PAYGO dollars to make all continuous practices eligible for SIPs and PIPs for new contracts.
- Consider eliminating state allocation system for conservation practices, and instead pool practices by cost at the national level. We recommend two pools within which producers compete for funding: the first pool should include practices with SIPs, PIPs, and bonus payments; and the second pool should include practices with SIPs and PIPs but no bonus payments.
- Where possible, FSA should work with state and local units of government, non-governmental organizations, and producer groups to coordinate producer enrollments, leverage resources and expertise, and achieve landscape-scale conservation goals.

Thank you for considering our recommendations. We look forward to following up with you and your team soon.

Sincerely,

American Rivers
Ducks Unlimited
Izaak Walton League of America
National Bobwhite Conservation Initiative
National Association of Conservation Districts
National Farmers Union
National Sustainable Agriculture Coalition
National Wildlife Federation
National Wild Turkey Federation
Pheasants Forever
Quail Forever
The Nature Conservancy
Theodore Roosevelt Conservation Partnership
Wildlife Mississippi