

American Woodcock Society * Archery Trade Association * Association of Fish and Wildlife Agencies * Boone and Crockett Club * California Waterfowl * Camp Fire Club of America * Congressional Sportsmen's Foundation * Conservation Force * Council to Advance Hunting and the Shooting Sports * Dallas Safari Club * Delta Waterfowl Foundation * Ducks Unlimited * Houston Safari Club * Izaak Walton League of America * Masters of Foxhounds Foundation * Mule Deer Foundation * National Association of Forest Service Retirees * National Shooting Sports Foundation * National Wild Turkey Federation * National Wildlife Federation * North American Falconers Association * North American Grouse Partnership * Orion – The Hunter's Institute * Pheasants Forever * Pope and Young Club * Quail Forever * Quality Deer Management Association * Ruffed Grouse Society * Safari Club International * Texas Wildlife Association * Theodore Roosevelt Conservation Partnership * Whitetails Unlimited * Wild Sheep Foundation * Wildlife Forever * Wildlife Management Institute * Wildlife Mississippi

October 2, 2019

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Dear Secretary Perdue,

As you know, the Agriculture Improvement Act of 2018 (the 2018 Farm Bill) continues and expands the Conservation Reserve Program (CRP) by increasing the statutory cap to 27 million acres by FY2023, up from the cap of 24 million acres set by the last farm bill. This increase in acreage was considered a major gain for sportsmen and women across the nation, with the potential for increased habitat and improved hunting access. However, as the fall hunting season approaches, we believe it is urgent to express our concerns regarding CRP implementation.

CRP has proven to be one of the most successful conservation programs in American history, providing a wide range of wildlife, water quality, and soil health benefits, as well as being a powerful tool for flood, drought, and wildfire mitigation. Ensuring consistent access to CRP increases farm resiliency while providing the public benefit of habitat restoration, water quality improvement, and sustainable wildlife populations.

Conservation programs like CRP are an integral part of the safety net for rural America, both financially and ecologically, and provide significant economic and societal benefits. This includes providing hunter access for economically significant game species such as pheasants, ducks, mule deer, and other wildlife – access that would decrease significantly with a reduction in CRP acres enrolled. For big game species in particular, CRP can provide vital corridors between large blocks of habitat on federal and private lands. In addition to opportunities for routine grazing and managed haying, lands enrolled in CRP also provide emergency forage during natural disasters, further demonstrating the value of this program to ranchers and rural communities.

Unfortunately, recent implementation of CRP has hindered efforts to create and restore wildlife habitat and implement water quality and wetland practices on private lands. Despite the statutory cap for FY2019 of 24 million acres, according to the Farm Service Agency's July 2019 CRP summary, there are only 22.35 million acres enrolled in the program. This shortfall of 1.65 million acres will only be

compounded by 15 million acres set to expire between now and September 2023. Without quick, bold action from USDA, this could lead to a devastating loss of habitat for wildlife populations and resulting loss of hunting opportunities. With such a significant number of acres set to expire in the next four years, it is critical that USDA maintain enrollment levels as close to the acreage cap as possible to meet demand and provide maximum benefits, and to avoid overwhelming an already taxed agency and unnecessarily impeding implementation of the program in the future.

While we appreciate USDA holding a continuous CRP signup in FY2019, we are very concerned with the decision to yet again limit the scope of the signup by only offering a smaller number of practices to landowners. This includes not offering State Acres for Wildlife Enhancement (SAFE), upland wildlife borders, and pollinator practices – all highly successful and popular initiatives. The recent signup also removes vital cost-share and incentive payments for the remaining available practices, further decreasing demand from landowners to enroll in the program. These same decisions were made during the FY2018 continuous CRP signup, resulting in the smallest continuous CRP signup in nearly 20 years. To ensure successful implementation of CRP contracts, it is critical that landowners be fairly compensated for installing these high-value practices with adequate cost-share and incentives. By limiting the practices available, removing cost-share and incentives, altering how soil rental rates are calculated, and adding a reduction to soil rental rates beyond what was required in the 2018 Farm Bill, we fear that landowner interest in CRP, as well as the program's effectiveness, will continue to diminish.

In order maintain landowner interest and hunter opportunities, we strongly urge you to:

- Provide details and ranking criteria for the pending FY2020 General sign-up as soon as possible. We recommend a sign-up period that would run from early December 2019 through February 2020 at a minimum in order to give landowners and USDA county offices time to promote the sign-up period and submit bids.
- Make available to landowners the full suite of practices under continuous CRP, including practices under the highly successful State Acres for Wildlife Enhancement (SAFE), upland wildlife borders, and pollinator initiatives. Ensuring that these practices are available would maximize benefits for wildlife habitat, soil health, and water quality while providing landowners with options when considering what is best for their operations.
- Restore practice and signing incentive payments for continuous CRP contracts, as directed by the 2018 Farm Bill. In addition to statutory language directing USDA to offer practice incentive payments for land enrolled under continuous CRP, the Managers explicitly maintained "incentives for continuous practices, including signing incentives, incentives to provide additional cost-share, and those related to specific practices...for certain high conservation value practices."
- Restore cost-share for mid-contract management (MCM) on all future CRP contracts. MCM has been an integral component of CRP since the 2002 Farm Bill and is a critical tool for managing conservation cover to its fullest potential for wildlife, soil health, and water quality. The decision to remove cost-share for MCM under the recent continuous sign-up adds an undue burden to landowners for performing important management activities.

Thank you for your consideration, and we look forward to continuing to work with you and your staff to successfully implement this critical conservation program.

Sincerely,

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National Association of Forest Service Retirees
National Shooting Sports Foundation
National Wild Turkey Federation
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