



# THE WILDLIFE SOCIETY

*South Dakota Chapter*

December 28, 2006

Laura Bies  
Associate Director of Government Affairs  
The Wildlife Society  
5410 Grosvenor Lane, Suite 200  
Bethesda, MD 20814-2144

Dear Laura:

Thank you for the opportunity to comment regarding The Wildlife Society's *Recommendations for the 2007 Farm Bill*. The South Dakota Chapter of the Wildlife Society is encouraged by the proactive stance the national chapter has taken in regard to preparations for the 2007 Farm Bill. We offer up our comments in an effort to help the TWS put forth clear and concise comments that will effectively help ensure a wildlife-friendly 2007 Farm Bill attractive to our nation's landowners. We suggest that comments be fairly program specific, to mirror the typical manner in which legislation is written. Our recommendations for TWS consideration to include in its position statement are as follows:

### **Recommendation # 1 Conservation Compliance**

- a. Wetland Compliance (Swampbuster) should be retained with no changes.
- b. Sodbuster should be replaced with a "Sodsaver" provision that would require native grazing lands without previous cropping history that is converted after the passage of the 2002 Farm Bill to be ineligible for any USDA program funds or benefits. These would include but not limited to, conservation, commodity, crop insurance or energy payments.

### **Recommendation # 2 Conservation Reserve Program (CRP)**

- a. CRP should be reauthorized and the acreage cap should be expanded to 45 million acres (originally authorized by the 1985 Farm Bill).
- b. State Habitat Technical Teams, made up of wildlife professionals, should be utilized in CRP administrative and management decisions.
- c. Reauthorize the Farmable Wetlands Program language as written in the 2002 Farm Bill.

- d. Create language that will direct USDA to create options for both general and Continuous options for CRP.
- e. Make CRP and all conservation payment exempt from self-employment tax (this will also likely need to be done in the tax code as well).
- f. Wildlife remains a co-equal object with soil and water quality for CRP.
- g. Cropping history requirements for CRP found in the 2002 Farm Bill should be retained. This will prohibit producers from farming their way into CRP.

**Recommendation # 3 Wetlands Reserve Program (WRP)**

- a. Reauthorize WRP in 2007 Farm Bill and expand the program to enroll a minimum 250,000 acres annually.
- b. Base easement values for WRP on fair market values for the loss of crop production on the land enrolled in WRP.

**Recommendation # 4 Environmental Quality Incentive Program (EQIP)**

- a. Reauthorize EQIP at current funding level.
- b. Assign co-equal status of fish and wildlife habitat with soil and water.

**Recommendation # 5 Wildlife Habitat Incentive Program (WHIP)**

- a. Reauthorize and expand WHIP funding to \$100 million annually.
- b. Provide language that will allow annual incentive payments for practices that will help meet special habitat needs identified in the State Wildlife Action Plans.

**Recommendation # 6 Grassland Reserve Program (GRP)**

- a. Reauthorize GRP and expand cap to 10 million acres for the duration of the 2007 Farm Bill.
- b. Direct USDA to place a higher emphasis on 30-year and permanent easements.

**Recommendation # 7 Conservation Security Program (CSP)**

- a. Continue CSP as long as it is complimentary to CRP, WRP, EQIP, WHIP and GRP and doesn't take funding away from these other programs.
- b. Require fish and wildlife habitat management as a criterion for participation at the Tier 2 level.

**Recommendation # 8 Biofuels**

- a. Bio-fuel efforts should be promoted, but in a manner that results in a "no net loss" of existing wildlife habitat, soil and water quality. For that reason, we recommend that existing cropland be targeted for bio-fuels production and not make current CRP acres available for bio-fuel production.
- b. Harvest for bio-fuels should be done in a manner (frequency, stubble height and seeding rates & mixtures) that promotes sustainability of the bio-fuels feedstock and wildlife benefits. Ideally, no more than 50% of

a given field should be harvested in a year; harvest should be done after the primary nesting season; and leave a stubble height of no less than 12 inches.

- c. Species with invasive properties should not be used.

It is our belief that the above recommendations would give TWS recommendations that would have the most impact on ensuring a wildlife-friendly Farm Bill in 2007.

While we recognize that TWS has spent significant time putting together recommendations in their current draft, we suggest **all recommendations offered in draft TWS white paper be discarded due to ambiguities, duplications and errors presented in the draft recommendations**. Namely, issues of concern to us contained with the current draft TWS position statement include:

1. Page 1, first paragraph, fourth sentence, it states: "Specifically, the Conservation Reserve Program (CRP), Conservation Reserve Enhancement Program (CREP), Continuous Conservation Reserve Program (CCRP)..." Collectively, CREP, CCRP are authorized through CRP, so CREP and CCRP would need to be dropped from this statement to make it accurate.
2. Recommendation # 2, it mentions that a systematic monitoring program for conservation benefits is needed, focused on actual conservation benefits, not on acres treated or dollars spend." While this would be an ideal situation, this suggestion would be difficult to adopt legislatively and we suggest that recommendation # 2 be dropped because it would be difficult to secure new funding for such an endeavor without causing cuts for some other conservation program. Dollars will be tight in this next Farm Bill cycle, so any new monitoring programs will likely come as a result of cutting programs for habitat.
3. Recommendation # 3, states that "The Conservation Effects Assessment program should be continued and expanded to specifically address fish and wildlife benefits." We suggest that this recommendation be deleted because CEAP is not a program in the 2002 Farm Bill but a partnership started in 2003 to look at conservation benefits, which already includes assessments of fish and wildlife habitat (through the efforts put forth by Charlie Rewa, NRCS and Ray Evans of Eco Associates).
4. Recommendation # 4 is written in a manner that would be difficult to write legislatively, and even more difficult to implement consistently. For that reason, we suggest it be dropped.

5. Recommendation # 5 addresses strengthening sod busting, however the supporting information in TWS draft white paper incorrectly mentions CRP as a factor driving grassland conversion. The 2002 Farm Bill put date certain requirements to prevent sod busted lands from being enrolled in CRP. We suggest that Sod saver replace Sodbuster as written in our recommendation # 1.
6. A recommendation for maintain existing Swampbuster provisions was omitted in the TWS draft.
7. Recommendation # 7 should be reworded to state: "WRP should be reauthorized and expanded." Easement options are already available in GRP and WRP, so why is it necessary to add this to CRP as well?
8. Recommendation # 8 is not program specific but reflected in the Field Office Technical Guides. We recommend deleting this one as well.
9. Recommendation # 9 is already being done administratively through program guidelines and in scoring process like the EBI for CRP, so we recommend deleting this statement.
10. Recommendation # 10 is fine as is and is included in our suggested recommendation # 6.
11. Recommendation # 11 has already been expanded to include landowners not in agriculture production, so the statement isn't necessary.
12. Recommendation # 12 is not necessary if WHIP funding is expanded as per our recommendation # 5.
13. Recommendation #13 WRP already has an enhancement option and WHIP and EQIP have local match/partnerships already, so this is not necessary as well.
14. Recommendations #14 & 15 are fine in concept, but difficult to legislate/monitor.
15. Recommendation #16 sounds like State Technical Committee meetings which are already being conducted quarterly in most states.
16. Recommendation #17 is fine in concept, but is already being done in some states informally through ranking processes for WHIP, EQIP and other programs, thus is not necessary in statute.

The South Dakota Chapter is thankful for this opportunity to offer comments and hope you will take our comments into consideration. If you have any questions, please feel to contact President Bridgette Flanders-Wanner at 605-280-4775.

Sincerely,

Bridgette Flanders-Wanner  
President, SD Chapter of The Wildlife Society

Please Note: These comments were developed with the assistance of SDTWS members Chad Switzer, Bill Smith, and Kurt Forman.