



Oral Comments for USDA Listening Session 2/26/19

National Wildlife Federation Priorities for 2018 Farm Bill Implementation

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My name is Aviva Glaser and I am the Director of Agriculture Policy at the National Wildlife Federation. National Wildlife Federation is America's largest conservation organization, representing over six million members, supporters, and affiliates across the country. We thank USDA for this opportunity to comment on implementation of the 2018 Farm Bill. The 2018 Farm Bill includes many important provisions that will benefit soil, water, and wildlife, and we look forward to working with USDA to ensure that the programs are implemented in a way that maximizes conservation benefits to the fullest extent of the statute.

I will give a few high level recommendations on Farm Bill implementation today, but will also be submitting more detailed recommendations from the Federation and our affiliates.

Title 2 - Conservation

Conservation Reserve Program (Section 2201)

We urge USDA to move forward quickly with in ensuring that that enrollment in CRP is as close to the acreage cap as possible. Current enrollment numbers, at approximately 22.5 million acres, are 1.5 million acres under the FY19 cap. With an additional 1.6 million acres set to expire at the end of this fiscal year, we urge the Secretary to begin signups as soon as possible to bring enrollment closer to the statutory cap. Without FY19 signups, we risk being as much as 3 million acres under the cap, which would be a lost opportunity for producers and for conservation. Thus, we urge you to hold a general signup this fiscal year, as required by law, as well as opening up continuous signup, including high value wildlife, wetland, water quality, and pollinator practices.

Environmental Quality Incentives Program (Section 2304)

We are pleased that this Farm Bill increases the percentage of the Environmental Quality Incentives Program (EQIP) funds going to wildlife practices from at least 5% to at least 10% of the total program funds, and we urge the implementation of this increased allocation as soon as possible. This will mean a significant increase in the amount of funding dedicated to wildlife practices, and we encourage the NRCS to require that every state have a state wildlife funding pool within EQIP to better focus EQIP wildlife funding on species and habitats identified in existing state, regional, and national wildlife plans such as the State Wildlife Action Plans and the North American Waterfowl Management Plan. We also encourage NRCS to use this funding to expand the successful Working Lands for Wildlife model to include new projects and to provide dedicated funding from EQIP as well as from other programs.

Wetland Conservation (Section 2101-2102)

The 2018 Farm Bill did not contain any significant changes to wetland conservation compliance (swampbuster), despite numerous proposals. Given the clear Congressional intent to maintain this long-standing compact between American taxpayers and farmers, we strongly urge the Secretary to refrain from making changes to swampbuster implementation that could result in the loss of wetlands and undermine the spirit and purpose of this compact, including the changes proposed in the interim

final rule on Wetland and Highly Erodible Land Conservation, published this past December, that would result in a loss of protection for seasonal wetlands.

Title 11 – Crop Insurance

Cover Crops (Section 11107)

The 2018 Farm Bill included important new language clarifying that cover cropping should be considered a good farming practice and providing for the Secretary to establish termination guidelines for cover crops. These changes should provide needed clarity to farmers and crop insurance agents and adjusters. We urge RMA to work with crop insurance companies and other stakeholders to educate farmers, crop insurance agents and adjusters on the new definition of “termination” and on the inclusion of cover crops as a “Good Farming Practice”. This would help avoid any confusion stakeholders may have. We also urge the Secretary to reconvene the Interagency Task Force on Cover Crop Policy to update the cover crop guidelines.

Conclusion:

Thank you for the opportunity to present these recommendations. Although we understand the urgency for moving forward quickly with implementation, we are also concerned about the quick timeline of this listening session and we urge USDA to take more opportunities for feedback from the public and stakeholders, including through other listening sessions outside of DC.

We look forward to submitting detailed recommendation and working with agency staff in the coming months on these, and many additional recommendations. We look forward to working together to ensure that implementation of the conservation programs is done in ways that maximize their effectiveness in protecting our soil, water and wildlife resources.