



February 26, 2008

Dear _____ (conference committee member),

A good 2008 Farm Bill is critical legislation for maintaining our nation's wildlife and the health of the environment in agricultural communities. It can provide incentives for farmers, ranchers, and other private landowners to protect and restore rare species and other wildlife and soil and water quality while producing agricultural products. A good Farm Bill should also responsibly address emerging agricultural products, such as biofuels, and their total environmental and economic costs and benefits. Last year, on behalf of the North American Section of the Society for Conservation Biology, we submitted recommendations on the Farm Bill to both the Senate and House Agriculture Committees. With conference negotiations in play, we'd like to highlight several of our recommendations for consideration in the conference committee.

We recommend adoption of several provisions in the Senate version of the Farm Bill and some of those in the House bill as the best balance of means to assist landowners in the conservation of natural resources, including species and habitats that support them.

We recommend strong measures that:

Protect Native Grassland Habitat with Sodsaver and Appropriate Incentives: Protecting remnant native habitats is critical for the maintenance of biodiversity in agricultural landscapes. A strengthened and expanded Sodsaver provision in the Farm Bill is critical for limiting the loss of grassland habitat. We prefer the Senate language that does not limit ineligibility to four years. We recommend that native grassland without a prior cropping history be ineligible for all Farm Bill program payments. This includes income or price support payments, crop insurance, disaster payments, conservation program enrollment, and Farm Service Agency farm loan benefits. We also recommend the inclusion of a "date-certain" clause of "July 1, 2007" as the effective date of these changes.

Reauthorize & Expand Biodiversity Benefits of Land Retirement Programs: Past Farm Bills created several land retirement programs that are responsible for substantial conservation benefits and have the potential to deliver even greater benefits for biodiversity. These programs include the Conservation Reserve Program (CRP), Grasslands Reserve Program (GRP), and the Wetlands Reserve Program (WRP). A growing body of research documents multiple benefits of these programs.

Conservation Reserve Program (CRP): Overall we prefer the senate version. It establishes a pilot program that would make wetland and buffer acreage eligible for the CRP. It also includes language that better protects seasonal wildlife from the impacts of biomass harvesting and grazing. The final language for CRP could be strengthened by targeting enrollment of CRP acres that buffer priority areas identified in regional biodiversity assessments or State Wildlife Action Plans.

Grassland Reserve Program (GRP): Both the Senate and House versions authorize less acreage for the GRP than the current Farm Bill. Given that temperate grasslands are one of the most altered and least protected ecosystems in the world (Hoekstra et al. 2005) and over 8.4 million acres of grasslands were converted to cropland in nine states of the Great Plains

region (USDA), we recommend that the Farm Bill reauthorize GRP at 2 million acres per year. The biodiversity benefits of GRP can be leveraged by adding language that targets resources on long-term and permanent easements, native plant communities, and grasslands that support at-risk species identified in State Wildlife Action Plans.

Wetlands Reserve Program: We are pleased that funding for the Wetlands Reserve Program was renewed and the total enrollment cap was extended. We recommend using the Senate version of the bill that includes an amendment that permits consideration of full economic value of the wetlands as part of a land's highest and best use evaluation. This change should remedy the undervaluation of candidate lands that resulted in a significant drop in enrollment in the last few years.

Conservation Stewardship Program (CSP): The Conservation Security Program (CSP) is potentially one of the most powerful tools for reshaping the conventional agricultural landscape to be a sustainable working landscape that provides healthy food, a good livelihood for farmers, and improved ecosystem services. We strongly recommend that the conferees use the Senate version's CSP language. While the House version suspends any expansion of the program until 2012, the Senate version calls for 13.3 million acres to be enrolled annually (up to 80 million acres), provides \$2 billion in new funds, and streamlines the program. This provides critical support for a program that rewards farmers for good stewardship, provides incentives for improvement, and has strong potential for enhancing the ecological function of agricultural lands.

Ecologically appropriate biofuels production: Development of biofuels as a renewable energy source poses significant opportunities for restoration and conservation of native grasslands, biodiversity, and ecological communities. It also poses significant potential risks. The 2008 Farm Bill should provide measures that maximize the conservation benefits of biofuels and minimize the risks. Although we applaud the improvements made in the Manager's Amendment to the Senate Biomass Crop Transition Assistance Program, the House bill's Biomass Energy Reserve Program better accounts for the needs of some wildlife species. As others such as the Teddy Roosevelt Conservation Partnership have recommended, we strongly suggest two improvements. First, please drop "varying harvest dates" from the list of variables to be selected for in the program. We know from extensive research that harvesting during the nesting and brood rearing seasons has detrimental effects on ground nesting bird species. Second, please add an explicit requirement to the "Additional Eligible Biomass" section that ensures that CRP harvest for biomass does not, in any case, occur more frequently than once every 3 years in order to maintain some wildlife habitat value. In the case of forested CRP, harvest for biomass should only include materials generated by forest management activities such as pruning and thinning and other activities associated with timber stand improvement.

Recent studies should give policy makers pause to avoid making biofuel-related policies with unintended environmental and economic effects. For instance, recent studies in *Science* report that converting forests, grasslands, and other natural systems to biofuels production releases many more times greenhouse gases annually than the fossil fuels they displace. This impact is in addition to the loss of these habitats themselves. However, biofuels produced from perennial vegetation planted in abandoned agricultural lands or from waste biomass sequesters more greenhouse gases than the fossil fuels they displace. We encourage you and your committees to develop a process for addressing these issues even if you cannot do much while settling differences between the two bills now in conference.

Funding for Research and Performance Measures: Performance measures and research are essential for evaluating the effectiveness of conservation practices for rare species and habitats, as well as other conservation values. We recommend funding rigorous, science-based assessments of the effectiveness of the United States' agricultural conservation programs for protecting native habitats, rare species, and the ecological processes that support them. To this end, we support investing \$20 million per year to continue the Conservation Effects Assessment Project.

Finally, we strongly support two aspects of the Senate bill that we did not address in our earlier recommendations:

Conservation Easements: The Senate bill permanently extends enhanced tax deductions for conservation easements which are critical tools for private lands conservation

Lacey Act Amendment: The Senate bill expanded the Lacey Act to prohibit the import, sale or trade of illegally-harvested wood and wood products. Besides supporting forest conservation, the Lacey Act Amendment also prevents forest owners from being undercut by cheap illegally-harvested timber from abroad.

We appreciate and encourage your leadership and dedication to passing a Farm Bill that advances the conservation of native North American Species and the habitats that support them. We welcome the opportunity to answer any questions you have about our recommendations.

Sincerely,

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