## **Appendix H** COMMENTS AND RESPONSES:

# **Appendix H**

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Federal Agencies	AH-16
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National Organizations	
State Organizations	
General Public	

Tracking Number	Mode of Transmittal	Name	Location
1	HRD	Len Baxter	No Location Provided
2	EML	Elizabeth Clanahan	Yoakum Co., TX
3	EML	Kelly McCracken	Montana
4	EML	Elwood Braund	Bedford Co., PA
5	EML	Aileen Jeffries	Winthrop, WA
6	EML	Alvin Schroeder	Tea, SD
7	EML	Marshall Scott	Byron, GA
8	EML	Jane Fitzgerald	Brentwood, MO
9	HRD	Stephen Peterson	Kensington, MD
10	EML	No Name Provided	No Location Provided
11	EML	Scott Volkert	Ozaukee,WI
12	EML	Barth Crouch	Salina,KS
13	EML	Craig Valentine	No Location Provided
14	EML	Dean Sandstoe	Des Moines, IA
15	EML	Steve Moseman	Milford, IA
16	EML	Glenn Savage	No Location Provided
17	EML	Rich Hinkhouse	Cherokee, IA
18	EML	Gary Steinbrunner	Ft. Recovery, OH
19	EML	Richard Fiedler	No Location Provided
20	EML	Michael Dorethy	No Location Provided
21	EML	P. Dunham	No Location Provided
22	EML	Harley Jung	No Location Provided
23	EML	Theodore Roosevelt Conservation Partnership	Bethesda, MD
24	EML	Eugene Thurm	No Location Provided
26	EML	Kevin Schmitt	No Location Provided
27	EML	Todd Homan	St. Henry, OH
28	EML	Trent Yantes	No Location Provided
29	EML	Paul Kalass	No Location Provided
30	EML	Craig Perkins	Hancock Co., OH
31	EML	Greg Johnson	Topeka, KS
32	EML	Doug Hanes	No Location Provided
33	EML	Brent Scott	Belleville, KS
34	EML	Miichael Elder	Acton, MA
35	EML	Brent Scott	Woodbine, IA
36	EML	Bill McGuire	Jefferson City, MO
37	EML	Jim Baird	Gaithersburg, MD
38	EML	Shawn Meyer	Beatrice, NE
39	EML	Steven Huber	Columbus, NE

Tracking Number	Mode of Transmittal	Name	Location
40	EML	Darren Simmons	Columbia City, IN
41	EML	Ted Fry	No Location Provided
42	EML	Paul Maloney	Jackson, MS
43	EML	Todd Farland	Forest City, IA
44	EML	Alan Allen	Wimberley, TX
45	EML	Betty Broders	Grinnell, IA
46	EML	Jim McGannon	North Dakota
47	EML	Jef Hodges	Clinton, MO
48	EML	Aileen Jeffries	San Francisco, CA
49	EML	Bruce DeLaet	Wausaukee, WI
50	EML	Craig Nearman	Union Co., SD
51	EML	Burdette Ehrhardt	Camden, OH
52	EML	Dennis DeMara	No Location Provided
53	EML	Steve Workman	No Location Provided
54	EML	Cris Freiwald	Big Stone City, SD
55	EML	Ted Scherff	Winchester, ID
56	EML	Ron Leathers	No Location Provided
57	EML	Oliver Toigo III	Horsham, PA
58	EML	Tim Lajoie	Baldwinville, MA
59	EML	Jim Horton	No Location Provided
60	EML	David Bradley	Omaha, NE
61	EML	Charles Barnosky	Bozeman, MN
62	HRD	Theodore Roosevelt Conservation Partnership	Tucson, AZ
63	EML	Timothy Shuman	Dover, PA
64	EML	Terry Harris	Cheyenne, WY
65	EML	Robert Stegmier	Rockford, MI
66	EML	Tom Olson	Colorado
67	EML	Dale Jones	No Location Provided
68	EML	No Name Provided	No Location Provided
69	EML	Norman Brus	Waverly, IA
70	EML	Jim Bennett	No Location Provided
71	EML	Robert Hayler	Missoula, MT
72	HRD	John Kaiser	No Location Provided
73	EML	Chris Volk	El Segundo, CA
75	EML	John Polzin	No Location Provided
76	EML	Milton Owen	Osage, IA
77	EML	Joe Stangel	Olivia, MN

Tracking Number	Mode of Transmittal	Name	Location
78	EML	Bill Hoag	Eden Prairie, MN
79	EML	Sheryl Gallup	MN
80	HRD	Theodore Roosevelt Conservation Partnership	St Paul, MN
81	HRD	Terry Riley	Washington, DC
82	EML	Scott Stephens	No Location Provided
83	HRD	Lester Flake	Brookings, SD
84	HRD	Jeffery Vonk	Des Moines, IA
85	HRD	Environmental Defense	Washington, DC
86	HRD	W.H. Tweedy	Cut Bank, MT
87	HRD	National Grain and Feed Association	Washington, DC
89	HRD	Jeffery Vonk	Des Moines, IA
91	HRD	Lou Bubula	Eugene, OR
92	HRD	G. Bueson	No Location Provided
93	HRD	Don Lamb	Millford, IA
94	HRD	Lester Flake	Brookings, SD
95	HRD	Warren Giles	Penn Yan, NY
96	HRD	Laurence Hanley	King City, MO
96	HRD	Laurence Hanley	King City, MO
97	HRD	Bill Harmon	Lincolnville, KS
98	HRD	Dick Hassler	Montana
99	HRD	John Hodges	Sommerset, NJ
100	EML	Chris Teeters	Pope Co., MN
101	EML	Michael Sharp	No Location Provided
102	EML	David Heller	Eden Prairie, MN
103	HRD	Bob Zelenka	Minneapolis, MN
104	HRD	George Vandel	Pierre, SD
105	EML	Albert Hoffman	North Dakota
106	HRD	Ric Holden	Helena, MT
107	HRD	John Hoskins	Jefferson City, MO
108	EML	Elwood Braund	Bradford County, PA
109	HRD	Keith Foye	Madison, WI
110	EML	Shane Fischer	Elk Point, SD
111	HRD	John Kaiser	Bradford, OH
112	EML	Frederick Roeseer	No Location Provided
113	EML	Dan Cain	No Location Provided
114	EML	Matt Holland	New London, MN

Tracking Number	Mode of Transmittal	Name	Location
115	HRD	M. Johnson	Chippewa Falls, WI
116	EML	John Jackson	Metairie, LA
117	HRD	Harold Olson	Jefferson
118	EML	William Baxter	Nebraska
119	EML	William Harlan	Erie-Ottawa-Sandusky, OH
120	EML	Cherie Rees	Vienna, VA
121	EML	Perry Loegering	Minnesota
122	EML	Terry Schraner	South Dakota
123	EML	Robert Heidbreder	Cuyahoga Falls, OH
124	EML	Steven Tondi	Rock Island, IL
125	EML	Kurt Flack	Oshkosh, WI
126	EML	Linda Siroky	Roy, MT
127	EML	Chuck DeMatteo	Marshall Co., Indiana
128	EML	Dave Brownell	Conrad, MT
129	EML	Ben Deeble	Missoula, MT
130	EML	Jim Tetzloff	No Location Provided
131	EML	Keir Asher	No Location Provided
132	EML	David Nomsen	Alexandria, MN
133	EML	No Name Provided	No Location Provided
134	EML	Randy Renner	Bismarck, ND
135	EML	Mike Mosel	Washington, DC
136	EML	Jon Costanzo	Oxford, OH
137	EML	Michael Hendel	Northfield, MN
138	EML	Jeffrey Crane	Washington, DC
139	EML	Jeanine LackeyJeanine Lackey	Nebraska
140	EML	No Name Provided	Yankton, SD
141	EML	David Howell	No Location Provided
142	EML	No Name Provided	Sammamish, WA
143	EML	Rick Warhurst	No Location Provided
144	EML	Brian Morgan	Princeton, IA
145	EML	Stephen Adair	Bismarck, ND
146	EML	Don Soderlund	No Location Provided
147	EML	No Name Provided	No Location Provided
148	EML	Anne Coan	Raleigh, NC
149	EML	No Name Provided	Rochester, MN
150	EML	No Name Provided	Washington
151	EML	No Name Provided	Marion, Ohio
152	EML	James White	No Location Provided

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Tracking Number	Mode of Transmittal	Name	Location
153	EML	Larry Kline	Woodbridge, VA
154	HRD	Nicholas Palma	Cedar Grove, NJ
160	HRD	Kendell Keith	Washington, DC
163	EML	John Clark	DeWitt, IA
164	EML	Theodore Roosevelt Conservation Partnership	Templeton, CA
165	EML	No Name Provided	Cambridge, IA
166	EML	No Name Provided	Ankeny, Iowa
167	EML	No Name Provided	Kendallville, IN
168	EML	No Name Provided	No Location Provided
169	EML	Richard Kleppe	Clarence, IA
170	EML	No Name Provided	Lafayette, IN
171	EML	Brad Cobb	St.Cloud MN
172	EML	No Name Provided	Stanton, IA
173	EML	No Name Provided	Grand Rapids, MI
174	EML	Wes Wikoff	Hays, KS
175	EML	Stephen Deleski	Willmar, MN
176	EML	Harland Lipker	Shakopee, MN
177	EML	Jon Schneider	Alexandria, MN
180	EML	Jim Neal	Alberta, MN
181	EML	Harry Brodbeck	No Location Provided
182	EML	Tom Landwehr	Shoreview, MN
183	EML	E.P.A.	Washington, DC
184	EML	Mary Mueller	Winthrop, MN
185	EML	Duane Olson	Geneseo, IL
186	EML	No Name Provided	Boone, IA
187	EML	Montana Wildlife Federation	Helena, MT
189	EML	Donnie Schooner	Upper Sandusky, OH
190	EML	Michael Doyle	Alexandria, MN
192	EML	Tim Gutormson	Brookings, SD
193	EML	Randy Jordan	Hays, KS
194	EML	Randy Jordan	Hays, KS
199	EML	John Gibson	Montana
200	HRD	Don Lank	Milford,IA
201	HRD	Laurence Hanley	King City, MO
202	HRD	George Jorgensen	Troy, KS
203	HRD	Mark Johnson	Stanley, WI
204	HRD	Dirk Hassler	Hilger, MT
205	HRD	H. Stegman	Offerle, KS

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Tracking Number	Mode of Transmittal	Name	Location
206	HRD	James Paugh	Bozeman, MT
207	HRD	Missy Sparrow-Lein	Plymouth, WI
208	HRD	Jerry Uiek	Racine, WI
209	HRD	Richard Van Aken	Holland, PA
210	HRD	Bill Harmon	Lincolnville, KS
211	HRD	Louis Bubala IV	Eugene, OR
212	HRD	Laurel Garlicki	Mill Hall, PA
213	HRD	D. Breck Carmichael	Columbia, SC
214	HRD	D. Breck Carmichael	Columbia, SC
215	HRD	D. Breck Carmichael	Columbia, SC
216	HRD	D. Breck Carmichael	Columbia, SC
217	HRD	D. Breck Carmichael	Columbia, SC
218	HRD	Duane Waarst	Wibaux, MT
219	HRD	Duane Waarst	Wibaux, MT
220	HRD	No Name Provided	Danville, IL
221	HRD	No Name Provided	Danville, IL
222	HRD	No Name Provided	Danville, IL
223	HRD	John Lynn	Coffee Creek, MT
224	HRD	Ron Lynn	Coffee Creek, MT
225	HRD	John Lynn	Coffee Creek, MT
226	HRD	Kirby Cottrell	Springfield, IL
227	HRD	Kirby Cottrell	Springfield, IL
228	HRD	Pat Weber	Alexandria, LA
300	EML	Bryan McCormack	No Location Provided
301	EML	August Hochenberger	New York, NY
302	EML	Tom Voltz	No Location Provided
303	EML	Tom Swahn Jr	Turnbridge, VT
304	EML	Kevin Sims	No Location Provided
305	EML	Eric Lahr	No Location Provided
306	EML	Fred Myers	No Location Provided
307	EML	John Eddy	No Location Provided
308	EML	Robert Stiner	No Location Provided
309	EML	Daniel Stitt III	No Location Provided
310	EML	John Jahoda	No Location Provided
311	EML	Gordon King	Oak Harbor, OH
312	EML	George D'Annolfo	Palm Bay, FL
313	EML	Joel Marvin	Hudson, WI
314	EML	Claude Hall	Danbridge, TN

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Tracking Number	Mode of Transmittal	Name	Location
315	EML	Fred Myers	No Location Provided
316	EML	John Lauderbaugh	No Location Provided
317	EML	John Pennell	No Location Provided
318	EML	Stephen Dennis	Elgin, OK
319	EML	James Shadix	Birmingham, AL
320	EML	Lester Graham	Polk, PA
321	EML	Paul Silva	No Location Provided
322	EML	Alan Purcell	No Location Provided
323	EML	Lee Taylor	Monument, CO
324	EML	Huston Hanson	No Location Provided
325	EML	Etienne Fonteneau	No Location Provided
326	EML	Michael Ostiguy	Randolph, MA
327	EML	James Szpicki	Lakeview, AR
328	EML	Allen Miller	Bozeman, MT
329	EML	Scott Hampel	Westminster, CO
330	EML	Dave Einerwold	No Location Provided
331	EML	G. Hanley	No Location Provided
332	EML	Ismet Nuri	Stephens City, VA
333	EML	Charlie Grinnan	Manassas, VA
335	EML	Pat Krcil	Dante, SD
336	EML	Richard Carr	No Location Provided
337	EML	Joe Fuehrer	West Bend, WI
338	EML	Ralph MacDonald	Derry, NH
339	EML	Chester Krcil	Claysville, PA
340	EML	Dan Falstad	Maple Grove, MN
341	EML	Mike England	Bozeman, MT
342	EML	Victor Morales	No Location Provided
343	EML	Larry Muench	Ogden, UT
344	EML	No Name Provided	No Location Provided
345	EML	Fred Myers	No Location Provided
346	EML	Terry Demaree	Geuda Springs, KS
347	EML	Jeffrey Burdick	No Location Provided
348	EML	George Robinson	Tacoma, WA
349	EML	Ron Kershner	No Location Provided
350	EML	James Cropsey	Tilton, NH
351	EML	Matthew Harris	No Location Provided
352	EML	Carl Spina	Fort Collins, CO
353	EML	Tyler Henry	Cody, WY

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Tracking Number	Mode of Transmittal	Name	Location
354	EML	Robert Woodard	Falconer, NY
355	EML	Tom Quirk	Chappaqua, NY
356	EML	Steve Maxwell	No Location Provided
357	EML	Norman Steinhoff	No Location Provided
358	EML	William Lewis	Ohio
359	EML	Patricia Young	No Location Provided
360	EML	Tom Waller	Soddy Daisy, TN
361	EML	Jake Ivan	Kenmare, ND
362	EML	Buffalo Bruce	Chadron, NE
363	EML	Paul Lea	Bethesda, MD
364	EML	Eric Reinertson	No Location Provided
365	EML	Eran Sandquist	Minnesota
366	EML	Charles McCormick	Winner. SD
367	EML	Bill Zehnder	Frankenmuth, MI
368	EML	Carl Wambach	Helena, MT
369	EML	Walter Mitty	No Location Provided
371	EML	Troy Schroeder	Hays, KS
372	EML	Environmental Defense Fund	Washington, DC
373	EML	Great Plains Ducks Unlimited	Memphis, TN
374	EML	North Dakota Natural Reserve Trust	Devils Lake, ND
375	EML	Oklahoma Department of Wildlife	Oklahoma
376	EML	International Association of Fish and Wildlife Agencies	Washington, DC
377	EML	No Name Provided	Gentry County, MO
378	EML	No Name Provided	No Location Provided
379	EML	No Name Provided	Shoreview, MN
400	EML	No Name Provided	Johnson, PA
401	EML	Darrell Sheffield	No Location Provided
403	EML	Angelo Juanita	No Location Provided
404	EML	Michael Stanley	Brighton, CO
405	EML	Sonya Boyd	No Location Provided
406	EML	Joseph Sandova	No Location Provided
407	EML	Kendall Hansen	No Location Provided
408	EML	Edmond Garrett	Gautier, MS
409	EML	Mandy Morrison	No Location Provided
410	EML	Ronald Bamberg	Salt Lake City, UT
411	EML	David Ciesla	No Location Provided

Tracking Number	Mode of Transmittal	Name	Location
412	EML	Ro Bailey	No Location Provided
413	EML	Larry Winter	No Location Provided
414	EML	Jennifer Bonacorso	No Location Provided
415	EML	Will Sullivan	No Location Provided
416	EML	Larry Nichols	No Location Provided
417	EML	Robert Holliday	Lexington, SC
418	EML	Gregory Elcock	Tijeras, NM
419	EML	Dan Bacher	Sacramento, CA
420	EML	Clifford Garstka. Sr.	No Location Provided
421	EML	Vic VanSant	No Location Provided
422	EML	Andrew Grow	Kodiak, AK
423	EML	Ken Barrett	Bozeman, MT
424	EML	George Cecil	Kalispell, MT
425	EML	Justin Kiddy	No Location Provided
426	EML	Rex Martin	No Location Provided
427	EML	Neville Storm	No Location Provided
428	EML	Robert Stewart	Phoenix, AZ
429	EML	Arthur Boardman	Phoenix, AZ
430	EML	Richard Mathisen	No Location Provided
431	EML	Stephen Wiedemer	No Location Provided
432	EML	John Chappell	Redmond, WA
433	EML	Todd Kapp	No Location Provided
434	EML	Michael Smoody	Oshkosh, WI
435	EML	David Potter	No Location Provided
436	EML	Jim Moses	No Location Provided
437	EML	Bernie Rice	No Location Provided
438	EML	Cal Joy	No Location Provided
439	EML	David Johnson	Kansas City, MO
441	EML	M.C. Tierney	No Location Provided
442	EML	William DeVore	No Location Provided
443	EML	Charles Daniels	Clear Brook, VA
444	EML	David Ungerman	Clancy, MT
445	EML	Sharon Baker	No Location Provided
446	EML	Christopher Trainor	No Location Provided
447	EML	Fred Myers	No Location Provided
448	EML	Henry Acord	No Location Provided
449	EML	Frank Fenney	No Location Provided
450	EML	Tim Wisinger	No Location Provided

Tracking Number	Mode of Transmittal	Name	Location
451	EML	Pete Backer	No Location Provided
452	EML	Brad Cantrell	No Location Provided
453	EML	Paul Carpenter	No Location Provided
454	EML	Alex Kitakis	No Location Provided
455	EML	Jeffrey Farkas	No Location Provided
456	EML	Sanford Estes	No Location Provided
457	EML	Matthew Ault	Arizona
458	EML	Tim Benson	Charlotte, NC
459	EML	Bill Owens	Omaha, NE
460	EML	Edward Gabsewics	No Location Provided
461	EML	James Bell	No Location Provided
462	EML	Jason Olmsted	Dimondale, MI
463	EML	David Edwards	No Location Provided
464	EML	Philip Palermo	No Location Provided
465	EML	Gary Armstrong	No Location Provided
466	EML	Dan Cardellino	Blairsville, PA
467	EML	Thomas Allgaier	Palm Bay, FL
468	EML	Robert Whitaker	No Location Provided
469	EML	Jon Davis	No Location Provided
470	EML	Gerald Stotler	Fountain Valley, CA
471	EML	Ken Fish	No Location Provided
472	EML	John Holtz	No Location Provided
473	EML	Jey Wolf	No Location Provided
474	EML	Dan Smith	No Location Provided
475	EML	Jeff Rader	Port Orchard, WA
476	EML	Angelo Meneguzzi	No Location Provided
477	EML	Greg Dargie	No Location Provided
478	EML	John Wicklund	No Location Provided
479	EML	Michael McKinney	No Location Provided
480	EML	Jacqueline Howard	Albuquerque, NM
481	EML	Robert Myers	No Location Provided
482	EML	Paul Tunkis	Livingston, MT
483	EML	Don Norman	No Location Provided
484	EML	Judson Peck	Penn Yan, NY
485	EML	Thomas Clark	Gardnerville, NV
486	EML	Donald Schieffer	No Location Provided
487	EML	Patrick Palmer	Lancaster, PA
488	EML	Ellie Gollihugh	No Location Provided

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Tracking Number	Mode of Transmittal	Name	Location
489	EML	Robert Mohr	Wardensville, WV
490	EML	Michael Holder	No Location Provided
491	EML	Ronald Wutz	No Location Provided
492	EML	Charles Buehler	Marathon, FL
493	EML	William Shubbuck	Middleport, NY
494	EML	John Bartin	St. Louis, MO
495	EML	Douglas Fenton	No Location Provided
496	EML	Michael Willett	Bardstown, KY
497	EML	Scott Sampson	Ovid, NY
498	EML	Cameron Curtis	No Location Provided
499	EML	James Miller	Newaygo, MI
500	HRD	Nicholas Palma	Cedar Grove, NJ
501	HRD	La Rue VanZile	Williamsport, PA
502	EML	William Churley	No Location Provided
503	EML	Reb Sauls	No Location Provided
504	EML	Richard Angelo	No Location Provided
505	EML	Peter Rist	No Location Provided
506	EML	Clifton Terrell	No Location Provided
507	EML	Andrew Bolya	No Location Provided
508	EML	Paul Mrozinksy	Weathery, PA
509	EML	Leonard Szafraniec Jr.	No Location Provided
510	EML	Christopher Wysong	Holland, MI
511	EML	Glen Anglese	Chicago, IL
512	EML	William Miller	Philadelphia, PA
513	EML	Robert Hiley	No Location Provided
514	EML	Robert Anderson	No Location Provided
515	EML	Sean Eaton	No Location Provided
516	EML	Tom Forwood	No Location Provided
517	EML	Bill Reichert	Cressona, PA
518	EML	No Name Provided	No Location Provided
519	EML	Tina Paquette	Hooksett, NH
520	EML	Jerry Allen	No Location Provided
521	EML	Tom Sycks	Rochester, MN
522	EML	Jeffrey Banke	California
523	HRD	Jerry Zopp	Menomonie, WI
524	HRD	Harold Olson	Rio Rancho, NM
525	HRD	George Hover	Rowland Heights, CA
526	HRD	Larry Vannes	Sunrise, FL

Tracking Number	Mode of Transmittal	Name	Location
527	HRD	John Hodges	Somerset, NJ
528	HRD	Marcia Woolman	The Plains, VA
529	HRD	Warren Giles	Penn Yan, NY
530	HRD	T. Bunson	Macon, GA
531	HRD	Lin Baxter	Dawson, GA
532	EML	Richard Jones	West Chester, PA
533	EML	James Shadix	Birmingham, AL
534	EML	John Charchut	Baltimore, MD
535	EML	William Shipton	Las Cruces, NM
536	EML	Robert Baker	Dalzell, SC
537	EML	Ken Hill	No Location Provided
538	EML	Bryan Nelson	No Location Provided
539	EML	Ronald Sanborn	No Location Provided
540	EML	Jim Norton	Windham, NH
541	EML	Jon Brudvig	No Location Provided
542	EML	James DiStefano	No Location Provided
543	EML	Ty Metcalf	No Location Provided
544	EML	Richard Vincent	Mesa, AZ
545	EML	Kent Dunn	Homer, IL
546	EML	Leo Kolaszewski	No Location Provided
547	EML	No Name Provided	No Location Provided
548	EML	Richard Evans	No Location Provided
549	EML	David Laden	Philadelphia, PA
550	EML	Thomas Fuller	Salt Lake City, UT
551	EML	Land Tawney	Missoula, MT
552	EML	Mike Wannemacher	Elida, OH
553	EML	Albert Arabia	No Location Provided
554	EML	Frank Westley	No Location Provided
555	EML	Stephen Wilbanks	Gainesville, GA
556	EML	Ted Scherff	Winchester, ID
557	EML	Ronald Galuppo Jr.	Keller, TX
558	EML	Dwight Ritter	Billings, MT
560	EML	Fred Wyatt III	No Location Provided
561	EML	Nicholas Malone	Iron Mountain, MI
562	EML	L. Paquette	No Location Provided
563	EML	Bill Wheelis	No Location Provided
564	EML	Bud Aultman	No Location Provided
565	EML	Mike Twedt	No Location Provided

Tracking Number	Mode of Transmittal	Name	Location
566	EML	Chet Grimsley	No Location Provided
567	EML	Andrew Griggs	No Location Provided
568	EML	Merle Ihne	Muscatine, IA
569	EML	Dennis Sheehan	No Location Provided
570	EML	Mike Lowe	No Location Provided
571	EML	Kenneth Varley	No Location Provided
572	EML	Any Larsson	No Location Provided
573	EML	Timothy Smith	No Location Provided
574	EML	J.D. Shank	No Location Provided
575	EML	Ronald Moss	Fort Blackmore, VA
576	EML	James Mitzen	No Location Provided
577	EML	Jerry Hamelink	Hudsonville, MI
578	EML	Larry Chesney	No Location Provided
579	EML	Roger Montgomery	Pascagoula, MS
580	EML	Louis Pico	San Diego, CA
581	EML	Jeremy Krebs	No Location Provided
582	EML	Pearsall Smith	No Location Provided
583	EML	Wilford Steffens	Trumann, AR
584	EML	David Popovitch	No Location Provided
585	EML	Dan DiSanto	Laguna Hills, CA
586	EML	Edward Kautz	No Location Provided
587	EML	Sanford Plummer	No Location Provided
588	EML	Fred Wyant	York, NE
589	EML	John Groshart	Glendive, MT
590	EML	Steven Mathews	No Location Provided
591	EML	Fred Gross	No Location Provided
592	EML	David Fisk	No Location Provided
593	EML	Jack Pistella	Pittsburgh, PA
594	EML	William Ward IV	No Location Provided
595	EML	Charlie Hernandez	Fremont, CA
596	EML	Chad Pearce	No Location Provided
597	EML	Ronald Cox	No Location Provided
598	EML	Timothy East	No Location Provided
599	EML	Edward King	No Location Provided
600	EML	Mark Henry	Carthage, MO
601	EML	Jim Shields	No Location Provided
602	EML	Jason Nabors	Cordova, TN
603	EML	Bart Clark	No Location Provided

Tracking Number	Mode of Transmittal	Name	Location
604	EML	Ed Scarfi	Freehold, NJ
605	EML	Dustin Stockdill	No Location Provided
607	EML	Jeff Skinner	Martinez, CA
608	EML	Frank Gilner	Fort Totten, NY
609	EML	Terry Bettiga	Kalamazoo, MI
610	EML	Dick Steele	Colorado
611	EML	Chuck Wells	No Location Provided
612	EML	Dan Allred	No Location Provided
613	EML	Clifford Harter	No Location Provided
614	EML	Laura Colombo	Commack, NY
615	EML	Wiggie Robinson	No Location Provided
616	EML	John Gordon	No Location Provided
617	EML	Clifton McIntush	No Location Provided
618	EML	Harlan Hark	No Location Provided
619	EML	Tom Young	No Location Provided
620	EML	John Frazier	No Location Provided
621	EML	Fred McNair	Austin, TX
622	EML	Jeffrey Birch	No Location Provided
623	EML	Tracy Christensen	Sandy, UT
624	EML	Jerry Nichols	Superior, MT
625	EML	Thomas Krajci	Corning, NY
626	EML	Terry Roberts	No Location Provided
627	EML	Charles Savage II	Xenia, OH
628	EML	Ben Wyatt	No Location Provided
629	EML	Leonard Gamber	Bancroft, MI
630	EML	Neal Mello	Hemet, CA
631	EML	William Chaffee	Gordonsville, VA
632	EML	William Benonacha	No Location Provided
633	EML	Jeff Warren	Portland, OR
634	EML	Mark Chaffin	No Location Provided
635	TEL	Rick Kickus	Hardington, NE
636	TEL	Paul Lindemann	Hillsdale, MI
637	TEL	Warren Christofferson	Froid, MT
638	TEL	Claude Pierret	Washington
639	TEL	Ron Smithburg	Fargo, ND
640	TEL	Christian E. Gronning	Anis, MT
641	TEL	Olaf Strommen	Malta, MT
642	TEL	Brian Whitmoyer	Unityville, PA

**Farm Service Agency** Final Programmatic Environmental Impact Statement

Tracking Number	Mode of Transmittal	Name	Location
643	TEL	Norman Haug	Shortell, MT
644	TEL	Felix Parks	Conrad, MT

Farm Service Agency		Final Program	<b>CONSERVATION RESERVE PROGRAM</b> matic Environmental Impact Statement
Tracking Number	183	Comment Category	Expansion

Comment EPA supports the proposed efforts by the FSA to implement changes in the Conservation Reserve Program based on the requirements of the 2002 Farm Bill (Alternative 3 - Proposed Action). However, we also believe there are many environmental benefits that would result from the geographical focus of the Environmental Targeting alternative (Alternative 4) that deserve serious consideration. The targeting alternative would maximize environmental benefits from the Conservation Reserve Program (CRP) by establishing regional priorities such as reductions in non-point source loadings, including sediments, pesticides, herbicides and nutrients that contribute to algal blooms, dead zones and fish kills. Targeting would, therefore, increase our ability to effectively implement the watershed approach and ultimately address national issues such as Gulf of Mexico hypoxia and prairie pothole wetlands restoration and protection. Given the beneficial aspects of the Environmental Targeting Alternative, we recommend that the FSA work to include, to the maximum extent practicable, the components of the Environmental Targeting Alternative into the Proposed Action Alternative.

**FSA Response** Comment noted. The PEIS has been expanded to include the targeted benefits achieved through CRP, CCRP, and CREP, which establishes these programs as a form of environmental targeting. Targeting to address environmental issues may be achieved through alternative 3, which provides a good mix of options to producers. Landowners and operators are provided choices through programs such as CRP general signup, CCRP, CREP, and FWP. While targeting through option 4 (Environmental Targeting Alternative) may focus on specific issues, enrollments could likely be reduced resulting in fewer benefits to the environment.

Fa	rm Service Agency	Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	183	Comment Category	Needs
Comment	enrolling areas targeted by CCRP and CF on enrollments which show that enrollm	first paragraph on page 5-18 suggest that USE REPs, as some contracts expire. This is not con ent of lands targeted by CCRP and CREP is mo s that is being made using the new bonus ince	sistent with USDA's published data re than doubling each year. The

**FSA Response** Comment noted.

Farm Service Agency		Final Programmati	CONSERVATION RESERVE PROGRAM ic Environmental Impact Statement
Tracking Number	183	Comment Category	Needs

**Comment** On page 5-18, the last sentence regarding TMDLs suggests that, because enrollment is "not mandatory" under CCRP or CREPs, "potential to positively impact TMDLs is minor." This greatly understates the role that incentives can play, the effectiveness of the lands targeted for enrollment by the CCRP and CREP, and the ability of state and federal programs to complement each other (as occurs in the Neuse CREP and TMDL programs cited above). The EIS needs to be revised to document the potential to enroll much, or most, of the buffer areas targeted, as well as the documented loading reductions that can occur for the most pervasive nutrient, sediment, and herbicide problems addressed by TMDLs and by other water quality programs.

**FSA Response** Impact table in Chapter 4 has been changed to address this comment. However, since the CRP program is voluntary, beneficial changes will only be obtained if landowners volunteer to be a part of the program. No enrollment, no benefits.

Farm Service Agency		<b>Conservation Reserve F</b> Final Programmatic Environmental Impact S	
Tracking Number	183	Comment Category	Needs

**Comment** On page 5-36, the Draft Programmatic EIS offers a CREP-like option (or SETA) for encouraging buffer enrollments along the Clinch River in Virginia in order to address the largest number of endangered species of any river in the U.S. under its Environmental Targeting Alternative. However, the Virginia CREP and the national CCRP both already provide such a bonus incentive to encourage farmers in the Clinch River drainage to enroll buffers. Since these benefits from buffers are already being pursued, they need to be identified under the Proposed Action Alternative (which continues current approaches) as well as the Environmental Targeting Alternative.

**FSA Response** Comment noted, discussion corrected.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	183	Comment Category	Needs
Comment		t, before the CRP targeted buffer enrollments, o ied by US Geological Survey maps, was cropped	

there may have been as little as 6 million acres adjacent to continually flowing--plus intermittent streams--in areas targeted by CCRP and CREP programs. This is relevant to the above CCRP and CREP discussions: With 2 million acres enrolled in the CCRP, already, and enrollments doubling each year, USDA has an opportunity to protect most currently cropped areas adjacent to streams. The Final Programmatic EIS needs to articulate that both the Proposed Action Alternative and the Environmental Targeting Alternative potentially can achieve the large benefits offered by buffer

**FSA Response** Comment noted.

restoration.

Farm Service Agency		Final Programmat	<b>CONSERVATION RESERVE PROGRAM</b> ic Environmental Impact Statement
Tracking Number	183	Comment Category	Needs

**Comment** In the same sections identified above, the Draft Programmatic EIS also needs to cite literature documenting an average of 95 percent loading reductions of nitrate in the shallow groundwater, which the research attributed primarily to denitrophication (Spruill, 2000). This denitrophication is important to the ecosystem because Spruill found that shallow ground water accounts for 70 percent of streamflow in his study's 28 North Carolina watersheds. Spruill was building on earlier studies with similar findings regarding nitrate loading reductions from buffers in lowland streams (National Research Council, 1993; Haycock and Pinay, 1993; Jacobs and Gilliam, 1985). The above information is particularly relevant to water quality and TMDL sections of the EIS (page 5-18), since the above study's comparison between 14 buffered streams and 14 nonbuffered streams occurred in the Neuse watershed. The Neuse is the focus of a North Carolina CREP program as well as a North Carolina TMDL program, both of which provide buffer enrollment incentives to achieve specific nitrate loading reduction goals.

**FSA Response** Comment noted. Although the sources and information in the comment is valid, the type of land targeted by general sign-up CRP up CRP is different than that targeted by CCRP and CREP. The environmental benefits produced by general sign-up CRP (through the use of the EBI) are more localized and targeted to address the "on-farm" environmental resources. CREP and CCRP (less than CREP) produce a more targeted conservation effort and the results that were mentioned above, in the Neuse Watershed of North Carolina, are a shining example of the type of environmental benefits received under CRP. The PEIS has been expanded in Sections 2.2.2, 2.2.3, and 2.2.4 and in chapter 5 to incorporate some discussion on buffers and the benefits to various environmental resources.

Farm Service Agency		Conservatio Final Programmatic Environment	
Tracking Number	183	Comment Category	Needs

Since stream buffers and grassed waterways play such a large role for all of the Alternatives, except for the baseline, it is Comment important to provide adequate documentation regarding their benefits, particularly in all of the text dealing with CCRP and CREP (including pages 5-5, 5-6, 5-8, 5-17, 5-33, 5-34, and, especially page 5-35). While this Draft Programmatic EIS text identifies the benefits from filtering sediment on each of the above pages, it does not document benefits resulting from biological processes which break down herbicides in buffers and grassed waterways. These biological processes often result in documented herbicide loading reductions of over 80 percent (National Research Council, 1993; Hall, Hartwig, and Hoffman, 1983; Rohde, Asmussen, Hauser, Wauchope, and Allision, 1980).

**FSA Response** The document has been expanded in Sections 2.2.2, 2.2.3, and 2.2.4 and in chapter 5, to discuss the importance of buffers on water quality, native vegetation, and wildlife.

Farm Service Agency			<b>CONSERVATION RESERVE PROGRAM</b> ic Environmental Impact Statement
Tracking Number	183	Comment Category	Needs

**Comment** Erosion reductions and certain wildlife benefits resulting from the general sign-up of the CRP are large, and the Draft Programmatic EIS does a good job of documenting that these benefits constitute an important difference between its Current Program, Alternative 2 for the CRP, and its No Program, Alternative 1 (or baseline). However, the Draft Programmatic EIS's comparison between its Proposed Action, Alternative 3, and its Environmental Targeting, Alternative 4, focuses on perceived differences between the CCRP, used by both Alternatives, versus the CREP, which expands under the Environmental Targeting Alternative. CCRP incentives to enroll buffers and grassed waterways were raised in 2001 to levels virtually comparable to the CREP incentives for those key practices. As a result, enrollment in the CCRP doubled, from 1 million acres to 2 million acres, in one year (perhaps while the Draft Programmatic EIS was being written). Although the Draft Programmatic EIS suggests that the CREP offers much better targeting of local environmental opportunities than the CCRP, a clearer description of their respective, current targeting mechanisms would suggest that the CCRP and the CREP now offer remarkably similar incentives to farmers. The CRPPs focus their incentives are not much larger than the incentives offered nationwide by CCRP, under both the Proposed Action and the Environmental Targeting Alternatives.

**FSA Response** No recommendations provided by comment,

Fa	rm Service Agency	Final Programma	<b>CONSERVATION RESERVE PROGRAM</b> atic Environmental Impact Statement
Tracking Number	183	Comment Category	Needs
Comment	incentives have doubled enrollment of the accomplishments under all of the Alternat Programmatic EIS.The EIS needs to cite th	quately represent the CRP's recent environme most environmentally beneficial practices in ives (except the baseline) far exceed what is he literature which supports the potential ben s which are the focus of its Proposed Action a	just one year. As a result, the CRP's represented in the Draft efits that result from enrollment of

Alternatives. It then needs to document that buffer incentives are effective under both the Conservation Reserve Program Continuous Sign-Up (CCRP) and the CREP that their enrollments more than double every year. The specific text dealing with Total Maximum Daily Loads (TMDLs), water quality, and species protection could then be modified in a manner consistent with the above changes. We reference peer reviewed literature that support our proposed changes.

**FSA Response** The document has been expanded in Sections 2.2.2, 2.2.3, and 2.2.4 to discuss the importance of buffers on water quality, native vegetation, and wildlife.

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme		
Tracking Number	183	Comment Category	Support	

**Comment** EPA supports the proposed efforts by the FSA to implement changes in the Conservation Reserve Program based on the requirements of the 2002 Farm Bill (Alternative 3 - Proposed Action).

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Fa	rm Service Agency	Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	183	Comment Category	Wildlife
Comment	practices, which include benefits to amp endangered species in the U.S. Yet, buf	the Draft Programmatic EIS for around 40,000 hibians, fish, and crustaceans which make up n fers provide such benefits along streams on a n o aquatic species from enrollment of stream bu	nost of the threatened and nuch larger CRP acreage than that.

**FSA Response** The PEIS has been expanded to include a more through discussion of buffers and their roles (Chapter 2).

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Statem	
Tracking Number	213	Comment Category	Air Quality

**Comment** There is no discussion of the value of grasslands in carbon sequestration. Grasslands, particularly native species (with deep and extensive root systems) sequester much carbon in the soil.

**FSA Response** The discussion of carbon sequestration has been expanded in Section 2.2.3.

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Stat	
Tracking Number	107	Comment Category	Air Quality

**Comment** Discussion of the carbon sequestration aspects of CRP is very limited, particularly regarding the benefits that prairie reconstructions, using native grasses and forbs, could provide.

**FSA Response** Discussion of carbon sequestration was expanded in section 2.2.3 to include the benefits grasslands provide.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	107	Comment Category	Economic Impact on Rural Communities
Comment	We believe the DPEIS fails to carefully ex analysis must include all of the economic	•	on rural communities and economies. The nd specifically the economic benefits of

hunting, fishing and wildlife viewing.

**FSA Response** Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative has been expanded. The discussion on job losses in the recreation sector of the economy in Section 5.5.1.1 has been expanded to address this comment.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	109	<b>Comment Category</b> Economic Impact on Rural Communities	

**Comment** The section on rural economic impacts states that increasing CRP acres has no positive impacts on land rents. The PEIS claims that CRP enrollment in fact has a negative impact on cash rental rates of remaining farmland, based on modeling done. This appears to be contrary to a study by Ryan et. Al. that shows CRP exerts an upward pressure on land rental rates by removing land from production. In Wisconsin, there is anecdotal information that farmland rental rates are increased in areas of heavy CRP participation. USDA should at least recognize that CRP has the potential to cause farmland rental rates to increase.

**FSA Response** The discussion of Uncertainty and/or Decreased Profitability of Tenant Farm Operations in Section 5.5.1.2. has been expanded to address this comment. Depending on local conditions CRP has the potential to affect land rents. By basing CRP rental payments on dryland cash rental rates, this potential is minimized.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	104	Comment Category	Economic Impact on Rural Communities
Comment	The CRP PEIS does not mention the effect outdoor recreation, but only briefly and n		hat CRP has on the revenue generated by agricultural employment or services. I

recommend that USDA spend more time looking at outdoor recreation economic impacts of CRP. The positive economic benefits CRP provides for outdoor recreation in the Northern Great Plains is essential for the survival of many small towns and rural areas.

**FSA Response** Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative has been expanded to address this comment. The discussion of job losses in the recreation sector of the economy in Section 5.5.1.1 has also been expanded.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	187	<b>Comment Category</b> Economic Impact on Rural Communities	

**Comment** Furthermore, a substantial economic and recreational contribution is made by upland hunting opportunities for species such as Ring-necked Pheasant, Gray Partridge and Plains Sharp-tailed Grouse that are known to frequent and utilize well-established CRP covers. The DPEIS fails to consider the impact to local economies if haying or grazing by livestock degrades upland bird habitats. Montana alone generates \$33 million in economic activity from upland bird hunting; it is in the interest of Montana sportsmen that this consideration be included when deciding management practices of CRP land.

**FSA Response** Comment noted. This comment presumes that haying and grazing are going to seriously degrade pheasant, partridge, and grouse habitat. Haying and grazing on CRP land is required to have in place a conservation plan that explicitly considers breeding birds. These plans postpone haying and grazing until after the breeding season. Additionally, landowners are well aware of the economic potential from hunting leases and will generally seek to further maintain bird habitat to maintain these opportunities.

Farm Service Agency		Final Pr	Conservation Reserve Program ogrammatic Environmental Impact Statement
Tracking Number	375	Comment Category	Economic Impact on Rural Communities

**Comment** I would encourage FSA to provide incentive payments beyond the annual \$5.00/acre rate to landowners who are willing to complete some management practices for habitat improvements during the life of a contract.

**FSA Response** Comment noted.

Farm Service Agency		Final Pr	Conservation Reserve Program ogrammatic Environmental Impact Statement
Tracking Number	375	Comment Category	Economic Impact on Rural Communities

**Comment** I would also stress the importance of maintaining the highest values to be awarded to native grasses/forbs/legume cover types in the EBI index during the enrollment process.

**FSA Response** Comment noted. The EBI does currently award more points for the selection of native grass, forbs, legumes, and tree plantings.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	121	Comment Category	Expansion

**Comment** I encourage expanding the program to at least 45 million acres.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	118	Comment Category	Expansion
Comment		f acres enrolled in General CRP and CCRP cont eat many soil, water and wildlife resource prot	

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres in accordance with the 2002 Farm Bill.

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	375	Comment Category	Expansion

**Comment** I also encourage FSA to look at expanding CRP to at least 45 million acres.

**FSA Response** Comment noted. The CRP acreage has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	84	Comment Category	Expansion
Comment	composition and vigor similar to seeding r allowed the same EBI score as if it were r comparable to the EBI, then a producer s	on of the 51% rule)- If the existing stand of nixes offered by the EBI at the time of re-en eseeded. If the stand no longer exhibits spec hould be given the option to either reseed of incentive payment to participants that are w	rollment, then the stand should be cies composition and vigor r apply management to raise the EBI.

although in cover conducive to soil and water conservation, are no longer beneficial to wildlife. The incentive payment should be sufficient to offset costs of reconditioning the CRP tract for wildlife (including interseeding, herbicide treatment,

**FSA Response** The Agency is reviewing options on how to enhance plant diversity on existing stands through a variety of management options such as interseeding, light disking, and other management. The Agency is reviewing the impacts of the policy.

etc....)

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	106	Comment Category	Haying/Grazing

**Comment** I believe that the farmer/rancher should be allowed to graze that grass off periodically. I hope you can expand the allowable forms of grass maintenance in the rules

**FSA Response** Comment noted.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	187	Comment Category	Haying/Grazing

A substantial benefit for upland bird and waterfowl in the form of nesting and winter cover has resulted in conjunction with Comment establishing protection from erosion from CRP programs. These enhancements of bird population should receive higher recognition in the proposed document and management considerations should be adjusted accordingly. For example, the preferred alternative allows for regular having and/or grazing by livestock. Heretofore, these uses were allowed only during weather extremes, such as the four-year drought recently experienced in Montana. These practices degrade suitable upland bird habitat by reducing cover and contributes to nest destruction and an increased mortality of hens and broods. Two sensitive species are known to use CRP land in Montana, Columbian Sharp-tailed Grouse and western Sage Grouse. USFWS has conducted examinations to determine whether to list these species as threatened under the federal Endangered Species Act (ESA); the findings concluded that a listing for Columbian Sharp-tailed Grouse was not warranted and determined that habitat security provided by seldom-grazed or hayed CRP lands has improved survivability. The USFWS also determined that protection was warranted but precluded for western Sage Grouse; that species relies on habitat provided by CRP practices. Many federal and state agencies as well as conservation organizations have joined forces to study conditions and mitigate situations inconsistent with the stabilization of Sage Grouse numbers. If having and grazing is increased as part of the revised CRP directives then recovery of these two species would be compromised.

**FSA Response** Comment noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	121	Comment Category	Haying/Grazing

**Comment** Haying and grazing should be limited and include provision for improving wildlife habitat.

**FSA Response** CRP is a conservation program with the primary objectives of improving water quality, reducing erosion and improving soil quality, and enhancing wildlife habitat. Provisions authoring emergency haying and grazing along with the creation of managed haying, grazing, and the harvesting of biomass will be authorized as long as the primary objectives of CRP are not compromised. Currently, for the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed. The features of the required conservation plan establish guidelines for land disturbances that could effect any environmental resources on the CRP land (Section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	84	Comment Category	Haying/Grazing
Comment		from the scientific community reveals the quali	, <u> </u>

for many game and non-game species declines with time due to excessive accumulation of dead litter, increased vegetation density, and the loss of plant diversity. The 2002 Farm Bill conference committee managers clearly state the improvement of wildlife resources is part of the program's scope and that the USDA should allow practices intended to enhance forage for the benefit of wildlife on CRP lands. Managed haying and grazing at 3-5 year intervals would enhance many of Iowa's CRP seedings. However, poor quality forage from unmanaged CRP combined with a mandatory payment reduction discourages management by CRP participants. In addition, the EBI provides no incentive to manage the cover once established. Management of the vegetation over the term of the CRP contract is as important as the cover established in determining the extent to which a CRP tract achieves wildlife purposes. USDA should allow managed haying and grazing for wildlife purposes without a payment reduction or provide an incentive payment for the application of prescribed management practices used to enhance CRP forage/vegetation for wildlife should developed jointly by the individual STC's in consultation with the state wildlife agency.

**FSA Response** Comment noted. The Draft PEIS discusses seed type variability in Section 5.2.3.1.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	104	Comment Category	Haying/Grazing

**Comment** The PEIS states that haying and grazing of CRP cover during the nesting and brood rearing seasons has had little impact on ground-nesting birds. This statement is false.

**FSA Response** The statement is false and has been changed to read, "The haying and grazing of CRP cover during the primary nesting and brood rearing season has occurred during authorized emergency conditions and does produce a detrimental impact to those ground-nesting birds in the authorized areas. However, little to no impact has occurred to ground-nesting birds as a result of permissive grazing or incidental gleaning because they are not authorized during the primary nesting and brood rearing season."

Farm Service Agency		Final Programm	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	36	Comment Category	Maintenance	
Comment		is not attended in the DPEIS and this is a huge n works quickly and litter buildup stifle plant di	<i>i i i</i>	

**FSA Response** Impacts of CRP maintenance practices on natural vegetation and wildlife are discussed in greater detail in sections 5.3 and 5.4.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	36	Comment Category	Maintenance
Comment		9 won't automatically mean that wildlife will b ose plant diversity and wildlife benefits after 1 re-entry in the program.	

**FSA Response** Comment noted. Re-enrollment criteria of CRP expiring lands is currently under review by FSA.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	36	Comment Category	Native Vegetation

**Comment** Trees planted where they don't ecologically fit are a poor bargain for the public \$ since thy just don't grow well to produce future timber crops or even sequester carbon. CRP puts too great an emphasis on tree plantings.

**FSA Response** Current CRP tree planting conservation practices are implemented on highly environmentally sensitive land to reduce runoff, filter excess sediment and nutrients, provide wildlife habitat, and sequester carbon in areas where Technical Service Providers, like NRCS and the Forest Service, have determined that the environmental benefits of planting trees will produce the greatest environmental return and are in accordance with the established Conservation Plan. The purpose of CP3 and CP3A is to establish a stand of trees in a timber plant that will enhance environmental benefits (2-CRP (Rev. 3) Amend 16 Exhibit 9).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	36	Comment Category	Native Vegetation

**Comment** The role/value of native grass/forbs plantings in carbon sequestration in not mentioned and should be.

**FSA Response** The role and importance of native vegetation in carbon sequestration is discussed further in sections 2.2.1 and 2.2.3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	104	Comment Category	Native Vegetation

**Comment** The CRP PEIS leaves the reader with the idea that "cool-season" grasses are non-native and invasive. This is a false statement and should be changed. Many native grasslands have significant native cool-season components.

**FSA Response** The discussion in Section 2.2.3.1 has been expanded to include benefits of cool-season grasses and their benefits to wildlife along with some discussion on the benefits of cool/warm-season grass mixes.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	109	Comment Category	Native Vegetation

**Comment** While trees do perform vital natural pollution control functions, there are situations when grassed riparian areas are necessary and should be allowed and encouraged. Local or regional landscapes and ecosystems, and management goals, may require grass buffers be used. USDA guidelines and practices should be flexible enough to allow for grass riparian areas in certain landscapes and situations.

**FSA Response** Comment noted. Current CRP tree planting practices are implemented on highly environmentally sensitive areas to reduce runoff, filter excess sediment and nutrients, provide wildlife habitat, and sequester carbon in areas where the Technical Service Provider, like NRCS and the Forest Service, have determined that the environmental benefits of planting trees will have the greatest environmental return.

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Statem	
Tracking Number	118	Comment Category	Needs

**Comment** The administering agency (FSA) also needs to utilize all the acreage which Congress has made available. Acreage that is being held back is not addressing soil, water or wildlife needs. The FSA needs to enroll the maximum number of acres available to produce optimum benefits.

**FSA Response** Comment noted. The current acreage enrolled under CRP is approximately 33.9 million acres while the program acreage cap is 36.4 million acres. Acreage is still currently available for enrollment and by targeting highly sensitive environmental areas through CCRP and CREP optimal environmental benefits are currently being produced.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	118	Comment Category	Needs
Comment	We also feel that the FSA needs to addre	ess what we feel is a major short coming of the	program in the emphasis of

standardizing grass mixtures for the sake of facilitating program administration. One size does not fit all. For example, in Nebraska, vegetative development is directly related to precipitation. This factor varies from 30 inches in the east to less than 16 inches in the west. This has resulted in the planting of inappropriate native grasses in the west to get the higher EBI points associated with CP2. We would recommend that the FSA consider letting the State Technical Committee determine the point values for at least CP4D. This should insure that we do in fact end up with species growing in the right place and truly being the best suited for wildlife.

**FSA Response** Comment noted. The Draft PEIS discusses the issue of grass seed type in Section 5.3.2.1.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	222	Comment Category	Needs

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices (I.e. center-pivot corners, wildlife field borders, act) as CRP buffers.

**FSA Response** Comment noted. Center-pivot corners and field borders are eligible for enrollment under general signup provided that the land meets basic eligibility requirements, but at no additional C/S.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	109	Comment Category	Needs
Comment	The 2002 Farm Bill changed the crop his	story requirements. Land eligible for CRP must r	now have been planted, or

considered to have been planted, for four of the six years prior the date the Farm Bill was signed. The PEIS concludes the change will have a net positive impact on soils and surface water because it better focuses on more intensely cropped farmland. It does not consider any negative effect resulting from the crop history change. We disagree with this conclusion. Many Wisconsin dairy farmers use rotations in excess of six years. There will be an unintended negative environmental consequence of the change in crop history in areas that have a longer than six year crop rotation and incorporate hay or alfalfa as part of that rotation.

**FSA Response** Comment already addressed in Section 5.2.2.3.

Farm Service Agency		Final Programma	<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	36	Comment Category	Needs	
Comment		r selection should be driven by conservation. ( en don't benefit wildlife while benefiting soil or vildlife?		

**FSA Response** Comment noted. The EBI awards more points for the use of native species over introduced species, while the conservation plan also addresses the preferences to use of native species and avoid monocultures (Section 3.2).

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	226	Comment Category	Needs

As identified in the DPEIS, buffers have been well adopted in the corn belt states. In other regions, millions of acres of Comment whole fields and whole farms continue to be enrolled in CRP. The regional imbalance in whole field and buffer enrollments in large measure results from the three to four fold differences in soil rental rates among regions. While it is reasonable to enroll fewer acres in more productive landscapes, more acres of field enrollments in the corn belt are needed to effectively deal wit the runoff of pollutants from agricultural land and to accommodate grassland species requiring larger blocks of grassland habitat.

**FSA Response** Land enrolled under general signups, as suggested by the comment, is subject to producer interest and a competitive ranking to ensure that the environmental benefits relative to cost is optimized.

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Stater	
Tracking Number	221	Comment Category	Needs
Commont	We need regular general CDD sign ups at	ad CCDD (huffare) and CDED's. This pat only a	nourages and promotes water

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's. This not only encourages and promotes water quality through the filtering of nutrients in filterstrips, but he CRP Program also assists in the reduction of sedimentation in our streams, rivers and lakes through the installation of waterways. These practices are highly advantageous to wildlife as they are vast acreages planted to good wildlife cover that is undisturbed and managed.

**FSA Response** Comment noted. Continuous signup and CREP signups are held on a continuous basis at local FSA offices. CREP is geographically limited; however, continuous is available in all offices. General signups are held periodically, taking into account CRP contracts scheduled to expire, the enrollment goals for continuous signups, for remaining available acreage, and other factors.

Farm Service Agency		Final Programma	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	107	Comment Category	Needs	
Comment		comparison between the cost of enrolling enviro Bill programs such as loan deficiency payments		

**FSA Response** Land retirement programs, such as CRP, can significantly offset some farm bill program costs, depending on crop prices, supply/demand, and the nature of the farm programs that are in effect.

Farm Service Agency		Final Programmati	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	84	Comment Category	Needs	

**Comment** Because of the small acreage's associated with the continuous CRP allowing participants to enroll whole fields where more than 50% of the field is in buffer will promote continued participation. SIP and PIP payments should also be continued to promote the enrollment of these small tracts. However, USDA could improve the wildlife benefits accrued from the Continuous CRP by only providing the PIP to participants willing to plant native species verses exotics.

**FSA Response** SIP and PIP payments are limited, by statutes, to basin rental payments (I.e. No incentives). No data was provided to evaluated the recommendation given.

Farm Service Agency Fir		Final Programm	<b>Conservation Reserve Program</b> Programmatic Environmental Impact Statement	
Tracking Number	107	Comment Category	Needs	

**Comment** The DPEIS fails to evaluate the array of conservation practices used in the CRP Continuous Sigh-up (CCRP) and how they might be expanded. We recommend an evaluation be conducted of approved CCRP conservation practices in the DPEIS, including additional practices that could achieve the needs of upland wildlife.

**FSA Response** The commentors suggestion would make millions of acres eligible for continuous signup; thereby, quickly using the limited enrollment authority.

Fa	rm Service Agency	Final Programma	<b>CONSERVATION RESERVE PROGRAM</b> atic Environmental Impact Statement
Tracking Number	187	Comment Category	Needs
Comment	that the public's wildlife deserves higher by state and federal wildlife managers is owned by the public and held in trus subsequent hunting opportunities has in hunting. We believe that this is inappro- financial gain from public CRP monies.	ican public tax monies are provided to support the er consideration than in previous CRP rules. The ' to be the overriding principle in wildlife managen t for the public by the state. As upland bird habit ncreased, landowners are charging access fees f opriate, "double dipping" by CRP subscribers that In light of this, MWF believes that the public sho g to those lands enhanced by public, CRP monies t in the CRP program or	"Public Trust Doctrine" is recognized ment. It establishes that the wildlife tat has improved due to CRP and for the purpose of upland bird to benefit with a build be given some access

no commercial hunting activities should be allowed. A sense of parody needs to be established.

**FSA Response** The CRP is a commercial venture between Commodity Credit Corporation and participants authorized by Title XII of the Food Security Act of 1985, as amended. However, the authorizing language does not include requirements to public access to private land enrolled in CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	227	Comment Category	New Alternative

**Comment** I would propose a course of action somewhat intermediated between alternative 3 and 4 in the PEIS.

**FSA Response** Comment noted. The PEIS has been expand to include the targeted benefits achieved through CRP, CCRP, and CREP, which establishes these programs as a form of environmental targeting. Targeting to address environmental issues may be achieved through alternative 3, which provides a good mix of options to producers. Landowners, and operators are provided choices through programs such as CRP general signup, CCRP, CREP, and FWP. While targeting through option 4 (Environmental Targeting Alternative) may focus on specific issues, enrollments could likely be reduced resulting in less benefits to the environment.

Farm Service Agency		Conservation Reserve Progr/ Final Programmatic Environmental Impact Stateme	
Tracking Number	84	Comment Category	Soils

- The draft PEIS provides helpful discussion of the truly staggering soil retention benefits of the CRP. In addition to the Comment general discussion of the benefits of establishing permanent vegetative cover on CRP lands (5-2), the PEIS should examine the environmental impacts on soil retention of establishing vegetation that is native to the area versus non-native species. For example, although planting switchgrass, or other tallgrass varieties, in short-grass steppe has initial appeal (because these grasses are easy to establish), it is not as good a choice for erosion control or water quality purposes as restoring native shortgrasses. Planting these out-of-system grasses in the arid short-grass steppe, inverts the natural ecosystem, which depends upon sturdy, drought-tolerant ankle-high grasses (like buffalo grass and blue grama) with extensive root systems. The out-of-system tallgrasses are more drought susceptible, more grazing intolerant, and less water use efficient than native shortgrasses. This creates the threat that disturbance (fire, grazing, drought) will cause these introduced grasses to fail, thereby exposing the soil to wind erosion just when the soil retention capabilities of the sturdy native shortgrasses (e.g., buffalo and blue gramma grass) are needed the most. Last summer's widespread western fires demonstrated that the same concerns hold true for the superior ability of native grasses versus non-native grasses to hold soil and spring back after a fire. See Colorado photos of crp exotic grasses after fire v. native shortgrass. This is a key issue for the CRP PEIS to consider particularly given that 23% of CRP lands are enrolled in introduced grasses and legumes (Fig. 5.1-1).
- **FSA Response** Discussion in 2.2.3.1 is expanded to include the erosion control benefits of sod-forming native grasses (i.e. buffalograss, switchgrass, ect.) that bind the soil near the surface as well as any exotic grass. FSA acknowledges the benefits of trying to restore the climatic vegetation that is best suited for the site. The EBI used in the last CRP signup provided incentives to restore vegetative plant communities best suited for the site. In developing the regulations and policy for the program, the agency will continue to implement procedure that will seek to restore native plant communities.

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	84	Comment Category	Soils

**Comment** The PEIS accurately notes that placing land into permanent conservation easements under CREP provides long-term soil quality benefits allowing the soil health to improve. It would be helpful to expand this discussion by citing to studies that provide a range of timeframes within which soil health improvements begin to occur. It would also be helpful to describe the numerous benefits of improved soil health, such as texture, permeability, biological activity, capacity to store water and nutrients, and organic matter contained in the soil (see e.g., National Academy of Science 1993).

**FSA Response** Comment noted. The document has been modified to address the soil quality benefits of the program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	374	Comment Category	Support
Comment	The CRP program changes described un	der the 2002 Farm Bill are welcomed changes. $^-$	They fix the problems that were

experienced in the previous sign-ups (15 to 20). Conservation Agriculture would like to go on record as supporting the 2002 Farm Bill option as described in the Draft Programmatic Environmental Impact Statement and support the general sign-up as the most effective CRP program option for the farmers in our region.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	84	Comment Category	Support
Comment		ventory data for Iowa show there has been typ ory 4 to 6 years prior to enactment will reduce	

has occurred in Iowa.

**FSA Response** Type 3 slippage should be reduced under the Proposed Action Alternative – FSA's Preferred Alternative due to the change in the cropping history. Refer to Section 5.5.2.3, discussion on slippage in the PEIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	375	Comment Category	Support

**Comment** The Department strongly supports Alternative #3 in the draft PEIS.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	121	Comment Category	Support

**Comment** I support Alternative 3 in the Draft EIS on CRP

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	220	Comment Category	Support	

**Comment** We strongly support Alternative 3 for the CRP program, in the Draft CRP environmental impact statement.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	36	<b>Comment Category</b>	Support

**Comment** Alternative #3 is clearly the best of the four alternatives.



Tracking Number118Comment CategorySupport

**Comment** the importance of the CRP to Nebraska's fish, wildlife and other natural resources cannot be overstated. It is particularly important that CRP continue as a blend of larger tracts and buffers targeted to specific program in Nebraska. Therefore, we strongly support Alternative 3 in the Draft EIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	107	Comment Category	Support	

**Comment** We strongly support selection of Alternative #3 in the Draft PEIS, the choice of the Farm Service Agency.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	107	Comment Category	Water Quality

**Comment** Although water quality issues are well addressed, discussion of groundwater, is quite limited.

**FSA Response** The discussion of groundwater issues is expanded section 2.2.2.2.

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	213	Comment Category	Wildlife

**Comment** Much of the CRP tree planting that has been done in the Southeast has been more detrimental than positive for wildlife. The DPEIS should evaluate the impact on wildlife, especially grassland and shrub-scrub dependent bird species, of trees planted in the CRP.

**FSA Response** Comment noted. Tree species selection is left to local offices but should be managed to provide the greatest conservation benefits.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	213	Comment Category	Wildlife

The DPEIS states that permitting existing cover to continue, will continue to have lasting positive impacts to wildlife on Comment already established vegetative plots. This is an incorrect assumption and simply not removing vegetative cover will not ensure wildlife conservation. In the southeastern U.S., most of the CRP acreage was planted to monoculture stands of loblolly pine or exotic sod-forming grasses such as fescue and Bermuda. Simply maintaining these plots without significant alteration will accrue limited, if any wildlife benefits.

**FSA Response** Statement reworded in section 5.3.3.1 to clarify statement. "If vegetative cover showed positive benefits for wildlife, those benefits will continue through re-enrollment." "If however, wildlife benefits will be limited through re-enrollment if previous vegetative cover was of limited quality."

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact Stater	
Tracking Number	213	Comment Category	Wildlife

**Comment** practices utilized in the CCRP do not address all three of the primary purposes of the CRP program: soil, water, and wildlife. Establishment of practices (I.e. wildlife field borders, center-pivot irrigation system field corner habitat, ect.) that provide targeted benefits for wildlife could help provide key habitat in the same way that filter strips are designed to address water quality. We recommend an evaluation be conducted of approved CCRP conservation practices in the DPEIS, including additional practices.

**FSA Response** The Practices eligible for the continuous signup generally provide benefits to large areas when compared to the acreage on which the practices is implemented. Practices eligible for continuous signup may be implemented on field borders and center-pivot corners if such land is otherwise eligible.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	36	Comment Category	Wildlife

**Comment** CCRP is missing opportunities to address wildlife because there is no mechanism to ensure wildlife is incorporated as is the case with general sign-up with the EBI. If there is no EBI with CCRP then development of practices to specifically address wildlife would get the job done. (wildlife field borders, center pivot corner habitat plantings, ect)

**FSA Response** Continuous signup and CREP provide significant wildlife benefits. Wildlife is taken into consideration in the practice requirements for almost all CRP practices.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	36	Comment Category	Wildlife

**Comment** Trees aren't always good for wildlife, particularly when they fragment prairie landscapes and pub declining prairie species at greater risk of predation than was historically the case.

**FSA Response** Tree selection and cultural practices are determined by the State Technical Committee taking into consideration plant selection and cultural practices that are best suited to the specific site. However, an in-depth discussion on the impacts of woody vegetation was added in sections 2.2.3, 2.2.4, 5.3, and 5.4. The discussions includes how woody vegetation spread into native grassland areas through: planting of windbreaks and shelterbelts, fire suppression, and as invasive species. Impacts on native grassland ecosystems, and other habitats, and how it has created habitat for non-grassland species, corridors for predators, habitat for woodland raptors

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	121	Comment Category	Wildlife

**Comment** It is important to have a general sign-up for wildlife to have vast acreages planted to good wildlife cover that is undisturbed and managed for wildlife.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices specifically target wildlife and wildlife habitat enhancement, with most practices producing a secondary benefit to wildlife (Appendix B).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	121	Comment Category	Wildlife

**Comment** The program should not encourage destruction of existing habitat areas such as native prairie just so producers can establish a cropping history to be eligible for the program.

**FSA Response** The 2002 Act changed the cropping history requirements to 4 out of the 6 years preceding enactment of the legislation. This change will not allow producers to destroy existing habitat to establish a cropping history.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	213	Comment Category	Wildlife

**Comment** Whether wildlife benefits accrue on CRP is totally dependent on the kind of cover planted, including diversity of the stand and how that cover is managed during the life of the contract. In the Southeast, the rate of natural succession necessitates periodic disturbance. These factors are all-important to wildlife, cannot be overstated, and certainly should be much better researched in the CRP DPEIS.

**FSA Response** A statement has been made on the impacts of vegetation selection its management on wildlife and in section 5.4. However, due to the scope of this document, all species of importance and all regions cannot be addressed.



Tracking Number 107 **Comment Category** Wildlife

The Draft PEIS fails to evaluate the effect of trees planted on CRP, and for the most part, states that trees have been Comment beneficial to wildlife. Tree planting on prairie landscapes in Missouri are often detrimental to declining prairie species and, in many instances, trees don't do well when planted where they historically didn't grow. We recommend that the DPEIS evaluate the impact of tree plantings on wildlife, particularly on prairie landscapes.

**FSA Response** An in-depth discussion on the impacts of woody vegetation was added in sections 2.2.3, 2.2.4, 5.3, and 5.4. The discussions will include: Woody vegetation's spread into native grassland areas through: planting of windbreaks and shelterbelts, fire suppression, and as invasive species. Impacts on native grassland ecosystems: creating habitat for nongrassland species, corridors for predators, habitat for woodland raptors.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	104	Comment Category	Wildlife
Comment	Crop production agriculture has been im	plicated as one of the main causes for the decli	ine of a variety of fish and wildlife

species, in very steep and long-term decline. Yet, the Continuous CRP sign-up has placed little emphasis on restoring habitats for these species. In fact, most benefits noted to date from CCRP have been coincidental to the administration of the program. I recommend that the PEIS evaluate the benefits of developing and authorizing Continuous sign-up CRP practices for fish and wildlife species in serious decline, such as the greater prairie chicken, Northern bobwhite quail, and prairie dog.

**FSA Response** The CRP is a voluntary program offering producers the option to enroll eligible acreage for a 10-15 year period while retaining control of the land, including hunting access.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	104	Comment Category	Wildlife
Comment	In one section of the CRP PEIS, a referer	nce is made that "croplands provide critical ha	bitat for a wide variety of wildlife

species, including hundreds considered endangered or threatened" This statement seems to assert that croplands provide "critical habitat" for threatened or endangered species. This is not true, as landscapes dominated by croplands constitutes lands on which many species have historically depended for habitat, and if the species is to survive at all, it will occur on these lands in low abundance. Many other habitat types are often needed.

**FSA Response** The third paragraph of section 2.2.4.3 was revised from, "agriculture lands provide critical habitat for T&E species," to "Landscapes dominated by croplands and other agricultural lands constitute the lands on which many species have historically depended for food, cover and water. These species often have nowhere else to go and must continue to survive on those lands if they are to survive at all."

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	375	Comment Category	Wildlife

**Comment** The continuous sign-up option has provided opportunities for a variety of natural resource concerns in our state. To increase the potential of this program, I would recommend that center-pivot corners be allowed as a conservation practice under the CCRP. This would create valuable wildlife habitat and provide additional options for producers around these irrigation systems.

**FSA Response** The Practices eligible for the continuous signup generally provide benefits to large areas when compared to the acreage on which the practices is implemented. Practices eligible for continuous signup may be implemented on field borders and center-pivot corners if such land is otherwise eligible.



Tracking Number 107

**Comment Category** 

Wildlife

**Comment** Discussion of the wildlife habitat implications of CRP in the Draft PEIS is inadequate, particularly as it relates to cover and how cover is managed during the contract period. In Missouri, periodic (every 3-5 years) management of CRP lands is essential to deliver wildlife benefits throughout the contract period.

**FSA Response** Maintenance practices and measures are determined at the state level. While it is important to emphasis the fact that not all management techniques are appropriate for all locations across the country, and that "one size" does not fit all, and that proper maintenance is critical in the overall health of natural vegetation and local wildlife populations, it is not within the scope of this document to describe in detail the appropriate management techniques for every different region across the U.S.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	160	Comment Category	Administration

**Comment** Program administration of the CRP needs some additional analysis, particularly as it affects local areas. The policy restriction that no more than 25 percent of available cropland in a given county can be enrolled (to protect the local economy from excessive downturns) is being administered in a way that effectively (and possibly unknowingly) raises the cap to permit 30 % or more of true available crop acreage in a given county into the program. This, in our view, is excessive and should be investigated to ensure that program administration is congruent with the intent of the legislation.

**FSA Response** As discussed in Sections 2.3.1.2 and 5.6.3 of the draft PEIS, the general decline of rural communities in the United States is attributable to a number of factors not related to the CRP program. The effects of CRP program participation on local communities are generally mixed (see section 5.6.2 of the draft PEIS). However, CRP does represent a benefit to the structure and viability of the community in that it creates an incentive for farmers to engage in environmentally beneficial practices that also support the general health and well-being of the larger community as a whole. CRP participation by "retirement" and "residential lifestyle farmers" is addressed in Section 2.3.1 of the draft PEIS. Rural communities in the United States, especially those that are agriculture dependent, have undergone a general decline in population, employment level, and income over the past 20 to 30 years. As noted in Sections 2.3.1.2 and 5.6.3 of the draft PEIS, these losses are attributable to a number of factors not related to the CRP program. Among these are shifts in the international commodities market, changing demographic and residency patterns and general transformation of the U.S. economy. To the extent that CRP participation affects the general social and economic climate of rural communities, any associated impacts are discussed in Sections 5.5 and 5.6 of the draft PEIS. The discussion of Uncertainty and/or Decreased Profitability of Tenant Farm Operations in Section 5.5.1.2 has been expanded to address this comment.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Aquatic Species

**Comment** Under this alternative, the PEIS should also examine the dramatic benefits to aquatic species from creating NETAs by incorporating the comments at 5-36.

**FSA Response** Impact comparison table in Chapter 4, Table 4.4-1, has been expanded to address this comment.

Fa	arm Service Agency	Final Program	CONSERVATION RESERVE PROGRAM natic Environmental Impact Statement
Tracking Number	85	Comment Category	Aquatic Species
Comment	Proposed Action/2002 Farm Bill/Balanced I	the dramatically higher increase in benefits Environmental Targeting Alternative. As dis continuous signup methodologies would d the places they are most needed.	scussed above, enrolling

**FSA Response** Comment noted. This would be true provided that Alternative #4 resulted in adequate acreage being enrolled in CCRP and CREP.

Farm Service Agency		Final Program	Conservation Reserve Program matic Environmental Impact Statement
Tracking Number	85	Comment Category	Aquatic Species
Commont	Finally, the DETC should discuss the signific	ant advaras imports to payotic life that as	an accur from inconvicto bouing or

**Comment** Finally, the PEIS should discuss the significant adverse impacts to aquatic life that can occur from inappropriate haying or grazing or emergency haying or grazing. As discussed above, excessive or inappropriate grazing can destroy vegetative cover, exposing soils to erosion and destroying filtration benefits they formerly provided. Grazing along streams can adversely impact fish and other aquatic organisms by impairing water quality, eroding stream banks and, if cattle have access to streams, altering stream beds (Licht at 70). The resulting increases in sediment, nutrient and pesticide loadings to streams harm aquatic species by removing food base and destroying habitat (and even by smothering benthic life, including endangered freshwater mussels and clams) (see, e.g., 2-36).

**FSA Response** Discussed earlier in Section 2-12 regarding nonpoint source pollution.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Aquatic Species

**Comment** The PEIS should paint a clearer picture of the environmental benefits by integrating the compelling information presented earlier on agricultural impacts on aquatic life (2-35 to 2-37).

**FSA Response** Section 5.2.3 references discussion of aquatic species in section 2.2.2.4.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Buffers

**Comment** We recommend additional discussion of specific wildlife-related CCRP practices (e.g. wildlife field borders, center-pivot corners managed for wildlife, and the development of new CCRP practices modeled after the existing CP-4D practice).

**FSA Response** Wildlife field borders are currently allowed under certain conservation practices, like CP15A, and center-pivot corners are allowed if the proposed contract land meets necessary general programmatic criteria but with no additional C/S.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Buffers

**Comment** The DPEIS contains inaccurate and misleading discussion (5.2.1.3.2 CCRP) on the effectiveness of buffers in the discussion of the new CCRP provisions allowing enrollment of whole fields if 50% of a field is eligible. We recommend inclusion of discussion encouraging additional CCRP participation due to the farmer and wildlife-friendly aspects of this provision

**FSA Response** Comment noted. While additional research was done, it did not refute our claim on the effectiveness of a buffer. While it was not said that there was no other benefits to a having a whole field enrolled, a buffer is only effective if it has something to buffer. And in this section the focus of the discussion was solely on water quality. While CCRP does have its positive impacts on wildlife populations, those impacts are not its primary focus. Due to the scope of this document, all species of interest in the U.S. cannot be addressed.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	EBI

**Comment** We support efforts to simplify the EBI, and its continued use to help prioritize regular CRP offers is necessary

**FSA Response** The agency is reviewing options on how to simplify the EBI and exploring the impacts of these actions.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	372	Comment Category	Economic Impact on Rural Communities

**Comment** Provide bonuses for high value practices (CP 23, 25 and CP22), for irrigated lands, for whole fields for habitat, and for contiguous enrollments;

**FSA Response** The EBI and continuous signups SIPs and PIPs provide incentives for these high value practices. Higher payments for irrigation lands is problematic because in most cases the water would be utilized elsewhere, with little environmental benefit.

Farm Service Agency

Tracking Number

80

**Comment Category** Economic Impact on Rural Communities

**Comment** Pheasants Forever supports the discussion of wildlife-based recreation at 2.2.4.2 and 2.3.2.5. Discussion of the economic impacts of the CRP on rural communities and economies should be expanded. Further discussion of the beneficial aspects of maintaining CRP lands in association with croplands for wildlife is needed. CRP lands and associated increases in demand for pheasant hunting provide positive economic benefits to local communities ( e.g. hotels, motels, restaurants, sporting-goods outlets, service stations). Documentation on the importance of CRP lands for wildlife production, and recreational opportunities for hunting, viewing, and recreation is needed.

**FSA Response** Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative has been expanded. The discussion of job losses in the recreation sector of the economy in Section 5.5.1.1 has been expanded.

		Conservation Reserve Program ogrammatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Economic Impact on Rural Communities

There are distinct taxpayer savings associated with CRP. Although lands enrolled in CRP represent a cost (cover Comment establishment/management and annual rental payment), there are significant savings in that Production Flexibility Contract Payments, Loan Deficiency Payments, crop-insurance, disaster payments, counter-cyclical payments, etc. are not triggered. CRP, since it targets the most environmentally sensitive lands (i.e. difficult to farm profitably), constitutes an environmental bargain for the taxpaying public. A section needs to be added to illuminate this aspect of CRP.

A section has been added to the PEIS on the costs and benefits of CRP. See Section 2.3.2.5. **FSA Response** 

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	372	Comment Category	Economic Impact on Rural Communities

**Comment** Provide bonuses for CREPs for permanent conservation easement option (total package, including easement payment equal up to 20% beyond fair market value of property);

**FSA Response** An easement program was part of the 1990 Farm Bill and was discontinured in 1996. CRP contracts with 15-30 year easements were offered in 1991-92 but there was not a lot of interest. CCC still holds easements on approximately 10,000 acres through 2020. Neither the 1996 nor the 2002 bill reauthorized easements. States can require or encourage easements as part of their CREP contracts. Minnesota, for instance, requires that a permanent easement be placed on the enrolled land after the contract expires. Iowa requires easements to maintain the wetlands and buffers for a minimum of 15 years beyond the CREP payments, for a total of 30 years. Other states with voluntary or required easement programs include Maryland, Florida, Indiana, Ohio, Arkansas, Wisconsin, Kentucky, North Dakota, Virginia, North Carolina and California.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	372	Comment Category	Economic Impact on Rural Communities
Comment	Provide 50% bonus or incentive, on top o Habitat.	f 50% cost-share, for restoration of	wetland or restoration of rare and declining

**FSA Response** Comment noted. A 25% incentive is provided for restoration of wetlands under FWP, SIPs and PIPs are provided.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	80	<b>Comment Category</b> Economic Impact on Rural Communities	5

**Comment** The DPEIS contains inadequate discussion of the taxpayer savings related to CRP. The final document should include a complete discussion of the savings in terms of reduced federal farm program payments that are associated with taking lands out of crop production. During the 1996 reauthorization of CRP, research by FAPRI documented substantial savings in commodity program payments related to options in expanding CRP acreage. Similar discussion should be available in the final document.

**FSA Response** Section 2.3.2.5 has been expanded to include a discussion of the costs and benefits of CRP. .

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement
Tracking Number	372	Comment Category Economic Impact on Rural Communities

**Comment** Approve incentives and bonuses for CREP enrollments if state declares that these funds would help achieve program goals.

**FSA Response** Most CREPs have incentives beyond those provided under continuous signup. Bonuses (SIPs and PIPs) are provided for most practices eigible for CREP enrollment.

Earm Samiaa Aranay
Farm Service Agency

373

Tracking Number

**Comment Category** Economic Impact on Rural Communities

**Comment** We continue to hear CRP blamed for the documented declines in rural economies although this opinion is commonly based on anecdotal information and supposition. While the DEIS does an adequate job of comparing rural economy trends over the course of CRP (1985 to present), it does not put these trends in a larger historical perspective or compare to adjacent areas that may provide increased insights. We also encourage you to review rural population trends in prairie Canada, where a similar landscape and decline in rural economies is occurring compared to the U.S. Great Plains, but there is no comparable CRP program.

**FSA Response** The extent to which anecdotal information and supposition shapes public perceptions of the adverse effects of the CRP program on rural economies and communities is recognized. Sections 2.3, 5.5 and 5.6, of the draft PEIS identify a number of other economic and social trends that also influence rural communities. Among these factors is a general restructuring of rural communities in the U.S. that has also contributed to a general decline in population and employment base, as well as a decreased ability to attract new residents or business investments. A comparison to economic and population trends in prairie Canada could potentially demonstrate that the overall effect of CRP participation does not influence rural communities as strongly as some of the other factors identified. However, such a comparison would also have to account for the differences in government policy, economic subsidy and social support mechanisms between the two countries in order to arrive at a supportable conclusion, and is beyond the scope of the PEIS.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	372	Comment Category	Economic Impact on Rural Communities

**Comment** Provide PIP and SIP to all continuous signup and CREP practices

**FSA Response** Currently, there are signing incentive payments (SIPs) for most continuous signup practices including those enrolled under CREP. Practices not eligible for SIPs include already established vegetative covers and trees, diversions, salt tolerant vegetation, alternative cropping systems, and cross wind traps. Under continuous signup, a Practice Incentive Payment (PIP) of 40% of the practice establishment cost is provided for all continuous signups practices. PIPs are only paid for those CREP practices that are permitted under continuous signup. There would be at least two possible effects if the FSA were to make SIPs and PIPs for more practices. First, it would effectively make less attractive the general signups. Second, it would reward landowners in states that had the money to create a CREP plan in the first place. Poorer states, and those with tight budgets may not be willing to establish a CREP plan, thus penalizing their landowners vis-à-vis other landowners nationwide.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	81	Comment Category	Economic Impact on Rural Communities
Comment		•	had on rural communities and economies. on and economic benefits hunting, fishing,

**FSA Response** The review of the previous studies have been enhanced in Section 5.5.1.1.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement
Tracking Num	<b>ber</b> 373	<b>Comment Category</b> Economic Impact on Rural Communities

**Comment** As stated previously, the most accurate comparison on the social and economic impact has to be comparing rural communities in Canada. Those communities are facing many of the exact same struggles except for the Canadian communities do not have a CRP program (a somewhat similar program is currently being developed). How is it then that they are facing the same economic downturn with the closure of implement, feed and grain stores, and the rest of the agriculture-related companies. It cannot be blamed on CRP, for it does not exist.

**FSA Response** Comment noted. A cross-cultural comparison of rural communities in the U.S. with those in Canada could be useful in demonstrating that CRP is not solely responsible for the decline of rural agricultural communities is noted. The economic downturns experienced by rural communities in Canada apparently reflect processes that are similar to those in the U.S. and are driven by economic and social forces that are clearly not related to the CRP program. However, the differences between the domestic economies of Canada and the U.S. in terms of economic subsidies, social support mechanisms, and land use regulations are sufficient to make a simple comparison of conditions in both countries problematic. A much broader and more complex study of U.S. and Canadian rural communities, that takes these variations into account, would be required before a valid comparison could be made. Such a study would be outside the scope of the DPEIS.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	372	Comment Category	Economic Impact on Rural Communities

**Comment** Provide greater incentives to replace natural diversity of vegetation (e.g., native mixes of grasses and forbs appropriate to locale or native mixes of native hardwoods appropriate to locale);

**FSA Response** The EBI awards the most points for the planting of native vegetation. Assuming all other land characteristics are the same, an application for enrollment with a native species cover would receive a higher ranking than an application with an introduced species. Thus, this incentive already exists.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Numbe	er 372	<b>Comment Category</b> Economic Impact on Rural Communities	

**Comment** Provide 30% bonus for maintenance based on natural disturbance (e.g., fire).

**FSA Response** Comment noted.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	372	<b>Comment Category</b> Economic Impact on Rural Communities		

**Comment** Offer 15 year contracts for native tree-planting, restoration of rare and declining habitats, and wetlands restoration;

**FSA Response** Comment noted. FSA currently allows these practices to range from a minimum of 10 to a maximum of 15 years.

Farm Service Agency		Final Pr	<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	23	Comment Category	Economic Impact on Rural Communities	
Comment	The DPEIS should examine the economic should include all of the economic benefi viewing.		nities and economies. A careful analysis nomic benefits hunting, fishing and wildlife	

**FSA Response** Comment noted. Rural communities in the United States, especially those that are agriculture dependent, have undergone a general decline in population, employment level and income over the past 20 to 30 years. As noted in Sections 2.3.1.2 and 5.6.3 of the draft PEIS, these losses are attributable to a number of factors not related to the CRP program. Among these are shifts in the international commodities market, changing demographic and residency patterns and general transformation of the U.S. economy. To the extent that CRP participation affects the general social and economic climate of rural communities, any associated impacts are discussed in Sections 5.5 and 5.6 of the draft PEIS. Also as discussed in Section 5.5.1.1, under increased uncertainty of producer income, CRP is providing a reliable source of income for landowners. To the extent that economic impacts of CRP can be identified and separated from other impacts on rural communities such as changes in market forces, demographic changes and industry consolidation, these impacts have been identified in Section 5.5. As noted in Comment 53, and in revised Section 2.3.2.2, the impacts are diffuse and highly dependent on the economic and social characteristics of a particular community. The analysis of the other forces affecting rural economies is outside the scope of the PEIS. However, these will be included in the study of the CRPs effects on rural economies that is mandated in the 2002 Act.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statemer	
Tracking Number	376	Comment Category	Economic Impact on Rural Communities

**Comment** Much information is presented on the potential impact of CRP enrollment on agricultural economies but, by contrast, very little information is presented on economic impacts on hunting, fishing, and wildlife viewing associated with the CRP; i.e. recreational aspects. Additional study of this aspect of CRP and discussion in the CRP PEIS is recommended. Hunting, fishing and wildlife viewing are very important to the economies of many rural communities.

**FSA Response** Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative has been expanded to address this comment. The discussion on job losses in the recreation sector of the economy in Section 5.5.1.1 has been expanded.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Economic Impact on Rural Communities
Comment	We believe the analysis of the economic l	penefits of CRP is incomplete. While	the DPEIS has addressed local recreational

benefits of CRP enhanced recreation, the impact of CRP reaches beyond local levels. Migratory species such as waterfowl, shorebirds, and songbirds, which are produced on CRP lands, travel across North America providing sporting and viewing opportunities for millions of Americans and boosting rural economies far removed from the location of CRP fields.

**FSA Response** Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative has been expanded to address this comment. The discussion on job losses in the recreation sector of the economy in Section 5.5.1.1 has been expanded.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category E	Economic Impact on Rural Communities

**Comment** Discussion of the economic impacts of the CRP on rural communities and economics should be expanded

**FSA Response** To the extent that economic impacts of CRP can be identified and separated from other impacts on rural communities such as changes in market forces, demographic changes and industry consolidation, these impacts have been identified in Section 5.5. As noted in Comment 53, and in revised Section 2.3.2.2, the impacts are diffuse and highly dependent on the economic and social characteristics of a particular community.

Farm Sei	Final Pr	
Tracking Number	376	Comment Category

**Tracking Number** 

Economic Impact on Rural Communities Comment Category

Under the Economic Impacts and/or Social Impacts sections, taxpayer savings associated with discontinuation of Production Comment Flexibility Contract Payments, LDP, disaster, crop insurance, the new counter-cyclical payments, etc. (on environmentally sensitive lands) should be mentioned. It is also important to note that landowner participants benefit economically from stable and predictable income from enrolled lands versus trying to farm lands that are often at risk of being unprofitable. Lastly, the economic stimulus of increased wildlife-associated recreation (hunting, fishing, viewing, etc.) should be better depicted.

**FSA Response** A section has been added to the PEIS to address the costs and benefits of CRP. See Section 2.3.2.5. Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative has been expanded. The discussion on job losses in the recreation sector of the economy in Section 5.5.1.1 has been expanded.

Farm Ser	vice Agency	<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Economic Impact on Rural Communities

**Comment** The addition of the economic impact of fish and wildlife recreation is needed (figures are available from the United States Fish and Wildlife Service; hunting information can be obtained at http://hunting.fws.gov/huntstat.html). It also is important to mention that public lands are most available in states with the smaller percentages of farmland and least available in states with the highest percentages of farmland. Therefore, in the more intensive agricultural regions of the United States, the role of agricultural lands (and habitat associated with those lands) is critically important in sustaining wildlife populations and opportunities for viewing, hunting, fishing and other recreational aspects of wildlife.

**FSA Response** Comment noted. The discussions of in section 5.4 has been expanded to detail the important contributions CRP makes to wildlife habitat. The discussion on job losses in the recreation sector of the economy in Section 5.5.1.1 has been expanded.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Economic Impact on Rural Communities

**Comment** The consolidation in the current economy of businesses both big and small has occurred and should be examined. Much like the rest of the business community, the need for efficiency has increased the average size of farms across this country. By being larger, a farmer or rancher can be more efficient in their work and have greater ability to bargain based on their purchasing power. These are just a few of the factors that have to be weighed and measured to get a better handle on the economic impact of CRP. The question should not be on CRP but on looking at the hundreds of other factors that are besetting rural communities. Some have claimed that CRP is closing farms across this country. Since 1980, there are 240,000 less farms in this country. Between 1960 and 1980, before there was CRP, this country lost 1.6 million farms. Between 1940 and 1960, once again no CRP, the reduction was 2.3 million. With the slowing of the reduction of total farms, there might be causative effect to say that CRP is keeping farmers on the farm by providing another source of reliable income.

**FSA Response** As discussed in Section 5.5.1.1, under increased uncertainty of producer income, CRP is providing a reliable source of income for landowners. To the extent that economic impacts of CRP can be identified and separated from other impacts on rural communities such as changes in market forces, demographic changes and industry consolidation, these impacts have been identified in Section 5.5. As noted in Comment 53, and in revised Section 2.3.2.2, the impacts are diffuse and highly dependent on the economic and social characteristics of a particular community. The analysis of the other forces affecting rural economies is outside the scope of the PEIS. However, these will be included in the study of the CRPs effects on rural economies that is mandated in the 2002 Act.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Economic Impact on Rural Communities
Comment	The draft PEIS provides analysis of the r	elationshin between current enrollmen	t in CPP and new cropland conversion (5-84

The draft PEIS provides analysis of the relationship between current enrollment in CRP and new cropland conversion (5-84 to 5-85). However, the analysis should focus more on the extent to which commodity crop payments are driving the high rate of slippage. See e.g., FAPRI, The House and Senate Farm Bills: A Comparative Study, FAPRI Policy Working Paper #01-02 (March 2002), p. 8 ("As in past analyses, FAPRI assumes that there will be a net reduction in row crop production of one acre for every five new acres of CRP enrollment."). The 86% slippage rate is largely based on examination of commodity cropland enrolled in CRP and the conversion of new land to commodity crops (5-84). Rangeland scientists report that there are many instances in which native rangeland, for example, is being broken out and planted in soybeans because landowners are motivated by the commodity program payments and the depression in the ranching economy. The PEIS should try to quantify the extent to which slippage is being motivated by the commodities program.

**FSA Response** The problem of slippage due to commodity programs is discussed in Section 2.3.2.4, Factors Other than the CRP that Can Cause Slippage.

Farm Se	rvice Agency	Final Pr	Conservation Reserve Program ogrammatic Environmental Impact Statement
Tracking Number 129		Comment Category	Economic Impact on Rural Communities

**Comment** The DPEIS fails to consider any of the potential economic impacts of reduced upland bird hunting resulting from having and livestock grazing of CRP lands. The DPEIS also fails to consider the economic effects of federal listing for each subspecies under the ESA that could result from the proposed action.

**FSA Response** Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative has been expanded. The discussion on job losses in the recreation sector of the economy in Section 5.5.1.1 has been expanded. The economic effects of federal ESA listings are outside the scope of the PEIS. Also the discussion of haying and grazing has been expanded to clearly state the steps taken to protect breeding bird habitat. Haying and grazing is only conducted within the scope of an approved conservation plan.

Farm Service Agency		Final Pr	<b>Conservation Reserve Program</b> ogrammatic Environmental Impact Statement
Tracking Number	160	Comment Category	Economic Impact on Rural Communities

**Comment** Given the detrimental economic impacts on local economies (of CRP), we would urge USDA to consider all the impacts-environmental and economic- in moving toward further extensive idling of tillable acreage, particularly in those states and locations where CRP is already a high proportion of the available cropland.

**FSA Response** Comment noted. The purpose of the PEIS is to consider the environmental and economic impacts of CRP.

Farm Service Agency			Final Pr	<b>Conservation Reserve Program</b> rogrammatic Environmental Impact Statement
Tracking Number		372	Comment Category	Economic Impact on Rural Communities

**Comment** 1.Reduce slippage by making increased use of continuous enrollments (CREP, special partnerships, NETA, etc.) (Producers are less likely to convert new acres into farming if they are enrolling partial fields of highly sensitive (and, in some cases, less productive) land through continuous enrollment)

**FSA Response** Slippage is an issue with many farm programs that provide income to producers. The change in cropping eligibility, from 3 out of 5 to 4 out of 6 years is expected to mitigate some of the slippage due to CRP. See Section 2.3.2.4 for further discussion.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Eligibility Criteria

**Comment** Discussion of eligibility criteria under 5.2.2.3 Impacts Under the Proposed Action needs clarification; Discussion should focus on the new criteria and the inability to enroll newly converted lands

**FSA Response** The PEIS has been expanded to clarify the discussion of the new criteria and the inability to enroll newly converted lands.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	Environmental Targeting

**Comment** Environmental Targeting (4.2.4), while an intriguing concept, needs much more scoping and evaluation before implementation; we do not support this alternative

**FSA Response** Comment noted. The PEIS has been expand to include the targeted benefits achieved through CRP, CCRP, and CREP, which establishes these programs as a form of environmental targeting. Targeting to address environmental issues may be achieved through alternative 3, which provides a good mix of options to producers. Landowners and operators are provided choices through programs such as CRP general signup, CCRP, CREP, and FWP. While targeting through option 4 (Environmental Targeting Alternative) may focus on specific issues, enrollments could likely be reduced resulting in less benefits to the environment.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	81	Comment Category	Expansion

Production agriculture has been implicated as one of the main causes for the decline of a variety of fish and wildlife species, Comment some in very steep and long-term decline. Yet, the CRP program has placed little emphasis on restoring habitats for these species. In fact, most benefits noted to date from the CRP have been coincidental to the administration of the program. We recommend that the PEIS evaluate the benefits of developing and authorizing Continuous Sign-up CRP practices for fish and wildlife species in serious decline, such as the lesser prairie chicken, greater prairie chicken, sage grouse, northern bobwhite quail, and prairie dog.

**FSA Response** Comment noted. CRP benefits reduce soil erosion, improve water quality, and help enhance wildlife habitat and wildlife in general. The objective of the program is to maintain a balance among these 3 resource areas and by creating conservation practices to specifically address certain wildlife species would not maintain that balance. CREPs can be developed for such a use, like the Oregon CREP (Section 3..5). CCC intends to generally provide wildlife benefits through establishment of practices in the CRP general signup, CCRP, CREP and FWP.

Farm	n Service Agency	Final Program	Conservation Reserve Program natic Environmental Impact Statemer		
racking Number	372	Comment Category	Expansion		
Comment 1	1. Provide higher bonuses and incentive payments for riparian buffers to meet 6 million acre goal;				
2	2. Allow 15-year contracts for native tree planting, wetlands restoration, and rare and declining habitat restoration;				
3	3. Provide 25% special incentive payment on top of 50% cost share for rare and declining habitat restoration; and				
2	I.Continue to provide incentives and	bonuses for CREP and do so for NETAs.			

## **FSA Response** 1. Comment noted.

2. These practices are eligible for contracts from 10 to 15 years.

3. Comment noted.

4. Comment noted. Incentives are the primary means of environmental targeting. By offering incentives, highly environmentally sensitive land is more likely to be enrolled than if no incentive were offered at al (OTA-ENV-640, 1995). CCC intends to enroll the most environmentally sensitive areas to obtain the greatest nationwide benefits. Conservation programs provides adequate incentives to entice landowners and operators to participate.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Expansion

**Comment** Pheasants Forever recommends that CRP be continued and expanded to no less than 45 million acres and that future program modifications provide additional soil, water, and wildlife benefits

**FSA Response** Comment noted. The CRP acreage has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill, which also requires that all resource areas targeted by CRP, Wildlife, Water, and Soil, receive equal status.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	87	Comment Category	Expansion
Commont	Eth alternative a CDD program with 10 p	villion across in total, all targeted specifically t	a filter string buffers, and other

**Comment** 5th alternative, a CRP program with 10 million acres in total, all targeted specifically to filter strips, buffers, and other environmental purposes, to determine if a much smaller CRP could effectively achieve the same benefits in water quality and other environmental improvements without the loss in productivity and adverse economic impacts that the current program causes by idling productive acres.

**FSA Response** Comment noted. FSA has determined that adding a fifth alternative would be out of scope of this PEIS. However, the acreage allocation among the various programs has yet to be determined.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Farmable Wetlands

**Comment** While the Farmable Wetlands Program has provided some benefits to wetlands conservation, it has the capability to do much more by increasing the size of buffers allowed to be enrolled around these wetlands. Current regulations allowing only narrow buffers do not completely protect the wetlands from continued sedimentation and chemical loadings from surrounding croplands, and therefore, do not provide sustainable conservation. These narrow buffers also function as ecological traps for grassland nesting birds forcing them to nest in small areas of cover where they are easy prey for predators. We recommend that FWP be modified to allow whole fields to be enrolled to increase water quality and wildlife benefits of the program.

**FSA Response** This comment has been noted and determined to be out of scope of this PEIS due to the fact that enrollment criteria and land eligibility under the newly expanded FWP had yet to be determined. The primary FWP buffer limits are statutory in nature and not subject to modification by regulation.

Fai	rm Service Agency	Final Programm	Conservation Reserve Program natic Environmental Impact Statement
Tracking Number	23	Comment Category	Haying/Grazing
Comment		ot be conducted during the primary nesting a agencies should be responsible for determinir	

**FSA Response** This comment has been noted and is in Section 3.2 of the PEIS under Conservation Planning.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	372	Comment Category	Haying/Grazing

**Comment** The draft PEIS assumes that there will be no adverse environmental consequences if haying and grazing are conducted on CRP lands in accordance with a conservation plan. However, Congress left USDA with a wide range of choices to make and potential impacts to consider with respect to haying and grazing. It is necessary that the PEIS describe and carefully examine the options with respect to haying and grazing because excessive or inappropriate grazing and haying can cause severe soil erosion and destroy wildlife habitat, including endangered species habitat.

**FSA Response** Although statute currently stipulates that CRP may not be harvested or grazed except at the discretion of the DAFP, emergency haying and gazing provisions were reached as a compromise to balance the needs of producers with those of the environmental community.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	129	Comment Category	Haying/Grazing

**Comment** Under the DPEIS preferred Alternative, haying and grazing of CRP lands would not necessarily longer be an "extraordinary" occurrence, but rather a regular one. In our opinion, the DPEIS must analyze the environmental impacts of this significant policy change.

**FSA Response** Comment noted. FSA continues to utilize every available program to provide assistance and emergency haying and grazing provides additional feed and forage to producers who have lost their hay stocks and grazing lands due to the natural disasters. Generally, to be approved for emergency haying or grazing under CRP, a county must have suffered at least a 40-percent loss of normal moisture and forage for the preceding four month qualifying period. The Farm Service Agency (FSA) will notify its State Committees that the 40-percent loss criterion no longer applies. State FSA committees may limit the area within the states if conditions do not warrant haying and grazing in all areas. CRP participants who do not own or lease livestock may donate, rent or lease the hay or the haying or grazing privileges. CRP annual rental payments made to participants will be reduced 25 percent to account for the areas hayed or grazed, unless the hay or the haying or grazing privileges are donated. For the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed. FSA is currently developing regulation outlining the guidelines for non-emergency haying and grazing.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	81	Comment Category	Haying/Grazing
Comment	The DPFIS states that having and grazir	og of CRP cover during the pesting and brood-	rearing seasons has had little impact

The DPETS states that having and grazing of CRP cover during the nesting and brood-rearing seasons has had little impact on ground-nesting birds. We believe this statement is misleading. There has been limited research on the impacts on birds from these activities in CRP, but the existing body of scientific literature shows that these activities can severely impact nest success and brood survival if timing and frequency are not considered. We recommend that having or grazing must not be conducted during the primary nesting and brood-rearing seasons, and the State Wildlife Agency should be wholly responsible for deciding the exact dates of those seasons. Also no more than one-fourth to one-third of any CRP field should be hayed in any one year and a payment reduction should be required commensurate with the value of the harvested hay, unless the landowner or producer agrees to enhance the existing vegetation to improve its value for wildlife.

**FSA Response** Further discussion has been added to the PEIS to clarify the discussion on haying and grazing during the primary nesting and brood rearing season to read, " The haying and grazing of CRP cover during the primary nesting and brood rearing season has occurred during authorized emergency conditions and does produce a detrimental impact to those ground-nesting birds in the authorized areas. However, little to no impact has occurred to ground-nesting birds as a result of permissive grazing or incidental gleaning because they are not authorized during the primary nesting and brood rearing season."

Farm Service Agency		Final Programmat	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Haying/Grazing	

**Comment** Allowances for haying, grazing, burning, disking, and biomass harvest of CRP lands should be very carefully examined so as not to unacceptably diminish the intended benefits of the program. If not properly structured, the potential for significant harm to many wildlife species is high. For example, as stated in the Farm Bill, attention must be paid to nesting seasons and should not allow for any haying until the danger to nesting birds is negligible. The impacts of managing CRP (e.g., haying, grazing, burning, and disking) vary by region according to the growth patterns of the vegetation established and the wildlife species being targeted. In the South and portions of the Midwest, growth of CRP is more vigorous and species like bobwhite quail require an interspersion of dense cover and more open areas. In these regions increased management of CRP may improve benefits to wildlife.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	37	Comment Category	Haying/Grazing

**Comment** Any grazing of harvesting of hay should only be allowed if it protects other values.

**FSA Response** CRP is a conservation program with the primary objectives of improving water quality, reducing erosion and improving soil quality, and enhancing wildlife habitat. Provisions authoring emergency haying and grazing along with the creation of managed haying, grazing, and the harvesting of biomass will be authorized as long as the primary objectives of CRP are not compromised.

Farm Service Agency		Final Programma	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Haying/Grazing	

**Comment** Additional discussion that haying and grazing has had little impact on ground-nesting birds is misleading. Discussion should focus on the importance of avoiding the primary nesting and brood-rearing seasons for both resident and migratory wildlife.

**FSA Response** Further discussion has been added to the PEIS to clarify the discussion on haying and grazing during the primary nesting and brood rearing season to read, " The haying and grazing of CRP cover during the primary nesting and brood rearing season has occurred during authorized emergency conditions and does produce a detrimental impact to those ground-nesting birds in the authorized areas. However, little to no impact has occurred to ground-nesting birds as a result of permissive grazing or incidental gleaning because they are not authorized during the primary nesting and brood rearing season."

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	363	Comment Category	Haying/Grazing

**Comment** Any grazing or harvesting of hay should only be allowed if it protects other values.

**FSA Response** CRP is a conservation program with the primary objectives of improving water quality, reducing erosion and improving soil quality, and enhancing wildlife habitat. Provisions authoring emergency haying and grazing along with the creation of managed haying, grazing, and the harvesting of biomass will be authorized as long as the primary objectives of CRP are not compromised.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Haying/Grazing

**Comment** We are very concerned about the potential negative impacts of allowances for haying, grazing, and biomass harvest on CRP lands. While this would provide producers and agribusiness with the potential for increased economic benefits, which may provide both on-farm and off-farm employment, the soil, water, and wildlife conservation purposes of CRP will be compromised. Several studies across the Great Plains have found a decrease in soil organic carbon with increasing grazing pressure (Bauer et al. 1987, Frank et al. 1995, Johnson and Matchett 2001, Potter et al. 2001). A few additional studies have found either an increase in soil organic carbon or no effect with grazing pressure when shallow-rooted species were replaced with deeper-rooted species (Shariff et al. 1994, Potter et al. 2001). These results suggest that depending on soil types and grass species response to grazing, the carbon sequestration benefits of CRP may be reduced with the allowance of grazing.

**FSA Response** CRP is a conservation program with the primary objectives of improving water quality, reducing erosion and improving soil quality, and enhancing wildlife habitat. Provisions authoring emergency haying and grazing along with the creation of managed haying, grazing, and the harvesting of biomass will be authorized as long as the primary objectives of CRP are not compromised. The features of the required conservation plan establish guidelines for land disturbances that could effect any environmental resources on the CRP land (Section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	Haying/Grazing

**Comment** a good summary of the extent of haying and grazing in past CRP programs (including an economic analysis of how it worked) should be developed and included in the DPEIS

**FSA Response** This comment has been noted but has been determined to be out of scope of this PEIS since the release of CRP land for emergency haying and grazing varies from year-to-year and is solely based on uncontrollable natural conditions. No data is available because of the randomness of emergency events like drought.

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Stateme	
Tracking Number	372	Comment Category	Haying/Grazing

**Comment** Work with rangeland specialists, biologists, ecologists, and state technical committees to develop science based guidelines that determine what kind of haying or grazing, if any, on what kinds of enrollments will enhance environmental benefits and avoid environmental harm. The guidelines will address location, stocking rates and intensity, rotation, frequency, timing during season (e.g., grassland bird nesting season), duration, climate, cover (native or non-native), ecosystem drivers (natural disturbance), the impact of emergency haying and grazing, and fundamental differences in grassland types (e.g., tallgrass prairie, shortgrass prairie, rangelands west of the continental divide, mixed grass prairie, eastern introduced grazing lands). In general, grazing will be allowed in an amount and intensity that mimics the grazing that naturally occurred on the type of grassland that the CRP land most closely resembles. Haying or grazing would be suspended immediately if adverse environmental consequences result. Other alternatives for haying and grazing that should be considered in the PEIS, but not offered as part of the Proposed Alternative, include allowing any haying and grazing as long as there are no significant adverse environmental consequences, and only allowing haying and grazing if there are significant environmental benefits, the parameters are science-based, and the producer puts up a bond.

**FSA Response** Comment noted and is under consideration by FSA.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Haying/Grazing

**Comment** According to some reports, exercise of the emergency haying and grazing provision has resulted in haying during the nesting season, thereby adversely impacting grassland birds. Studies show that many species of grassland birds (such as bobolink, red-winged blackbird, dickissel, sedge wren, eastern meadowlark, Henslow's sparrow, and swamp sparrow) abandon fields mowed during breeding activities (Sample and Mossman 1997). The PEIS should also examine the impact of emergency grazing in current CRP on wildlife. As discussed below, it is well documented that grazing that is too intense, during the nesting season or otherwise inappropriate can adversely impact wildlife, such as grassland birds (see, Belanger & Picard 1999; Kantrud 1981; Skinner, et al. 1984; Herkert, et al. 1996).



Tracking Number80Comment CategoryHaying/Grazing

**Comment** Section 2.3.2.5 Recreation and CRP notes the importance of properly timed haying and grazing for wildlife benefits. Additional discussion that haying and grazing has had little impact on ground-nesting birds is misleading. Discussion should focus on the importance of avoiding the primary nesting and brood-rearing seasons for both resident and migratory wildlife. Additional discussion of the benefits to resident wildlife by providing winter cover is warranted.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	85	Comment Category	Haying/Grazing

**Comment** The PEIS should not simply assume that there will not be negative impacts to grassland vegetation from haying and grazing if it is conducted in accordance with a conservation plan. There are significant potential adverse impacts to vegetation from inappropriate haying and grazing, including destruction of vegetative cover. However, there are important potential benefits from appropriate grazing in grassland ecosystems that historically developed with grazing as a form of disturbance. In the shortgrass steppe, for example, grazing eliminates competition and shade, allowing native blue grama and buffalo grasses to thrive. In the tallgrass prairie, appropriate grazing benefits vegetation by restoring heterogeneity, creating variability in vegetation height, composition, density, and biomass (this positively affects wildlife biodiversity as well) (Fuhlendorf, et al. 2001). Under the Proposed Action/2002 Farm Bill/Balanced Environmental Targeting Alternative, environmental benefits are likely because haying and grazing would only be authorized in accordance with science-based guidelines and only to enhance environmental benefits and avoid environmental harm. Environmental harm would also be unlikely under this alternative because haying or grazing would be halted if there are adverse environmental impacts.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	Haying/Grazing	

**Comment** While we are not opposed to limited amounts of haying and grazing, proper constraints and guidelines must be followed

**FSA Response** CRP is a conservation program with the primary objectives of improving water quality, reducing erosion and improving soil quality, and enhancing wildlife habitat. Provisions authoring emergency haying and grazing along with the creation of managed haying, grazing, and the harvesting of biomass will be authorized as long as the primary objectives of CRP are not compromised. The features of the required conservation plan establish guidelines for land disturbances that could effect any environmental resources on the CRP land (Section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Haying/Grazing

**Comment** The current lack of grazing on CRP lands is causing adverse environmental impacts in some parts of the country. Grazing and aridity are the drivers that shaped the American short-grass steppe. Native herbivores, such as bison, prairie dogs, pronghorn antelope, and elk, would heavily crop native buffalo grass and blue grama grass. These native short-grasses would sprout back with renewed vigor and energy. Heavy grazing controlled competition from taller grasses that could not withstand the heavy grazing pressure. Grazing not only benefited the short-grass steppe by eliminating competitor strains of grass, it also eliminated shade. In the absence of grazing, taller strains of grass can grow and "shade out" the native short-grass. However, even in the shortgrass steppe, care must be taken to ensure that the land is not overgrazed, causing habitat loss and erosion. Moreover, within the shortgrass region, there are areas, such as sand sage prairie, that did not develop with grazing pressure and cannot tolerate it.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Maintenance

**Comment** Lack of fire: Failure to use fire on CRP lands where it was a native driver of the ecosystem is contributing to woody invasion of grasslands (Licht at 60). Failure to use fire as a management tool and active fire suppression have enabled trees to invade prairie, especially in the eastern regions (Licht at 81), but also in areas like the Nebraska Sandhills, where trees were historically very rare or absent (Licht at 60). In the shortgrass prairie, absence of fire is contributing to the expansion of shrublands. Lack of fire also diminishes habitat value by reducing heterogeneity. Fires historically burned patches of prairie, creating a mosaic of grassland successional stages throughout the prairie (Licht at 80). "After burns many grasses grew more vigorously and were more nutritious, and flowering increased in many prairie forbs (Licht at 81; Risser, et al. 1981.).

**FSA Response** A discussion of the importance of fire in all aspects of grassland ecosystems will be expanded in section 2.2.3.1. However

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	143	Comment Category	Maintenance

**Comment** If CRP is to be managed in the Northern Great Plains, the management action should be implemented infrequently, perhaps once during a 10-year contract and twice during a 15-year contract. Management of CRP is a regional issue and should be addressed in that manner.

**FSA Response** Comment noted. CRP is a National program and is administered at multiple levels, se Section 3.2 of the PEIS.

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	81	Comment Category	Maintenance
Commont			

**Comment** The DPEIS fails to evaluate the impacts of periodic maintenance and associated maintenance payments on the goals and objectives of the CRP. It has been our observation that the annual maintenance payments appear to be paid to contract holders each year without any noticeable maintenance conducted or required. Most CRP fields need periodic maintenance to continue to provide the conservation benefits of the program. There is a need to apply periodic management (burning/disking) in order to ensure CRP lands provide benefits for wildlife throughout the contract period. This need is very important in regions of the US where natural succession works rapidly. We recommend the PEIS evaluate and document the benefits of periodic maintenance, particularly to wildlife, over those from little or no maintenance during the contract period.

**FSA Response** Impacts of improper CRP maintenance practices on natural vegetation and wildlife are discussed in greater detail in sections 5.3 and 5.4. However, maintenance practices and measures are determined at the state level, and are written into the conservation plan that the landowner enters in to when his or her land is enrolled into CRP (refer to section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	37	Comment Category	Maintenance

**Comment** Management activities to maintain habitat quality should be required to the extent that they are paid for by public funds.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Fa	rm Service Agency	Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	372	Comment Category	Maintenance
Comment	with a maintenance incentive payment the	environmental benefits by eliminating the ann nat reflects the costs of the maintenance. Enc based on forms of natural disturbance for ecc	ourage cooperative maintenance.

**FSA Response** Comment noted. We will take this into consideration. (Note: wouldn't a maintenance incentive payment drive up the costs of the program?)

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Maintenance
Comment	such grassland bird species as mallards	tive impacts for wildlife of inappropriate burns , northern pintail, northern harrier, mourning o wn to abandon fields, fail to colonize fields, or	dove, sedge wren, Henslow's sparrow,

breeding season immediately after early spring burns (Sample and Mossman at 62).

**FSA Response** Maintenance practices and measures are determined at the state level, and are written into the conservation plan that the landowner enters in to when his or her land is enrolled into CRP (refer to section 3.2). Within the plan should detailed proper maintenance techniques and schedules to minimize any harm towards wildlife.

Farm Service Agency		Final Program	<b>CONSERVATION RESERVE PROGRAM</b> matic Environmental Impact Statement
Tracking Number	85	Comment Category	Maintenance

While it is generally permissible to selectively cut noxious weeds, the \$5 per year annual maintenance allowance (that is Comment standard for most CRP practices) is insufficient incentive to ensure that farmers will cut these invasive weeds. The annual maintenance allowance may be sufficient to buy herbicide, but not to pay for its application. Moreover, in some areas, such as the mixed-grass prairie, the most effective method to control invasive species is through controlled burns. As is discussed in greater detail below, the annual maintenance fees are too low to adequately compensate for the costs of conducting controlled burns. The failure to systematically address these management issues often degrades the habitat value of CRP lands and poses a threat to the habitat value of lands adjacent to CRP lands.

**FSA Response** The PEIS has been expand to address the producer/landowner's responsibility with regards to contract maintenance. However, maintenance practice standards are currently under review by FSA.

Farm Service Agency		Final Programma	<b>CONSERVATION RESERVE PROGRAM</b> tic Environmental Impact Statement
Tracking Number	85	Comment Category	Maintenance

**Comment** In addition, the PEIS should consider the environmental impacts of increased use of maintenance tools based on forms of natural disturbance for an ecosystem. Management tools, such as fire, must based on careful study of the functions of the natural drivers of the ecosystem. It is important to have fire management regimes mimic natural fire cycles in order to promote environmental benefits and to avoid unintended adverse impacts. Managing larger tracts with fire and doing patch burns can provide a "margin for error." Failure to mimic natural fire cycles, timing (e.g., midsummer versus late fall or early spring), and scope can adversely impact wildlife. For example, a small prairie preserve in western Minnesota instituted an intensive burn regime to promote floral diversity, but the unintended impact was a steep decline in the Dakota skipper butterfly on the site (Licht at 81). However, natural fires on many native grasslands (e.g., Oklahoma and Kansas native tallgrass and mixedgrass prairie) were essential to maintaining ecosystem structure and function (Engle and Bidwell 2001). Under this alternative, controlled burns are likely to produce environmental benefits, not adverse impacts, because this maintenance tool will be used selectively and based on the natural fire cycle of the particular grassland ecosystem.

**FSA Response** Comment noted. Maintenance practices and measures are determined at the state level, and are written into the conservation plan that the landowner enters in to when his or her land is enrolled into CRP (refer to section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Maintenance

Even where CRP has not intentionally planted invasive species, inadequate maintenance may support the spread of invasive Comment species beyond the CRP land. Reports indicate that invasive species on CRP often go undetected due to insufficient monitoring, and even when invasive species are detected, they are often not successfully eradicated or controlled. Failure to remove exotics, like crownvetch, cheatgrass and napweed poses a threat to adjacent prairie remnants and destroys or degrades the habitat value of CRP lands. The PEIS should more thoroughly examine the adverse environmental impacts that result from inadequate maintenance incentives in current CRP.

**FSA Response** The PEIS has been expand to address the producer/landowner's responsibility with regards to contract maintenance. However, maintenance practice standards are currently under review by FSA.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	Maintenance

**Comment** Little is mentioned about the importance of periodic CRP maintenance (disking, controlled burning, herbicide treatment) for improving plant species diversity in vegetative cover, controlling noxious weeds and increasing wildlife numbers

**FSA Response** Discussion added in section 2.2.3 to discuss importance of intermittent disturbances for the health of grassland ecosystems. However, maintenance practices and measures are determined at the state level, and are written into the conservation plan that the landowner enters in to when his or her land is enrolled into CRP (refer to section 3.2).

Farm Service Agency		Final	<b>Conservation Reser</b> Programmatic Environmental Impa		
Tracking Number	373	Comment Categor	y Maintenance		
Comment	In the Prairie Pothole Region, CRP and other forms of undisturbed cover like that found on Waterfowl Production Areas (WPAs) make up only 4 percent of the landscape, while active cropland comprises 63 percent and grazing land comprises 21 percent. The undisturbed dense cover provided by CRP has been shown to be especially productive for waterfowl (Reynolds et al. 2001), ring-necked pheasants (Clark and Bogenschutz 1999) and many species of grassland songbirds (Johnson and Schwartz 1993). In North and South Dakota, Renner et al. (1995) found a 50 percent reduction in waterfor nest densities and hatchlings in CRP that was hayed the previous year compared to idled CRP. Clearly, a reduction in the density of the cover provided by CRP in the Prairie Pothole Region by management actions would compromise these documented wildlife benefits.				
	Further west in the midgrass and sho build-up of plant litter. Recovery from from reduced cover density. Light dis soils reducing the net sequestration of	burns in these regions is slow and the burns in these regions is slow and the king and burning would also release of	e gains in stand vigor do not offset arbon and nitrogen that has been s	t the losses	
	This is a regional issue and managem recovery of bobwhite quail and other concern. We urge you to avoid a one regional approach that considers regional	wildlife populations requiring greater i -size-fits-all approach to management	nterspersion and disturbance of co and harvest of CRP and instead ta	ver are a Ike a more	
FSA Response	Comment noted. CRP is anything but (Section 3.2) it allows for local enviror				

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	37	Comment Category	Monitoring

**Comment** I believe that sufficient funds should be invested to monitor the environmental benefits of CRP so that Congress can be informed of the important benefits provided by the program.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		Conservation Reserve Progre Final Programmatic Environmental Impact Statem	
Tracking Number	23	Comment Category	Monitoring
6t			

**Comment** The DPEIS should evaluate the need for a monitoring and research program for the CRP, to obtain data to determine the program's impact on soil, water and wildlife conservation at the watershed and/or landscape levels. This will help determine the effectiveness of achieving the legislated goals and objectives of the program, and aid in making the necessary adjustments to maximize benefits of the program.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		Final Programm	<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	81	Comment Category	Monitoring	
Comment	determine the effectiveness of achieving	PEIS of developing and funding a research and g the legislated goals and objectives of the pro rmine how well the CRP is meeting soil, water	gram. Very little research or	

information it will be difficult to determine how effective the program is at achieving these goal and to make the necessary adjustments to improve the program. We recommend the PEIS evaluate the need for a research and monitoring program

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP. See Section 3.2 of the PEIS for a brief discussion of research on CRP land.

for the CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	372	Comment Category	Native Vegetation

**Comment** Eliminate use of invasive species and increase focus on maintenance.

**FSA Response** The PEIS has been expanded to include a more detailed discussion on CRP contracted land and producer maintenance responsibilities. The issue of invasive species can be found in Section 2.2.3 of the PEIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Native Vegetation

**Comment** Under Forestland (page 2-48) there is no mention of native versus exotic issues as was discussed in connection with grasslands. These issues are equally important in forestland settings. Neither is there discussion of the implications of planting trees on lands where trees are not adapted (i.e. prairie soils best adapted to grasses) as CRP has done since inception. Tree plantings on CRP do not automatically result in benefits to wildlife. Quite the converse, much of the CRP tree planting that has been done on prairies, in the Lake States and the Southeast have been more detrimental than positive to wildlife. This issue needs further study in the EBI and, in any event, future tree plantings on CRP should be limited to only tree species native to the specific area (ecologically compatible) and only where there are clear benefits to soil, water and wildlife. The CRP is, after all, a conservation program and conservation should drive cover selection and management.

**FSA Response** Section 2.2.3, Forestland, has been expanded to include information regarding native and exotic trees.

Farm Service Agency		Final Program	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Native Vegetation	
Comment	1) but continue to favor native plantings	e No Action (Current Program) alternative (i. under EBI), the PEIS needs to examine the e on of the impacts of nonnative plantings sho	environmental impacts of the native	

(discussed below under wildlife impacts) and more detailed discussion of invasive species spread through CRP plantings (5-43). Significant unintended adverse environmental impacts occur when CRP practices install invasive species that then spread to adjacent wild lands. In Wisconsin, for example, land has been enrolled in CRP and planted with mixes that include invasive exotic species, such as smooth bromegrass and birdsfoot trefoil, that then invade adjacent native unplowed prairie remnants. The PEIS should list the invasive species in current planting mixes and evaluate the impacts of planting

**FSA Response** The discussion in Section 2.2.3.1 has been expanded to include benefits of cool-season grasses and their benefits to wildlife along with some discussion on the benefits of cool/warm-season grass mixes.

these species.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Native Vegetation

**Comment** The discussion on invasive species (starting on page 2-40) omits discussion of a number of species of significant importance on CRP. For example, there is no mention of the invasive qualities of fescue or how endophyte-infected fescue affects the reproductive success of livestock or wildlife like the cottontail rabbit. Neither is there discussion of serecea lespedeza, autumn olive, Johnsongrass, bermudagrass or other non-native and invasive species that present continual challenges to agriculture as well as the public in general. Given the conservation purposes of CRP, it seems logical and prudent to avoid use of such invasive species on enrolled lands, especially when numerous other cover choices exist.

**FSA Response** While the comment has been noted, there are in excess of 200 species of plants that are considered to be invasive, and the discussion of each would be informative but is considered out of the scope for the PEIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemer	
Tracking Number	376	Comment Category	Native Vegetation

**Comment** Under Introduced Grasses (top of page 40), introduced grasses are depicted as "cool-season" grasses although a few warm-season exceptions are mentioned. This, combined with the previous characterization of "warm-season" grasses as native leads the reader to the incorrect generalization that warm-season means native and cool-season means exotic. In fact, native grasses include both warm- and cool-season species and introduced grasses (not native to the United States) include both warm- and cool-season species. This needs clarification.

**FSA Response** The discussion in Section 2.2.3.1 has been expanded to include benefits of cool-season grasses and their benefits to wildlife along with some discussion on the benefits of cool/warm-season grass mixes.

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	376	Comment Category	Native Vegetation

**Comment** native warm-season grasses are referenced but there is no discussion of native cool-season grasses (i.e. Western wheatgrass, porcupinegrass, Virginia wildrye, Canada wildrye, green needlegrass and others). These natives have potential for conservation as well as agronomic purposes, including in CRP plantings, and should be discussed and given more emphasis in program implementation.

**FSA Response** The discussion in Section 2.2.3.1 has been expanded to include benefits of cool-season grasses and their benefits to wildlife along with some discussion on the benefits of cool/warm-season grass mixes.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Native Vegetation

**Comment** Surveys presented in the DPEIS indicate that producers intend to retain 30-40 percent of the CRP acres in grass for having and grazing after the contract expires. While this is not as high as the 75 percent retention rate cited for tree plantings, it is significant and should be recognized in the EBI under N4 (enduring benefits) with a score of 20 points for CP1 and CP2.

**FSA Response** Comment noted. Suggestions will be taken under advisement.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Native Vegetation
Comment		sion of the value of grasslands in carbon se nsive root systems) sequester much carbor	· · · · ·

prairie regions of the United States where trees are not suited to the climatic, soil or ecosystem.

cover, particularly when native species are used, could help the nation meet carbon sequestration goals - particularly in

**FSA Response** The discussion in Section 2.2.3 will be expanded to include the value of grasslands in carbon sequestration. However, it should be noted that if grasslands are periodically burned to maintain the integrity and diversity of the native cover, much of the carbon sequestered is lost.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Native Vegetation

**Comment** While we recognize the benefits of restoring native grassland species in attempts to recapture ecological functions of grasslands and prevent the introduction of noxious species, we question the economics and wildlife benefits of favoring native species in a relatively short-term conservation program (10-15 years) such as the CRP, especially in the Great Plains. The costs of restoring native species may prohibit some producers from submitting CRP offers who might otherwise convert high risk, marginal croplands to tame grass covers. We know of no evidence showing increased water quality or wildlife benefits from native grass plantings versus tame grasses in the Great Plains. We believe a better solution would be to let state technical committees, in consultation with state wildlife agencies, determine the seed mixes most beneficial to wildlife species. This way the introduction of invasive grasses detrimental to bobwhite quail populations could be prevented in southern areas through CP2 and CP3, while tame species providing dense nesting cover for waterfowl, pheasants, and other grassland nesting birds would continue to be available for producers in the Great Plains and Midwest. To accomplish this we recommend that the EBI allow 50 points for 3 introduced grasses and at least 1 forbs or legume under CP1, and 50 points under CP4D for a mixture of grasses, forbs, and legumes including introduced grasses best suited for various wildlife species in the area. CP4D should be retained as a practice specific to wildlife habitat, not native habitat.

**FSA Response** NRCS, currently, has the technical responsibility for the establishment of native and non-native grass planting conservation practices under CRP and wildlife and other environmental concerns are considered when establishing these conserving protective measures (2-CRP (Rev.3) Amend.9 Exhibit 9).

Fa	arm Service Agency		Final Prog	<b>CONSERVATION RESERVE PROGRAM</b> rammatic Environmental Impact Statement
Tracking Number	372		Comment Category	Native Vegetation
Comment	Cover: 1.Favor installation of native o	rasses and forbs by prov	vidina strona incentives in c	ontinuous enrollment and by widening the
	point differential in the EBI (in impacts (such as habitat fragm	creasing wildlife habitat nentation from planting nonnative grasses wither	benefits for grassland birds out-of-system grasses), and	and other species and avoiding adverse l often providing more water quality and prolonged drought when they are most
	increased wildlife habitat bene	fits, avoids unintended a	adverse environmental impa	zed the site (using native species provides acts (such as the spread of invasive tree at are best adapted to surviving local
	3.Make broader use of CP 25,	dramatically increasing of	environmental gains by rest	oring rare and declining native habitat.
FSA Response	1. Comment noted. FSA will c	onsider this comment w	hen developing new regulat	ions and procedures.
	environment and wildlife conc	erns when making dete Amend.9 Exhibit 9) with	rminations about types of p each county identifying the	ractices are preserving and improving the lantings, spacing, and other practice e eligible species for planting (2-CRP r this practice.
	practice and must be reviewe	d by NRCS National Hea	dquarters, and approved by	cifications shall be developed for this DAFP with Count offices have no CP25 (2-CRP (Rev.3) Amend.6 Exhibit 9).

Fa	rm Service Agency	Final Program	<b>CONSERVATION RESERVE PROGRAM</b> Imatic Environmental Impact Statement
Tracking Number	376	Comment Category	Native Vegetation
Comment	sheet erosion due to its shallow root de	forming grasses, like smooth brome grass, ca pth providing for a denser and tight knit grou grass, switchgrass, etc.) that bind the soil ne	und cover." There are several

**FSA Response** The discussion in Section 2.2.3.1 will be expanded to include the erosion control benefits of sod-forming native grasses (i.e. buffalograss, switchgrass, ect.) that bind the soil near the surface as well as exotic grasses.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Native Vegetation

**Comment** Under the Natural Vegetation/Forestland section (Proposed Action), the 1st statement states: "ecological benefits associated with tree planting conservation practices could continue for another year". This falsely implies that there are broad ecological benefits associated with all CRP tree plantings; this is not the case for tree plantings that fragment prairie landscapes or that 3 million acres of dense and unmanaged loblolly pine CRP plantations in the southeastern United States continue to provide little to no habitat for wildlife.

**FSA Response** THE PEIS had been modified so to more concisely address the ecological effects of tree plantings.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	80	Comment Category	Native Vegetation
Comment		ails to note the benefits of native cool-seas and include discussion on maximizing wild	

both warm and cool-season plantings.

**FSA Response** The discussion in Section 2.2.3.1 has been expanded to include benefits of cool-season grasses and their benefits to wildlife along with some discussion on the benefits of cool/warm-season grass mixes.



Tracking Number 81 Comment Category

Native Vegetation

**Comment** Most of the native Tallgrass Prairie in North America has been lost to development and agriculture. The ecology the Mixed-grass and Shortgrass prairies also have been compromised severely. This loss of grass has coincided with broad scale declines in grassland bird populations and bird productivity, particularly bobwhite quail, greater and lesser prairie chickens and sage grouse. The extensive conversion of cropland to large blocks of CRP cover has been noticeable particularly where large blocks of CRP cover have been installed in the Northern Great Plains region of the country. We believe the DPEIS fails to adequately document and evaluate these benefits. We recommend that the PEIS evaluate the biological, economic and social benefits of the CRP on restoring large blocks of grassland habitats in the Great Plains and Midwest, and we recommend the CRP continuer its primary focus on restoring large blocks (whole-field enrollment) of native cover in these and other areas of the US.

**FSA Response** While the importance of habitat size is discussed in section 2.2.4.1, the discussion has be expanded to include the importance of grassland habitat. The benefits of CRP to this issue has been expanded in section 5.4.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Native Vegetation
Commont	The DEIS should examine the environmen	tal impacts of planting native versus pop-n	ative trees of inappropriate

**Comment** The PEIS should examine the environmental impacts of planting native versus non-native trees, of inappropriate tree-planting, and of planting monocultures. The North Carolina CREP provides an excellent example of how the decision to install high-density monocultures of loblolly pine undermines water quality benefits and is at odds with the needs of native wildlife.

**FSA Response** Discussion in section 2.2.3 is expanded to include instances where woody vegetation is considered invasive and/or exotic, and the fact that many times trees planted in certain areas are not well suited for the area and do not grow well. Loblolly pine is a native species of North Carolina.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Native Vegetation

**Comment** Under the Natural Vegetation/Grasslands section (Proposed Action), the term "force the planting of more native species" in the 1st statement should be replaced with "maximize the planting of native species." This is important because CRP is a voluntary program that doesn't "force" any landowner. Rather, terms of enrollment are negotiated via the EBI and landowners are fairly compensated for whatever they agree, on enrollment, to provide in the way of natural resource benefits. In the 2nd statement, it should be noted that whether or not wildlife benefits are provided would be depend on the timing of haying/grazing and stocking rate rather than saying that "the impact would be minor to negligible".

**FSA Response** CRP is a voluntary program where highly environmentally sensitive land is targeted for enrollment. Producers choose conservation practices that will maximize the environmental benefits of enrolling the land into the program and receive monetary compensation for the practices chosen . Even though the program is voluntary and no producer can be "forced" to undertake any specific conservation practice, by providing additional incentives and using the EBI, native plantings are more favored and emphasized more than non-native plantings. Section 5.3.3 has been changed to reflect the comment.

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	132	Comment Category	Native Vegetation

**Comment** Discussion at 2.2.3.1 Grasslands fails to note the benefits of native cool-season grass. Discussion should note the benefits of cool-season native grasses and include discussion on maximizing wildlife benefits through a combination of both warm and cool-season plantings

**FSA Response** The discussion in Section 2.2.3.1 has been expanded to include benefits of cool-season grasses and their benefits to wildlife along with some discussion on the benefits of cool/warm-season grass mixes.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	85	Comment Category	Native Vegetation

**Comment** The PEIS should also consider the environmental impacts that occur in instances when preparing a site and installing vegetation on newly enrolled CRP lands destroys valuable native habitat. For example, as reported by Dr. Joy Zedler of the University of Wisconsin and others, a landowner in Green County, Wisconsin was instructed to apply herbicide to a rare sedge meadow site he enrolled in CRP to prepare the land to install trees – silky dogwood, white oak and white pine. Although the landowner successfully negotiated with NRCS to reduce the scope of the herbicide application, herbicide was applied and destroyed native vegetation. Furthermore, as tree species mature, they will produce a canopy that will shade out the remaining sedge meadow. Just over the fence, the adjacent property had the same soil type and supported relict lowland oak savanna, sedge meadow, and wet prairie, including a few scattered 100 to 150-year old open grown bur oaks. According to a consultant, the conservation management plan could have used a controlled burn and then planted wet prairie and sedge meadow species at a fraction of the cost, with a higher likelihood of success, and with far greater environmental benefits.

**FSA Response** The PEIS has been modified so to more concisely address the ecological effects of tree plantings. However, Section 3.2 discusses the various agencies involved in the CRP process and their roles. Before CRP-1 can be approved, an approved Conservation Plan authorized by NRCS is required. This plan contains information regarding the establishment, support, and maintenance of the approved and authorized conservation practices to be installed on the land and outlines the necessary measures for the successful establishment of such practices outlined in the NRCS FOTG.

Fa	arm Service Agency	Final Program	<b>CONSERVATION RESERVE PROGRAM</b> matic Environmental Impact Statement
Tracking Number	81	Comment Category	Native Vegetation
Comment	sensitive lands are enrolled in CRP. How the country in that trees, most with very to evaluate the effect of trees planted or body of scientific evidence on this subject trees planted on the CRP in the Southeast	water, and wildlife purposes of CRP to ensur ever, the existing EBI has created a significan / limited wildlife value, continue to be planted of CRP, and for the most part, states that trees t is contrary to the statements made in the D st have had serious negative impacts on Nort mpact on fish and wildlife of trees planted on	at problem for wildlife in many areas of d on millions of acres. The DPEIS fails s have been beneficial to wildlife. The DPEIS. There also is evidence that hern bobwhite quail populations. We

species native to the specific area and only where there are clear benefits to soil, water, and wildlife.

the Lake States, and the Southeast. We also recommend that the EBI be modified to limit tree planting on CRP to only

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	376	Comment Category	Native Vegetation

**Comment** As in the previous segment (5.5.2), the rationale and benefits of the new eligibility criteria (4 out of 6 years prior to enactment of the Farm Bill) are misstated. The primary resource benefit is that the new criteria is "date-certain" and, therefore, eliminates the economic lure of breaking out new land (grassland, forestland, etc.) for the purpose of enrolling in CRP after 2 years of farming; native prairie was particularly vulnerable to this tendency.

**FSA Response** The PEIS has been expanded to more completely address the benefits of the new land history eligibility criteria.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Native Vegetation

**Comment** On page 5-47, under Invasive Species discussion is very limited and, at the very least, should reference the discussion under the Current Program alternative should hold true. It also seems appropriate that only native or non-invasive introduced species be used to achieve conservation purposes on CRP, whether general sign-up, CCRP or CREP.

**FSA Response** Section 5.3.3 has been expanded to include additional information and a reference to the Current Program Alternative in Section 5.3.2 has been included.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	372	Comment Category	Needs

As you know, the draft PEIS describes the Proposed Alternative solely in terms of changes to be made pursuant to the 2002 Comment Farm Bill. As currently written, the Proposed Alternative is legally deficient because it fails to describe and assess the potential environmental consequences of the alternatives that USDA has in making changes pursuant to the new Farm Bill. For example, the draft PEIS fails to offer and examine alternatives for considering managed having and grazing on CRP lands. This is a serious legal deficiency, particularly in light of the severe adverse environmental consequences that can occur if inappropriate grazing or having are allowed on CRP lands.

**FSA Response** FSA considers its alternatives to meet the requirements of Section 1502.14 of the CEQ Regulation. The proposed action alternative is based on the changes contained in the 2002 Farm Bill. The 2002 Farm Bill contains provisions for allowing managed having and grazing. FSA will work to ensure that all having and grazing is carried out in accordance with a conservation plan that incorporates protection for important resources including threatened and endangered species.

Fa	rm Service Agency	Final Progra	<b>CONSERVATION RESERVE PROGRAM</b> mmatic Environmental Impact Statement
Tracking Number	372	Comment Category	Needs
Comment		s signup practices to provide enhanced wildli ETAs) to serve environmental goals of nation	
	tallgrass prairie, long-leaf pine, bottom for floodplain wetlands restoration (cr wetlands to filter drainage networks (e presently bypasses buffers); and long-	to include rare and declining habitat (restorin land hardwoods is critical for endangered sp itical for filtration, flood control, fish nurseries e.g., at end of tile lines or drainage ditches, th term tree planting for carbon sequestration (l sequestration benefits due to their enormous	ecies and wildlife), wetlands restoration s, and migratory bird habitat) and hereby filtering polluted runoff that long-term restoration of floodplain
	and declining habitat restoration as lor	at, each state can enroll up to ½ of 1% of its ng as enrollments are within mapped areas ar t enrollments in rare and declining habitat to	nd use CP 25 (thereby using best wildlife
	(including bottomland hardwood restor Midwest, western cottonwood and will	rity areas where existing data shows compell ration), long-leaf pines in the southeast; tallg ow forests, the Chesapeake Bay, and shortgra As. USDA will exercise broad discretion to de	rass prairie and oak savanna in the ass prairie in the West. Work with EPA
FSA Response	FSA will study the costs and benefits.		

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact State	
Tracking Number	85	Comment Category	Needs

Comment The PEIS should also discuss the relative degree of wildlife benefit from the conservation practices, considering that enrollment is overwhelmingly focused on maintaining existing vegetation (CP 10), rather than the relatively higher value practices for wildlife, such as restoration of rare and declining habitat (CP 25) and wetlands restoration (CP 23). See Fig. 5.4-1. Native wildlife typically does not benefit as much (or in some cases at all) from monoculture planting (especially nonnative monocultures) as it would from installing higher value practices that support more biodiversity.

**FSA Response** Comment noted. CRP is a conservation program to improve water quality, reduce soil erosion, and enhance wildlife habitat. Maintaining a programmatic balance of these three resource areas is the goal of CRP.

Fa	rm Service Agency	Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	372	Comment Category	Needs
Comment	quality and wildlife habitat gains. (By the highest potential impact to surface T&E habitat (5-54) and the best poten	nd expand existing CREPs and approve new CREP blending tailored, selective conservation practices water quality under the current CRP (5-14); the tial to restore rare and declining ecosystems, like gn program resources with areas of greatest need	in CREP target areas, CREPs have high[est] potential at influencing tallgrass prairie (5-45). The
	1.In general, presume SIP and PIP are	e appropriate for all CREP practices since these are	e all high-value practices;
		select and modify conservation practices to meet leted areas is key to heightened water quality and	
	of current enrollment and areas of gre more CREPs that focus in whole, or in	rare and declining habitat (The PEIS maps show atest habitat need. See Fig. 2.2-28, Fig. 2.2-29, I part, on restoring rare and declining habitat coul he places where it is most badly needed);	Fig. 2.2-30, Fig. 2.2-23. Developing
	4.Provide additional incentives for thos	se CREP enrollments that provide prolonged conse	ervation benefits (thereby rewarding
FSA Response	Comment noted. FSA will take this con	mment under consideration when developing the	new regulations and procedures.

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	372	Comment Category	Needs

**Comment** The description of this alternative (Exclusive Environmental Targeting) should lay out in greater detail what exclusively pursuing environmental targeting would mean for CRP.

**FSA Response** The PEIS has been expanded to address this comment, see Section4.2.4.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	372	Comment Category	Needs

**Comment** In addition, the Proposed Alternative, as currently written, is legally deficient because it fails to consider and provide alternatives for the full range of issues that must be addressed in implementing the 2002 Farm Bill. For example, Congress left it up to FSA to decide whether to offer a general signup and how much to focus on selective enrollments through continuous signup mechanisms. Yet the draft PEIS fails to provide alternatives. It is unclear whether, when and to what extent a general signup would be held under this alternative. It is also unclear what the goals and/or set aside for CREP and continuous signup acreage would be. The Proposed Alternative fails to include alternatives for addressing many other critical sub-issues that are vital to Farm Bill implementation. Congress has left the particulars of these issues in USDA's hands to determine, and their resolution can have very significant positive or negative environmental consequences.

**FSA Response** FSA does not agree that the proposed alternative is legally deficient. The proposed alternative addresses the implementation of the Conservation Reserve Program as provided for in the 2002 Farm Bill. FSA is able to offer general signups as well as continuous signups and the Conservation Reserve Enhancement Program. FSA is currently on track to provide a general signup in 2003. Plans are still underway to ensure that continuous and CREP are offered as thay have been in the past. The primary focus of FSA is to deliver these conservation programs in such a manner that positive environmental/conservation benefits are achieved.

Farm Service Agency		Final Programma	CONSERVATION RESERVE PROGRAM atic Environmental Impact Statement
Tracking Number	372	Comment Category	Needs

**Comment** The PEIS should provide a 2002 Farm Bill/Balanced Environmental Targeting alternative instead of the 2002 Farm Bill alternative, and, as we stated above, this alternative should be the Proposed Alternative. At the very least, a 2002 Farm Bill/Balanced Environmental Targeting Alternative should be offered in addition to the 2002 Farm Bill Alternative. The 2002 Farm Bill/Balanced Environmental Targeting Alternative would take into consideration the discretion Congress gave USDA in making changes pursuant to the 2002 Farm Bill and would examine USDA's different alternatives for making these changes. For example, this alternative would consider the agency's alternatives in permitting managed haying and grazing on certain CRP lands and the potential environmental consequences. This alternative would also provide FSA with environmentally balanced options to pursue with respect to the wide range of determinations the agency must make consistent with 2002 Farm Bill implementation but not explicitly required by the Act.

**FSA Response** In the PEIS, FSA did take a look at environmental targeting in its 4rth alternative. However, the proposed action alternative, 2002 Farm Bill, also includes forms of environmental targeting through continuous signups and CREP. Both the proposed action alternative and the environmental targeting alternative (#4) include provisions for managed haying and grazing. FSA will diligently strive to fully utilize its CCRP and CREP authorities within the proposed action alternative to achieve the greatest environmental/conservation benefits possible. Also, the managed haying and grazing provisions will be managed to avoid any adverse environmental consequences.

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	80	Comment Category	Needs

**Comment** Discussion of eligibility criteria under 5.2.2.3 Impacts Under Proposed Action (p5-30) needs clarification. Previous criteria allowing a window of 2 out of 5 years cropping history vs. the new 4 out of 6 years prior to date of enactment is intended to further protect floodplain, riparian, and wetland areas. Discussion should focus on the new criteria and the inability to enroll newly converted lands.

**FSA Response** 4/6 will ensure that land had been cropped for 4 of 6 years from 1996-2001. It is unclear how 4/6 would further protect floodplains, riparian, and wetland areas as suggested.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	81	Comment Category	Needs
Comment	might be expanded. The CCRP provides	f conservation practices used in the CRP Continuo s an appropriate mix of conservation practices, bu es of the CRP program : Soil, water, and wildlife.	

The CCRP upland wildlife benefits accrue mostly be chance, if at all, as a function of cover choices when filter strips, contour buffer strips, and others soil and practices are established. Since contract offers for the CCRP are not ranked, and wildlife choices often cost more than options not beneficial to wildlife, wildlife benefits often are forgone to save dollars. We recommend an evaluation be conducted of approved CCRP conservation practices in the PEIS, including additional practices.

**FSA Response** Comment noted. CRP is a conservation program to improve water quality, reduce soil erosion, and enhance wildlife habitat. Maintaining a programmatic balance of these three resource areas is the goal of CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	87	Comment Category	Needs

**Comment** The study fails to make any note of the major macro-effect that the CRP has had on the ability of the U.S. wheat sector to compete in global markets.

**FSA Response** While substantial wheat acreage has entered the CRP, it does not account for the decline in US competitiveness in the Worldmarket. Since 1996, the time of enrollment for the CRP, 10 million acres have left wheat production. This suggests other more fundamental issues are driving US competitiveness in world wheat markets.

Farm Service Agency		Final Programm	<b>CONSERVATION RESERVE PROGRAM</b> natic Environmental Impact Statement
Tracking Number	85	Comment Category	Needs

The draft PEIS should present a clearer picture of the extent of current enrollment in general signup, the mix of practices Comment within general signup and where general signup enrollments are located. It should also present a clearer picture of the extent of current enrollment in continuous signup methods (including CREP), the mix of practices and where continuous enrollment signups are located. It would be very helpful to created a map that shows existing general signup acreage in one color and existing continuous and CREP acreage in another color. This information would be very helpful used in conjunction with the extremely useful maps the draft CRP PEIS already includes showing miles of impaired surface waters by watershed, applied pesticides and potential runoff, excess nitrogen and runoff potential, tons of sediment delivered from sheet and rill erosion, and sediment runoff potential.

**FSA Response** Chapter 5 of the PEIS has been expanded to present a better representation of acreage enrolled.

Farm Service Agency		Final Programma	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	8	Comment Category	Needs	
Comment		er focus areas and lifting the cap of 25% CRP pe ecovery than establishing the larger target areas	, , ,	

**FSA Response** The cropland enrollment limitation is a statutory requirement and may not be waived for grassland recovery. The comment refers to a "focus area" which is unclear. However, CRP is designed to broadly address a number of environmental factors such as water quality and air quality, in addition to wildlife habitat.

Farm Service Agency		Final Programmat	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Needs	
Comment	by providing text and tables that show cut through continuous methods. It is impor	ion of the impact of the current CRP on ripariar rrent enrollment in wetlands and riparian buffer tant to break the data down in this manner so of 5 tells us that 86% of total CRP wetland and rip	s through general signup and continuous enrollments and general	

Midwest and Northern Plains region. Providing this additional information would help us determine if CREP and continuous signup flexibility and incentives are helping to achieve badly needed enrollment in these practices in high priority areas in the rest of the nation (such as the Chesapeake Bay watersheds). This discussion should also be tied to the compelling maps (Fig. 2.2-19, Fig. 2.2-21), showing the pressing need to realign wetlands enrollments and the dramatic need for riparian restoration in high priority areas (See Fig. 2.2-6, Fig. 2.2-10, Fig. 2.2-12, Fig. 2.2-13, Fig. 2.2-14, Fig. 2.2-15, Fig. 2.2-16, Fig. 2.2-19).

**FSA Response** Table 5.2-3 gives an overall summary of wetland and associated practice acreages for active contracts for all CRP program years (1987-2003).

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	87	Comment Category	Needs

**Comment** The study fails to investigate the issue concerning excessive CRP enrollments in some counties possibly caused by the methodology used by FSA county offices in computing "total cropland" acres.

**FSA Response** The total cropland definition is applied uniformly and is the sum of all cropland, which resides in local USDA files. The number is system generated, based on previously loaded data.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Needs
Comment	The PEIS should also cite to some of the	many articles that discuss floodplains restoration	on benefits. These benefits include

providing direct, critical habitat for fish and migrating birds – the flood regime flushes food into river systems and the floodplain vegetation filters the quality of floodwaters and provides badly needed food and shelter for migrating birds. Lands that are frequently flooded lessen the severity and frequency of downstream floods and are high-risk areas for farming and for housing.

**FSA Response** While the comment is noteworthy, while many CRP lands are found in floodplains, floodplain restoration is not one of the primary focuses of CRP.

Farm Service Agency		Final Programm	CONSERVATION RESERVE PROGRAM atic Environmental Impact Statement
Tracking Number	85	Comment Category	Needs

The PEIS should more carefully consider the value of lands, such as native rangeland and bottomland hardwoods, being lost Comment due to slippage. The PEIS should try to carefully assess the causes of slippage under the current program (e.g., commodities payments, to establish a cropping history for CRP, etc.) so decision-makers can more easily assess the differences in slippage between this alternative and other alternatives. The extent to which valuable native habitat is being converted to cropland due to slippage must be better evaluated and alternatives to such native habitat loss must be examined. This also increases the need to ensure that CRP enrollments are providing substantial water quality, soil, and/or wildlife habitat benefits.

**FSA Response** The commentor does not make the connection between "slippage" and environmental benefits. However, "slippage" is such a small percentage the loss is negligible.

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	160	Comment Category	Needs

According to USDA analysis, the greatest non-market benefits are related to increased wildlife production on CRP acres Comment (bird hunting and viewing). The reduction in emphasis of this program on soil erosion (compared to the previously authorized CRP), as well as the relatively minor water quality benefits this program is currently generating (only 8 percent of non-market benefits) is a concern. Given this, we would urge renewed emphasis by USDA on filter and buffer strips, providing little if any, further opportunity for whole-farm buyout through the program. Water quality is a major challenge for U.S. Agriculture, and we urge a shift in emphasis within the CRP to better address the issue.

**FSA Response** The commentor suggests that any remaining enrollment authority limited to continuous signup practices, which provide substantial water quality benefits. However, the commentor is basing his comparison of water quality benefits and wildlife benefits based on the acres enrolled which does not reflect that relatively small-scale continuous signup acreage to protect much larger acreage.

Farm Se	rvice Agency

Tracking Number	372	Comment Category	Needs

**Comment** General Signups: Hold a limited (1 million acre) general signup within the next year. Base future general signups on progress toward meeting continuous signup and CREP goals. Make changes to increase environmental benefits from general signup enrollments:

1.Award more points for restoration of rare and declining habitat (The PEIS maps show a wide discrepancy between areas of current enrollment and areas of greatest habitat need. See Fig. 2.2-28, Fig. 2.2-29, Fig. 2.2-30, Fig. 2.2-23. Awarding more points for CP 25 would help restore the most needed habitat in the places it is most badly needed);

2.Add relative abundance factor (to reflect increased environmental benefit of enrollments in environmentally sensitive places that do not have much current enrollment);

3.Change weights and categories for wildlife covers to highly favor native species. Provide more reward for plantings that seek to replicate natural diversity of vegetation; e.g., native mix and diversity of forbs and grasses. (This would provide increased benefits for wildlife and help prevent unintended adverse impacts from planting invasive or out-of-system plantings);

4.Eliminate separate water quality criteria from EBI in favor of greater focus in continuous signup on achieving water quality goals (CRP should, in general, meet water quality goals through expanded use of continuous enrollment and CREP, freeing

**FSA Response** We appreciate your comments and will take them unto consideration as we develop the regulations and procedures.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	85	Comment Category	Needs
Comment	habitat would provide exceptional vegeta compelling example the PEIS should exa As discussed above, less than 1% of nat prairie exceeds those reported for any o Knopf 1994). "Mesic tallgrass prairie, se ecosystems that have recently been ider et al. 1995). "Over three hundred specie more on recently burned areas; 95 perc	tive tallgrass prairie remains in the United States ther major ecosystem in North America" (Herke adge meadow, and Lakeplain wet prairie are thre ntified as critically endangered in the United Stat es of plants could be found within 1 square mile cent of the species were perennial, many with lif	nder this alternative provides a 5. "Declines in acreage of tallgrass rt, et al. 1995 at 90; Samson and ee Midwestern grassland tes (Herkert, et al. 1995 at 90; Noss e of native tallgrass prairie, and even respans of twenty years or more"
		ussed below, restoring rare and declining habita mmals, including threatened and endangered sp	

**FSA Response** The commentor does not provide data on total land that would be made eligible for continuous signup if due to the restoration of rare and declining habitat making further analysis impossible.

Farm Service Agency		Final Programmat	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	129	Comment Category	Needs	
Comment	then allow the state office to tier down t	ply with NEPA, the federal office creates the above o the project level through the use of a "CPA-52" sing since the 1970's. the field officer must condu	form, a cursory, pro forma	

before signing off on the private land project. By filling out the CPA-52's typically fall within a categorical exclusion, no significant environmental impact, which does not require further environmental analysis. However, the CPA-52 is not open for public comment, is difficult to acquire, and in some instances may be shielded from public review of comment. In short, the federal office creates an umbrella programmatic environmental analysis, which allows the state office to tier down to the CPA-52, a process that allows projects to be conducted on private lands without any public comment or review on specific projects, despite federal funding. Although the agency seems to be attempting to comply with NEPA, our

preliminary review reveals the CPA-52 is both a shallow and narrow document, that is unable to analyze the cumulative effects of , for example, changes in several CRP projects. The DPEIS fails to conduct a broader analysis of effects on wildlife

populations and habitat. As such, more thorough analysis must occur at the programmatic level within the final PEIS.

**FSA Response** The comment refers to NRCS environmental analysis. Although the comment questions that analysis, we understand the NRCS process has been approved for legal sufficiency.

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	372	Comment Category	Needs
Commont			

**Comment** In addition to offering a balanced environmental targeting and 2002 Farm Bill alternative, the draft PEIS should provide an Exclusive Environmental Targeting alternative that also looks at the critical sub-issues of program administration. The discussion of each of the alternatives needs to address the critical sub-issues of program administration in order to provide a full enough picture of the program for decision-making and to satisfy NEPA.

**FSA Response** The lack of specificity precludes further analysis.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	182	Comment Category	Needs

**Comment** The report does not include a thorough examination of benefits from increased use of third parties and other outside partners and cooperators who can provide unlimited assistance in the successful, efficient delivery of these programs.

**FSA Response** The comment provides no specific example of any onerous rules and regulations that is counterproductive. Therefore, no further analysis can be conducted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Needs
Comment		from continuous enrollment to vegetation wou	<b>2</b> ,

alternative due to: the higher incentives to restore native vegetation, the ban on installing invasive species, the inclusion of rare and declining habitat as a continuous signup practice, and the increase in CREPs that focus on wildlife habitat restoration, particularly restoration of rare and declining habitat. These changes should help restore more native vegetation in the places it is most needed. Fig. 2.2-18, Fig. 2.2-19, Fig. 2.2-21, Fig. 2.2-23. Under this alternative, after mapping critical potential habitat, each state could enroll up to ½ of 1% of its cropland in continuous signup for rare and declining habitat restoration as long as enrollments are within mapped areas and use CP 25 (thereby using best wildlife habitat data at the local level to target enrollments in rare and declining habitat to locations of top conservation value).

**FSA Response** Comment noted.

Farm Service Agency		Final Programma	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	80	Comment Category	Needs	
Comment	discussion of the new CCRP provisions a inclusion of discussion encouraging addir	eading discussion (5.2.1.3.2 CCRP p5-17) on the llowing enrollment of whole fields if 50% of a fictional CCRP participation due to the farmer and otes the 50% CCRP provision may provide mod	ield is eligible. We recommend wildlife-friendly aspects of this	

disagree. In some agricultural regions of the country smaller acreages planted to good covers and managed for wildlife may provide much more substantial wildlife benefits. The may especially be true in regions that have minimal acreage enrolled through CRP general sign-ups. We recommend additional research and discussion into the wildlife value of CCRP buffers, additional discussion of specific wildlife-related CCRP practices (e.g. wildlife field borders, center-pivot corners managed for wildlife, and the development of new CCRP practices modeled after the existing CP-4D practice). The DPEIS

should evaluate inclusion of species-of-special-interest focused practices such as for the ring-necked pheasant and

**FSA Response** Comment noted. While additional research was done, it did not refute our discussion of the effectiveness of a buffer. CCC intends to continue enrolling the most environmentally sensitive acreage to obtain the greatest nationwide benefits while implementing the law. The interim regulations accomplish this function.

bobwhite quail.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	87	Comment Category	Needs

**Comment** The Study does not discuss other grain and oil seed supply situations that are confronting the U.S. and raising issues as to whether the U.S. should be idling more acres at all.

**FSA Response** Supply and demand shift from year to year. The changing market prices clearly demonstrate this point. Since 1996, when the FAIR Act was passed, grain and oilseed prices have generally trended downward. This downward trend indicates the growth in supply is more rapid than the growth in demand. There are a number of reasons for this, including beneficial weather, technological growth, slowing world economies, and expanding foreign production. The EIS does discuss yield growth, but does not cover the full operation of grain and oilseed markets. However, given the declining prices it is reasonable to state that a 2.8 million acre increase in the maximum enrollment will not be detrimental to US grain and oilseed markets.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	23	Comment Category	Needs
Comment	The DPEIS should evaluate the biologica	I, economic and social benefits of the CRP on re	estoring large blocks of grassland

and other areas of the US.

habitats in the Great Plains and Midwest. The CRP should have as its primary focus the restoration of native cover in these

**FSA Response** Comment noted. CRP is a conservation program to improve water quality, reduce soil erosion, and enhance wildlife habitat. Maintaining a programmatic balance of these three resource areas is the goal of CRP.

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number 80		Comment Category	Needs

**Comment** The DPEIS fails to adequately document the biological, social, and economic benefits of general CRP enrollment of larger blocks of croplands that are primarily restored to grassland habitats. Larger blocks of CRP planted to recommended wildlife covers that are managed primarily for wildlife habitat should continues as the focal point of CRP.

**FSA Response** The importance of habitat size is discussed in section 2.2.4.1.

Fa	rm Service Agency	Conservation Reserve Pro Final Programmatic Environmental Impact Stat	
Tracking Number	376	Comment Category	Needs
Comment	specifications require that soil and wate is exceedingly important that a negotia wildlife needs are balanced with other r The EBI has worked well in CRP genera language) that includes wildlife. Howe chance (i.e. enrollment is automatic if t	Congress made wildlife co-equal with soil and wer conservation be achieved while wildlife conse ation instrument like the Environmental Benefits resource needs. Al sign-up to ensure a "Balance Among Resource ver, in CCRP there is no such mechanism and, t he land/practice qualifies, regardless of cover c vildlife field borders, center-pivot irrigation syste	rvation is discretionary. Therefore, it is Index (EBI) be used to ensure that e Purposes" (2002 Farm Bill herefore, wildlife needs are left to hoice). In the absence of an EBI for
	provide targeted benefits for wildlife co address water quality.	uld help provide key habitat in the same way th	nat filter strips are designed to

**FSA Response** The Practices eligible for the continuous signup generally provide benefits to large areas when compared to the acreage on which the practices is implemented. Practices eligible for continuous signup may be implemented on field borders and center-pivot corners if such land is otherwise eligible.

Tracking Number 373 Comment Category Needs

**Comment** The DPEIS describes the value of placing CRP adjacent to water bodies to enhance water quality of our nation's wetlands, streams, rivers, and lakes, but does not adequately describe the added wildlife benefits of placement of CRP acres in proximity to water. Wetland-grassland complexes in the Northern Great Plains contain higher species diversity than either wetland or grassland landscapes alone. Therefore, maximum wildlife benefits are achieved when grasslands are restored within landscapes containing a high density of wetlands. These landscapes are often difficult to farm because of the topographic and spatial variation and are often highly erodible.

The rationale behind increased scores for EBI-defined examples of permanent water was to improve the spatial placement of restored grasslands. However, maximum wildlife benefits are achieved in areas containing a mix of wetlands ranging in hydroperiod from temporary to seasonal to permanent. The periodic drying of temporary and seasonal wetlands allows nutrients to be recycled and aquatic plants to germinate creating more productive sources of food and cover for wildlife in many years while more permanent water serves as refuge areas in times of drought.

Ducks Unlimited, Inc. recommends that an incremental scoring system such as the one listed below be adopted for N1c of the EBI based on wetland densities from National Wetlands Inventory (NWI) maps within the section of land (square mile) containing proposed CRP tracts. Such a system would further promote removal of marginal land from cropping and increase the effectiveness and efficiency of CRP in providing wildlife benefits.

**FSA Response** The CCRP, CREP, and FWP programs identify conservation practices that establish buffers adjacent to water or restore farmed wetlands as eligible for continuous sighup. These continuous signups do not use the EBI, but instead accept feasible offers that meet these programs basic eligibility criteria.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Needs

**Comment** While the DPEIS has adequately described the benefits of wetland restoration to the soil, water, and wildlife purposes of the CRP, this value must be reflected in the EBI to encourage wetland restoration practices such as CP23. We recommend that increased points should be given for that proportion of wetland acres in a CRP offer by changing the EBI score for N2d = (Cropped wetland acres / total CRP acres) \* 50. We further point out that a large body of scientific evidence shows that seed banks of indigenous wetland plants persist for at least 100 years and that once hydrology is restored to previously drained sites, vegetation re-establishes quickly. Seeding or planting should not be required or receive points in the EBI unless this practice is used for forested wetlands.

**FSA Response** However, CP23 will become a continuous signup practice.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	373	Comment Category	Needs

**Comment** The DPEIS fails to include a thorough examination of benefits from increased use of third parties, state agencies, and other outside partners and cooperators who have assisted, and can increase their assistance, in the successful, efficient delivery of these programs. Non-governmental organizations such as DU have a long history of working on these programs, and we hope to continue that productive relationship. However, onerous rules and regulations would be counterproductive to efficient achievement of program objectives through enhanced partnerships with the private sector.

**FSA Response** The comment provides no specific example of any onerous rules and regulations that is counterproductive. Therefore, nor further analysis can be conducted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	23	Comment Category	Needs
Comment		us Sign-up (CCRP) conservation practices shou vildlife choices often cost more than options n	

benefits often are forgone to save dollars.

**FSA Response** Enrollees in CCRP have their choice of several conservation practices. To varying degrees, each of these practices has the benefit of reducing sediment and contamination runoff, which benefits aquatic species, and provides permanent vegetative cover and forage for wildlife. The practice establishment costs are split between the CCC and the enrollee. The enrollee can receive up to a 20% practice incentive payment for certain practices that have wildlife benefits.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	23	Comment Category	Needs

**Comment** The DPEIS should evaluate the benefits of developing and authorizing Continuous Sign-up CRP practices for fish and wildlife species in serious decline, such as grassland-dependent birds and mammals.

**FSA Response** The comment fails to make specific recommendations. Doing what the comment suggests would make millions of acres eligible for continuous signup, thereby completely using the limited remaining enrollment authority.

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact S	
Tracking Number 132		Comment Category	Needs

**Comment** The DPEIS fails to adequately document the biological, social, and economic benefits of general CRP enrollment of larger blocks of croplands that are primarily restored to grasslands habitats. Larger blocks of CRP planted to recommended wildlife covers that are managed primarily for wildlife habitat should continue as the focal point of CRP

**FSA Response** Comment fails to indicate in what way the analysis was deficient. Comment is general in nature.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	23	Comment Category	Needs

**Comment** The DPEIS should evaluate and document the benefits of periodic maintenance of CRP lands during the contract period, particularly to wildlife.

**FSA Response** Comment noted. The data available on periodic maintenance on CRP land is either incomplete or insufficient. Since each CRP contract, conservation plan, and conservation practices implemented on the contracted land is different and tailored to that specific parcel, the documented benefits to wildlife are incomplete and therefore out of scope of this PEIS.

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	373	Comment Category	Needs

Within the DPEIS there is a great deal of contradictory statements, information, and general tone regarding the economic Comment impacts of CRP, both negatively and positively. Table S.6-1 is a prime example as it makes statements that do not take into account an abundance of USDA data. Reviewing the National Agriculture Statistics Service (NASS) data on employment would make the comment on S-19 under the Environmental Targeting Section come into question. It mentions a "Possible beneficial increase in on- and off-farm agricultural employment at the county and local level." The use of the word Possible leaves room to quibble, but there is a general tone throughout the summary and other sections that points to an overall negative effect economically while the NASS data has shown that the reduction in ag employment has slowed dramatically from the plummeting it had done before 1980.

**FSA Response** No suggestion by commentor. The tone of any PEIS should remain neutral.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	No Action

**Comment** The No Action (4.4.4) Alternative should not be used, because failure to change past programs and capture a number of needed improvements/modifications would not let CRP reach its best potential as a broad-based conservation program

**FSA Response** Comment noted. The No Action Alternative is used as an analytical baseline for comparison between it and the Proposed Action Alternative.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	135	Comment Category	Opposition
Comment		ral sign-ups and moving the entire program's al target area on the greater Mississippi River	•

**FSA Response** Comment noted. FSA'a preferred alternative is the Proposed Action alternative, which would continue general CRP with an EBI, CCRP, CREP, and expand the FWP.

the Gulf of Mexico.

Farm Service Agency		Final Program	<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	Regional Cover Practices	

**Comment** Regional differences in CRP cover practices need addressing in a more comprehensive fashion

**FSA Response** Through the various levels of program administration (Section 3.2), CRP allows for local environmental resources to be targeted while producing the optimal environmental benefits.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	85	Comment Category	Riparian, Floodplain, Wetlands

**Comment** The CRP PEIS should expand the discussion of the tremendous adverse impacts on riparian areas, floodplains and wetlands if there was no CRP to include all of the functions and values that would be lost if there were no CRP and these areas were converted to agricultural production. In addition to the soil erosion and filtration benefits discussed (5-19), there would be significant flood control, aquifer recharge, aquatic habitat and wildlife habitat functions lost.

**FSA Response** CRP takes lands already in agricultural production out of production over the short- and long-term depending on the conservation program. CRP does not protect existing riparian areas, floodplains, and wetlands from conversion to agriculture.

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	376	Comment Category	Riparian, Floodplains, Wetland

**Comment** On page 5-30 (1st full paragraph) the statement is made that riparian areas will benefit from devotion of marginal pastureland to vegetation, particularly trees and goes on to say that trees will improve the natural function of the riparian area. This is only true in situations where wooded riparian areas are consistent with the ecosystem. Many prairie streams historically had herbaceous riparian areas and, ecologically, these are needed to best restore environmental functions on prairie landscapes.

On page 5-30 (6th paragraph), reference is made to the 4 out of the 6 years prior to date of enactment of the Farm Bill eligibility criteria in the context that this could cause adverse impact to riparian areas (meaning more intensely farmed land is eligible for CRP). Quite the contrary, the former criteria (2 out of 5 year) was a moving target and all someone had to do was break-out new land (including riparian areas), farm for 2 years and enroll in CRP to receive annual payments on land that wouldn't normally produce that level of income. The new eligibility criteria introduces a date-certain aspect that will ensure against breaking-out new land, whether riparian or prairie or some other, and then enrolling it in CRP. This should be clarified.

**FSA Response** The additional wildlife benefits provided by placement of CRP acres, specifically restored grasslands, in proximity to water will be described as follows: "CRP lands adjacent to waterbodies also provides important wildlife benefits, particularly restored grasslands within areas of wetlands. Wetland-grassland complexes contain greater species diversity and occurrences of threatened and endangered species than either ecosystem alone. This is particular true for grassland songbirds, shorebirds, and colonial water birds."

The wording will be clarified to state that the date-certain crop history (4-6) requirement will help reduce pressures on producers to breakout new land.

Farm Service Agency		Final Progra	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	23	Comment Category	Riparian, Floodplains, Wetland	

**Comment** A primary focus of CRP should be on restoring and protecting the ecological integrity of watersheds.

**FSA Response** Comment noted. CCRP and CREP poses the greatest potential to protect and restore ecological integrity of watersheds impacted by agriculture and agricultural practices, since both programs target highly environmentally sensitive land. However, since CRP is a voluntary program the environmental benefits can only be attained if eligible land in impaired watersheds is enrolled. To help facilitate enrollment on a watershed basis, CRP will be using watershed-based priority areas and zones to provide greater enrollment in targeted critical areas.

Fa	rm Service Agency	Final Prog	<b>Conservation Reserve Program</b> rammatic Environmental Impact Statement
Tracking Number	81	Comment Category	Riparian, Floodplains, Wetland
Comment	Ensure the primary focus on restoring and waterways in the US. We have several m The program should be structured so that and protection are high. A large proportion water and associated upland habitats, and	nillion miles of habitat that lie at the inte t all of these habitats receive the highes on of our Nation's wildlife and fish are de	rface of water and upland that need work. It priority, even when costs of restoration ependent on the ecological health of our

**FSA Response** Comment noted. CCC intends to generally provide wildlife benefits through establishment of practices in the CRP general signup, CCRP, CREP, and FWP.

for wildlife.

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	373	Comment Category	Riparian, Floodplains, Wetland

**Comment** The DPEIS describes the value of placing CRP adjacent to water bodies to enhance water quality of our nation's wetlands, streams, rivers, and lakes, but does not adequately describe the added wildlife benefits of placement of CRP acres in proximity to water. Wetland-grassland complexes in the Northern Great Plains contain higher species diversity than either wetland or grassland landscapes alone. Therefore, maximum wildlife benefits are achieved when grasslands are restored within landscapes containing a high density of wetlands. These landscapes are often difficult to farm because of the topographic and spatial variation and are often highly erodible.

The rationale behind increased scores for EBI-defined examples of permanent water was to improve the spatial placement of restored grasslands. However, maximum wildlife benefits are achieved in areas containing a mix of wetlands ranging in hydroperiod from temporary to seasonal to permanent. The periodic drying of temporary and seasonal wetlands allows nutrients to be recycled and aquatic plants to germinate creating more productive sources of food and cover for wildlife in many years while more permanent water serves as refuge areas in times of drought.

**FSA Response** The wording will be clarified to state that wetland adjacent land enrollment will provide optimal benefits to wildlife through a wetlands-systems approach to land eligibility and wetlands conservation practices.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Riparian, Floodplains, Wetland

**Comment** Under Major Wetland Types the statement is made (4th paragraph, 2nd sentence) that "Hardwood trees such as red maple and gum or coniferous trees such as cedar, fir and spruce usually dominate wetlands." This statement, as relates to the coniferous trees listed, is not correct except in limited and geographically isolated situations. Coniferous trees do not dominate most wetlands but, if an example is needed, cypress would fill the bill much better than the species listed.

**FSA Response** The statement "Hardwood trees such as red maple and gum or coniferous trees such as cedar, fir and spruce usually dominates wetlands" will be omitted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Species-of-Special Interest

**Comment** The DPEIS should evaluate inclusion of species-of-special-interest focused practices such as for the ring-necked pheasant and bobwhite quail

**FSA Response** Comment noted. CRP is a large scale conservation program and to focus on specific species would be considered out of scope of this Programmatic Environmental Impact Statement. Comment noted. CCC intends to generally provide wildlife benefits through establishment of practices in the CRP general signup, CCRP, CREP, and FWP.

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	604	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	603	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	422	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	600	Comment Category	Support



Tracking Number601Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.



Tracking Number598Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.



Tracking Number 599 **Comment Category** Support

Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should Comment adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number 602		Comment Category	Support



Tracking Number605Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.



Tracking Number606Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact State	
Tracking Number	607	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number 609		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve I</b> Final Programmatic Environmental Impact S	
Tracking Number 590		Comment Category	Support



Tracking Number 610 **Comment Category** Support

Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should Comment adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	611	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Staten	
Tracking Number	612	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve I</b> Final Programmatic Environmental Impact S	
Tracking Number 613		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve I</b> Final Programmatic Environmental Impact S	
Tracking Number 614		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number 608		Comment Category	Support



Tracking Number588Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.



Tracking Number579Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact State	
Tracking Number	414	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	580	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Statem	
Tracking Number	581	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	582	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	583	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	584	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	585	Comment Category	Support

Farm Service Agency		Conservation Reserver Final Programmatic Environmental Impact	
Tracking Number 592		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Stat	
Tracking Number	587	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact Stat	
Tracking Number 597		Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	589	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	627	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number 591		Comment Category	Support

Farm Service Agency		Final Programm	<b>CONSERVATION RESERVE PROGRAM</b> natic Environmental Impact Statement
Tracking Number	615	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number 593		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	594	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Proo</b> Final Programmatic Environmental Impact State	
Tracking Number	595	<b>Comment Category</b>	Support

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact S	
Tracking Number 596		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Statem	
Tracking Number 586		Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	404	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact	
Tracking Number	212	Comment Category	Support

Farm Service Agency		Conservation Reserv Final Programmatic Environmental Impac	
Tracking Number	407	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact S	
Tracking Number	411	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	401	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	402	Comment Category	Support

Farm Service Agency		Final Programm	CONSERVATION RESERVE PROGRAM natic Environmental Impact Statement
Tracking Number	416	<b>Comment Category</b>	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Staten	
Tracking Number	417	Comment Category	Support

Farm Service Agency		Conservation Reservation Rese	
Tracking Number	625	Comment Category	Support

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	420	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve I</b> Final Programmatic Environmental Impact S	
Tracking Number	633	Comment Category	Support

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	418	Comment Category	Support



Tracking Number405Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	410	Comment Category	Support

Farm Service Agency		Conservation Reserve Prog Final Programmatic Environmental Impact Staten	
Tracking Number	409	<b>Comment Category</b>	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	408	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	578	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	406	Comment Category	Support	

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact Stat	
Tracking Number	419	Comment Category	Support



Tracking Number403Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	628	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	617	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statement	
Tracking Number	618	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	619	Comment Category	Support



Tracking Number620Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Stat	
Tracking Number	621	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	622	Comment Category	Support



Tracking Number 623 **Comment Category** Support

Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should Comment adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.



Tracking Number 624 **Comment Category** Support

Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should Comment adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.



Tracking Number634Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact Stat	
Tracking Number 626		Comment Category	Support

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number 412		Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	629	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	630	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	631	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact S	
Tracking Number 413		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number 632		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	421	Comment Category	Support

**Comment** I favor alternative 3 of the farm bill draft EIS

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Stater	
Tracking Number	415	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	616	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	400	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Staten	
Tracking Number	526	Comment Category	Support

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number 535		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Staten	
Tracking Number	480	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve I</b> Final Programmatic Environmental Impact S	
Tracking Number	518	Comment Category	Support



Tracking Number 423 **Comment Category** Support

Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should Comment adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.



Tracking Number520Comment CategorySupport

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Stat	
Tracking Number	521	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	522	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	523	Comment Category	Support

Farm Service Agency		Conservation Reserv Final Programmatic Environmental Impac	
Tracking Number	516	Comment Category	Support

Farm Service Agency		Conservation Reserve Pr Final Programmatic Environmental Impact Sta	
Tracking Number	525	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Stat	
Tracking Number	515	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Stateme	
Tracking Number	527	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	528	Comment Category	Support

	Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number529Comment CategorySupport	Tracking Number	529	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	530	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	531	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	532	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	533	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact Sta	
Tracking Number	519	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	524	Comment Category	Support

Farm Service Agency		<b>Conservation Res</b> Final Programmatic Environmental Imp	
Tracking Number	506	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	Support

**Comment** We recommend that Alternative 4.2.3, the Proposed Action, with recommended changes, be implemented

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact Stater	
Tracking Number	141	Comment Category	Support

**Comment** 4.2.3 Proposed Action (Table 4.4-1) offers the best approach in implementation, administration and continued refinement of a national CRP

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	Support

**Comment** The Longleaf CPA, has been a good addition to CRP by promoting a threatened ecosystem; We support its continuation

**FSA Response** Comment noted. The Longleaf Pine CPA and other CPAs will continue under the New Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	132	Comment Category	Support	

**Comment** Pheasants Forever strongly supports Alternative #3 in the DPEIS, the agencies' preferred alternative



Tracking Number 500

**Comment Category** 

Support

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	501	Comment Category	Support

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	502	Comment Category	Support

Farm Service Agency		Conservation Reserv Final Programmatic Environmental Impact	
Tracking Number	503	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemer	
Tracking Number	517	Comment Category	Support

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	505	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact	
Tracking Number 536		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	507	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact	
Tracking Number 508		Comment Category Support	

Farm Service Agency		<b>Conservation Re</b> Final Programmatic Environmental Ir	
Tracking Number	509	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	510	Comment Category	Support

Farm Service Agency		<b>Conservation Reserv</b> Final Programmatic Environmental Impac	
Tracking Number	511	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	512	Comment Category	Support

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	513	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	514	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	504	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Staten	
Tracking Number	568	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	534	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	559	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	560	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	561	Comment Category	Support

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Stateme	
Tracking Number	562	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	563	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	564	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statemer	
Tracking Number	565	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	557	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	567	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	556	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	569	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	570	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	571	Comment Category Support	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	572	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	573	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	574	Comment Category	Support

Farm Service Agency		Conservation Reserv Final Programmatic Environmental Impac	
Tracking Number	575	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	576	Comment Category	Support

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact State	
Tracking Number	566	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	547	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Statem	
Tracking Number	537	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	538	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statement	
Tracking Number	539	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	540	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statemer	
Tracking Number	541	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	542	Comment Category	Support

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	543	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	544	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	558	Comment Category Support	

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact Stater	
Tracking Number	546	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	577	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	548	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	549	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	550	Comment Category Support	

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Statem	
Tracking Number	551	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Proo</b> Final Programmatic Environmental Impact State	
Tracking Number	552	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	553	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	554	Comment Category	Support

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	555	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact Stat	
Tracking Number	545	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statement	
Tracking Number	329	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	300	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	321	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	322	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	323	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	324	Comment Category	Support
		je.,	

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number 325		Comment Category	Support

Farm Service Agency		Conservation Reserve Final Programmatic Environmental Impact	
Tracking Number 326		Comment Category	Support

Farm Service Agency		<b>Conservation Re</b> Final Programmatic Environmental Im	
Tracking Number 319		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	328	Comment Category Support	

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	478	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	330	Comment Category Support	

Farm Service Agency		Conservation Reserver Final Programmatic Environmental Impact	
Tracking Number 331		Comment Category	Support

Farm Service Agency		<b>Conservation Rese</b> Final Programmatic Environmental Impa	
Tracking Number 332		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	333	Comment Category	Support

Farm Service Agency		Conservation Reserve Final Programmatic Environmental Impact	
Tracking Number	334	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	335	Comment Category Support	

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	336	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	327	Comment Category	Support

Farm Service Agency		Final Programm	CONSERVATION RESERVE PROGRAM natic Environmental Impact Statement
Tracking Number	310	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Statem	
Tracking Number	301	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	302	Comment Category	Support

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	303	Comment Category	Support

Farm Service Agency		Conservation Reserve Final Programmatic Environmental Impact	
Tracking Number	304	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	305	<b>Comment Category</b>	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	306	Comment Category	Support

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact Stater	
Tracking Number	307	Comment Category	Support

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Farm Service Agency		Conservation Reserve Progre Final Programmatic Environmental Impact Statem	
Tracking Number	309	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	339	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve I</b> Final Programmatic Environmental Impact S	
Tracking Number	311	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Staten	
Tracking Number	312	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	313	Comment Category	Support

Farm Service Agency		Conservation Reserv Final Programmatic Environmental Impac	
Tracking Number	314	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Stater	
Tracking Number	315	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	424	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	317	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve F</b> Final Programmatic Environmental Impact S	
Tracking Number	308	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	116	Comment Category	Support

**Comment** Conservation Force urges you to adopt alternative 3 of the Draft Environmental Impact Statement for implementation of the Conservation Reserve Program (CRP) since its renewal in the 2002 farm bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	359	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	360	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	363	Comment Category	Support

**Comment** I recommend the adoption of Alternative 3

Farm Service Agency			<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	40	Comment Category	Support	

**Comment** We support the CRP Signup. This is a valuable asset to the habitat for valuable nesting cover and for rearing chicks.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	37	Comment Category	Support

**Comment** I recommend the adoption of alternative 3.

<b>ROGRAM</b> Itement

**Comment** We endorse FSA's proposed action to implement changes in CRP general provisions, CCRP and CRWP consistent with what was enacted in the Farm Security and Rural Investment Act of 2002.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	138	Comment Category	Support

**Comment** We recommend that the CRP be continued and expanded, and encourage the USDA to consider the environmental, social and economic impact of this program during this period of evaluation and review.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. The purpose of this PEIS is to determine the impacts on the environment and the social and economic aspects related to each Alternative.

Farm Service Agency		Final Programm	CONSERVATION RESERVE PROGRAM Natic Environmental Impact Statement
Tracking Number	337	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	9	Comment Category	Support

**Comment** I am writing to urge you to adopt Alternative 3 of the Draft Environmental Impact Statement for implementation of the Conservation Reserve Program.

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	356	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Stater	
Tracking Number	372	Comment Category	Support

**Comment** Thus, we strongly urge you to revise the current 2002 Farm Bill Alternative into a 2002 Farm Bill/Balanced Environmental Targeting Alternative, and to make this 2002 Farm Bill/Balanced Environmental Targeting Alternative the Proposed Action. This alternative should be the Proposed Action because it would give FSA a way to (1) make the changes required by the 2002 Farm Bill, and (2) address the program issues that the agency must address in Farm Bill implementation but are not specifically addressed by Congress in the 2002 Farm Bill.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. The Current CRP is an environmentally targeted conservation program through the implementation of general CRP,CCRP, CREP, and FWP. The Proposed Action and Environmental Targeting Alternatives would both implement changes required by the 2002 Farm Bill, but the Environmental Targeting Alternative would eliminate the general CRP signup and allocate all the authorized acreage to be portioned among CCRP, CREP, and FWP. The PEIS had been expanded to clarify this distinction among the two Alternatives. The programmatic issues not specifically addressed by Congress in the 2002 Farm Bill are considered out of scope for this PEIS and can be considered regulatory.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Support

**Comment** We recommend that Alternative 3 in the DPEIS, the agency's preferred alternative, be adopted for administering the CRP.

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Statem	
Tracking Number	376	Comment Category	Support

**Comment** We recommend that the CRP be continued and that USDA continue to explore opportunities to broaden the ecological, social and economic benefits of this program. Further, we strongly support selection of Alternative #3 in the DPEIS, the agencies' preferred alternative.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	171	Comment Category	Support

**Comment** My name is Brad Cobb, President of Stearns County Pheasants Forever in central MN representing 600 members. I want to voice my opinion that we need to implement Alt.#3 for the CRP program.... Thanks in advance of your support.

Farm Service Agency		<b>Conservation Reserve Proge</b> Final Programmatic Environmental Impact Statem	
Tracking Number	23	Comment Category	Support

**Comment** We recommend that Alternative 3 in the DPEIS, the agency's preferred alternative, be selected as the method by which the CRP will be administered.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	80	Comment Category	Support	

**Comment** Pheasants Forever strongly supports Alternative #3 in the DPEIS, the agencies' preferred alternative.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	81	Comment Category	Support

**Comment** We recommend that Alternative 3 in the DPEIS, the agencies' preferred alternative, be selected as the method by which the CRP will be administered.

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	112	Comment Category	Support

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	348	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	316	<b>Comment Category</b>	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statement	
Tracking Number	340	Comment Category Support	

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number 341		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	342	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact Stat	
Tracking Number	343	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	344	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	345	Comment Category	Support

Farm Service Agency		Conservation Reserve Prog Final Programmatic Environmental Impact Statem	
Tracking Number	358	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	347	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statement	
Tracking Number	357	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	349	Comment Category	Support

Farm Service Agency		Final Programma	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number 350		Comment Category Support	

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	351	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	352	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Proo</b> Final Programmatic Environmental Impact State	
Tracking Number	353	Comment Category	Support

Farm Service Agency		<b>Conservation Reserv</b> Final Programmatic Environmental Impac	
Tracking Number 354		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number 355		Comment Category	Support

Farm Service Agency		<b>Conservation Res</b> Final Programmatic Environmental Im	
Tracking Number 338		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number 346		Comment Category Support	

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statement	
Tracking Number	452	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve F</b> Final Programmatic Environmental Impact S	
Tracking Number	460	Comment Category	Support

Farm Service Agency		<b>Conservation Reser</b> Final Programmatic Environmental Impac	
Tracking Number	499	Comment Category	Support

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	445	Comment Category	Support

Farm Service Agency		Conservation Reserv Final Programmatic Environmental Impac	
Tracking Number	446	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	447	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Staten	
Tracking Number	448	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact	
Tracking Number	449	Comment Category	Support

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	318	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	451	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	441	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	453	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	454	Comment Category	Support

Farm Service Agency		Conservation Reserv Final Programmatic Environmental Impac	
Tracking Number	455	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	456	Comment Category	Support

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	457	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	458	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	459	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	450	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	433	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	425	Comment Category	Support

Farm Service Agency		Conservation Reserve Prog Final Programmatic Environmental Impact Stater	
Tracking Number	426	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	427	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	428	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	429	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statement	
Tracking Number	429	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	430	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Statem	
Tracking Number	443	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	432	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	444	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number 434		Comment Category Support	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemer	
Tracking Number	435	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number 436		Comment Category Support	

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Statem	
Tracking Number	437	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Stater	
Tracking Number	438	Comment Category	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	439	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact Stat	
Tracking Number	440	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact Stat	
Tracking Number	431	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pro</b> Final Programmatic Environmental Impact State	
Tracking Number	491	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve I</b> Final Programmatic Environmental Impact S	
Tracking Number	482	Comment Category Support	

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number 483		Comment Category	Support

Farm Service Agency		<b>Conservation Reserv</b> Final Programmatic Environmental Impac	
Tracking Number	484	Comment Category	Support

Farm Service Agency		Conservation Reserv Final Programmatic Environmental Impact	
Tracking Number	485	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number 486		Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	487	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	494	Comment Category	Support

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	481	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	496	Comment Category	Support
Commont	Again I want to overage my strong sup	nort for Altornative 2. The Department of Agri	iculturals Form Convice Agonov should

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	488	Comment Category	Support

Farm Service Agency		Conservation Reserve Prog Final Programmatic Environmental Impact Stater	
Tracking Number	492	Comment Category	Support

Farm Service Agency		Conservation Reserve Pr Final Programmatic Environmental Impact Sta	
Tracking Number	493	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve I</b> Final Programmatic Environmental Impact S	
Tracking Number	461	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	442	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	498	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Stater	
Tracking Number	497	Comment Category	Support

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact State	
Tracking Number	495	<b>Comment Category</b>	Support

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Statem	
Tracking Number	489	Comment Category	Support

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Stateme	
Tracking Number	466	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number 462		Comment Category	Support

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	463	Comment Category Support	

Farm Service Agency		<b>Conservation Reserve</b> Final Programmatic Environmental Impact	
Tracking Number	464	Comment Category	Support

Farm Service Agency		<b>Conservation Res</b> Final Programmatic Environmental Im	
Tracking Number	490	<b>Comment Category</b>	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	465	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	479	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	467	Comment Category	Support

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statemer	
Tracking Number	468	Comment Category	Support

Farm Service Agency		Conservation Reserve Pro Final Programmatic Environmental Impact State	
Tracking Number	469	Comment Category	Support

Farm Service Agency		<b>Conservation Rese</b> Final Programmatic Environmental Imp	
Tracking Number	475	Comment Category	Support

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact State	
Tracking Number	471	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	477	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	472	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	473	Comment Category	Support

Fa	rm Service Agency	Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	141	Comment Category	Support
Comment	•••	ith provisions for a regular CRP with EBI, a Cont ve Enhancement Program (CREP) and an expan	

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact State	
Tracking Number	474	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Statem	
Tracking Number	476	Comment Category	Support

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Pr Final Programmatic Environmental Impact Sta	
Tracking Number	470	Comment Category	Support

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	132	Comment Category	Taxpayer Savings

**Comment** The DPEIS contains inadequate discussion of the taxpayer savings related to CRP. The final document should include a complete discussion of the savings in terms of reduced federal farm program payments that are associated with taking lands out of production

FSA Response Section 2.3.2.5 has been expanded to include a discussion of the costs and benefits of CRP

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	141	Comment Category	Trees and Shrubs

**Comment** The use of trees and shrubs in CRP projects needs more attention

**FSA Response** Comment noted.

Fai	rm Service Agency	Final Program	Conservation Reserve Program
Tracking Number	376	Comment Category	Water Quality
Comment	the west. Enrollment of lands in CRP courrecharge underground aquifers. Water of impact of CRP. On page 5-17, discussion of the new CCP buffer effectiveness, the statement that an additional 50% of the unfarmable fiel these are small fields and the effectivenes enrollment of these small fields in their encourse completely filter the water that flow Regardless, producers often will not enrol it becomes a program dilemma between	this is a critically important issue in many p uld reduce irrigation pressure as well as red quantity is too important an issue not to incl RP provision (enroll whole-field if more than 'if the buffer is already at its maximum size d is added to be buffered" is inaccurate and ess of the buffer isn't diminished at all when ntirety. If anything, the effectiveness of the s through it (generated in-field or from adja Il buffers in CCRP when they are left with a not having any buffer at all or allowing enro- been needed and implementation will solve to	uce runoff and increase infiltration to lude in discussion of the environmental 50% is eligible) and how it relates to then the less effective it will be when misleading. In practical application, buffer size is extended through buffer is enhanced in its ability to acent fields that remain in production). small sliver of a field to farm and, so, ollment of the entire field. The new

**FSA Response** Discussion of water quantity has been expanded in section 2.2.2.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	373	Comment Category	Water Quality

Although water quality issues are well addressed, discussion of groundwater a serious public issue for citizens in many parts of the United States is quite limited. CRP, particularly the general sign-up, can contribute significantly to groundwater recharge in that lands in permanent cover reduce runoff and increase infiltration dramatically when compared to cultivated cropland. Replenished groundwater resources are absolutely essential, especially in rural areas where nearly all household water comes from the ground. In addition, agricultural irrigation accounts for 63 percent of groundwater use, and aquatic species associated with streams and cave systems depend on water resources fed by groundwater. The Ogallala aquifer is an excellent example of regionally diminishing groundwater resources, which benefit from conservation of playa lakes and other groundwater recharge strategies to which CRP could contribute. Maps and discussion should be added that show areas of the United States with depleted or declining groundwater and stream resources for comparison with cropland acres and CRP enrollment potential. Surveys presented in the DPEIS indicate that producers intend to retain 30-40 percent of the CRP acres in grass for haying and grazing after the contract expires. While this is not as high as the 75 percent retention rate cited for tree plantings, it is significant and should be recognized in the EBI under N4 (enduring benefits) with a score of 20 points for CP1 and CP2.

**FSA Response** The discussion of groundwater issues will be expanded to discuss the benefits of vegetative cover in section 2.2.2.2. The example of the Ogallala aquifer is already in the document in section 2.2.2.3.

Farm Service Agency		<b>Conservation Reserve Prog</b> Final Programmatic Environmental Impact Stater	
Tracking Number	85	Comment Category	Water Quality

**Comment** The water quality benefits from general signup enrollments generally stem from the value of removing lands from production because of the pollutants, such as sediment, generated by cropping these lands and from the value of establishing perennial vegetation on these lands. Whereas, continuous enrollment and CREP provide heightened water quality benefits by providing high quality practices (e.g., buffers and wetlands restorations) in targeted locations (e.g., riparian areas) to reduce runoff not only from the land enrolled but also from adjacent farmland.

**FSA Response** We agree, heightened water quality benefits are achieved through the continuous signup practices.

Fai	rm Service Agency	Final Program	Conservation Reserve Program matic Environmental Impact Statemer
Tracking Number	376	Comment Category	Water Quality
Comment	again, groundwater quantity is a serio decrease runoff and increase infiltration (further depleting dwindling groundwa	ecies section (Proposed Action), improved grou	ands in permanent cover would at would otherwise need to be irrigate

**FSA Response** Discussion of water quantity has been expanded in section 2.2.2.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Water Quality

**Comment** Under the Water Resources/Aquatic Species section (Proposed Action), improved groundwater supplies would help maintain stream flow during dry months, to the benefit of aquatic species.

**FSA Response** The discussion of groundwater issues will be expanded to discuss the benefits of vegetative cover in section 2.2.2.2.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Wildlife
Comment	In general, it is notable that, although Co	ongress made wildlife co-equal with soil and wa	ater in CRP, NRCS standards and

In general, it is notable that, although Congress made wildlife co-equal with soil and water in CRP, NRCS standards and specifications require that soil and water conservation be achieved while wildlife conservation is discretionary. Therefore, it is exceedingly important that a negotiation instrument like the Environmental Benefits Index (EBI) be used to ensure that wildlife needs are balanced with other resource needs. The EBI has worked well in CRP general sign-up to ensure a "Balance Among Resource Purposes" (2002 Farm Bill language) that includes wildlife. However, in CCRP there is no such mechanism and, therefore, wildlife needs are left to chance (i.e. enrollment is automatic if the land/practice qualifies, regardless of cover choice). In the absence of an EBI for CCRP, establishment of practices (i.e. wildlife field borders, center-pivot irrigation system field corner habitat, etc.) that provide targeted benefits for wildlife could help provide key habitat in the same way that filter strips are designed to address water quality. Another way of providing for wildlife in CCRP would be to require only wildlife-beneficial cover choices when filter strips, contour buffer strips, etc. are planted.

**FSA Response** The Practices eligible for the continuous signup generally provide benefits to large areas when compared to the acreage on which the practices is implemented. Practices eligible for continuous signup may be implemented on field borders and center-pivot corners if such land is otherwise eligible.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Wildlife

**Comment** While the combination of CRP general sign-up lands, CCRP and CREP makes CRP a more comprehensive conservation program, the lands enrolled through general CRP sign-up process provide the majority of CRP's wildlife benefits

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	373	Comment Category	Wildlife

**Comment** The DPEIS needs to acknowledge regional differences in wildlife habitat requirements. For example, bobwhite quail, which are mentioned numerous times throughout the document, are early successional species that require disturbed grasslands that create a mosaic of dense cover and open ground to provide forage, roosting, and nesting habitat. To provide for this declining species in the south and mid-south, CRP tracts will need to be disturbed every 3-5 years to reduce litter and create openings. Prairie-nesting waterfowl, grouse, and songbirds in the Great Plains and Midwest are adapted to later successional habitats. Dense litter and canopy cover provides secure nest sites and increases the production of insects and small mammals that helps buffer predation pressure on ground-nesting birds. To provide for these declining species in the Great Plains and Midwest, CRP should be left undisturbed with management limited to only once in a 10-year contract and twice in a 15-year contract. More frequent disturbance will degrade nesting cover and reduce production of alternate prey important to the prairie ecosystem. The CRP should be structured to account for these regional variables and to ensure that each CRP contract provides soil, water, and wildlife benefits throughout the contract period.

**FSA Response** Management characteristics of the contract land are determined in the conservation planning process before CRP-1 is signed (Section 3.2). Added benefits obtained by re-enrolling CRP depends upon the wildlife species in question. Different species benefit from differing stages of succession. Ideally, the most desired outcome is land with a mosaic of cover in all stages of succession.

Farm Service Agency		Final Programm	<b>CONSERVATION RESERVE PROGRAM</b> atic Environmental Impact Statement
Tracking Number	82	Comment Category	Wildlife
Commont	Although windheadly and shelterholts ma	w provido orogion honofito in projrio rogiono t	hay have strong negative

Although windbreaks and shelterbelts may provide erosion benefits in prairie regions, they have strong negative consequences of endemic wildlife populations within the region. Invasion by trees into grasslands is commonly associated with negative consequences to most species of endemic breeding birds. In a recent review of 64 peer-reviewed research studies that examined the effects of woody vegetation were deleterious for all species examined except for 3 sparrow species which were able to utilize tree areas but did not require trees. In fact, negative impacts of trees have been clearly demonstrated for sharp-tailed grouse, prairie chickens, ring-necked pheasants, waterfowl, and most grassland songbirds. Thus, the information presented in Table 5.4-1 did not incorporate the most recent scientific evidence. There is no evidence that windbreaks and shelterbelts provided positive benefits to pheasants, sharptail grouse and neo-tropical songbirds; in fact the contrary is strongly supported. As a result, I recommend that the CRP not allow tree plantings as an accepted practice in prairie ecoregions.

**FSA Response** An in-depth discussion on the impacts of woody vegetation was added in sections 2.2.3, 2.2.4, 5.3, and 5.4. The discussions includes: Woody vegetations spread into native grassland areas through: planting of windbreaks and shelterbelts, fire suppression, and as invasive species. Impacts on native grassland ecosystems: creating habitat for non-grassland species, corridors for predators, habitat for woodland raptors.

Farm Service Agency		<b>Conservation Reserve Proo</b> Final Programmatic Environmental Impact Stater	
Tracking Number	85	Comment Category	Wildlife
• · · · ·			

**Comment** The PEIS needs to provide a more in-depth description of the positive and negative impacts the current CRP has on wildlife. The impacts on wildlife of introduced native grasses, native grasses, legumes, trees and other herbaceous vegetation should not be lumped together.

**FSA Response** Comment noted. Due to the large scale of CRP and the variability among CRP-1s and multiple ecological regions in which the program covers , the impacts of all vegetative cover mixes is too numerous and too variable and has been considered out of scope for the PEIS.

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	23	Comment Category	Wildlife

**Comment** We also recommend that the EBI be modified to limit tree planting on CRP to only species native to the specific area and only where there are clear benefits of trees to soil, water, and wildlife.

**FSA Response** Comment noted. FSA will take this comment under consideration when developing the new regulations and procedures.

Farm Service Agency		Final Programma	<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Wildlife	
Comment	<i>i</i>	of CREP on wildlife should be significantly rev ogram, CREPs have the "high[est] potential at	· · · · · · · · · · · · · · · · · · ·	

small geographic landscape and specific environmental resources they target within a state" (5-54) and the best potential to restore rare and declining ecosystems, like tallgrass prairie (5-45). Under the Proposed Action/2002 Farm Bill/Balanced Environmental Targeting Alternative, CREPs hold even greater potential benefit for wildlife and for threatened and endangered species. Under this alternative, establishing CREPs that restore rare and declining habitat would be a high priority. This would help correct the current discrepancy between CRP enrollment and the areas of greatest habitat need. See Fig. 2.2-28, Fig. 2.2-29, Fig. 2.2-30, Fig. 2.2-23. Providing greater flexibility to tailor conservation practices and incentives to meet local wildlife needs will also ensure that CREPs achieve high enrollment and install highly beneficial conservation practices, particularly CP 25. Wildlife benefits will be further heightened by CREPs that prolong benefits

**FSA Response** CCC intends to continue its continuous and CREP signups of certain highly beneficial environmental and wildlife practices. The interim regulations accomplish that function.

through contract extensions and permanent conservation easements.

Farm Service Agency		Final Programma	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Wildlife	
Comment	wildlife habitat and has generally focused weight to wildlife habitat restoration and Furthermore, development of CREPs that	has generally relied more on general signups more on water quality improvements than wi factors in the relative location of wildlife habita focus on wildlife habitat restoration has been t the restoration of grassland habitat under th	ldlife. The EBI gives inadequate at in only a limited way. limited. The North Dakota CREP	

by requiring enrollments in the grassland target areas to simultaneously serve grassland habitat and water quality goals. The PEIS should discuss how these factors contribute to the discrepancy between current CRP enrollments and the areas of greatest need for habitat restoration for threatened and endangered species. See Figs. 2.2-28 to 2.2-30.

**FSA Response** CCC intends to generally provide wildlife benefits through establishment of practices in the CRP general signup, CCRP, CREP, and FWP. CCC intends to continue to be responsive to initiatives that provide environmental and wildlife benefits through CREP. The PEIS has been expanded to address the producer/landowners responsibility with regard to contract maintenance. However, maintenance practice standards are currently under review.

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Stateme	
Tracking Number	373	Comment Category	Wildlife

**Comment** Furthermore, existing data do not support the claim that in this same table that windbreaks, shelterbelts, and small fields have provided positive benefits to pheasants, sharptailed grouse, and Neotropical songbirds. We recommend that the DPEIS more rigorously evaluate the impact of trees planted under the CRP on fish and wildlife in the northern and southern plains and that the EBI be modified to limit tree planting on CRP only to species native to a specific area and only when there are clear benefits to soil, water, and wildlife.

**FSA Response** An in-depth discussion on the impacts of woody vegetation was added in sections 2.2.3, 2.2.4, 5.3, and 5.4. The discussions includes: Woody vegetations spread into native grassland areas through: planting of windbreaks and shelterbelts, fire suppression, and as invasive species. Impacts on native grassland ecosystems: creating habitat for non-grassland species, corridors for predators, habitat for woodland raptors.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	376	Comment Category	Wildlife

**Comment** Discussion of suites of species (fish/clams, amphibians/reptiles, etc.) does not illuminate agriculture and population sustainability issues; this should be included.

**FSA Response** Due to the large scale of CRP and the variability among CRP-1s and multiple ecological regions in which the program covers , the impacts on different suites of species is too numerous and too variable and has been considered out of scope for the PEIS.

Farm Service Agency		Final Programmat	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	85	Comment Category	Wildlife	
Comment	(5-53). Current CRP benefits some endar restoration, wildlife corridors, and wetlar	eatened and endangered species in the United S angered species through taking cropland out of p nds; and buffering rivers, streams, and other wat fect threatened and endangered species. Howey	roduction; restoring habitat cers. CREP would have the highest	

factors in current CRP that limit the positive impacts on threatened and endangered species. Such factors include: planting non-native species on CRP lands; failing to control invasive species on CRP lands and to maintain CRP lands; installing practices on CRP lands that destroy valuable existing native habitat; and installing practices that are inappropriate to the ecosystem (such as planting trees within native prairie).

**FSA Response** Impacts to T&E species from certain CRP practices are noted in 5.4.

Farm Service Agency		Conservation Reserve Pr Final Programmatic Environmental Impact Sta	
Tracking Number	376	Comment Category	Wildlife

**Comment** Regarding management, the rate of natural succession necessitates periodic disturbance (light disking/prescribed burning) in parts of the U.S. where succession is rapid while no disturbance is better where succession works slowly. These factors are all-important to wildlife, cannot be overstated, and certainly should be much better researched and discussed in the CRP DPEIS than they are. At a minimum, the following research should be factored into discussions: McCoy, T., E.W. Kurzejeski, L.W. Burger Jr., and M. Ryan. 2001. Effects of Conservation Practices, Mowing, and Temporal Changes on Vegetation Structure on CRP Fields in Northern Missouri.

**FSA Response** We support the concept that management plays an important role in plant succession. We have added language into the EIS that reflects the role of management and the impact of succession.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	129	Comment Category	Wildlife

**Comment** The DPEIS fails to consider the best available science or to analyze the cumulative effects that the proposed action may have upon both these subspecies of grouse (western sage grouse, Columbian sharp-tailed grouse)

**FSA Response** Comment noted. The PEIS examines the impacts to wildlife including bird species. However to specifically focus on individual species or subspecies at the programmatic level is considered out of scope of this PEIS.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	373	Comment Category	Wildlife

- Comment One of the main reasons the CRP has had such a significant impact on the soil, water, and wildlife resources of our nation is that it has restored large blocks of lands in focused landscapes (e.g., the Prairie Pothole Region National Priority Area). Most of the grasslands and wetlands in the mixed- and tall-grass prairie ecosystems on North America have been lost or severely degraded by agriculture. This extensive loss of prairie wetland-grassland complexes has caused declines in the population levels and reproductive success of many species of grassland nesting birds such as waterfowl, grouse, shorebirds, and songbirds, which have high economic and cultural values. The extensive conversion of cropland to large blocks of CRP cover has allowed many of these species to reverse or slow population declines. The DPEIS fails to adequately describe these benefits to grassland-nesting birds, especially in the Prairie Pothole Region, and to examine the impacts that losing this national priority area would have. We recommend that CRP continue its focus on restoring large blocks of cover (whole-field enrollment) and that EBI points continue to be given for national priority areas so that gains that the program has achieved are not lost by spreading acres ineffectively across a much larger landscape. Ducks Unlimited, Inc. strongly recommends that the Prairie Pothole Region be retained as a Conservation Priority Area in accordance with the wishes of Congress in passing the 2002 Farm Bill, and that the point score be increased from 25 to 50 points for offers in a national or approved state-designated CPA. We believe this higher point score is more commensurate with the value of CRP in these national and state priority areas. If state and national priority areas are used only to determine eligibility, and points are given equally to zones within those areas under the EBI, the value of placing CRP in areas of national concern will be eliminated. Any zone will compete equally with any other zone, and the effectiveness of the CRP in addressing national environmental issues will be severely compromised.
- **FSA Response** Comment noted. Discussion of the importance of large blocks of habitat are discussed in Section 2.2.3. And in Section 5.4. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Currently, over 26 million acres are planted to vegetative cover, which produce multiple benefits to wildlife and wildlife habitat (Section 5.4.2). CRP, through the use of the EBI, economic incentives, and CREP, produces multiple environmental benefits for soils, water quality, and wildlife habitat.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	373	Comment Category	Wildlife
Comment	Although windbreaks and shelterbelts ma	ay help control erosion in prairie regions, they a	re detrimental to wildlife

Although Windbreaks and shelterbeits may help control erosion in praine regions, they are detrimental to Wildlife populations by allowing non-endemic species such as forest-dependent raptors to invade grasslands, which can have substantial negative impacts on native grassland birds and small mammals. In a recent review of 64 peer-reviewed research studies examining the effects of woody vegetation on habitat suitability for grassland nesting species, Bakker (2002) found that woody vegetation had a deleterious effect on occurrence, density, and/or nesting success of both game and nongame nesting birds. This negative impact of woody vegetation was significant for sharp-tailed grouse, prairie chicken, ring-necked pheasants, waterfowl, savannah sparrows, grasshopper sparrows, dickcissels, and many other prairie songbirds. Only two species responded positively to woody vegetation, clay-colored sparrow and vesper sparrow, in greater than two of the studies. Grassland plantings alone can provide similar erosion control benefits to windbreaks and shelterbelts and with positive impacts on endemic wildlife as opposed to the negative effects of woody vegetation. Therefore, we recommend that the CRP not allow tree plantings in prairie ecoregions.

**FSA Response** An in-depth discussion on the impacts of woody vegetation was added in sections 2.2.3, 2.2.4, 5.3, and 5.4. The discussions includes: Woody vegetations spread into native grassland areas through: planting of windbreaks and shelterbelts, fire suppression, and as invasive species. Impacts on native grassland ecosystems: creating habitat for non-grassland species, corridors for predators, habitat for woodland raptors.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statemer	
Tracking Number	373	Comment Category	Wildlife
Comment			

**Comment** The table showing the impacts of CRP practices on wildlife species (5.4 – 1) is not grounded in the most recent scientific evidence. Tame grass plantings have not been negative to pheasants, bobwhite quail, grouse, waterfowl, deer, and cottontail rabbits in the southern high plains compared to the intensively cropped fields they replaced. Native plantings may have produced more positive results, but the current table is misleading and should be reworked to reflect the existing scientific literature. Furthermore, existing data do not support the claim that in this same table that windbreaks, shelterbelts, and small fields have provided positive benefits to pheasants, sharptailed grouse, and Neotropical songbirds. We recommend that the DPEIS more rigorously evaluate the impact of trees planted under the CRP on fish and wildlife in the northern and southern plains and that the EBI be modified to limit tree planting on CRP only to species native to a specific area and only when there are clear benefits to soil, water, and wildlife.

**FSA Response** Comment noted. Table 5.4-1 was generated with the most recent data available, however it will be noted that some tame grass plantings do not negatively impact certain upland game species. Discussion on the impacts of woody vegetation on native grasslands have been expanded.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Wildlife

**Comment** The 2nd paragraph defines fragmentation in the context of wildlife habitat but does not mention some of the more extensive and serious causes of fragmentation such as: Conversion of grassland to cropland (on a grassland landscape) or conversion of native forestland to pine plantation (on a forested landscape).

**FSA Response** The PEIS document did not address the multitude of potential causes for fragmentation. We understand there are many causes for fragmentation, however, we did not feel this discussion was necessary for most readers to understand the impact of the action.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	376	Comment Category	Wildlife

**Comment** In the 3rd paragraph, the statement is made that croplands provide critical habitat for a wide variety of wildlife, including hundreds of species considered endangered or threatened. This statement is inaccurate in asserting that these lands provide critical habitat. Rather, landscapes dominated by croplands and other agricultural lands constitute the lands on which many species have historically depended for food, cover and water. These species often have nowhere else to go and must continue to survive on those lands if they are to survive at all. Therefore, it is not the existence of croplands that is critical to these species; rather, it is the integration of wildlife habitat considerations on croplands and other agricultural lands that is important.

Discussion of suites of species (fish/clams, amphibians/reptiles, etc.) does not illuminate agriculture and population sustainability issues; this should be included.

**FSA Response** The statement was clarified in Section 2.2.4.3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Wildlife
Comment	, , , ,	CCRP would be to require only wildlife-beneficia	• •

contour buffer strips, etc. are planted. Neither is there any mention of how succession (a natural process just as erosion is a natural process) changes wildlife habitat over time. Succession can diminish the value of the habitat if litter accumulates at ground level, thereby smothering some plants and limiting diversity as well as restricting wildlife movement just as unmanaged erosion can escalate beyond the tolerable limit to form a gully. In some parts of the United States (where succession works rapidly), management must be applied frequently (every 3-5 years) to continue wildlife benefits while in other places (lower rainfall and/or shorter growing seasons), succession works slower and benefits are best in the absence of frequent disturbance. The CRP should be structured to account for these regional variables and ensure that each CRP contract provides soil, water and wildlife benefits throughout the contract period and not just part of it.

**FSA Response** FSA practice standards are based on NRCS State FOTG standards and in most cases provided significant wildlife benefits. FSA is reviewing enhanced management requirements for new contracts. We are reviewing the impacts as we develop the rules and regulations.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	376	Comment Category	Wildlife

**Comment** Under the Threatened and Endangered Species category, it should be noted that benefits to T and E species (including state-listed species) will only accrue with planning and attention to the kind of habitat planted and how that habitat is maintained throughout the life of the CRP contract. It should also be noted the CRP constitutes an opportunity for agriculture to be proactive and get ahead of the negative aspects of T&E species and the regulatory issues that tend to surface when things go from bad to worse.

**FSA Response** Comment noted. We concur with your statement.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	23	Comment Category	Wildlife

**Comment** The DPEIS should evaluate the impact on fish and wildlife of trees planted on the CRP, particularly on prairies, in the Lake States and the Southeast.

**FSA Response** An in-depth discussion on the impacts of woody vegetation was added in sections 2.2.3, 2.2.4, 5.3, and 5.4. The discussions includes how woody vegetation spread into native grassland areas through: planting of windbreaks and shelterbelts, fire suppression, and as invasive species. Impacts on native grassland ecosystems, and other habitats, and how it has created habitat for non-grassland species, corridors for predators, habitat for woodland raptors

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Wildlife

**Comment** Additional discussion of the benefits to resident wildlife by providing winter cover is warranted

**FSA Response** Discussion of the importance of winter cover to wildlife is expanded in 2.2.4.1.

Farm Service Agency			CONSERVATION RESERVE PROGRAM c Environmental Impact Statement
Tracking Number	376	Comment Category	Wildlife

**Comment** The DPEIS states that haying and grazing of CRP cover during the nesting and brood rearing seasons has had little impact on ground-nesting birds. This statement is misleading. There has been limited research on the impacts of birds from these activities in CRP, but the existing body of scientific literature shows that these activities can severely impact nest success and brood survival if timing and frequency are not considered. It is important that haying or grazing not be conducted during the primary nesting and brood-rearing seasons, and the State Wildlife Agency should be wholly responsible for deciding the exact dates of those seasons (since wildlife are entrusted to the states). Also, no more than one fourth to one third of any CRP field should be hayed or grazed in any one year, and a payment reduction should be required commensurate with the value of the harvested forage, unless the landowner or producer agrees to enhance the existing vegetation to improve its value for wildlife.

**FSA Response** The discussion of the effects having and grazing has on ground-nesting birds have been expanded in section 2.2.4. FSA will involve local officials in the process of developing conservation plans to address managed having and grazing.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Wildlife

**Comment** Further discussion of the beneficial aspects of maintaining CRP lands in association with croplands for wildlife is needed

**FSA Response** Discussion on the impacts of maintenance to wildlife is expanded in section 5.4.

Farm Service Agency		Final Programma	<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Wildlife	
Comment		Endangered Species the benefits of CRP general nagement of that cover in the EBI and plan deve		

**FSA Response** Comment noted. The benefits of implementing vegetative cover conservation practices authorized under CRP to T & E species is currently considered in the conservation planning phase of contract develope and incorporated by NRCS during this process.

Farm Service Agency		Final Programm	<b>CONSERVATION RESERVE PROGRAM</b> natic Environmental Impact Statement
Tracking Number	376	Comment Category	Wildlife
Comment	a serious flaw in how CCRP is implement water benefits (at little to no increased of the flaw in CCRP that leads to missed-op purposes (as in the general sign-up) and	3.2), the dialog misses the absolutely huge po- ted. Any and all CCRP practices could provide cost to the program or landowners) if planted to portunity in relation to wildlife is that there is d NRCS standards and specification for practice date treatment of soil and water needs. This is	wildlife benefits along with soil and to wildlife-beneficial cover. However, no EBI to balance wildlife with other e establishment do not mandate

treatment of wildlife needs as they mandate treatment of soil and water needs. This is an inequity in CCRP that should be corrected, particularly since Congress made wildlife co-equal with other purposes in CRP. Best options include establishing practices (wildlife field borders, center-pivot corner habitat plantings, etc.) specifically to address upland wildlife needs and requiring the use of wildlife-beneficial cover choices in all CCRP plantings.

**FSA Response** The Practices eligible for the continuous signup generally provide benefits to large areas when compared to the acreage on which the practices is implemented. Practices eligible for continuous signup may be implemented on field borders and center-pivot corners if such land is otherwise eligible.

Fa	rm Service Agency	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	376	Comment Category	Wildlife
Comment	provide wildlife benefits is dependent or 2nd statement is misleading in the asse to compete with cattle for food and wat the stand as well as the nesting, brood (starting permitting existing cover to co lasting positive impacts on wildlife habit wildlife-beneficial plants and manageme In some places this means periodic lig	in the 1st statement, it should be noted that when the cover planted and how that cover is manage rtion that upland species that utilize certain cropla er. The more appropriate issue is the effect of liv rearing and winter cover that are essential for wil ntinue) is incorrect and misleading in the assertio at, because this will only be the case if the CRP s ent is applied to ensure wildlife benefits are provident the disking/prescribed burning and in other places ural succession drive the disturbance versus non-	ed during the contract period. The and habitat when they are forced vestock use on plant diversity of dlife survival. The 3rd statement n that this would continue to have tand continues to consist of ded throughout the contract period. this means no disturbance;

**FSA Response** The language in the final has been modified.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Wildlife Based Recreation

**Comment** Documentation on the importance of CRP lands for wildlife production, and recreational opportunities for hunting, viewing, and recreation is needed

**FSA Response** Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative has been expanded.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	132	Comment Category	Wildlife Based Recreation

**Comment** Pheasants Forever supports the discussion of wildlife-based recreation at 2.2.4.2 and 2.3.2.5

**FSA Response** Comment noted.



Tracking Number	31	Comment Category	Acreage
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**Comment** We would like to encourage expanding CRP to 45 million acres

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Final Pr	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	. 189	Comment Category	Economic Impact on Rural Communities	
Comment	The DPEIS fails to account for the benefici	al economic impacts CRP has had on	the rural communities that provide	

**FSA Response** The discussion of job losses in the recreation sector of the economy in Section 5.5.1.1 has been expanded.

increased opportunities for hunting and fishing

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	199	Comment Category	Economic Impact on Rural Communities
Comment	A substantial economic and recreational	contribution is made by upland huntin	a opportunities, that utilize well-established

A substantial economic and recreational contribution is made by upland hunting opportunities, that utilize well-established CRP covers. The DPEIS fails to consider the impact to local economies if haying or grazing by livestock degrades upland bird habitats. Montana alone generates \$33 million in economic activity from upland bird hunting; it is in the interest of Montana sportsman that this consideration be included when deciding management practices of CRP land.

**FSA Response** Comment noted. This comment presumes that haying and grazing are going to seriously degrade pheasant, partridge, and grouse habitat. Haying and grazing on CRP land is required to have in place a conservation plan that explicitly considers breeding birds. These plans postpone haying and grazing until after the breeding season. Additionally, landowners are well aware of the economic potential from hunting leases and will generally seek to further maintain bird habitat to maintain these opportunities.

Farm Service Agency		Conservation Reserve Prog Final Programmatic Environmental Impact Stater	
Tracking Number	103	<b>Comment Category</b>	Economic Impact on Rural Communities

**Comment** Further expansion of the CRP base, from the point of view from our member grain elevators and feed mill, was not welcome news. In this fragile and depressed agricultural economy, we (agribusiness) find ourselves also struggling to survive. A CRP expansion has reduced even further, the sale of ag inputs from our agribusinesses and our grain handle.

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	18	Comment Category	Enrollment

**Comment** I strongly urge you to consider expanding the CRP Program to 45 million acres and continue general sign-up

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	127	Comment Category	Enrollment

**Comment** A target of 45 million acres should be viewed as a realistic and attainable goal

**FSA Response** Comment noted. The CRP acreage has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	52	Comment Category	Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	127	Comment Category	Expansion
Comment	The final EIS should include and evalua initiation	te the expansion of CRP and practices that rein	force New wildlife CRP Buffer

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	113	Comment Category	Expansion

**Comment** These programs should be looked at for expansion and new wildlife practices as CRP buffers

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	371	Comment Category	Expansion

**Comment** CCRP should be expanded and improved for wildlife and other benefits.

**FSA Response** Comment noted. CCRP currently targets highly sensitive environmental areas where the impacts of agriculture or agricultural practices have degraded the cropland and surround areas. The benefits from CCRP for wildlife and other resource areas like soil quality and water quality can be found In Chapter 5 of the PEIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	31	Comment Category	Expansion

**Comment** The final EIS should evaluate expansion options and new wildlife practices as CRP buffers

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	12	Comment Category	Expansion	

**Comment** The final EIS should consider expanding the CRP acreage cap and including new wildlife practices in CCRP and CREP's

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	200	Comment Category	Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	32	Comment Category	Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	30	Comment Category	Expansion
Comment	The final Environmental Impact Statemer CRP buffers	nt (EIS) should evaluate CRP expansion option	ns and new wildlife practices, such as

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	22	Comment Category	Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	193	Comment Category	Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers



Tracking Number 185 Comment Category Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers



Tracking Number 136 Comment Category Expansion

**Comment** Please ensure that the final draft of the EIS carefully considers plans for CRP expansion and novel wildlife practices

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	11	Comment Category	Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	54	Comment Category	Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	139	Comment Category	Expansion

**Comment** We also encourage that options for expanding CRP to at least 45 million acres be evaluated.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	35	Comment Category	Expansion

**Comment** as well as options to expand CRP to at least 45 million acres.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	139	Comment Category	Expansion

**Comment** We support the inclusion of center-pivot corners, wildlife field borders, and allowing light disking for vegetation management on these acres.

**FSA Response** Wildlife field borders are currently allowed under certain conservation practices, like CP15A, and center-pivot corners are allowed if the proposed contract land meets necessary general programmatic criteria but with no additional C/S. Light disking is a maintenance practice and the use of this maintenance practice is based on local NRCS guidelines and the FOTG.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	139	Comment Category	Expansion

**Comment** We support a voluntary public access provision within CRP for hunting and other recreational use.

**FSA Response** Public access is a matter between the owner and/or tenant and the person seeking access. CRP is not authorized to require public access.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemer	
Tracking Number	199	Comment Category	Haying/Grazing

**Comment** If haying and grazing is increased as part of the revised CRP directives then recovery of these two species (Columbian Sharp-tailed Grouse, and Sage Grouse) would be compromised.

**FSA Response** CRP is a conservation program with the primary objectives of improving water quality, reducing erosion and improving soil quality, and enhancing wildlife habitat. Provisions authoring emergency haying and grazing along with the creation of managed haying, grazing, and the harvesting of biomass will be authorized as long as the primary objectives of CRP are not compromised. Currently, for the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed. The features of the required conservation plan establish guidelines for land disturbances that could effect any environmental resources on the CRP land (Section 3.2), like not occurring during the primary nesting season (2-CRP )Rev.3) Amend.20 Par 241).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	139	Comment Category	Haying/Grazing

**Comment** Haying and grazing should be limited within CRP to maintain wildlife, and that provisions for improving wildlife habitat should be incorporated into the program.

**FSA Response** Comment noted. FSA continues to utilize every available program to provide assistance and emergency haying and grazing provides additional feed and forage to producers who have lost their hay stocks and grazing lands due to the natural disasters. Generally, to be approved for emergency haying or grazing under CRP, a county must have suffered at least a 40-percent loss of normal moisture and forage for the preceding four month qualifying period. The Farm Service Agency (FSA) will notify its State Committees that the 40-percent loss criterion no longer applies. State FSA committees may limit the area within the states if conditions do not warrant haying and grazing in all areas. CRP participants who do not own or lease livestock may donate, rent or lease the hay or the haying or grazing privileges. CRP annual rental payments made to participants will be reduced 25 percent to account for the areas hayed or grazed, unless the hay or the haying or grazing privileges are donated. For the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	127	Comment Category	Haying/Grazing

**Comment** The limited use of haying and grazing could be reasonably instituted, if based on a well thought out plan which included wetland protection with Buffers as Protective measures inhibiting erosion and ground water contamination

**FSA Response** CRP is a conservation program with the primary objectives of improving water quality, reducing erosion and improving soil quality, and enhancing wildlife habitat. Provisions authoring emergency haying and grazing along with the creation of managed haying, grazing, and the harvesting of biomass will be authorized as long as the primary objectives of CRP are not compromised. Currently, for the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed. The features of the required conservation plan establish guidelines for land disturbances that could effect any environmental resources on the CRP land (Section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	139	Comment Category	Native Vegetation

**Comment** We strongly support the effort to restore and protect native grasslands through the CRP and associated initiatives. However, we believe that assigning higher points to tree planting will have negative and far reaching impacts on the grassland dependent wildlife of the state, particularly the declining populations of grassland birds.

**FSA Response** Comment noted. FSA will take this comment under consideration when developing the new regulations and procedures.

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	103	Comment Category	Needs

**Comment** We want to encourage your consideration of a proposal that put fewer acres into the CRP but to target the land for use as needed filter strips, buffers and for other environmental purposes.

**FSA Response** Congress has authorized 39.2 million acres of which land is available to enroll acreage under general signup, continuous signup, CREP and farmable wetland program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	32	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statemer	
Tracking Number	30	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	22	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	192	Comment Category	Needs

**Comment** WE NEED regular general CRP sign-ups and CCRP and CREP's

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	52	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	185	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	200	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	11	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	136	Comment Category	Needs

**Comment** We very much need whole-field CRP sign-ups, CREP projects, and the CCRP Program

Farm Service Agency		<b>CONSERVATION RESERVE PROGRAM</b> Final Programmatic Environmental Impact Statement	
Tracking Number	148	Comment Category	Needs
Comment		hould recognize that state resources have been not the financial obligations under CREP shou	

government, rather than the large state match currently required.

**FSA Response** Only one-fifth of the resources are required to be non-federal. Further, some may suggest that reducing the commitment would be unfair to the over 20 states that have already committed its resources to CREP

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	362	Comment Category	Needs

**Comment** We wish to stress the critical need for general sign-up for wildlife in grass and legumes. The need of wildlife practices in the CCRP are lacking and we believe need to be strengthened.

**FSA Response** The commentor provides no detailed information upon which to evaluate the proposed comment.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	12	Comment Category	Needs
Comment	Our members want both regular genera practices	I sign-ups and strong CCRP and CREP Programs,	, which include specific wildlife

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Some of the current authorized CRP practices already specifically target wildlife and wildlife habitat enhancement with most of the authorized conservation practices producing secondary benefits for wildlife (Appendix B). The approved conservation practices authorized under the Cp practice list provide multiple benefits to upland game birds and waterowl, through the implementation of programs like FWP and CREP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	362	Comment Category	Needs
Comment	We cannot stress enough the importance and grazing.	e of implementing provisions for improving wild	life habitat such as limiting haying

**FSA Response** With the interim rule, FSA will be implementing managed having and grazing provision.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	31	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	199	Comment Category	Needs

**Comment** since public tax monies are funding the program, public access to these lands should be a requirement for enrollment in the CRP program or no commercial hunting activities should be allowed. A sense of parody needs to be established.

**FSA Response** Public access is a matter between the owner and/or tenant and the person seeking access. CRP is not authorized to require public access.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statement	
Tracking Number	113	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	362	Comment Category	Needs

**Comment** We believe that a voluntary public access program for hunters should be encouraged.

**FSA Response** Public access is a matter between the owner and/or tenant and the person seeking access. CRP is not authorized to require public access.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	127	Comment Category	Needs	

**Comment** Regular sign-ups are crucial to the continuation of wildlife habitat which includes buffer strips and CREPs

Farm Service Agency		<b>Conservation Reserve Proge</b> Final Programmatic Environmental Impact Statem	
Tracking Number 148		Comment Category	Opposition

**Comment** We do not support mandating states to establish Conservation Reserve Enhancement Program (CREP) areas, as we do not feel this was why the CREP was established. CREP was meant to be voluntary on the part of states, where those states voluntarily identified specific needs in particular areas.

**FSA Response** Comment noted.

Farm Service	Agency	

Tracking Number	76	Comment Category	Support
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**Comment** Please support alternative #3 in the draft CRP EIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	22	Comment Category	Support

**Comment** I strongly support Alternative 3 for the CRP Program

Farm Service Agency			<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	35	Comment Category Sup	port	

**Comment** I strongly support Alternative 3 for the CRP program.

Farm Service Agency

Tracking Number	54	Comment Category	Support
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**Comment** I strongly support Alternative 3 for the CRP program.

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	148	Comment Category	Support

**Comment** NC Farm Bureau strongly supports the proposed alternative described under the DEIS, with special emphasis on the need for General Sign-up opportunities. We do not support the CRP being changed to make eligible only those lands that are currently eligible under the Continuous Sign-up.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	148	Comment Category	Support

**Comment** We support changes to the Farmed Wetlands Program to allow a nationwide program available to all states, rather than a program restricted to certain named states, as is the case now.

**FSA Response** Comment noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	371	Comment Category	Support

**Comment** It is important to keep general signup CRP in existence at near the current level.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	185	Comment Category	Support	

**Comment** I strongly support Alternative 3 for the CRP Program.



Tracking Number 136 Comment Category

Support

**Comment** I strongly support Alternative 3

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	189	Comment Category	Support

**Comment** We support and encourage Alternative 3 in the Draft Programmatic Environmental Impact Statement

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	189	Comment Category	Support

**Comment** After reviewing the DPEIS, we recommend and strongly support Alternative 3

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	193	Comment Category	Support

**Comment** urge you to consider alternative 3 for the CRP program

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	127	Comment Category	Support

**Comment** This letter reflects my grave concern for the support and initiation of Alternative number three for the future of the CRP Program; Pleas strongly consider alternative number three for the continuation of the CRP Program

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	12	Comment Category	Support	

**Comment** We strongly support Alternative 3 for the CRP Program

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	119	Comment Category	Support

Comment I voice the support of our 500+ members for Alternative 3 for the 2002 CRP

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	139	Comment Category	Support
Comment	it is the opinion of the Nebraska Chapter	r of the Wildlife Society that the only acceptable	e choice is Alternative 3 with plans

for continuing general sign-ups, CREPs, and Continuous CRP (CCRP; e.g. buffers) and incorporating changes from the 2002

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	113	Comment Category	Support

**Comment** I strongly support Alternative 3 for the CRP Program

Farm Service Agency			Conservation Reserve Program
Tracking Number	30	Comment Category	Support

**Comment** we strongly support Alternative 3 for the CRP Program

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	200	Comment Category	Support

**Comment** We strongly support Alternative 3 for the CRP Program

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	11	Comment Category	Support	

**Comment** I strongly support Alternative 3 for the CRP Program

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	52	Comment Category	Support	

**Comment** We strongly support Alternative 3 for the CRP Program

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	362	Comment Category	Support

**Comment** We support alternative 3 in the draft DPEIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	32	Comment Category	Support

**Comment** I strongly support Alternative 3 for the CRP Program

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	31	Comment Category	Support

**Comment** We strongly support Alternative 3 for the CRP Program

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	66	Comment Category Support		

**Comment** I'm writing to express my support for the general CRP signups, CCRP buffers and CREP as smart use of federal funding.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	35	Comment Category	Wildlife

**Comment** I would also like to see a voluntary public access program for hunters as well as specific wildlife practices in the CCRP and buffer initiative.

**FSA Response** Public access is a matter between the owner and/or tenant and the person seeking access. CRP is not authorized to require public access.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	35	Comment Category	Wildlife	

**Comment** A general sign-up for wildlife is needed

Farm Service Agency		<b>Conservation Reser</b> Final Programmatic Environmental Impa	
Tracking Number	199	Comment Category Wildlife	

**Comment** A substantial benefit for upland bird and waterfowl in the form of nesting and winter cover has resulted in conjunction with establishing protection from erosion from CRP programs. These enhancements of bird population should receive higher recognition in the proposed document and management considerations should be adjusted accordingly.

**FSA Response** Comment noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Administration
Comment	The CRP signup process is a quagmire of	f unnecessary red-tape. Not only does this al	low for biased USDA employees to

single out certain participants for elimination from the signup, it creates a burden of paperwork that is unnecessary.

**FSA Response** FSA continues to improve the delivery of all of its programs, including CRP, to reduce burdens and increase participation. All eligible landowners are strongly encouraged to seek enrollment/acceptance into the program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	210	Comment Category	Cropping History

**Comment** As an American producer, I appreciate the continuance of the CRP under the new 2002-2007 Farm Bill, but I am in disagreement with the policy that has changed the cropping history provisions

**FSA Response** Comment noted. The 2002 Act provides that the cropping history requirements are 4 out of the 6 years preceding enactment of the legislation.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	210	Comment Category	Cropping History

**Comment** A 4 year cropping requirement creates an unfair burden and obstacle on the conservation minded producer. I recommend this rule be changed

**FSA Response** Comment noted. In accordance with the 2002 Farm Bill the cropping history has been changed from 3 out of 5 years to 4 out of 6 years.

Farm Service Agency		Final Pro	<b>CONSERVATION RESERVE PROGRAM</b> Final Programmatic Environmental Impact Statement	
Tracking Number	219	Comment Category	Economic Impact on Rural Communities	
Comment	CRP has also been good for the economy. What good does it do for the farmers to m lot of soil from blowing and washing away	nove into towns when there isn't eno	n the land in small farming communities. Pugh jobs for everyone now. CRP has saved a	

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	69	Comment Category	Economic Impact on Rural Communities

**Comment** positive financial affects to the economy of rural states in the form of hunting revenue.

**FSA Response** Comment noted. See Section 5.5.2.1 dealing with the loss in recreational opportunities under the No Program alternative, which has been expanded. In particular note the references: Young and Osborn, Feather et al, and FSA 1997.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	3	Comment Category	Economic Impact on Rural Communities

**Comment** Also I don't think it is right that we are charged 25% of the CRP payment when it has been mandated to us that it must be maintained every 3 years. If I had it to do over I would not enroll a single acre in the CRP program and right now I advocating that no one enroll their land in the program.

**FSA Response** Comment noted. Legislation requires rental payment reduction commesurate with the economic value when CRP lands are hayed or grazed under emergency provisions.

Fa	orm Service Agency	Final Pr	Conservation Reserve Program ogrammatic Environmental Impact Statement
Tracking Number	105	Comment Category	Economic Impact on Rural Communities
Comment	One has only to look at the small town m grain cooperative. Our health care is nea farm.		

**FSA Response** Comment noted. Rural communities in the United States, and especially those that are agriculture dependent have undergone a general decline in population, employment level and income over the past 20 to 30 years. As noted in Sections 2.3.1.2 and 5.6.3 of the draft PEIS, these losses are attributable to a number of factors are not necessarily related to the CRP program. Among these are shifts in the international commodities market, changing demographic and residency patterns and general transformation of the U.S. economy. To the extent that CRP participation affects the general social and economic climate of rural communities, any associated impacts are discussed in Sections 5.5 and 5.6 of the draft PEIS. The CRP has a 25% limit on cropland enrolled to limit the impact of the CRP on rural economies.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	145	<b>Comment Category</b>	Economic Impact on Rural Communities

**Comment** Overall, CRP is providing a reliable income to farmers trying to farm high-risk, marginal lands.

**FSA Response** Comment noted.

Farm Service Agency

**Tracking Number** 

86

**Comment Category** Economic Impact on Rural Communities

**Comment** Studies provided to the Secretary of Agriculture are not complete enough nor do they have enough data to conclude adverse effects of CRP on the local economy. There is not enough information on the impact of CRP on the producers, the community in general, the agricultural community, the job market, agricultural product prices and CRP in general to deduce trends or hardships on local communities due to the CRP program. Many of the studies cited are geared toward big business and do not include all the factors involved in a full economic community. Factors such as product prices, non agricultural impact, commodities, foreign markets, non agricultural community gains/losses, drought, land prices, taxes, state economies, living standards and big business are not taken fully into account. Most CRP moneys are deposited directly into the local community. The CRP program is a multifaceted entity that exists in a multitude of layers whose impact cannot be easily determined by several small studies in isolated communities with too many variables that are not taken into account. Until subsequent independent studies are completed on the subject of CRP financial and community impact, there should not be decisions made based on estimation of economic community adversity in local communities. The bottom line is that more independent studies need to be done which include all aspects of the CRP program and its impact on all of the Community.

**FSA Response** NEPA requires that a determination of potential impact be based on the best available data for any given resource area. To the extent that information is available and can be successfully analyzed within the scope and parameters defined for the draft PEIS, estimates of the potential sources of impact to the local economies and communities have been made. However, the need for additional and more detailed information expressed by the comment is recognized. The DPEIS indicates the need for additional detailed studies to be conducted in Sections 5.5 and 5.6, as well as in other sections of the report. The 2002 Act also recognizes the need for additional information, mandating a study of CRP's impacts on rural communities.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	639	Comment Category	Economic Impact on Rural Communities

**Comment** it is not the government's position or purpose to be in competition with local farmers and ranchers. Right now they pay \$5 over the going market rate for cash rent, supposedly to allow the farmers to have the cash to spray the weeds.

**FSA Response** Maintenance of the conservation cover is imperative to realizing the benefits of CRP enrollment over the life of the contract. The producer is receiving a CRP that is a rental rate equivalent plus an allowance for maintenance of the CRP land. The payment of the maintenance fee is to cover the owner's costs that he would not have to incur if it were rented to a tenant.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	639	Comment Category	Economic Impact on Rural Communities

**Comment** We hear the USDA, our so-called representatives, spouting on about how they are out to help the rural communities. It speeds-up the depletion of the rural areas, as most of the larger scale enrollees are retired farmers who contribute a dwindling amount to the community. Especially when the head south for most of the year. It just down not do anything positive except for those in isolated areas that have been inundated with adverse weather. Then it is appropriate.

**FSA Response** Comment noted. As discussed in Sections 2.3.1.2 and 5.6.3 of the draft PEIS the general decline of rural communities in the United States is attributable to a number of factors not necessarily related to the CRP program. The effects of CRP program participation on local communities are generally mixed (see section 5.6.2 of the draft PEIS). However, CRP does represent a benefit to the structure and viability of the community in that it creates an incentive for farmers to engage in environmentally beneficial practices that also support the general health and well-being of the larger community as a whole. CRP participation by "retirement" and "residential lifestyle farmers" is addressed in Section 2.3.1 of the draft PEIS. Also, in consideration of potential adverse impacts, legislation limits enrollment in a county to 25 percent of the cropland in the county.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	639	Comment Category	Economic Impact on Rural Communities

**Comment** it is completely ridiculous that you have to give back the entire amount given, I mean earned. You have a young guy trying to start out, if he's buying extra fuel, chemicals, fertilizer, maybe hiring another guy. He's contributing to the economy of that area. That is way more productive and beneficial than having the government pay someone a flat rent. That guy will still get the rent, but he'll generate a lot more business if that land is in production.

**FSA Response** The effect of the of CRP enrollments on the local economy varies. The money can be received by an existing farmer who uses the payments to invest in capital equipment, or purchase additional inputs for cropland still in production. It may be spent as part of the family income in local stores. It may be spent by a retiree living away from the community. Adverse impacts can affect the agricultural business sector more than other business sectors. See the discussion on employment changes in the agricultural sector in Section 5.5.1.1.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	640	Comment Category	Economic Impact on Rural Communities

**Comment** I have no problem with the CRP program. I think it's good for stopping erosion and for habitat for wildlife. My comment is that if taxpayers are to pay for farmers not to farm, I think it would be in everyone's interest to have sportsmen hunt on the land. I know people who have CRP land and charge for hunting. I think that's double-dipping.

**FSA Response** Comment noted. The public is not guaranteed access to land under a CRP-1 contract. A landowner may permit a fisherman or hunter to access his land, and he may or may not charge for use of the land. The issue of public access has been raised regarding benefit measurement and the population affected. The contention is, that if a hunter or fisherman is to enjoy all the recreational benefits of improved wildlife habitat, he must have access to the land/waterbody where the wildlife is nesting or residing. This is not necessary, however, for a sportsman to benefit. Some of the benefits enjoyed by hunters are due to the existence of wildlife breeding, nesting and foraging grounds, particularly if the animal is migratory. Other benefits are denied the sportsman who cannot access the property. Enrollment in CRP is done under a contract. Property rights are not being affected, although use is. Also, allowing public access would expose the landowner to liability, if someone is injured on his land while recreating.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	638	Comment Category	Economic Impact on Rural Communities

**Comment** CRP is very hard on rural communities. The lack of business shuts down the local industry. The original sign-up was for HEL, but now fertile land goes in and all anyone looks at are the points.

**FSA Response** The comment is noted. The CRP limits the amount of cropland that can be enrolled in a county to 25% in order to reduce the potential negative impacts on local economies. Rural communities in the United States, and especially those that are agriculture dependent have undergone a general decline in population, employment level and income over the past 20 to 30 years. As noted in Sections 2.3.1.2 and 5.6.3 of the draft PEIS, these losses are attributable to a number of factors are not necessarily related to the CRP program. Among these are shifts in the international commodities market, changing demographic and residency patterns and general transformation of the U.S. economy. To the extent that CRP participation affects the general social and economic climate of rural communities, any associated impacts are discussed in Sections 5.5 and 5.6 of the draft PEIS.

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	29	Comment Category	Enrollment

**Comment** CRP does not give the financial incentives the other buffer programs do. The incentive seems lopsided when you realize the enrollee may need to fine-tune their farming skills to attain the completed practice ... Allow the incentive to those who can give the best result for the dollar spent.

**FSA Response** Comment noted. CCC intends to enroll the most environmentally sensitive areas to obtain the greatest nationwide benefits. Conservation programs provides adequate incentives to entice landowners and operators to participate.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	636	Comment Category	Enrollment

**Comment** At one time I had 6000 acres of CRP land within 4 miles of my farm. It does nothing for the community. I agree with the program funding filter strips and waterways and some of this nasty, severe, hilly ground that should be in CRP, but I don't agree that the flat land should been the program just because that ground is highly erodible. It has been shown by the Soil Conservation Service that be minimal till or no till that we can keep the soil washing and erosion to a minimum.

**FSA Response** Comment noted. The CRP provides landowners and operators an option that provides economic benefits while addressing environmental issues of the State and Nation. Producers may choose to retire land planted to grass or trees for a 10 to 15 year period, receive stable income through annual rental payments and provide improved water quality, sediment control, and enhanced wildlife benefits, a win-win scenario for everyone.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	188	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	174	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	175	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	176	Comment Category	Expansion

**Comment** Please consider CCRP or buffer strips around the center pivot corners and possible undisturbed wildlife fields.

**FSA Response** Wildlife field borders are currently allowed under certain conservation practices, like CP15A, and center-pivot corners are allowed if the proposed contract land meets necessary general programmatic criteria but with no additional C/S.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	176	Comment Category	Expansion

**Comment** Should be a goal to find ways to increase the CRP acreage to over 45 million acres.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	177	Comment Category	Expansion

**Comment** I am concerned about the relatively limited number of upland acres currently eligible for restoration in the Farmable Wetlands Program.

**FSA Response** Comment noted. The expansion of the FWP nationwide increasing the opportunity for eligible upland acres to be enrolled under this program if all land eligibility requirements are met. The primary FWP buffer limits are statutory in nature and not subject to modification by regulation.

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	177	Comment Category	Expansion

**Comment** I recommend that the CRP be targeted for areas with significant numbers of existing wetlands to maximize the effectiveness of the program in restoring wetland-grassland complexes and in benefiting upland nesting migratory birds associated with, or dependant, upon wetlands.

**FSA Response** Wetland systems acreage enrollment will remain a program priority. Wetland-eligible enrollment will soon be better supported through a year-round continuous signup instead of intermittent signups.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	15	Comment Category	Expansion

**Comment** Call for a voluntary public access program for hunters.

**FSA Response** Public access is a matter between the owner and/or tenant and the person seeking access. CRP is not authorized to require public access.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	102	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	194	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	192	Comment Category	Expansion

**Comment** I would be in favor of expanding CRP to at least 45 million acres.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million areas and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	190	Comment Category	Expansion

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices can and do serve as buffers for wildlife yet don't explicitly state such, like CP15 (See NRCS National Conservation Planning Handbook and FOTG for more details). The CRP acreage cap has been established as 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	15	Comment Category	Expansion

**Comment** Encourage the option of expanding CRP to at least 45 million acres,

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage capin accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	27	Comment Category	Expansion

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices can and do serve as buffers for wildlife yet don't explicitly state such, like CP15A (See NRCS National Conservation Planning Handbook and FOTG for more details). The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap n accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	15	Comment Category	Expansion

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	110	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	101	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	16	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	181	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	43	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Proc Final Programmatic Environmental Impact State	
Tracking Number	202	Comment Category	Expansion

**Comment** The CRP Program needs to be expanded and rental rates increased as land rental rates are higher than renting under the CRP program

**FSA Response** Under and CCRP and CREP, the effective rental rates are higher than the SRR due to signing and practice incentive payments. Enrollment in CRP is voluntary. Each producer considers the economic costs and benefits of enrolling land in the program. See Table 2.3-9. Also refer to Section 2.3.2.3.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	207	Comment Category	Expansion



Tracking Number 207 Comment Category Expansion

**Comment** I would also like to encourage the options of expanding CRP to at least 45 million acres

**FSA Response** Comment noted. The CRP acreage has been expanded to 39.2 million acres and is limited to this acreage cap, in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	208	Comment Category	Expansion

**Comment** I would encourage you to expand the program not reduce it

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	124	Comment Category	Expansion	

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	39	Comment Category	Expansion

**Comment** I strongly support the Conservation Reserve Program. In fact the program needs to expand acres in more environmentally sensitive areas.

**FSA Response** Comment noted. CCRP and CREP currently target highly environmentally sensitive croplands affected by agriculture and agricultural production practices.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	64	Comment Category	Expansion

**Comment** I would ask that you consider expanding CRP to at least 45 million acres.

**FSA Response** Comment noted. The CRP acreage has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	64	Comment Category	Expansion

**Comment** I believe that any alternative must include center-pivot corners, wildlife field borders, and allow for light disking for vegetation management.

**FSA Response** Wildlife field borders are currently allowed under certain conservation practices, like CP15A, and center-pivot corners are allowed if the proposed contract land meets necessary general programmatic criteria but with no additional C/S. Light disking is a maintenance practice and the use of this maintenance practice is based on local NRCS guidelines and the FOTG.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	19	Comment Category	Expansion

**Comment** We need to expand CRP to 45 million acres.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	38	Comment Category	Expansion

**Comment** I would encourage that options expanding CRP to at least 45 million acres be evaluated.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	10	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	59	Comment Category	Expansion

**Comment** The CRP program should be expanded to at least 45 million acres of undisturbed acreage and it should be managed for wildlife preservation. They need to include center-pivot corners and wildlife field borders.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill. Center pivot corners are authorized on CRP land if land meets general eligibility requirements but at no additional C/S. Wildlife field borders are allowed under certain practices, such as CP15A.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	69	Comment Category	Expansion

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers. CRP should be expanded to a minimum of 45 million acres.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices can and do serve as buffers for wildlife yet don't explicitly state such, like CP15A (See NRCS National Conservation Planning Handbook and FOTG for more details). The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	17	Comment Category	Expansion

**Comment** I call for added CRP acreage up to 45 million acres, and I feel that this should be evaluated now before it is too late.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	14	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	19	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	131	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	130	Comment Category	Expansion	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	137	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	146	Comment Category	Expansion

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	33	Comment Category	Expansion	

**Comment** and expanding the CRP to at least 45 million acres.

**FSA Response** Comment noted. The CRP acreage cap has been expanded to 39.2 million acres and is limited to this acreage cap in accordance with the 2002 Farm Bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	167	Comment Category	Expansion	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	379	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	151	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	166	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	133	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	147	Comment Category	Expansion

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	140	Comment Category	Expansion

**Comment** Please have the final EIS evaluate CRP expansion options and include new wildlife practices as CRP buffers.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	111	Comment Category	Expansion

Farm Service Agency		Conservation Reserve Final Programmatic Environmental Impact	
Tracking Number	33	Comment Category	Haying/Grazing

**Comment** I understand the efforts allowed to hay and graze existing CRP acres, but I hope provisions will be considered t to help manage those acres taken by grazing while maintaining it for wildlife habitat.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	207	Comment Category	Haying/Grazing

**Comment** haying and grazing should be limited and include provisions for improving wildlife habitat

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	38	Comment Category Hay	ying/Grazing

**Comment** I also feel that haying and grazing should be limited and include provisions for improving wildlife habitat.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	190	Comment Category	Haying/Grazing

**Comment** Haying and grazing should be limited to have minimal impact on wildlife.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	59	Comment Category	Haying/Grazing

**Comment** At the same time haying and grazing should be limited.

**FSA Response** Currently, FSA continues to utilize every available program to provide assistance and emergency haying and grazing provides additional feed and forage to producers who have lost their hay stocks and grazing lands due to the natural disasters. Generally, to be approved for emergency haying or grazing under CRP, a county must have suffered at least a 40-percent loss of normal moisture and forage for the preceding four month qualifying period. The Farm Service Agency (FSA) will notify its State Committees that the 40-percent loss criterion no longer applies. State FSA committees may limit the area within the states if conditions do not warrant haying and grazing in all areas. CRP participants who do not own or lease livestock may donate, rent or lease the hay or the haying or grazing privileges. CRP annual rental payments made to participants will be reduced 25 percent to account for the areas hayed or grazed, unless the hay or the haying or grazing privileges are donated. For the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	120	Comment Category	Haying/Grazing

**Comment** any grazing of harvesting of hay should only be allowed if it protects other values.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	5	Comment Category	Haying/Grazing	

**Comment** The only problem I know of is having the CRP protection waived when a farm "Crisis" Drought etc. Occurs. If I cannot count on it to be a constant conservation effort, I am embarrassed to promote it .

**FSA Response** Comment noted. FSA continues to utilize every available program to provide assistance and emergency haying and grazing provides additional feed and forage to producers who have lost their hay stocks and grazing lands due to the natural disasters. Generally, to be approved for emergency haying or grazing under CRP, a county must have suffered at least a 40-percent loss of normal moisture and forage for the preceding four month qualifying period. The Farm Service Agency (FSA) will notify its State Committees that the 40-percent loss criterion no longer applies. State FSA committees may limit the area within the states if conditions do not warrant haying and grazing in all areas. CRP participants who do not own or lease livestock may donate, rent or lease the hay or the haying or grazing privileges. CRP annual rental payments made to participants will be reduced 25 percent to account for the areas hayed or grazed, unless the hay or the haying or grazing privileges are donated. For the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	48	Comment Category	Haying/Grazing

**Comment** Any grazing of harvesting of hay should only be allowed if it protects other values.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	105	Comment Category	Haying/Grazing

**Comment** I've just read where this CRP hay will not hit the open market. What do you think that has done to the hay market? Recent comments on the radio state that hay prices will now fall 30% due to the influx of hay. I guess that's great unless you're trying to sell hay or custom haying is your business. We were told that CRP was not to be considered a hay reserve. That was not it's intention. Figure the cost of the residue on those fields where hay was removed, and it will be tons of compost that was not placed on the land. It makes the cost of haying staggering let alone the impact on the wildlife environment.

**FSA Response** On a national level, hay users could benefit from the reduction in hay price, offsetting the adverse impact of additional hay supply on non-CRP enrolled producers. On a local level, hay purchasers would also benefit. For purchasers, however, hay is one input used to produce a product. For sellers, it can be their primary source of income, and the effect of a price change could be more adverse and not fully offset by the community benefit. Regarding the disruption to wildlife, see Section 5.3.3.1 and Section 5.3.3.2.

Farm Service Agency		<b>CONSERVATION RESERVE PROGRAM</b> Final Programmatic Environmental Impact Statement	
Tracking Number	50	Comment Category	Haying/Grazing

**Comment** The bailing of CRP ground should be limited and include provisions for improving wildlife habitat if allowed

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	108	Comment Category	Haying/Grazing

**Comment** People from Southern PA own and we can cut and use the hay for no charge, just to keep it looking good. If the government pays \$35 dollars an acre for Conservation Reserve. We are going to not have enough land to support our cattle. WE thing the farm bill was suppose to help us. The land they reserve is land that is only used for hay anyway.

**FSA Response** Enrollment in CRP is voluntary. Each producer considers the economic costs and benefits of enrolling land in the program. See Table 2.3-9.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	192	Comment Category	Haying/Grazing

**Comment** And believe that grazing and haying options should be limited.

**FSA Response** CRP is a conservation program with the primary objectives of improving water quality, reducing erosion and improving soil quality, and enhancing wildlife habitat. Provisions authoring emergency haying and grazing along with the creation of managed haying, grazing, and the harvesting of biomass will be authorized as long as the primary objectives of CRP are not compromised. The features of the required conservation plan establish guidelines for land disturbances that could effect any environmental resources on the CRP land (Section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	57	Comment Category	Haying/Grazing

**Comment** Any grazing of harvesting of hay should only be allowed if it protects other values.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	42	Comment Category	Haying/Grazing

**Comment** Any grazing of harvesting of hay should only be allowed if it protects other values.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	15	Comment Category	Haying/Grazing

**Comment** Suggest that haying and grazing should be limited.

**FSA Response** FSA continues to utilize every available program to provide assistance and emergency haying and grazing provides additional feed and forage to producers who have lost their hay stocks and grazing lands due to the natural disasters. Generally, to be approved for emergency haying or grazing under CRP, a county must have suffered at least a 40-percent loss of normal moisture and forage for the preceding four month qualifying period. The Farm Service Agency (FSA) will notify its State Committees that the 40-percent loss criterion no longer applies. State FSA committees may limit the area within the states if conditions do not warrant haying and grazing privileges. CRP participants who do not own or lease livestock may donate, rent or lease the hay or the haying or grazing privileges. CRP annual rental payments made to participants will be reduced 25 percent to account for the areas hayed or grazed, unless the hay or the haying or grazing privileges are donated. For the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed. The features of the required conservation plan establish guidelines for land disturbances that could disturb environmental resources on the CRP land (Section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	4	Comment Category	Haying/Grazing

**Comment** If the government pays \$35 dollars an acre for Conservation Reserve. We are going to not have enough land to support our cattle. We think the farm bill was suppose to help us. The land they reserve is land that is only used for hay anyway. People think that the Conservation Reserve is a Big waste of Taxpayers money.

**FSA Response** Comment noted. Under the Proposed Action, grazing is permitted at a reduced CRP rental rate.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	128	Comment Category	Haying/Grazing

**Comment** It has hurt the hay producers in our area as it takes money out of their pockets. A producer shouldn't be able to sell his CRP hay if he puts up himself as this is double dipping with the government which is illegal I do believe. All this CRP program is doing is making the farmer and rancher more dependent on the government.

**FSA Response** CRP rental rates are reduced for those who produce hay on the enrolled land. On a national level, hay users could benefit from the reduction in hay price, offsetting the adverse impact of additional hay supply on non-CRP enrolled producers. On a local level, hay purchasers would also benefit. For purchasers, however, hay is one input used to produce a product. For sellers, it can be their primary source of income, and the effect of a price change could be more adverse and not fully offset by the community benefit.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	204	Comment Category	Haying/Grazing

**Comment** I feel if somebody has signed-up land to receive payments under CRP they should not under any circumstances be allowed to graze or hay that property

**FSA Response** CRP participants who do not own or lease livestock may donate, rent or lease the hay or the haying or grazing privileges. CRP annual rental payments made to participants will be reduced 25 percent to account for the areas hayed or grazed, unless the hay or the haying or grazing privileges are donated.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	644	Comment Category	Haying/Grazing

I have about 200 acres in CRP and I have used it for haying and grazing. And I think that it has been when it is needed. I Comment think this year, on the haying aspect' it maybe was turned loose too guick. The grazing was fine, but the haying has hurt producers that are raising hay and selling it. I think it has lowered the commodity price of hay. I've used the hay for my own stock, and that's fine, but when you but it in the market, I don't know if that's good or not.

**FSA Response** CRP rental rates are reduced for those who produce hay on the enrolled land. On a national level, hay users could benefit from the reduction in hay price, offsetting the adverse impact of additional hay supply on non-CRP enrolled producers. On a local level, hay purchasers would also benefit. For purchasers, however, hay is one input used to produce a product. For sellers, it can be their primary source of income, and the effect of a price change could be more adverse and not fully offset by the community benefit

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	134	Comment Category	Haying/Grazing

**Comment** The haying, grazing, and biomass harvest on CRP lands could have a very detrimental impact on the benefits provided by ground nesting birds.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	643	Comment Category	Haying/Grazing
Comment	I am totally against CRP land being put u	p for hay and being sold. It's ruining my ha	y market. I try to sell and I don't think

**FSA Response** CRP rental rates are reduced for those who produce hay on the enrolled land. On a national level, hay users could benefit from the reduction in hay price, offsetting the adverse impact of additional hay supply on non-CRP enrolled producers. On a local level, hay purchasers would also benefit. For purchasers, however, hay is one input used to produce a product. For sellers, it can be their primary source of income, and the effect of a price change could be more adverse and not fully offset by the community benefit

it's right.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	3	Comment Category	Haying/Grazing

**Comment** If we were able to maintain it (CRP lands) through the use of haying and grazing both the local economy and CRP would benefit. My own personal experiences show that the CRP land that has been grazed or hayed has a healthier and better stand of grasses than the CRP that has other types of maintenance.

**FSA Response** Comment noted. Although statute currently stipulates that CRP may not be harvested or grazed except at the discretion of the DAFP, emergency haying and gazing provisions were reached as a compromise to balance the needs of producers with those of the environmental community.

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	377	Comment Category Haying/Grazir	

**Comment** Because of the many acres of land in the CRP program, grassland for grazing is difficult to obtain. It is also difficult for new and/or young farmers to find land that they can purchase and farm or graze. We purchased a farm enrolled in the CRP program this spring with the idea of using this as grassland in five years when the current contract runs out. We would like to begin using the ground for grazing now, but the cost of having to pay back all previous payments plus interest makes in financially impossible to do this. By leaving this marginal farmland in grass for cattle, no additional government payments would be needed. Erosion control and wildlife habitat would remain much the same as it is now with the farm enrolled in CRP. We suggest that future CRP rules allow land owners who purchase land already enrolled in the CRP to be able to take this land out of the program with no penalty if they agree to use it for grazing. This would still accomplish the purposes of the program, while allowing new and young farmers an opportunity to expand their operations and make a living.

**FSA Response** The comment has been noted and has been considered out of scope for this PEIS. The future rules and policy of the program have yet to be determined and are beyond the scope of this PEIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	173	Comment Category	Haying/Grazing
Comment	I also recommend that CRP lands be car of natural resource benefits. Any grazing be allowed if it protects other values.		

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statemer	
Tracking Number	77	Comment Category	Haying/Grazing

**Comment** Haying and grazing should not be part of these provisions to increase habitat. If people want to hay and graze they should plant down areas to do this in not take advantage of a government program.

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Statem	
Tracking Number	75	Comment Category	Haying/Grazing

**Comment** Any grazing and harvesting of hay should only be allowed if it protects other values. Management activities to maintain habitat quality should be required to the extent that they are paid for by public funds.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	176	Comment Category	Haying/Grazing

**Comment** On these established CRP acres having and grazing should only be allowed on extreme cases, (drought conditions).

**FSA Response** FSA continues to utilize every available program to provide assistance and emergency haying and grazing provides additional feed and forage to producers who have lost their hay stocks and grazing lands due to the natural disasters. Generally, to be approved for emergency haying or grazing under CRP, a county must have suffered at least a 40-percent loss of normal moisture and forage for the preceding four month qualifying period. The Farm Service Agency (FSA) will notify its State Committees that the 40-percent loss criterion no longer applies. State FSA committees may limit the area within the states if conditions do not warrant haying and grazing in all areas. CRP participants who do not own or lease livestock may donate, rent or lease the hay or the haying or grazing privileges. CRP annual rental payments made to participants will be reduced 25 percent to account for the areas hayed or grazed, unless the hay or the haying or grazing privileges are donated. For the welfare of wildlife, at least 25 percent of the CRP contract acreage must be left ungrazed and 50 percent unhayed.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	50	Comment Category	Hunting

**Comment** Public hunting access to CRP ground similar to our "walk-in" hunting acres in South Dakota may make the CRP Program more tolerable to John Doe taxpayer. You may even increase the compensation given to the landowner by doing so

**FSA Response** In accordance with CRP Notice 380, CRP participants may lease hunting rights, charge fees for access to hunters, or conduct other similar hunting operations on CRP acreage if this activity occurs during the normal hunting season for the pursuit of game that is normal to the area. Hunting must be conducted consistent with Federal and State laws and bag limits for the appropriate game species. The landowner still retains the rights to the land even though it is enrolled under CRP and therefore has the right to allow of deny access to the land as they see fit as long it is in accordance with all CRP and State regulations and guidelines pertaining to land owners rights and responsibilities.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	206	Comment Category	Irrigation

**Comment** CRP is of no value to an irrigated operation

**FSA Response** Irrigated land rents are not paid because of the conflict with different states' water rights and usage laws. Irrigated rents are provided by the payments of signing and practice incentive payments under CCRP and CREP. The CRP objective has been to preserve water quality, not water quantity. The effect has been that there is an inequitable regional distribution of CRP, since most of the irrigated land is located in the western and southwestern United States. The underlying assumption of the CRP is that agricultural production creates runoff that leads to sedimentation and nonpoint source pollution, and loss of soil productivity through erosion. To focus on water quantity and water quality, land that is irrigated should be retired since irrigated land tends to be in areas with limited water resources and heavy agricultural water use (primarily states in the west and southwest). Conservation of water would serve the purpose of not only preserving the water supply, but maintaining in-stream flows that benefit aquatic life. For instance, the focus of the CREP program in Oregon is to restore habitats for salmon and trout, federally listed as threatened or endangered species. The CREP program in Washington is aimed at restoring salmon habitat. Only dryland cash and cash equivalent rental rates are paid, whether the land is irrigated or not. Since the federal government cannot interfere with state water right law, the state must purchase the rights if they are to be retired and used in-stream. Only Oregon is doing this, and only for two year periods. Thus, the water rights are being purchased for a period shorter than the duration of the CREP contract.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	206	Comment Category	Land Ownership

**Comment** CRP destroys young peoples hope of ever owning land

**FSA Response** Comment noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	204	Comment Category	Land Ownership

**Comment** I feel that in order to enroll into CRP a landowner should at least reside in that state or better yet in the county

**FSA Response** Comment noted. There are no landowner residency requirements to enroll in CRP only land eligibility criteria that must be met.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemer	
Tracking Number	642	Comment Category	Maintenance

**Comment** I think the CRP would be all right if they made the farmers control the weeds. I'm a farmer raising crops right alongside CRP fields. The CRP fields get 6 feet high with weeds. There are fields that have not been touched in 6-7 years. It's a big rip-off. I personally think they should be made to control their weeds before they get paid.

**FSA Response** The PEIS has been expanded to include a more detailed discussion on producer/landowner's responsibilities when performing maintenance on CRP land (Section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	636	Comment Category	Maintenance

**Comment** I have a CRP farm west of me that for 2 years never cut any weeds, never took care of the thistles. Now they blew onto my fields and now I have a thistle problem.

**FSA Response** The PEIS has been expanded to provide a more detailed discussion on producer maintenance obligations when enrolled in CRP (Section 3.2).

Farm Service Agency		Final Programm	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	168	Comment Category	Maintenance	
Comment	Some contracts are working as planned a some private landowners enrolled in the p	am is considered, a through field examination nd others are not. The maintenance of these program. Field inspections are not keeping up	acres is not being taken seriously by with the current program	

and many acres are not meeting the contract specifications. Noxious weeds are being allowed to propagate even though the contract specifically addresses this issue with a maintenance fee and the threat of reduced payments or termination of contract. The enforcement of these specifications is not being met due to a lack of field inspectors and the vast amount of enrolled acres. Although some attempts are made to gain compliance with the agreed upon contract through letters from local FSA offices, there is no real follow-up to determine if the problem has been solved. This is labor intensive, but should be addressed before allowing more enrollment in the Conservation Reserve Program.

**FSA Response** The PEIS has been expanded to include the discussion on producer maintenance requirements on CRP contracted land in Section 3.2.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	42	Comment Category	Maintenance

**Comment** Management activities to maintain habitat quality should be required to the extent that they are paid for by public funds.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	120	Comment Category	Maintenance

**Comment** Management activities to maintain habitat quality should be required to the extent that they are paid for by public funds.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency			<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	48	Comment Category	Maintenance	

**Comment** Management activities to maintain habitat quality should be required to the extent that they are paid for by public funds.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statement	
Tracking Number	105	Comment Category	Maintenance

**Comment** 85% of the land area in this portion of the county is now enrolled in the CRP program. We have noxious weed problems. We are caught between an environmental concern and proper management technique.

**FSA Response** Maintenance practices and measures are determined at the state level, and are written into the conservation plan that the landowner enters in to when his or her land is enrolled into CRP (refer to section 3.2).

Farm Service Agency		Conservation Reserve Final Programmatic Environmental Impact	
Tracking Number	105	Comment Category	Maintenance

**Comment** Legumes are a concern. Case in point: A producer has noxious weeds on his CRP; clipping doesn't help; spraying is the alternative; according to his contract he has to maintain a certain % of legumes on the field. There are now cases where 100% of tracts should be sprayed, but if they are sprayed, they will damage the legume required to be on the tract. It's a double standard. Does the \$5 management fee to the producer cover the cost of this expense? NO!

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Prograt</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	223	Comment Category	Maintenance
0			

**Comment** As a program to preserve land for future generations CRP may have its place, however, the manner in which the program is being administered is defeating that very purpose. More particularly, there has been little to no management of weeds. Without weed control, land that is in CRP has not only contaminated itself, but also the surrounding land for at least a ten-mile radius.

**FSA Response** The PEIS has been expanded to include a more detailed discussion on producer/landowner's responsibilities when performing maintenance on CRP land (Section 3.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	173	Comment Category	Maintenance

**Comment** Management activities to maintain habitat quality should be required to the extent that they are paid for by public funds.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	120	Comment Category	Monitoring

**Comment** Finally, I believe that sufficient funds should be invested to monitor the environmental benefits of CRP so that Congress can be informed of the important benefits provide by the program.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	57	Comment Category Monitoring	1

**Comment** Management activities to maintain habitat quality should be required to the extent that they are paid for by public funds.

**FSA Response** Comment noted. CRP participants agree to maintain the conservation practices for the duration of the contract. The annual payments include a maintenance payment.



Tracking Number 42

**Comment Category** 

Monitoring

**Comment** I believe that sufficient funds should be invested to monitor the environmental benefits of CRP so that Congress can be informed of the important benefits provided by the program.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	173	Comment Category	Monitoring

**Comment** Finally, I believe that sufficient funds should be invested to monitor the environmental benefits of CRP so that Congress can be informed of the important benefits provide by the program.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	211	Comment Category	Monitoring

**Comment** You should also invest a portion of funds to monitor the results and show Congress the program's value

**FSA Response** Comment noted. The Secretary is required, under the RCA 1977, to provide a periodic report to Congress that describes the condition of private lands. This report discusses the effectiveness of USDA programs in obtaining their objectives. The next report is to be delivered in 2005.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	48	Comment Category	Monitoring

**Comment** I believe that sufficient funds should be invested to monitor the environmental benefits of CRP so that Congress can be informed of the important benefits provided by the program.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	57	Comment Category	Monitoring

**Comment** I believe that sufficient funds should be invested to monitor the environmental benefits of CRP so that Congress can be informed of the important benefits provided by the program.

**FSA Response** Comment noted. The is currently no statutory authority to provide funds for monitoring CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	361	Comment Category	Native Vegetation

**Comment** Proposals for planting native grasses and forbs should receive the highest ranks. Exotic grasses, while better than trees also pose a grave threat to biodiversity.

**FSA Response** Discussion in Section 2.2.3 is expanded to include instances where woody vegetation is considered invasive and/or exotic, and the fact that many times, trees planted in certain areas are4 not well suited for the area.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	228	Comment Category	Native Vegetation

**Comment** The site should dictate what trees to plant and what cultural techniques are best suited for that particular site and that particular species for the long term benefit of water quality and wildlife habitat.

**FSA Response** Comment noted. See section 3.2 of the PEIS for further discussion on pre CRP-1 requirements pertaining to vegetative species selection prior to planting.

Farm Service Agency		Final Programma	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	15	Comment Category	Native Vegetation	

**Comment** Suggest provisions be included to change present pastureland to native grass improving wildlife habitat.

**FSA Response** Comment noted. The changing of provisions associated with land use classifications such as pastureland is considered out of scope for the PEIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	151	Comment Category	Needs

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	224	Comment Category	Needs

**Comment** If the CRP program is going to be reimplemented, the USDA needs to actually enforce the weed control provisions or implement harsher regulations for weed control. For instance, CRP participants should be required to control and manage the weeds before they go to seed.

**FSA Response** CRP participants are contractually required to maintain land enrolled in CRP free from insects, weeds, and pests are subject to payment reductions and contract termination for non-compliance. FSA spot checks CRP contracts annually and works with local weed boards to monitor contract compliance.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	225	Comment Category	Needs

**Comment** The local FSA office should be required to check CRP land to insure the participants are compelling with the regulations. If participants fail to comply, the payments should be suspended and the funds they have received paid back.

**FSA Response** All CRP contracts are subject to annual FSA spot checks. The remedies for non-compliance range from assessing a payment reduction to contract termination.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	24	Comment Category	Needs

**Comment** We need to continue regular general CRP program sign-ups, CCRP (buffers), and CREP's.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	20	Comment Category	Needs

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices can and do serve as buffers for wildlife yet don't explicitly state such, like CP15A (See NRCS National Conservation Planning Handbook and FOTG for more details).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	367	Comment Category	Needs

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices can and do serve as buffers for wildlife yet don't explicitly state such, like CP15A (See NRCS National Conservation Planning Handbook and FOTG for more details).

Farm Service Agency		<b>Conservation Reser</b> Final Programmatic Environmental Impa	
Tracking Number 38		Comment Category Needs	

**Comment** I also think that there should be a voluntary public access program for hunters and nature lovers of all kinds. Including the privilege of hunting!

**FSA Response** Public access is a matter between the owner and/or tenant and the person seeking access. CRP is not authorized to require public access.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	167	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	59	Comment Category	Needs

**Comment** We also need voluntary public access program for hunters.

**FSA Response** Public access is a matter between the owner and/or tenant and the person seeking access. CRP is not authorized to require public access.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemer	
Tracking Number	145	Comment Category	Needs
Comment	If the CRP is to continue its effectiveness	the importance of national priority areas mus	st he stressed and the FBI which is

**Comment** If the CRP is to continue its effectiveness, the importance of national priority areas must be stressed and the EBI which is so important in determining where CRP acreage actually hits the grounds needs to be modified to allow increased points (from 25 to 50) for offers falling in a national priority area.

**FSA Response** Comment Noted.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	166	Comment Category	Needs

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	14	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	111	Comment Category	Needs

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	379	Comment Category	Needs

Farm Service Agency

Tracking Number	86	Comment Category	Needs
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**Comment** There are far too many USDA personal on local levels.

**FSA Response** Unclear what this has to do with the CRP PEIS.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	124	Comment Category	Needs

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statemer	
Tracking Number	15	Comment Category	Needs

**Comment** Stress the importance for the regular general sign-ups and CCRP (buffers) and CREP's, as we need vast acreage planted to good wildlife cover that is undisturbed and managed for wildlife.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	101	Comment Category	Needs

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	140	Comment Category	Needs

**Comment** Regular CRP sign-up's are absolutely needed; as well as CCRP (buffers) & CREP'S.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	364	Comment Category Needs	

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices can and do serve as buffers for wildlife yet don't explicitly state such, like CP15A (See NRCS National Conservation Planning Handbook and FOTG for more details).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	177	Comment Category	Needs

**Comment** I recommend adoption of an Environmental Benefit Index scoring system that favors tracts in areas with a high density of wetlands over tracts in other areas.

**FSA Response** Comment noted. FSA will take this comment under consideration when developing the new regulations and procedures.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	133	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's.

**FSA Response** Comment noted. Continuous signup and CREP signups are held on a continuous basis at local FSA offices. CREP is geographically limited; however, continuous is available in all offices. General signups are held periodically, taking into account CRP contracts scheduled to expire, the enrollment goals for continuous signups, for remaining available acreage, and other factors.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Needs

**Comment** The NRCS role should be strictly for assistance when requested by producers.

**FSA Response** NRCS, like other technical service providers, provides needed technical assistance when producers request to enroll in CRP.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Needs

**Comment** USDA employees should be exempt from participation in competitive USDA programs such as CRP.

**FSA Response** Under CRP, prior to contract approval, contracts are reviewed and approved by a third party to ensure there were no conflicts of interest.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	27	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (Buffers) and CREP's

**FSA Response** Comment noted. Continuous signup and CREP signups are held on a continuous basis at local FSA offices. CREP is geographically limited; however, continuous is available in all offices. General signups are held periodically, taking into account CRP contracts scheduled to expire, the enrollment goals for continuous signups, for remaining available acreage, and other factors.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Needs

**Comment** Small farmer CRP participants have lost their voice in the CRP participation process. It appears that the CRP program is now geared towards big business, big corporations, big special interest groups and big bureaucracy, but not towards the actual CRP participants in the new proposed CRP rules in comparison to the comments from people representing other groups. This egregious problem must be addressed. It has roots in all that we have outlined above. But moreover the majority of this problem can be resolved in a very simple measure. Like the song says its RESPECT. Simply respecting and istening to CRP participants will allow for a more meaningful exchange of ideas on how to improve the program.

**FSA Response** FSA has a long history of citizen-centered, results-orientated conservation on which includes the local farmers and ranchers who are responsible for implementation at the county level.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	102	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's.

**FSA Response** Comment noted. Continuous signup and CREP signups are held on a continuous basis at local FSA offices. CREP is geographically limited; however, continuous is available in all offices. General signups are held periodically, taking into account CRP contracts scheduled to expire, the enrollment goals for continuous signups, for remaining available acreage, and other factors.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	111	Comment Category	Needs

**Comment** I believe it is a terrible mistake to even consider elimination of whole-field CRP sigh-ups. CRP has conserved billions of tons of soil from eroding into our waterways and contributed to millions of acres of wildlife habitat.

**FSA Response** Comment noted. FSA will take this comment under consideration when developing the new regulations and procedures.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Needs

**Comment** Some participants are favored or punished by local USDA office personal. When an individual receives a substantially larger rental rate or lower rental rate than his or her neighbors a red flag should be raised.

**FSA Response** Rental rates are set based on the soil types of the land being offered and are subject to appeal.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	207	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP

**FSA Response** Comment noted. Continuous signup and CREP signups are held on a continuous basis at local FSA offices. CREP is geographically limited; however, continuous is available in all offices. General signups are held periodically, taking into account CRP contracts scheduled to expire, the enrollment goals for continuous signups, for remaining available acreage, and other factors.

Fa	rm Service Agency	Final Programm	<b>CONSERVATION RESERVE PROGRAM</b> atic Environmental Impact Statement
Tracking Number	378	Comment Category	Needs
Comment	I do not think CRP should be able to be commercial hunting operation. If the go citizens via taxation uses these dollars t	vernment, which represents all	

should be a government lease and remain open to trespassing within the

limitations that it is healthy for the land and wildlife.

**FSA Response** The CRP is a commercial venture between Commodity Credit Corporation and participants authorized by Title XII of the Food Security Act of 1985, as amended. However, the authorizing language does not include requirements to public access to private land enrolled in CRP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Needs

**Comment** The maximum CRP amount per individual should be consistent with the farm bill and should raised to \$75,000 per individual or per corporation.

**FSA Response** Maximum payment amount is consistent with the Farm Bill and is set at \$50,000 per "person" per year.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Needs

**Comment** One-size fits all policy with regards to participants should be implemented and strictly enforced.

**FSA Response** National guidance consistent with legislative authority is issued. Flexibility is authorized at lower levels where appropriate.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Needs

**Comment** Forced maintenance dictated by USDA agencies allows no participant input and gives unprofessional employees power to financially harm participants.

**FSA Response** The comment is unclear. Producers have extensive impact and involvement in complying with the terms of the contract. Further, administrative actions are generally subject to appeal.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	147	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	86	Comment Category	Needs

**Comment** Office wide professionalism should be mandatory.

**FSA Response** We agree. FSA strives to provide professional, courteous, efficient, and cost-effective assistance with all of its programs.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	110	Comment Category	Needs

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's.

**FSA Response** Comment noted. Continuous signup and CREP signups are held on a continuous basis at local FSA offices. CREP is geographically limited; however, continuous is available in all offices. General signups are held periodically, taking into account CRP contracts scheduled to expire, the enrollment goals for continuous signups, for remaining available acreage, and other factors.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	366	Comment Category	Needs

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices can and do serve as buffers for wildlife yet don't explicitly state such, like CP15A (See NRCS National Conservation Planning Handbook and FOTG for more details).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	203	Comment Category	None Identified

**Comment** No comments pertaining to the CRP DPEIS

**FSA Response** No comment noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	637	Comment Category	Oppose

**Comment** I'm totally against CRP even though I have a quarter in it.

FSA Response Comment noted. However, the 2002 Farm Bill enacted into law on May 13, 2002 extended the CRP through 2007

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	6	Comment Category	Opposition

**Comment** As a conservation partner in Lincoln Co. I feel this is the most horrendous program I've ever subjected myself to. So far this whole program the way it is being operated in Lincoln county, South Dakota is only short of a nightmare. The rent we receive for all the work and headache should be worth at least \$250 per acre, instead of \$85 per acre. Whoopee Ding, we get \$5.00 for weed control and maintenance. I'm sorry to say I wish I had never head of the CRP program.

**FSA Response** Comment noted. The CRP seeks to plant certain environmentally sensitive acreage to enhance water quality, reduce sediment loading to streams, rivers, and water bodies, and enhance wildlife habitat. Producers have the opportunity to voluntarily offer acreage for a 10 to 15 year period in return for an annual rental payment and cost-share assistance in practice establishment. The 2002 Farm Bill, enacted into law on May 13, 2002, extends the CRP through 2007.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	201	Comment Category	Opposition

**Comment** The CRP Program should be discontinued as soon as possible

**FSA Response** Comment noted. However, the 2002 Farm Bill enacted into law on May 13, 2002 extended the CRP through 2007.

Farm Service Agency		Conservation Reservation Final Programmatic Environmental Impac	
Tracking Number	126	Comment Category	Opposition

**Comment** CRP is my pet peeve. My husband and I run a ranch in central Montana. We have never had CRP. Our land is surrounded by land that is in CRP. My husband and his brother are good stewards of the land and are doing such a terrific job that our land is not and has never been eligible for CRP. We are glad of this. I feel than CRP programs gives farmers and ranchers a bad name in large cities in the US. It seem like a welfare handout.

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	3	Comment Category	Opposition

**Comment** The down-side of the CRP program is it is breaking rural communities in states like Montana, where I reside. Since the enactment of the CRP program we have lost numerous implement dealerships and small businesses.

**FSA Response** Comment noted. However, the increasing participation of larger farms in the CRP program is more reflective of the structure of agricultural production in the United States in general than of the CRP program itself. As noted in Sections 2.3.1.1, 2.3.1.2, 5.6.2 and 5.6.3 of the draft PEIS, the ownership and control of agricultural assets has exhibited a general trend toward increasing consolidation and concentration in the United States since the beginning of the twentieth century. Factors contributing to this trend include increasing mechanization of production, advances in technologies and the larger capital expenditures required for contemporary farming, in addition to any effects attributable to the growth of government subsidies or the CRP program itself. Other factors affecting CRP participation include farm location, the types of commodities produced and other operator and household characteristics. To some extent disparities in payments to smaller farmers are also a function of the greater incomes generated by larger family and corporate farms, for which CRP payments represent a smaller share of gross farm income. Table 2.3-4 demonstrates that smaller farms actually have a greater portion of their total acreage in CRP than do larger farms, despite the higher dollars per participating farm associated with larger farms. Payment limitations also serve to minimize disproportionate access to program benefits by larger farms.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	205	Comment Category	Support

**Comment** I think that CRP is a very good program not only financially but very good for the environment

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	207	Comment Category	Support

**Comment** I strongly support Alternative 3 for the CRP Program

Farm Se	rvice Agency	<b>Conservation</b> Final Programmatic Environmen	
Tracking Number	24	Comment Category	Support

I strongly support Alternative 3 for the CRP program. Comment

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	20	Comment Category	Support	

**Comment** I strongly support Alternative 3 for the CRP program. We need regular general CRP sign-ups and CCRP and CREP's.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	28	Comment Category	Support	

**Comment** I am STRONGLY in favor of Alternative 3 for the CRP Program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	186	Comment Category Suppo	ort

**Comment** I am writing to urge you to support alternative 3 for the CRP program.



Tracking Number34Comment CategorySupport

**Comment** I recommend the adoption of Alternative 3.

Farm Service Agency Fina		Final Programmat	Conservation Reserve Program
Tracking Number	38	Comment Category	Support

**Comment** I support Alternative 3 in the draft CRP Environmental Impact Statement.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	44	Comment Category	Support

**Comment** I favor Alternative 3, because it allows more acreage and creates the new wetlands program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	43	Comment Category	Support

**Comment** I am a strong supporter of the Alternative 3 for the CRP program.

Farm Service Agency		Final Programmat	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	42	Comment Category	Support	

**Comment** I recommend the adoption of Alternative 3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	45	Comment Category	Support

**Comment** It is important to do everything possible to preserve our environment through any feasible means.

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Statement	
Tracking Number	55	Comment Category	Support

**Comment** I favor alternative three, which will allow for the expansion of acres in the program and increase protection of aquatic resources on those lands.

Farm Service Agency		Final Programma	<b>CONSERVATION RESERVE PROGRA</b> tic Environmental Impact Stateme	
Tracking Number	53	Comment Category	Support	

**Comment** Please adopt Alternative 3, which is the most favorable for hunters, fishermen and other sportsmen.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	51	Comment Category	Support	

**Comment** I strongly support Alternative 3 for the CRP program. We need the regular general sign-ups, and CCRP and CREP's.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	5	Comment Category	Support	

**Comment** I have found that CRP makes conservation efforts possible. It has been most valuable in my community.

**FSA Response** Comment noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	33	Comment Category	Support

**Comment** I wanted to drop you a note in support of alternative 3 in the draft of CRP EIS.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	211	Comment Category	Support

**Comment** we recommend you adopt Alternative 3

**FSA Response** Comment noted. FSA's Preferred Alternative is Alternative 3-the Proposed Action.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	62	Comment Category	Support

**Comment** I fully approve of Alternative 3. This is a yes vote.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	218	Comment Category	Support

**Comment** the CRP program is one of the best programs they have had. Where would all the farmers and ranchers have gotten their hay and grazing these dry year. If it hadn't been for CRP.

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Proge</b> Final Programmatic Environmental Impact Statem	
Tracking Number	172	Comment Category	Support

I am strongly in support of alternative 3 for the CRP program. With the trend of current farming practices and without Comment continuous CRP signups in many different forms, I fear my children will never get to enjoy the vast array of wildlife that I currently do. I believe that many grassland species' numbers will continue to plummet, some to the point of extinction. Anything we can do to prevent this is an absolute necessity. CRP is one of the best programs going to help the environment and I think wildlife should be high on the list when it comes to the specifics of implementing new sign-ups.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	49	Comment Category	Support

**Comment** For the betterment of all hunters, fishermen, and the general public, adopt Alternative 3 of the Draft Environmental Impact Statement.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	641	Comment Category	Support

**Comment** I feel that the CRP has saved a lot of people from going broke because they could put their poor producing land in CRP. In drought years, the haying of CRP kind has helped keep many cows in the county that would have been shipped out.

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	364	Comment Category	Support

**Comment** I strongly support Alternative 3 for the CRP

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	365	Comment Category	Support	

**Comment** I strongly support Alternative 3 for the CRP program.



Tracking Number366Comment CategorySupport

**Comment** I strongly support Alternative 3 for the CRP program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	367	Comment Category	Support

**Comment** I strongly support Alternative 3 for the CRP program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	368	Comment Category	Support

**Comment** Please consider mine a vote of support for Alternative #3 in the CRP plan.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	369	Comment Category	Support	

**Comment** As a tax paying farmer and a fee paying sportsman, I favor alternative 3 to the current farm bill under consideration.

Farm Service Agency

Tracking Number 635

Comment Category

Support

**Comment** The CRP program is a good program

**FSA Response** Comment noted.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	75	Comment Category	Support	

**Comment** I recommend the adoption of Alternative 3.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	124	Comment Category	Support

**Comment** I strongly support Alternative 3 for the CRP Program

Farm Service Agency	Final Pi

Tracking Number	26	Comment Category	Support
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**Comment** I strongly support Alternative 3 for the CRP program.

		Conservation Reserve Program atic Environmental Impact Statement	
Tracking Number	64	Comment Category	Support
Comment	I support Alternative 3.		

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	211	Comment Category	Support

**Comment** The program not only helps the environment with wildlife habitat and reduced soil deterioration and erosion, it greatly helps farmers around the country survive when they have land that is otherwise marginal for crops

**FSA Response** Commented noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	63	Comment Category	Support	

**Comment** After reading your proposed plans for the preservation of America's natural resources I hope you will adopt Alternative #3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	209	Comment Category Support	

**Comment** Being a hunter, I support implementation of Alternative 3 for the CRP and CREP programs of the 2002 Farm Bill

Farm Service Agency			<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	208	Comment Category Su	pport	

**Comment** I strongly support Alternative 3 for the CRP Program

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	77	Comment Category	Support
Comment	I support only alternative 3.		

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	83	Comment Category	Support

**Comment** I want to express my support continuing the active CRP program as well as sign-ups for CREP and CCRP buffers. We are producing too many crops on too much land already and I like the environmental values of the CRP and other programs that promote long-term vegetative cover on the land.

Farm Service Agency		<b>Conservation Reserve Progr</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	73	Comment Category	Support

**Comment** I urge you to decide in favor of Alternative 3. As an active hunter and angler, only this alternative is consistent with my goals and the goals of most of my associates.

Farm Service Agency		Final Programma	CONSERVATION RESERVE PROGRAM tic Environmental Impact Statement
Tracking Number	71	Comment Category	Support

**Comment** I am strongly in favor of alternative 3 which extends and expands the CRP program.

Farm Service Agency		Final Programma	<b>CONSERVATION RESERVE PROGRAM</b> Itic Environmental Impact Statement
Tracking Number	70	Comment Category	Support

**Comment** I am writing to let you know that I strongly support Alternative 3 as proposed in USDA's CRP PEIS.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	79	Comment Category	Support	

**Comment** I ask that you support Alternative 3 for the CRP Program.

Farm Sei	rvice Agency	Conservation Reserve Final Programmatic Environmental Impact	
Tracking Number	78	Comment Category	Support

**Comment** As a hunter, landowner, CRP participant and tax payer I strongly encourage the maximum wildlife, soil and water benefits to this program.

**FSA Response** Comment noted. CRP currently targets the environmental resources of water quality, soil quality, and wildlife habitat enhancement all equally and will continue to this as mandated by the 2002 Farm bill.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	65	Comment Category	Support

**Comment** I have reviewed the alternatives and I fully support alternative 3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	150	Comment Category	Support

**Comment** My family does not farm, but we appreciate the cleaner air that is an unintended benefit of CRP.

**FSA Response** Comment noted.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	10	Comment Category	Support	

**Comment** I strongly support Alternative 3 for the CRP program.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	180	Comment Category	Support

**Comment** I support alternative 3 for the CRP program.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	181	Comment Category	Support	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	142	Comment Category	Support

**Comment** As you are considering new rules, please accept my inputs that Alternative 3 is the best option for implementation. I believe that it meets the overall goals of CRP and wildlife conservation by putting rules in place to expand the number of acres allowed under both CRP and the CREP and creates a new, incentive based farmable wetlands program.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	147	Comment Category	Support	

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	177	Comment Category	Support

**Comment** I recommend and support the USDA's adoption of Alternative 3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	176	Comment Category	Support	

**Comment** I'm in support of Alternative #3 in the draft CRP environmental impact statement.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	194	Comment Category	Support	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	175	Comment Category	Support

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	188	Comment Category	Support	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	174	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	169	Comment Category	Support

**Comment** the CRP program has been a very beneficial program for conserving soil and water, reducing production and promoting wildlife. Most of the money for the program has been spent wisely.

**FSA Response** Comment noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	163	Comment Category	Support

**Comment** I'm writing to express my support for alternative #3 for the CRP program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	153	Comment Category	Support

**Comment** I am writing to ask you to select alternative 3 of the Draft EIS on implementation of the Conservation Reserve Program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	152	Comment Category	Support

**Comment** I am writing in favor of Alternative 3 for the CRP program.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	145	Comment Category	Support

**Comment** I recommend alternative 3 in the DPEIS.

Farm Service Agency	
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Tracking Number	48	Comment Category
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Support

**Comment** I recommend the adoption of Alternative 3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	2	Comment Category	Support

**Comment** The impact of CRP is a win-win situation for landowners and wildlife.

**FSA Response** Comment noted.

Farm Service Agency		<b>Conservation Reserve P</b> Final Programmatic Environmental Impact St	
Tracking Number	149	Comment Category	Support

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	110	Comment Category	Support	

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	13	Comment Category	Support

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices as CRP buffers.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	13	Comment Category	Support

**Comment** We need regular general CRP sign-ups and CCRP (buffers) and CREP's.

**FSA Response** Comment noted. Continuous signup and CREP signups are held on a continuous basis at local FSA offices. CREP is geographically limited; however, continuous is available in all offices. General signups are held periodically, taking into account CRP contracts scheduled to expire, the enrollment goals for continuous signups, for remaining available acreage, and other factors.

Farm Service Agency			Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	13	Comment Category	Support	

Farm Service Agency

Tracking Number	14	Comment Category	Support
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Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	15	Comment Category	Support	

**Comment** My wife and I strongly support Alternative 3 draft Environmental Impact Statement for the CRP Program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	125	Comment Category	Support

**Comment** I am writing to ask you to adopt Alternative 3 of the Draft Environmental Impact Statement for implementation of the Conservation Reserve Program.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	120	Comment Category	Support

**Comment** I recommend the adoption of Alternative 3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	184	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	123	Comment Category	Support

**Comment** I would like you to consider Alternative 3 for the management of the CRP & CREP programs. As a hunter & fisherman & someone who just likes to see any type of wildlife, we need to make it possible for hose that have the land that supports these creatures to have a reason to leave the land in a way that will make certain of their future.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	100	Comment Category	Support

Fa	rm Service Agency	Final Program	<b>CONSERVATION RESERVE PROGRAM</b> matic Environmental Impact Statement
Tracking Number	379	Comment Category	Support
Comment	I strongly support Alternative 3 for the CRP program are hard to measure, but not consider the few, self-serving inter variety.	are many and far reaching. Please do	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	101	Comment Category	Support	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	102	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	133	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	27	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	190	Comment Category	Support

**Comment** As an avid outdoorsman I strongly support Alternative 3 for the CRP program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	192	Comment Category	Support
Comment	I am writing to support the inclusion of continuing general sigh-up for CRP the CREP's program and the buffer program (CCRP).		

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	140	Comment Category	Support

**Comment** I am is strong support of Alternate 3 for the CRP program.

Farm Service Agency			ERVATION RESERVE PROGRAM ronmental Impact Statement
Tracking Number	122	Comment Category	Support

**Comment** As a hunter and wildlife enthusiast, I support continuance of the CRP program in all areas of the US.

Farm Service Agency		<b>Conservation Res</b> Final Programmatic Environmental Imp	
Tracking Number	69	Comment Category Support	

Farm Service Agency		<b>Conservation Reserve Progra</b> Final Programmatic Environmental Impact Stateme	
Tracking Number	144	Comment Category	Support
Comment	I respectfully ask for your support of CRI waterways.	P alternative 3. As we desperately need CRP bu	uffers to save our wildlife and

Farm Service Agency			ISERVATION RESERVE PROGRAM vironmental Impact Statement
Tracking Number	151	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	137	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	130	Comment Category	Support

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	131	Comment Category	Support	

Farm Service Agency			SERVATION RESERVE PROGRAM vironmental Impact Statement
Tracking Number	19	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemer		
Tracking Number	17	Comment Category	Support	

**Comment** I support Alternative 3 for the CRP EIS.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Statement	
Tracking Number	173	Comment Category	Support

**Comment** I recommend the adoption of Alternative 3.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statemen	
Tracking Number	68	Comment Category	Support

**Comment** After reading the alternatives o on the board I wish that you'd consider Alternative 3 as your choice as it covers the criteria established for CRP the best.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	146	Comment Category	Support	

Farm Service Agency		Conservation Reserve Programmatic Environmental Impact Stateme	
Tracking Number	61	Comment Category	Support
<b>.</b>			

**Comment** I am in favor of Alternative 3, which in essence meets the overall goals of CRP and wildlife conservation by putting rules in place to expand the number of acres allowed under both CRP and the CREP and creates a new incentive-based farmable wetland program.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	59	Comment Category	Support

**Comment** Of the four options identified in the EIS, ONLY option 3 is acceptable and I strongly support it.

Fai	rm Service Agency	Final Programma	CONSERVATION RESERVE PROGRAM tic Environmental Impact Statement
Tracking Number	58	Comment Category	Support
Comment	hunted CRP properties in southern Kan	and one who appreciates all efforts in improving sas and Northern Oklahoma and have seen what oport of alternative 3 in the farm bill and want to	good conservation can do for both

Farm Service Agency		Final Programma	<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	56	Comment Category	Support	
Comment		im, I submit that the only acceptable alternative in the use of CREPs and Continuous CRP signups ations in the 2002 Farm Bill.		

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	57	Comment Category	Support

**Comment** I recommend the adoption of Alternative 3.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	47	Comment Category	Support

**Comment** I urge the support of the CRP as modified by the 2002 Farm Bill. Maximized environmental benefit provides the best values for the tax payer investment.

Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Comment Category	Support

**Comment** As a long time resident of states (North Dakota and Colorado) I strongly urge our Congress to continue funding the nation's Conservation Reserve Program. Since I was a youngster in North Dakota, I have seen overall wildlife and farm land health improve dramatically as a result of these types of programs.

**FSA Response** Comment noted.

Farm Service Agency

Tracking Number 16	Comment Category	Support
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ement

I understand that CRP is again being reviewed. I own farm ground and I Comment can tell you that without CRP there would be NO habitat and very little protection from runoff of fertilizers, pesticides and herbicides. CRP programs need to STRENGTHEN, not weaken. Please support alternative number three. Don't let big business dictate an end to CRP. WE do not need more production, but we do need CRP expansion.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	167	Comment Category Support	

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	114	Comment Category	Support

**Comment** I strongly support Alternative 3 for the CRP program. The benefits of the program for soil, water, and wildlife are tremendous and I would encourage the expansion of CRP to 45 million acres.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. The maximum acreage, which was established by the 2002 Farm Bill, allowed to be enrolled under CRP is 39.2 million acres and is limited to this acreage cap (See Section 4.2).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	164	Comment Category	Support

**Comment** Again, I want to express my strong support for Alternative 3. The Department of Agriculture's Farm Service Agency should adopt this alternative and move forward with the next sign-up period so we can continue to benefit from the kind of incentive-based conservation that supports the American traditions of hunting and fishing.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement		
Tracking Number	111	Comment Category	Support	

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	166	Comment Category	Support

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	60	Comment Category	Support

**Comment** I would like to offer my support for Alternative 3 in the Draft CRP EIS.

Farm Service Agency		Final Programm	Conservation Reserve Program atic Environmental Impact Statement
Tracking Number	169	Comment Category	Support

**Comment** I would like to strongly recommend the adoption of alternative 3 of the draft environmental impact statement of the CRP and CREP.

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	165	Comment Category	Support
Comment I			

**Comment** I urge you to adopt alternative 3 of the Draft Environmental Impact statement for implementation of the Conservation Reserve Program (CRP) since it's renewal on the 2002 farm bill. As I understand it, alternative 3 comes closest to meeting overall goals of CRP and wildlife conservation by putting rules in place that allow for expansion of CRP acres.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement		
Tracking Number	7	Comment Category	Trees	

**Comment** We were encouraged to plant the trees, now that they are mature and ready for harvest we cannot get anything out of time, labor, and land usage.

**FSA Response** Comment Noted. FSA's Preferred Alternative would provide a one-year extension for certain lands planted to hardwood trees.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	207	Comment Category	Wildlife

**Comment** CRP is by far the best program available for wildlife

**FSA Response** Comment noted. We agree, the CRP provided a variety of wildlife habitat benefits.

Farm Service Agency		<b>Conservation Reserve Pr</b> Final Programmatic Environmental Impact Sta	
Tracking Number	126	Comment Category	Wildlife

**Comment** CRP land is not at all palatable to the wildlife. Why munch on dry colorless, tasteless, nutritionless grass on CRP when you can go next door and eat the tender green nutritious shoots that are growing on our land that has been worked and planted or grazed the right way?

**FSA Response** Comment noted. CRP is a conservation program to improve water quality, reduce soil erosion, and enhance wildlife habitat. Maintaining a programmatic balance of these three resource areas is the goal of CRP. The vegetative cover produced by CRP may in fact not be palatable for some wildlife but there are multiple benefits for wildlife achieved through the implementation of various CRP conservation practices (Section 5.4.2).

Farm Service Agency		Final Programma	Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	33	Comment Category	Wildlife	
Comment	I understand the economics involved and wildlife	hope we can continue the funding and suppor	t to allow general sign-up for	

**FSA Response** Comment noted. FSA's preferred alternative would continue general signup with an EBI, continuous signup, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	134	Comment Category	Wildlife

**Comment** CRP is an essential habitat component for wildlife in the northern Great Plains. The Rebound in wildlife populations since the establishment of CRP is proof in the pudding.

**FSA Response** Comment noted.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	361	Comment Category	Wildlife

**Comment** I would like to register my opinion against the proposal for the increase of EBI points for tree plantings. This would increase habitat for predators not normally found in grasslands.

**FSA Response** We acknowledge the importance of plantings that are consistent with the climax ecosystem for the site. We will take your opinion under consideration as we develop the rules and regulations.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	126	Comment Category	Wildlife

**Comment** We have heard of people who plow up land just to get on this program. The farmers abusing the land should have been fined just like any other business that ruins our natural resources not paid every year for ten years with the chance to renew for an additional ten.

**FSA Response** Comment noted. The cropping history requirements has been changed to 4 out of 6 years preceding enactment of the 2002 Act. This requirement precludes plowing up land to meet cropping history.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	207	Comment Category	Wildlife

**Comment** There is a lack of specific wildlife practices in the CCRP or buffer initiative. They should include center-pivot corners and wildlife field borders

**FSA Response** The Practices eligible for the continuous signup generally provide benefits to large areas when compared to the acreage on which the practices is implemented. Practices eligible for continuous signup may be implemented on field borders and center-pivot corners if such land is otherwise eligible.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	21	Comment Category	Wildlife

**Comment** It is extremely important to wildlife that we continue CCRP, CREP's, and regular general sign-ups.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	59	Comment Category	Wildlife

**Comment** We need vast acreage planted with good wildlife cover to maintain a balance.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Currently, over 26 million acres are planted to vegetative cover, which produce multiple benefits to wildlife and wildlife habitat (Section 5.4.2). CRP, through the use of the EBI, economic incentives, and CREP, produces multiple environmental benefits for soils, water quality, and wildlife habitat.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	47	Comment Category	Wildlife

**Comment** In all cases wildlife should be considered as a co-equal to other factors. CCRP and CREP should additionally focus on wildlife issues. Specific language in the Farm Bill states that where ever possible practices that give preference to Bobwhite quail should be implemented. CCRP and CREP are excellent opportunities for this.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Currently, over 26 million acres are planted to vegetative cover, which produce multiple benefits to wildlife and wildlife habitat (Section 5.4.2). CRP, through the use of the EBI, economic incentives, and CREP, produces multiple environmental benefits for soils, water quality, and wildlife habitat. There is no specific requirement in the "Farm Bill for Bobwhite quail.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	41	Comment Category	Wildlife

**Comment** Please do everything possible to ensure the future of hunting and fishing for future generations.

Farm Service Agency		Conservation Reserve Progr Final Programmatic Environmental Impact Statem	
Tracking Number	38	Comment Category	Wildlife

**Comment** You should also note the lack of specific wildlife practices in the CCRP of buffer initiative (call for including center-pivot corners, wildlife field borders, and allowable light disking for vegetation management)

**FSA Response** The Practices eligible for the continuous signup generally provide benefits to large areas when compared to the acreage on which the practices is implemented. Practices eligible for continuous signup may be implemented on field borders and center-pivot corners if such land is otherwise eligible.

Farm Service Agency		<b>Conservation Reserve Program</b> Final Programmatic Environmental Impact Statement	
Tracking Number	192	Comment Category	Wildlife

**Comment** CRP has greatly enhanced the opportunities for public hunting and had a dramatic impact on pheasant, deer, and non-game populations in South Dakota.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statemen	
Tracking Number	38	Comment Category	Wildlife

**Comment** I also want to stress the importance of the general sign-up for wildlife. We need vast acreage planted to good wildlife cover that is in grass and legumes and managed for wildlife.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Currently, over 26 million acres has been enrolled and planted to vegetative cover under CRP, which produced multiple benefits to wildlife and wildlife species habitat (Section 5.4.2). The CRP is a voluntary program offering producers the option to enroll eligible acreage for a 10-15 year period while retaining control of the land, including hunting access.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	114	Comment Category	Wildlife

**Comment** The general CRP sign-up is crucial to many species of wildlife that larger blocks of undisturbed habitats produce.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	24	Comment Category	Wildlife

**Comment** The final EIS should evaluate CRP expansion options and new wildlife practices such as buffers. We need large acreages planted to good wildlife. Cover that is undisturbed and managed for wildlife.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Many of the current authorized CRP practices can and do serve as buffers for wildlife yet don't explicitly state such, like CP15A (See NRCS National Conservation Planning Handbook and FOTG for more details).

Farm Service Agency		Conservation Reserve Progra Final Programmatic Environmental Impact Stateme	
Tracking Number	69	Comment Category	Wildlife

**Comment** The general sign-up (of CRP) is very important for wildlife. We need vast acreage planted to good wildlife cover that is undisturbed (haying and grazing should be limited) and managed for wildlife.

**FSA Response** Comment noted. FSA's Preferred Alternative (Alternative 3-the Proposed Action) would continue general signup with an EBI, CCRP, CREP, and expand the FWP. Over 26 million acres are currently enrolled under vegetative cover, which provide multiple benefits to wildlife (Section 5.4.2) and enhance wildlife habitat. Haying and grazing is currently limited to emergency conditions, as directed by the Secretary of Agriculture in approved counties (Section 3.3 of the PEIS has been expanded to discuss permissive and restricted grazing on CRP land).

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	636	Comment Category	Wildlife

**Comment** This program has single-handedly been the most disastrous to our county, which most of us farmers would say. The deer population has exploded, the turkey population the same thing. The raccoons the same thing.

Farm Service Agency		Conservation Reserve Program Final Programmatic Environmental Impact Statement	
Tracking Number	67	Comment Category	Wildlife

**Comment** The only problem that reduced the importance of the CRP program to wildlife, is the allowance of use whenever there are drought conditions, or any other conditions that are not conducive to agriculture. I would rather pay more for the acreage established and protected than what we have been doing.