

From: "lcraun@swbell.net%inter2" <lcraun@swbell.net>
Subject: Farm Bill 2007 Official Comments - 08/31/2005 03:38 PM CDT
Date Sent: 08/31/2005 03:38:11 CDT
Date Received: 08/31/2005 03:39:22 CDT

Email: lcraun@swbell.net
FirstName: Linda
LastName: Raun
Address1: Lowell Farms
Address2: 4 N. Washington
City: El Campo
State: Texas
zipcode: 77437
Question1: July 31, 2005

Dear USDA,

My husband & I are rice farmers from El Campo, Texas. I also have the honor of serving on the FSA State Committee in Texas. After listening to all 4 hours of the July 7th Farm Bill Forum, I have a suggestion I would like for you to consider in the formulation of the next Farm Bill.

USDA should tighten the definitions of "actively engaged" and "producer".

This suggestion helps addresses three of your questions:
Question 1 ? "by correcting an unintended consequence?"
Question 2 ? "effectively and fairly distributing assistance to producers?"
Question 3 ? "providing effective assistance in rural areas?"

By definition, to be actively engaged, one must be at risk. In the case of a tenant farmer, this is a very well enforced and documented rule. The loose interpretation of actively engaged currently used by FSA is that a landowner is exempt (or considered at risk) by just owning land. Tenants and landowners are not treated equally. Unfortunately, an unintended consequence occurs which allows landowners to take land out of production and keep DCP payments that were intended for producers who are at risk. This loophole has allowed folks to buy land, use DCP payments to make their land purchase payments without farming the land, being at risk, or turning the dollars over in the local rural economy. Tenant farmers have also been affected by losing their ability to grow a crop. These are often absentee landowners who live in urban areas.

The definition of producer also gets cloudy in this interpretation. I feel it should be someone who produces something, whether they are a landowner or a tenant. A landowner collecting payments without a crop growing on the land should not be considered to be a producer or to be actively engaged. Correcting this simple interpretation of the regulations would correct an unintended consequence, fairly distribute assistance to producers, and provide assistance in rural areas. An added benefit would be saving the government money and assuring the dollars are going to folks who both deserve and desperately need them. The intent of "Freedom to Farm" and the de-coupling of payments was to allow for flexibility for farmers to plant for the market based on price, demand, and supply while staying in compliance with WTO rules. Overall, the current Farm Bill allows producers, both tenant and landowners, the opportunity to supply the United States with the safest, most abundant, and highest quality food supply in the world. As a producer, I appreciate the time, availability, and interest you

have shown to hear our comments and concerns. With your interest and effort, I feel the next Farm Bill can be a true safety net for farmers and for all of rural America.

Sincerely,

Linda C. Raun
4 N. Washington
El Campo, TX 77437
979-543-4950
lcraun@swbell.net

Question2:

Question3:

Question4:

Question5:

Question6: