

Eickholt, Brad

From: LZiemer@tu.org%inter2 [LZiemer@tu.org]
Sent: Friday, November 11, 2005 12:01 AM
To: FarmBill
Cc: KFinkler@tu.org%inter2
Subject: Trout Unlimited Comments on 2007 Farm Bill Reauthorization

Attachments: tmp.htm; Farm Bill Listening Session Written Comments Montana Water Project.doc



tmp.htm (33 KB) Farm Bill Listening
Session W...



Dear Secretary Johanns,

Thank you for the opportunity to comment on the 2007 reauthorization of the Farm Bill. Comments from Trout Unlimited in Montana are attached, and pasted in below (with some formatting lost).

Sincerely,

Laura Ziemer, Director
Trout Unlimited's Montana Water Project
(406) 522-7291 ext 103
321 East Main Street, Suite 411
Bozeman, Montana 59715

Farm Bill Listening Forum in Bozeman, Montana
November 4, 2005

Comments of Laura Ziemer, Director
Montana Water Project
Trout Unlimited

Introduction

Trout Unlimited is the world's largest trout and salmon conservation organization. Our mission is to conserve, protect, and restore North America's coldwater fisheries and their watersheds. TU has over 133,000 members, a full-time staff of almost 70 and offices in Washington, DC and in 15 states (including Maine). TU's extensive network of grassroots volunteers is organized into more than 490 local chapters, operating under 35 state

councils who collectively contribute more than 460,000 hours nationally in support of cold water conservation.

Coldwater fisheries are a national treasure. Across the country, millions of anglers use and enjoy these resources every year. Many agricultural operations are located adjacent to these streams and, therefore, impact the habitat for aquatic species. In the northeast, prime coldwater fisheries are often surrounded by private forestlands. Stream and river habitat conditions reflect the stewardship practices of the region's forest landowners. Trout and salmon are demanding fish. They require cold, clean waters and healthy river ecosystems. That, in turn, requires healthy watersheds and wise stewardship of our rural lands.

Agricultural practices and nonpoint pollution derived from them are a major source of water pollution nationwide. In 1998, agriculture was identified in state reports to EPA as the leading source of impairment for 15% of impaired streams and rivers and 13% of lakes and ponds nationwide in state reports to EPA, a value that is certainly an underestimate of the significance of agriculture for water quality. EPA estimates that agriculture places more than 70% of the 2261 (HUC-8) watersheds nationwide at moderate or severe risk. Simply put, what happens on our nation's farms is critical to the health of our waters and our watersheds.

Moreover, the policies laid out in the 2007 Farm Bill will have far reaching effects with respect to land use and conservation activity here in Rocky Mountains, and throughout the nation. By subsidizing certain activities and providing education, training, technical support and incentives for others, USDA policy alters the behavior not only of farmers, but of ranchers, forest landowners, rural businesses and private landowners. Where existing farm programs favor unsustainable practices they run counter to the national interest in water quality, healthy watersheds and safe, secure rural economies. Where they undercut the social and economic basis of those rural communities, they may inadvertently lead to changes in land use that will alter the health of rural watersheds, and reduce traditional access for fishing, hunting, and outdoor recreation. USDA conservation programs also provide one of the most effective tools the federal government can employ to encourage conservation on private lands. These programs encourage protection of environmentally sensitive lands, restoration of aquatic systems and in protecting the natural capital that provides the ecosystem services essential for healthy rural economies and which support healthy coldwater fisheries.

Montana NRCS: A National Leader in Promoting Watershed Health

The Farm Bill looks a bit different from Montana than it does from elsewhere around the nation. Montana is the perfect place to hear thoughts about what the next Farm Bill should be, since we are lucky here to have enjoyed the leadership of State Conservationist Dave White.

Thanks to his creativity and leadership, Montana NRCS has implemented some of the best examples of watershed stewardship in the West, if not the nation, under the 2002 Farm Bill. You have to look no further than what Montana NRCS has done over the last several years to see what the conservation potential of the 2007 Farm Bill can - and indeed, should-- be.

As Director of Trout Unlimited's Montana Water Project, I have been involved with stream restoration projects and state water policy in Montana since 1998. With Montana Trout Unlimited's track record of successful stream restoration projects in nearly every major river basin in western Montana, Trout Unlimited is well-positioned to partner with Montana NRCS on ambitious, basin-wide initiatives that are addressing systemic, limiting factors to reaching watershed health.

To that end, State Conservationist Dave White has made remarkable use of special initiatives. In the Blackfoot River, the Jefferson River, and the Big Hole River, special initiatives under the EQIP program are producing watershed restoration gains that benefit imperiled native trout species and producers alike. These benefits include removal of

fish passage barriers, riparian habitat restoration, and streamflow improvement through careful investment in irrigation and stockwatering infrastructure and efficiency.

In addition, the Montana NRCS has worked in partnership with Trout Unlimited to provide incentive payments and additional technical support for producers who utilize individual EQIP contracts to improve streamflows on dewatered streams key to fish populations. This innovative use of Montana's EQIP program has led to award-winning streamflow restoration projects that have also boosted producers' crop production.

Montana's experience has produced a rich portfolio of successful partnerships between producers, the NRCS, and Trout Unlimited to achieve substantial gains in watershed health. Drawing on these successes, Trout Unlimited offers a number of discrete suggestions on 2007 Farm Bill reauthorization that would encourage the replication of Montana's success in other states. Seven specific recommendations follow.

Increasing Benefits to Aquatic Resources from Farm Bill Programs:

Trout Unlimited's Seven Recommendations for 2007 Farm Bill Reauthorization.

I. Create New Opportunities for Stream Restoration

Based on an analysis of Natural Resources Conservation Service (NRCS) data, a very small percentage of existing Farm Bill conservation funding is allocated for stream and fish restoration projects. The existing Wildlife Habitat Incentive Program (WHIP) focuses on wildlife habitat but no Farm Bill conservation program focuses exclusively on stream restoration.

Given the significance of our coldwater fisheries, a certain amount of 2007 Farm Bill conservation funds should be focused exclusively on stream habitat restoration. As such, we recommend creating a new Farm Bill program specifically targeted to stream habitat restoration and conservation. The new program should focus on creating incentives to protect streamside areas, repair in-stream habitat, improve water flows and water quality, and initiate watershed management and planning.

The 2005 farm bill should create a new stream restoration program. Key components would include:

- * Specific allocation of funds for stream restoration;
- * Provide cost-share and incentive payments;
- * Create a ranking mechanism to prioritize projects, e.g. small dam removal, streamside area protection, improve fish passage, or improve stream flows;
- * Priority given to restoration projects that benefit at risk species; and
- * To ensure that projects address the causes of stream habitat degradation, give priority to landowners who demonstrate that upland improvements associated with the stream habitat improvement have been, or will be, carried out.

II. Improve Project Delivery under Wildlife Habitat Incentives Program (WHIP)

Maintaining funding for the WHIP will help private land owners afford to implement conservation measures of critical importance to stream ecosystems throughout the state. Many states, however, do not address aquatic habitat issues with WHIP because of the small allocations and high demand for other types of conservation work. Furthermore, since 2002, an average of \$27 million each year has been allocated to WHIP nationwide, however, an average of more than 3000 applications, amounting to \$25 million go unfunded each year.

Many of the barriers to effective use of WHIP dollars are institutional and bureaucratic. Good WHIP projects often take several years to incubate, because of time spent raising matching funds, bringing along reluctant landowners, and completing paperwork.

* Simply put, the program needs more money nationwide, and those dollars need to be better targeted on significant conservation needs.

* Many WHIP projects - especially those targeted on stream restoration - provide the landowner little or no direct benefit, except for the "warm glow" associated with doing something good for the streams on their land. Yet participation in WHIP requires significant effort on the part of the landowner, even when the landowner is working closely with project sponsors like Trout Unlimited or a local Soil and Water Conservation Districts.

* Cost share rates should be raised to 90% for projects addressing national or regional fisheries and wildlife priorities that are carried out in partnership with conservation organizations.

* Simplifying the paperwork demanded of private landowners would facilitate project development. The agency should seek ways to reduce paperwork requirements for landowners involved with WHIP projects carried out in partnership with conservation groups and in the context of watershed or other regional plans.

III. Increase access to EQIP funds for riparian and floodplain restoration

* Add "lands adjacent to streams and rivers" to the definition of eligible lands in EQIP.

IV. Provide New Incentives for Increased Surface and Groundwater Flow

* Amend the Ground and Surface Water Conservation Program's (GSWC) net savings clause to state, "Net Savings.-The Secretary may provide assistance to a producer under this section only if the Secretary determines that the assistance will facilitate a conservation measure that results in both a net savings in groundwater or surface water resources in the agricultural operation of the producer and increased groundwater or surface flows." (new language in bold).

* Apply this new net savings clause to any water conservation or irrigation efficiency practices funded through EQIP.

* Increase cost-share payments of EQIP and GSWC from 75% to 90% for projects that result in increased instream flows.

* Provide incentives for water conservation that result in increased surface flows, particularly in drought-stricken basins.

V. Addition to Conservation Security Program

* Add "enhancement of instream flows" to the list of conservation practices that may be implemented by a producer under a conservation security contract.

* Add requirements that CSP operators address wildlife and fisheries impacts of their operations (in addition to nutrient management, pesticide use, water quality, soil quality and energy) before qualifying for the highest possible CSP payments.

* Find ways to better integrate organic producers into the CSP program.

VI. Modifications to the Conservation Reserve Enhancement Programs

* Create incentives for states to use CREPs to benefit at-risk aquatic species (especially with regards to in-stream flow issues) by setting aside a specific portion of CREP funds for this purpose and decreasing the required state match for projects addressing ESA-listed or formal candidate species.

VII. Support Rural Communities

* Increase investments in research technical assistance for and small crops and specialty livestock producers that are the source of some of Montana's best stewardship practices.

* Support research and extension efforts aimed at increasing high value-added products from small farms and ranches.

* Support farmers markets, community supported agriculture (CSAs) and other alternative, high margin sales outlets for farmers and ranchers.

Comments submitted November 4, 2005, by Laura Ziemer, Director, Trout Unlimited's Montana Water Project, Farm Bill Listening Forum in Bozeman, Montana.

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