

February 3, 2020

William Beam
Acting Administrator
Farm Service Agency
United States Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Margo Erny
Acting Executive Vice President
Commodity Credit Corporation
United States Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Re: Docket ID No. CCC-2019-0006; RIN 0560-AI41; Conservation Reserve Program
Interim Rule; 84 Fed. Reg. 235 (December 6, 2019)

Dear Acting Administrator Beam and Acting Executive Vice President Erny,

North Dakota Farmers Union (NDFU) appreciates the opportunity to comment on implementation of the Soil Health and Income Protection Pilot (SHIPP) Program. NDFU, the largest general farm organization in North Dakota, represents more than 50,000 farm and ranch families, members, and their energy and agriculture supply cooperatives. We believe the SHIPP Program can help alleviate oversupply in the marketplace and provide a tool for remediating saline soils.

NDFU's member-driven policy supports "a short-term conservation reserve program of 3-5 years for land that has temporarily lost productivity." We appreciate the Farm Service Agency's (FSA) and Commodity Credit Corporation's (CCC) efforts to implement the new SHIPP Program. We urge the agencies to enroll the maximum allowable acreage of 50,000 in the SHIPP Program and to provide flexibility to participants.

The last several years have been incredibly challenging for North Dakota's family farmers and ranchers. Excess supply and market disruptions have, in many cases, driven commodity prices below the cost of production. Many farmers are losing money on their least productive acres. The SHIPP Program offers a solution, allowing farmers to idle those acres while alleviating chronic oversupply.

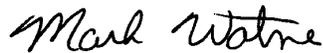
North Dakota is in the heart of the Prairie Pothole Region. It is not unusual for North Dakota farmers to plant and harvest a crop on shallow depressions that are under water the next growing season. When that land becomes tillable again, high salinity levels often make those small acreages unsuitable for farming until the soil can be remediated.

NDFU believes the SHIPP Program can provide a new solution for farmers working to remediate saline soils. The modest annual rental payments the SHIPP Program provides will encourage farmers to plant salt-tolerant covers on land surrounding potholes to remediate the soil. We understand that, as stated in the interim rule, a SHIPP contract requires the lowest practicable cost perennial cover be established. We urge the FSA and CCC to provide enrollees the flexibility they need to address specific resource concerns, including soil salinity.

NDFU is excited about the SHIPP Program's potential to serve as a model for future economic and conservation tools. We respectfully request the FSA and CCC maximize program enrollment and flexibility.

Sincerely,

NORTH DAKOTA FARMERS UNION

A handwritten signature in black ink that reads "Mark Watne". The signature is written in a cursive, slightly slanted style.

Mark Watne
President

