September 4, 2020

Administrator Richard Fordyce
USDA FSA
1400 Independence Ave., S.W.
STOP 0506
Washington, DC 20250

Director Administrator Fordyce,

As you are no doubt aware, Colorado and many areas of the Western United States are experiencing a tremendous drought. Every county in Colorado is experiencing at least some areas of D2 (Moderate) drought and more than one-third of the state is listed as D3 (Extreme) drought. This makes the need for relief programs much greater than usual as well as the need for any changes to programs to have timely vetting and consideration by producers and the agency.

A drought of this scale and duration creates significant impacts on both crop and livestock producers. Our current situation is amplified by the fact that similar drought conditions existed as recently as the summer of 2018 and in the case for some counties continuously for the past five years.

The Colorado Farm Bureau would like to thank USDA for its work ensuring that disaster declarations were made by the Secretary and that the CRP Emergency Haying and Grazing program was activated. As it stands, every county in Colorado is now eligible for the program.

However, the arbitrary requirement that producers remove livestock 30 days prior to the first frost date to allow for a rest period is concerning. This policy change was passed down just a short while ago with little warning to producers. Colorado’s first frost date is listed as October 15th. For producers who do not yet have livestock moved onto CRP acres, the new provision effectively blocks them from taking advantage of emergency grazing resources for an additional 30 days.

Producers who currently have animals on CRP acres must now secure transportation to remove them in 11 days, before again returning to graze after October 15. Moreover, costs for feed or alternative grazing will be incurred and it is not yet clear as to whether or not emergency CRP access can be counted under LFP as a loss.

This requirement is problematic and arbitrary in nature, and it creates significant costs for transportation of livestock at a time when producers can least afford it, due to ongoing losses in price and increased costs of inputs. It adds stress to livestock, endangers pregnancy, and will not help protect native plants and grasses already dormant due to significant drought conditions.
The requirement effectively makes the emergency grazing program unworkable for livestock producers when drought disasters are declared late in the year and we urge your office to make swift changes to allow for increased flexibility and maximum utility of CRP forage resources. Time is of the essence in this instance and we would greatly appreciate your quick response in the matter. Providing needed changes now will also help prevent this problem from occurring again in future drought years.

Thank you for your consideration,

Chad Vorthmann
Executive Vice President

CC: Sec. Sonny Perdue
Under Secretary Bill Northey
Clarice Navarro, Colorado State FSA Director
Senator, Cory Gardner
Senator Michael Bennett