



NATIONAL CAMPAIGN
FOR SUSTAINABLE
AGRICULTURE

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Memorandum

TO: Obama-Biden Administration, Transition and Agency Review Team for the United States Department of Agriculture

FROM: The Renewable Energy Committee of the National Campaign for Sustainable Agriculture

DATE: December 19, 2008

SUBJECT: **Biomass Crop Assistance Program Recommendations**

On behalf of the Renewable Energy Committee of the National Campaign for Sustainable Agriculture, I respectfully submit the following policy recommendations regarding the implementation of the Biomass Crop Assistance Program.

The Biomass Crop Assistance Program (BCAP) was established by the 2008 Farm Bill to promote the cultivation of bioenergy crops that show exceptional promise in producing highly energy efficient bio-energy from non-food or feed crops in a manner that preserves natural resources.

- 1. Accelerate implementation.** USDA has signaled its intent to prepare an Environmental Impact Statement [73 Fed. Reg.57047 (October 1, 2008)] which could delay implementation of BCAP until late in 2010. We urge you to explore any means available for conducting a shorter yet effective environmental review. BCAP holds such economic and environmental promise for rural communities. An abbreviated but effective environmental review would allow USDA to bring this program on line in 2009.
- 2. Ensure strong sustainability standards.** BCAP project selection criteria include a project's impact on soil, water, and related resources. As the Manager's Report suggests we urge you to include impacts to wildlife and wildlife habitat within this criteria. The Manager's report also suggests that "the primary focus of the BCAP will be promoting the cultivation of perennial bioenergy crops." We urge you to uphold a high standard of protection for soil and water quality by prioritizing projects which rely on perennials. Annual BCAP crops should only be grown as part of a resource conserving crop rotation.
- 3. Ensure broad based economic opportunity.** We urge you to send strong signals in the BCAP rulemaking process to attract projects that encourage local ownership and investment in the biomass conversion facility and incorporate opportunities for beginning and socially disadvantaged farmers and ranchers.
- 4. Provide adequate payment rates.** To be successful the secretary must provide a payment rate that adequately compensates farmers for taking on the risk of producing a crop with an uncertain market.

Respectfully Submitted,

Dennis Olson, Chair
NCSA Renewable Energy Committee