



March 15, 2010

Ms. Rebecca Davis  
Director, Topeka Regional Office  
Risk Management Agency  
2641 SW Wanamaker  
Suite 201  
Topeka, KS 66614

RE: Non-Irrigated Issues Impacting Crop Insurance Coverage In Western Kansas, Western Nebraska and Eastern Colorado

Dear Ms. Davis;

Thank you for the opportunity to provide comment on RMAs concern about the practice of continuous cropping on non-irrigated acres in western Kansas and parts of Colorado and Nebraska.

This has been a topic of grave concern for our growers since we first learned of these efforts last year. Our non-irrigated growers in these areas believe the proposal ignores agronomic realities and improved technology, not only in seed but production practices that make planting these crops a viable proposition.

The proposal also overlooks a persistent drought that pervaded much of the time frame used to draw the RMA's conclusions. Drought conditions, regardless of cropping practices, increase losses. The notion of trying to "back in" a change in policy to mitigate the impact of an extended natural disaster flies in the face of the very reason crop insurance is needed and why the government sees it as an integral part of a farmers safety net.

Growers and staff from grain producer groups from Kansas, Colorado and Nebraska met during the their joint national convention in early March to discuss the RMA proposal. The consensus of the group was that data cited by RMA were not being appropriately utilized by RMA and that there was a strong need to pursue a continuing dialogue through a workshop setting to thoroughly explore this issue.

We believe a workshop that includes all stakeholders is imperative if RMA wants to adequately explore the issue and insure that it is interpreting all data, comments, and suggestions in the proper manner. The ability for direct dialogue is always preferential to simply receiving comments.

There are many factors to consider and many viable alternatives to simply dropping coverage for our growers. We call on RMA to not make any changes for the 2011 cropping season, employ a stakeholder workshop or workshops, and to take a more thoughtful approach to this issue.

Specifically, we ask that RMA account for several deficiencies in simply proposing a blanket crop rotation restriction for continued insurance coverage.

In order to maximize use of available moisture in the region, farmers cannot be without options that provide for logical agronomic management responses to changing moisture dynamics. In Western Kansas it is all about the moisture, whether present or not.

Our farmers have made considerable investments in reduced tillage systems on their farms. Moisture conservation and improved soil physical properties are the result. Requiring a fallow period between summer crops does not ensure adequate moisture for the following season.

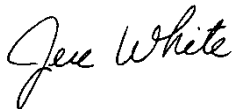
Tillage techniques and practices have much greater impact on soil water availability and retention.

In fact, your sister agency at USDA, NRCS promotes the practice of planting three high residue crops in four years. This practice has demonstrated an improvement in soil quality, including water and carbon sequestration capacities. The proposed limitations on crop rotations of non-irrigated farms in the region would not be consistent with these practices and would be expected to negatively impact crop production and conservation efforts.

We believe a very high majority of our growers employ sound agronomic practices on their farms. We also believe that abuse can and does happen. We would ask that an open and frank discussion regarding ways to provide for responsible management occur during the proposed workshop process so that if changes are implemented, responsible producers are not penalized by the few bad actors.

I look forward to continued dialogue on this issue.

Sincerely,

A handwritten signature in cursive script that reads "Jere White".

Jere White  
Executive Director  
Kansas Corn Growers Association  
Kansas Grain Sorghum Producers Association