

Mr. Brandon Willis
Administrator – Risk Management Agency
U.S. Department of Agriculture
South Agriculture Building, Room 6092-S
Washington, DC 20250

Administrator Willis;

On behalf of the more than 35,000 wheat growers in Colorado, Kansas, Oklahoma and Texas, we are writing to urge you to implement the actual production history (APH) adjustment provisions of the Agricultural Act of 2014 in time for the 2015 crop year.

In the most recent farm bill debate, producers made great sacrifices and worked with decision-makers to implement changes to farm safety net programs that drastically reduced the level of support and predictability traditionally provided by federal farm programs. Producers were willing to make these sacrifices largely due to the ongoing coverage provided by the federal crop insurance program and key improvements to the program included in the final bill.

Many of the changes contained in the Agricultural Act of 2014 recognized crop insurance as the center of our modern safety net. Unfortunately, many of our growers have been stuck in the worst drought since the dust bowl of the 1930's and have found their crop insurance coverage diminishing at an alarming pace. Back-to-back drought years have reduced producers' APHs to levels that no longer reflect even average production expectations, therefore reducing crop insurance guarantees. Additionally, producers across this region will suffer the effects of this drought for years to come as their APHs are continually punished because a one-in-eighty year drought is included in their 10-year production history.

The farm bill was authored at the height of a drought that gripped the Plains states. In an analysis using National Agricultural Statistics Service data for Colorado, Kansas, Oklahoma and Texas, we estimate that more than half of the 22 million annually planted wheat acres across these four states would be eligible to drop their 2013 wheat yield due to the severity of the drought. We believe that further analysis would reveal even more eligible years of production due to the ongoing nature of the current drought.

Implementing these provisions in time for the 2015 crop year would allow wheat producers across this region the opportunity to further protect their farms from the effects of drought. While the implementation of these provisions will provide benefits to growers across the country when future adverse weather conditions occur, it will make an immediate and lasting impact for our growers who have been operating under extreme drought conditions. We realize that a change to the APH calculation isn't as simple as flipping a switch. If it is not feasible to implement these provisions nationwide for the 2015 crop year, we ask that they be implemented for growers in states experiencing persistent drought to provide growers the needed benefits of the new provision while not over-burdening your agency.

Thank you for your consideration,

Sincerely,

Colorado Association of Wheat Growers
Kansas Association of Wheat Growers
Oklahoma Wheat Growers Association
Texas Wheat Producers Association