



To foster the science and the art of soil, water, and related natural resource management to achieve sustainability.

International Headquarters
945 SW Ankeny Road
Ankeny, Iowa 50023-9723
Telephone (515) 289-2331
fax (515) 289-1227
email: swcs@swcs.org
<http://www.swcs.org>

June 7, 2010

**Dr. Roger Beachy, Director
USDA National Institute of Food and Agriculture
Jamie L. Whitten Building, Room 305-A
1400 Independence Avenue, SW., Stop 2201
Washington, DC 20250-2201**

Subject: Docket Number NIFA-2010-0001

Dear Dr. Beachy:

Thank you for the opportunity to comment on the NIFA FY-2011 Agriculture and Food Research Initiative (AFRI) Request for Applications (RFA). AFRI funding is unique in the role it plays to address critical research needs across a broad spectrum of agricultural and natural resource issues, build regional partnerships to address these issues, and apply the benefits of this program from national to community perspectives through the efforts of land grant institutions and their many cooperating partners.

The NIFA commitment to focus funding into core challenge areas is important to generate the knowledge and subsequent outreach in these areas to achieve measurable progress addressing these pressing issues. However, in the establishment of the core areas, USDA's strategic goal to 'protect and enhance the nation's natural resource base and the environment' cannot be achieved without the addition of a sixth core area: Protection of the Nation's Soil and Water Resources.

Our agricultural land resource base that has for years provided food and fiber to meet the needs of the world's population, now is being asked to provide an ever increasing level of biofuel feedstocks. Developing and implementing sustainable agricultural systems is key to profitable agriculture and the protection of our nation's land and water resources. The NIFA AFRI program is unquestionably the most appropriate research and extension program to integrate agency, university and private, non-profit efforts to address this challenge.

NIFA proposes that the Climate Change and Bioenergy challenge areas address the protection of the nation's water resources. This is fundamentally impossible. The greatest agricultural threat to water quality is the off-site impact of sediment,

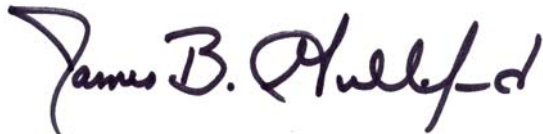
nutrient, pesticide, pathogen and pharmaceutical contaminants. These are not the water resource issues of climate change and bioenergy production.

In November, 2009, Secretary of Agriculture Tom Vilsack announced the Mississippi River Basin Healthy Watersheds Initiative (MRBI) This initiative committed USDA to work with agricultural producers to address soil conservation and water quality protection needs in the Mississippi River Basin to reduce nitrogen and phosphorus loss from agricultural lands that threaten local and regional water resources, and contribute to the hypoxic zone in the Gulf of Mexico. This \$320 million initiative needs the continued support of the AFRI program to improve the efficiency of agricultural production systems, and provide protections to assure that nutrient and pesticide inputs achieve their intended agricultural result without becoming negative, offsite pollutants.

In conclusion, protection of the soil and water resources of the nation is fundamental to the long term viability of agriculture, and its ability to continue to provide food, fiber and fuel in the face of an ever increasing population, domestically and globally. The efforts of many to address this challenge is seriously diminished without the leadership and important contribution of NIFA and the AFRI program. This is too important of an issue for NIFA to be absent as a partner.

Thank you for considering these comments and the request for the NIFA to add a sixth challenge area: Protection of the Nation's Soil and Water Resources to the AFRI program in FY-2011. If I can provide additional information with respect to this request, please contact me.

Sincerely,

A handwritten signature in dark ink that reads "James B. Gulliford". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

**James B. Gulliford, Executive Director
Soil and Water Conservation Society**