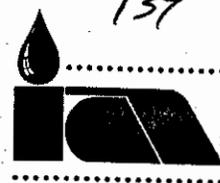


# THE IRRIGATION ASSOCIATION



February 6, 2004

Conservation Operations Division  
Natural Resource Conservation Service  
P.O. Box 2890  
Washington, DC 20013-2890

6540 Arlington Blvd  
Falls Church, VA 22042-6638  
Phone: (703) 536-7080  
Fax: (703) 536-7019  
[www.irrigation.org](http://www.irrigation.org)

Re: Conservation Security Program Proposed Rule

Dear Conservation Security Program:

Thank you very much for the opportunity to comment on the Natural Resources Conservation Service's (NRCS) proposed rule on the Conservation Security Program. The Irrigation Association shares the Department of Agriculture's strong commitment to water conservation and water quality.

Modern irrigation systems play a key role in water conservation. Agricultural water withdrawals account for 79.6% of the water used in the United States, according to the National Agricultural Statistics Service's most recent "Farm and Ranch Irrigation Survey." In the view of the Irrigation Association, the conversion of older surface irrigation techniques such as flood and furrow to pressurized systems like sprinkler and drip will do more to further the goal of water conservation than any other agricultural practice. The statement is supported by an assessment of current irrigation practices. Currently, surface irrigation accounts for 51% of irrigated agricultural acreage, yet it uses 63% of the water. Pressurized systems, in contrast, are used on the other 49% of irrigated agricultural acreage, but use of 37% of the water. The increased efficiency with pressurized systems allows farmers to produce more crops, while using less of our water resources.

Under the proposed rule, NRCS proposes to "impose eligibility requirements based on selected priority watersheds." Since location within a priority watershed is a criterion that must be met in order to receive CSP funds, it is essential that the priority watersheds be from diverse areas of the country and recognize the specific concerns related with each geographic region. In some areas, water and soil quality may be the primary concern, but in many parts of the country, water use needs to be taken into account, as well. In identifying priority watersheds, the CSP program should take into account arid parts of the country in which improved water conservation measures are essential components of environmental stewardship.

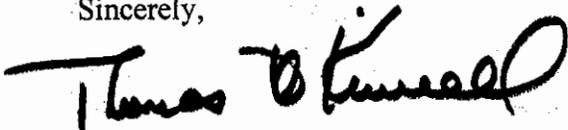
The watershed selection process makes sense given the limited funds available under CSP. One concern in the use of the watershed technique is the tendency to evaluate improvement in the whole watershed rather than on farm improvements. Individual farms will qualify for the CSP funds and effectiveness should be measured at the farm level.

In addition, the proposed rule requests comments on the use of technical service providers (TSPs). The rule should encourage the use of TSPs for activities in which a

certification process exists to ensure that stellar technical advice will be given to producers. It should also recognize TSP agreements in place with USDA under other conservation programs, such as the Environmental Quality Incentives Program. Because of the Irrigation Association's rigorous certification standards, USDA in May 2003 signed a five-year memorandum of understanding that allows association to recommend agricultural certified irrigation designers to the Department. These designers must perform work that meets USDA standards and specifications for effective water management. This MOU and similar ones with other organizations should be honored under the new CSP program.

Thank you for the opportunity to comment on the CSP proposed rule and the important role of modern irrigation systems in water conservation. The Irrigation Association is a non profit industry organization made of 1600 companies that manufacture, distribute, design and install irrigation systems. Water conservation through proper water management is fundamental to our existence and expressed in the association's water conservation policy, which is attached.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas H. Kimmell". The signature is fluid and cursive, with a large initial "T" and "K".

Thomas H. Kimmell  
Executive Director



# Upper Delta Soil & Water Conservation District

134

180 East Main Street New Roads, LA 70760 Phone (225)638-7746 Ext 3

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*Supervisor*

February 13, 2004

Conservation Security Program Comments  
ATTN: David McKay, Cons. Operations Div.  
USDA/NRCS  
P. O. Box 2890  
Washington, D. C. 20013

Dear Mr. McKay:

The Supervisors of the Upper Delta Soil and Water Conservation District strongly recommend that the watershed in the Upper Terrebonne Drainage Basin be selected for inclusion in this year's USDA/NRCS Conservation Security Program. This watershed covers portions of the Upper Delta and Lower Delta Soil and Water Conservation Districts and includes portions of Pointe Coupee, West Baton Rouge and Iberville Parishes. It is roughly 409,000 acres in size with over 97,000 acres in row crops.

Iberville #3 Water District, located at the lower end of the watershed, utilizes the surface water for a source of drinking water. This water supply is identified by EPA in the recently issued Interim Registration Eligibility Decision (IRED) for Atrazine (Case No. 0062) as one of the six in the country that will be involved in extensive monitoring over the next five years because of the presence of this commonly used herbicide. The two major crops in the basin, sugar cane and corn, both utilize Atrazine in the farming practices. It is for this reason our District strongly recommends the watershed be included for funding under this year's Conservation Security Program (CSP). This would provide the NRCS and the local conservation district an excellent opportunity to show immediate environmental benefits as a result of accelerating the implementation of comprehensive conservation measures under the CSP.

Funding this proposal would provide benefits that would reach beyond the agriculture fields and drain ways where conservation measures are applied and into rural communities that have their drinking water supply adversely impacted by chemical laden sediments contained in the runoff from agriculture lands in the watershed.

This proposed project would provide a great opportunity to quickly show significant environmental benefits as a result of the NRCS and our local district working together to implement a comprehensive resource management project under CSP.

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February 13, 2004

We greatly appreciate the opportunity to present this recommendation and we are prepared to provide additional information to further identify the problems and our proposed solutions.

Respectfully,



Andrew Price Gay, Jr., Chairman  
Upper Delta SWCD  
APG:coa

cc: Mr. Terry Smith, Chairman, State Soil and Water Conservation Committee  
Mr. Brad Spicer, Exec. Director, State Soil and Water Conservation Committee  
Mr. Donald Gohmert, State Conservationist, Natural Resources Conservation Service



## Minnesota Department of Natural Resources

500 Lafayette Road  
St. Paul, Minnesota 55155-40\_\_

February 10, 2004

Mr. David McKay  
Conservation Operations Division  
NRCS P.O. Box 2890  
Washington, DC 20013

Dear Mr. McKay:

Thank you for the opportunity to comment on the proposed rule for the Conservation Security Program (CSP). I would like to suggest a definition for incidental forestland and provide recommendations for levels of treatment for forestland included in the CSP contract. As you know incidental forestland is included in the definition of agricultural land. I believe that incidental forestland must include:

**The wooded or forested portions of a farm that do not contribute regularly to the annual income of the agricultural operation but contributes to the overall stewardship of the land and enhances or protects the soil, water, timber, and wildlife resources of the agricultural operation.**

Incidental forestland is extremely important. The wooded or forested portions of a farm play an integral role in the environmental stewardship of a farm. In deed, previous programs focused efforts to take certain fields permanently out of production, often restoring tree cover to those areas. Converting these areas to row crops or pasture would result in site or environmental degradation. The above definition is consistent with the definition of agricultural land and would exclude forest or woodland that is not part of agricultural farming operation; yet encourage proper management of forests and woodlands that contribute to the environmental benefits of a farm.

CSP should recognize and encourage proper land use. The program needs to recognize that proper land management includes selecting which areas are best suited to row crops and which areas are best suited to wildlife or fiber production. In order to receive payments through the CSP program, a certain level of treatment would be necessary. The level of treatment required should be linked to the payment received.

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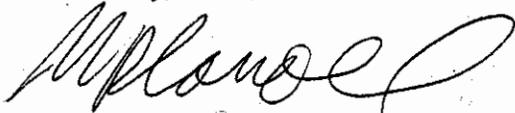
Mr. David McKay  
February 10, 2004  
Page two

On incidental forestland, the lowest level of treatment should be the possession of a Forest Stewardship Plan for those acres included in CSP. In addition, they should implement those practices recommended in the Stewardship Plan that sustain forest health. The next level of treatment should include those requirements in the lowest level as well as require that the owner/operator implement at least one additional practice that benefits the Soil, Water, Air, Plants, or Animals as recommended in the Stewardship Plan. The final treatment level would be for those landowners who, in addition, to the previous requirements have addressed all the resource concerns identified in their Stewardship plan.

It is my belief that part of properly managing a farm is to produce agricultural commodities in a sustainable manner. We need to encourage farmers to look at and manage their entire farm; even if those acres that may not contribute financially.

Once again, thank you for the opportunity to comment. I look forward to working with our partners to implement this new conservation program.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Carroll", written in black ink.

Michael R. Carroll, Director  
Division of Forestry