

Conservation Security Program Comments  
ATTN: David McKay  
NRCS Conservation Operations Division  
P.O. Box 2890  
Washington, DC 20013

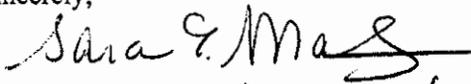
I am writing to suggest important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the CSP as a nationwide conservation program focused on working farmlands and which would reward the best, and motivate the rest. As intended by Congress, the CSP should be open to all farmers in the U.S. practicing effective conservation.

First, USDA should issue a supplement to the rule, which would be open for public comment for 30 days. This should be done immediately to fix major problems with the proposed rules issued on January 2, 2004, which are not consistent with the law authorizing the CSP nor with the funding allocated by Congress making CSP an uncapped national entitlement program.

In addition,

1. USDA's preferred approach in the proposed rule would severely and unnecessarily prevent most farmers from gaining access to the CSP. USDA must adhere to the law, and to the recently appropriated full funding of CSP by Congress, and make CSP available nationwide to all farmers practicing effective conservation. The USDA needs to get rid of the idea of restricting sign-up for CSP to a few selected watersheds and undefined categories.
2. The USDA's proposed rules fail to make anywhere close to adequate payments for environmental benefits being produced by farmers currently practicing effective conservation. The best way to secure the vital conservation of our soil and other resources is to recognize and reward it when and where it is being done. Paying the best practitioners for results is sound economics and smart policy, providing both reward and motivation. CSP base payments should be set at the local rental rates based on land capability without the 90% reduction proposed by USDA. Enhanced payments should reward the most environmentally-beneficial systems and to the maximum extent possible pay for results. The enhanced payments should not be treated as cost-share but rather as real bonuses to reward exceptional performance.
3. CSP needs to recognize and reward resource-conserving crop rotations and managed rotational grazing as proven conservation farming systems that deliver environmental benefits to society. Both are specifically mentioned for enhanced payments in the CSP statute. The final rule should highlight substantial enhancement payments for these systems, as well as payments for management of existing practices.
4. USDA should not penalize farmers for shifting former cropland to pasture as part of a managed grazing system. Former or potential cropland that is pastured and put into a managed rotational grazing system must receive equal payment rates to other cropland, and not the lower rate of pastureland. The rules should establish base payments based on NRCS land capability classes, not current land use.
5. CSP should allow farmers with USDA-approved organic certification plans under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both. No need to tie farmers up in red tape.

Sincerely,

 (Sara E. Martinez)  
E5866 Weber Road  
Viroqua, WI 54665

(Additional comments on back)

February 24, 2004

Mr. David McKay  
Attention: Conservation Security Program  
Conservation Planning Team Leader  
Conservation Operations Division  
USDA NRCS  
P.O. Box 2890  
Washington, DC 20013-2890

Dear Mr. McKay:

I am pleased to submit comments on the proposed rule to implement the 2002 Farm Bill Conservation Security Program. First, I applaud NRCS for developing a proposed rule in the face of the number of legislative changes that were made to the program following its enactment.

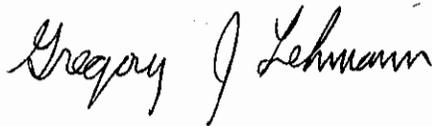
I have several concerns relative to the proposed rule. I understand that during the development of the proposed rule, changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change, NRCS proposed a much more limited program that would be available only to a relatively small number of producers in highly targeted watersheds. The proposed rule also placed significantly lower limits on cost-share rates and base payments than were allowed in the statute; restricted the number and types of practices that would be eligible for payment; and required producers to address resource concerns prior to enrolling in the program.

The enactment of the 2004 Consolidated Appropriations Bill, however, restored the CSP to an uncapped entitlement as it was originally written. Given that fact, I strongly urge NRCS to prepare a rule to implement the program as originally intended and without the severe restrictions in the currently proposed rule. The principal issues that need to be addressed in the supplement to properly implement the CSP as an uncapped entitlement include:

- allowing open enrollment to all eligible producers nationwide with no preference for producers in targeted watersheds;
- providing the full cost-share, maintenance and base payments as provided for in the statute;
- removing the limitation on the types of practices eligible for payment; and
- making the CSP a true rewards program by allowing producers to use CSP to address resource concerns after enrollment.

I appreciate the opportunity to provide my comments on the CSP proposed rule.

Sincerely yours,



February 25, 2004

David McKay  
Conservation Operations, NRCS  
PO Box 2890  
Washington, DC 20013-2890

Dear Mr. McKay,

This letter is in regards to endorsing a full, nationally implemented CSP. This program is important to meeting resource conservation goals on working agricultural lands

After reviewing ALR-12, the Conservation Security Program proposed rule, I have found there are two significant shortcomings. One shortcoming is that the rule doesn't provide for the rewards for conservation farmers as originally intended by the law. The second is that it doesn't provide for a program nationwide.

One key issue that needs to be addressed is the removal of the funding cap limitation. CSP was authorized as an entitlement program with the 2002 Farm Bill. Congress has removed the appropriation cap limitation and now NRCS should amend the rule to reflect this action to make it an entitlement program.

The second issue I feel needs to be addressed is the watershed limitation. The rule states that NRCS will identify and offer CSP only in high priority watersheds. This is NOT locally led conservation as so widely promoted in the 2002 Farm Bill. This creates the potential for this to become politically driven as to being available to all eligible producers nationwide.

Another issue is resource concerns. According to the law, all resource concerns in the USDA field Office Technical Guide such as soil, air and water quality, wildlife and plant habitat, and forest stewardship are eligible for participation. The proposed rule only requires that soil & water quality be addressed for all three tiers and places a lower priority on all other resource concerns.

An issue of concern is also the cost-share payments. The proposed rule requires cost-share payments to be less than EQIP. The authorization however provided a cost-share limit of 75% - the same as EQIP and other cost-share programs

We should also look at using the 2001 national rental rate, or an appropriate rate where the national rate does not correctly reflect local conditions, to establish CSP base payments. Currently, the proposed rule uses state and local rental rates, but reduces the payment base down to 10% of the already reduced rate in the law.

My final concern is that of eligible practices. NRCS is proposing to offer a reduced list of eligible practices. The law only provides for two limits: animal waste transport and storage, therefore all other practices should be eligible.

Mr. McKay, I hope that you will review the comments that you receive and enact the CSP program as it was intended, an entitlement program that is to be a nationwide program available to all eligible producers. We are looking to our agricultural producers to be leaders in helping to protect our environment. It is time to reward those who take conservation seriously and want to protect our environment.

Sincerely,



Phil Cooper  
Brown County, Ohio Producer

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February 24, 2004

Mr. David McKay  
Attention: Conservation Security Program  
Conservation Planning Team Leader  
Conservation Operations Division  
USDA NRCS  
P.O. Box 2890  
Washington, DC 20013-2890

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I have several concerns relative to the proposed rule. I understand that during the development of the proposed rule, changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change, NRCS proposed a much more limited program that would be available only to a relatively small number of producers in highly targeted watersheds. The proposed rule also placed significantly lower limits on cost-share rates and base payments than were allowed in the statute; restricted the number and types of practices that would be eligible for payment; and required producers to address resource concerns prior to enrolling in the program.

The enactment of the 2004 Consolidated Appropriations Bill, however, restored the CSP to an uncapped entitlement as it was originally written. Given that fact, I strongly urge NRCS to prepare a rule to implement the program as originally intended and without the severe restrictions in the currently proposed rule. The principal issues that need to be addressed in the supplement to properly implement the CSP as an uncapped entitlement include:

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- providing the full cost-share, maintenance and base payments as provided for in the statute;
- removing the limitation on the types of practices eligible for payment; and
- making the CSP a true rewards program by allowing producers to use CSP to address resource concerns after enrollment.

I appreciate the opportunity to provide my comments on the CSP proposed rule.

Sincerely yours,

*Bernard Lehmann*

February 25, 2004

Conservation Operations Division  
Natural Resources Conservation Service  
ATTN: Conservation Security Program  
P.O. Box 2890  
Washington, DC 20013-2890

To Whom it May Concern:

Thank you for providing public comment on the USDA's proposed rules for the Conservation Security Program. However, the proposed rules for the CSP needs to eliminate the restrictions on participation in the CSP to a few "selected watersheds" and undefined "categories".

As a certified organic farmer, it is my view that the CSP should be a nationwide, accessible program, open to ALL farmers! CSP should allow farmers with USDA-approved organic certification plans under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both.

Also, the USDA's proposed rules fail to made adequate payments to farmers currently participating in effective conservation practices. It is my opinion that enhanced payments and NOT cost-share payments, should reward those farmers who participate in environmentally-beneficial systems. CSP payments should be set at the local rental rates based on land capability without the 90 % reduction proposed by the USDA!

Finally, your proposed rules should address managed rotational grazing and resource conserving crop rotations. Please be reminded that managed rotational grazing is recognized by scientists and farmers as an excellent way to protect our soil and water. Also, it has been scientifically proven that diversified crop rotations effectively build and improve soil while managing pests and reducing erosion.

Again, thank you for allowing public comment on the proposed rules. With genuine concern, I ask that the CSP be offered to ALL of America's farmers, especially certified organic farmers, to preserve our nation's natural resources for future generations.

Sincerely,

Russell Brodtke  
2921 Brodtke Lane  
Cato, WI 54206

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Conservation Operation Division  
P.O. Box 2890  
Washington, D.C. 20013-2890

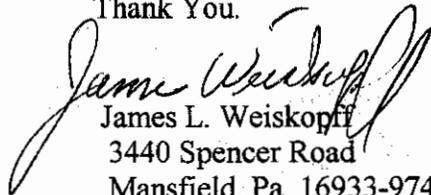
Dear Sirs:

I participate in the Chesapeake Bay Watershed and support your program to clean up the Bay.

I am a small farmer on 127 acres. I raise a few beef cows fed from our totally grassland farm. I try to use practices that protect our environment and believe conservative programs should be a part of it.

Thank you for your initiative in this matter

Thank You.



James L. Weiskopff  
3440 Spencer Road  
Mansfield, Pa. 16933-9742