

March 2, 2004

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

Dear Mr. McKay:

“Conservation Security Program Comments”

It appears to me that the original grassroots organization, namely Conservation Districts, are left out of the administration of all USDA conservation activities. Thereby eliminating the real intent of the conservation movement, of a bottoms-up program so to speak and now has become a tops-down program.

It was apparent from the 1930's that to have real effective soil and water conservation on the land and have it done faster and better, the local districts were formed thus involving the landowners, operators, and stakeholders. In order to establish a truly nationwide program a real partnership was needed. We have close to 3,000 conservation districts in the 50 states and 4 territories and some 15,000 supervisors, who have been elected by their peers to represent them in conservation issues, programs, projects, by state and federal statutes.

My concern is the more we side-step the grassroots system the more dictatorship creeps in to our government. I say that the USDA must get back to the true partnership that the conservation districts and NRCS enjoyed at the beginning, back in the 1930's and 1940's or we will lose the local impute and federal agencies will have all the say, good or bad. There are many decisions that need to be made on CSP, here are some of them.

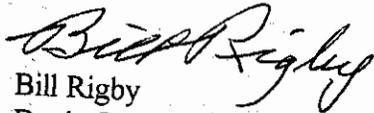
1. Determine if the farm/ranch is in a selected watershed.
2. Determine eligibility
3. Conduct follow up interviews.
4. Select successful applicants
5. Complete a conservation security plan
6. Determine CSP tier levels.

The local supervisors are the ones who know the answers to these and many more questions that need to be answered. The many NRCS people who I have interviewed on this subject agree that NRCS will need help.

Then I ask the big question: Who is more qualified than the local supervisors who are elected to this very important job? The locally elected supervisor must be allowed to do the job for which state and federal laws were enacted and should be noted in your instruction rules.

Thank you for your help.

Sincerely,



Bill Rigby  
Davis Conservation District  
1616 North Main  
Centerville, Utah 84014

CC: Senator Robert Bennett  
Utah Commissioner of Agriculture, Cary Peterson  
NACD

McGrath Family Farm  
505 North Wood Rd  
Camarillo Ca, 93010

Dear Mr. McKay,

My name is Philip McGrath and I am writing to you in my capacity as a farmer based in Camarillo CA.

I believe that the CSP can be a very useful tool for helping my farm as well as farmers in my area to conserve and improve natural resources, but only if the proposed rule is changed to reflect the original spirit of program.

Specifically, I would like to recommend the following changes:

- **Make All Farms Eligible:** Restore eligibility for all by eliminating the selection of priority watersheds and limited "categories" for enrollment.
- **Motivate Farmers:** Allow farmers to achieve high conservation standards while in the program, not as a precondition for applying.
- **Green payments:** Restore meaningful incentive payments so that farmers are financially rewarded for outstanding environmental performance. The proposed rule calls for pennies an acre for base payments, 5% cost-share payments for practices, and enhanced payments that don't even cover the farmer's costs.
- **Comprehensive Conservation:** Allow farmers to address any or all significant natural resource concerns on their farm, and allow them to make use of all effective conservation practices, instead of severely restricting what can be done.
- **Reward Resource-Conservation Crop Rotations, Rotational Grazing, and Buffers:** USDA should make the enhancement payments for these big pay-off conservation systems a highlight of the program by providing direct, substantial incentives for farmers and ranchers to adopt them. The rule should be amended to name these conservation systems in the rule as qualifying for enhanced payments on a nationwide basis.
- **Treat Grass-Based Agriculture Fairly:** Establish base payments based on NRCS land capability classes, not based on current land use.
- **Respond to the Needs of Organic Producers:** The rule should include a clear mechanism for coordinating participation in the NOP and the CSP. USDA staff should deliver these complementary programs in the most farmer-friendly, least burdensome fashion possible.
- **Restore a Comprehensive, Locally-Driven Approach to Conservation:** Allow the conservation resource concern priorities to be set at the state level so the program can be as responsive as possible to the major resource issues in each region of the country. One solution would be to have each

state include soil quality and water quality among their top 5 resource concerns and have farmers choose to address at least 2 of the 5 (tier 1 and tier 2) and all 5 (tier 3).

- **Provide for Ongoing, Not One-Time Support:** To succeed in maintaining and enhancing conservation systems long term, farmers must be able to remain in the program. The rule should comport with the law and allow contracts in good standing to be renewed at the option of the producer.

- **Don't Penalize Cash Renters:** The rule should provide fair treatment for tenants, allowing a tenant's CSP contract to exclude such land entirely, or allowing the farmer or rancher to receive CSP payments on land meeting CSP standards as long as the tenant controls the land.

- **Provide for a Continuous Sign-Up Process:** The rule should provide for a predictable, continuous, nationwide signup process.

Thank you very much for considering these comments.

Sincerely yours,

Philip McGrath

505 North Wood Rd Camarillo Ca 93010

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,



Jon Carboni  
W5346 Clark Lane  
Pickerel, WI 54465

February 25, 2004

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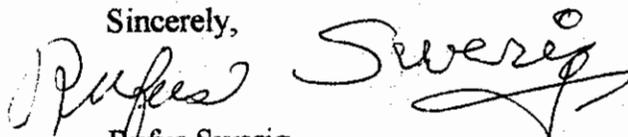
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Sincerely,



Rufus Swerig  
2134 Highway B  
Stoughton, WI 53589