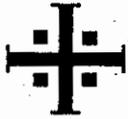


BENEDICTINE
SISTERS



St. Walburg Monastery
2500 Amsterdam Road
Covington KY 41017-5316
[REDACTED] (859) 331-6324
[REDACTED] FAX (859) 331-2136

February 25, 2004

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.
2. 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.
3. 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.
4. 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.
5. NRCS should utilize the one-producer, one-contract approach to CSP contracts, as a way to provide the fairest treatment of all producers and to guard against program fraud and abuse. All CSP payments should be attributed to real persons (not various corporate or business entities). Payment limits set in the law (\$20,000 per year for Tier 1, \$35,000 per year for Tier 2, and \$45,000 per year for Tier 3) must be maintained.

6. CSP contracts should be renewable, as part of an ongoing program, and not limited to one-time contracts. NRCS' proposal that CSP contracts in general not be renewable, except in special circumstances, conflicts with the law, which leaves it up to the farmer to decide if he or she wants to renew the contract, which USDA would renew unless the farmer was not fulfilling the contract. NRCS' proposed restriction to one-time contracts is contrary to the entire purpose of the CSP to secure ongoing conservation of our nation's national resources.

Thank you for consideration of this request.

Sincerely,

Sr. Rose Rauen, OSB

Sr. Rose Rauen, OSB

To NRCs

RE CSP comments.

Please except the following comments regarding
the Cons. Security Program:

As an active conservationist (Farmer) for
40+ yrs, I am delighted that finally those that
have worked for many years toward this end
can be rewarded.

Comment 1.

Selection of participants by where one lives
rather than by what has been done is
a contradiction of the purpose of this program.
Even with limited funds, everyone should
be afforded the opportunity to participate.

Comment 2.

Conservation Districts should have a
Partnership role in the selection process.
If CSP is administered from Washington or
the state office it will fail.

Comment 3.

More emphasis should be placed on
enticing or encouraging farmers to become involved.
(Education about soil quality etc) Training
of N.R.C.s. personnel / TSP^s)

Comment 4.

With the workload already overwhelming at the local office, much more responsibility could be given to TSP.

Comment 5.

I saw a lack of all farm planning in the summary. This is crucial.

Summary

Enhancement of Soil Quality is long overdue. We have been concerned with water Q. and Air Q. at the expense of a most important Resource. Soil Quality is the "next frontier". This is because it relates to soil health which relates to crop health which in turn relates to human health. In the next 10 yrs this will be at the public's forefront. Bottom line, this is a win-win situation.

D. Herbert "Bussie" York
Sandy River Farms.
Maine.

February 25, 2004

Re: Conservation Security Program Proposed Rule

Dear Secretary Veneman,

I am disappointed in the shortcomings of the proposed rule for the Conservation Security program and I urge you to issue a supplemental or revised rule reflecting the new law restoring the CSP's entitlement funding status. I also have some key concerns that should be addressed in a revised rule to bring the draft program implementation design in line with the requirements of the CSP section of the 2002 Farm Bill. Please issue this in a timely fashion, without adding significantly to the length of the existing public comment period, so farmers can still enroll in the program this year.

The proposed rule fails to provide a nationwide program available to all farmers and ranchers in all regions of the country who are practicing effective conservation, as required by law. It limits CSP eligibility to farmers and ranchers within a small number of watersheds and, within those watersheds, to certain "enrollment categories and subcategories" of producers. This would result in vastly lower participation levels and far less progress in solving natural resource problems. The rule should be modified by removing the restrictions limiting enrollment to certain watersheds, certain classes of farmers and ranchers, and to a limited set of resource concerns.

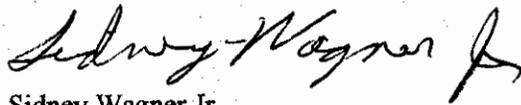
In addition, the proposed rule sets the entry point too high. The highest NRCS conservation standards for soil and water quality would have to be achieved prior to becoming eligible for the CSP. This is in stark contrast to the law, which says that relevant conservation standards must be met as a result of participation in the CSP. For Tier 3 participants, the proposed rule would require every single NRCS conservation standard to have been met prior to enrollment. The proposal would deny access to farmers who are transitioning to sustainable agriculture. The rule should be modified to retain high environmental standards, but to allow farmers and ranchers to achieve those high standards while in the program.

Instead of providing meaningful incentives and financial rewards for outstanding environmental effort and performance as envisioned by the law, the proposal demands that farm families cover the vast majority of costs of implementing and maintaining conservation systems out of their own pocket. The payment structure needs to be radically revised or the program has no hope of succeeding. The rule should establish cost-share rates on par with cost-share rates under other USDA conservation programs. Cost-share rates for newly installed practices should be equivalent to the rates under the Environmental Quality Incentives Program. Cost-share rates for the management and maintenance of existing conservation practices should be set at the 75% maximum rate established in the CSP law. Base payments should be set at the rates established in the CSP law, not the 90% reduced rate in the proposed rule.

Enhanced payments should reward the most environmentally-beneficial systems and, to the maximum extent possible, pay for results. Enhanced payments for on-farm research and demonstration projects and for on-farm monitoring and evaluation activities should allow the producer to recover costs. The enhanced payments for treating resource problems to management intensity levels beyond the current NRCS standards, for addressing additional resource problems, and for collective action within a watershed should not be treated as cost-share but rather as real bonuses to reward exceptional performance. A revised rule should also explicitly recognize resource-conserving crop rotations, rotational grazing and buffers as practices receiving substantial enhanced payments, as required by law.

I look forward to commenting on a revised proposed rule that describes a fair and workable program that works for family farmers and the environment.

Thank you,

A handwritten signature in cursive script that reads "Sidney Wagner Jr". The signature is written in black ink and is positioned above the typed name.

Sidney Wagner Jr
367 Lakeshore Dr
McCook Lake, SD 57049

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,

David McKay