

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

383

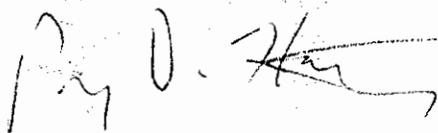
I am writing to suggest important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the CSP as a nationwide conservation program focused on working farmlands and which would reward the best, and motivate the rest. As intended by Congress, the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



(Additional comments on back)

Additional Comments:

1. NRCS is seeking comments on the idea of a 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. Do you agree with this approach? Do you agree that all CSP payments should also be attributed to real persons (not various corporate or business entities)? And do you agree that the 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) should be maintained?

YES, I SUPPORT THIS.

2. NRCS is proposing that CSP contracts in general not be renewable, except in special circumstances. The law, on the other hand, leaves it up to the farmer to decide if he or she wants to renew the contract, and USDA would renew unless the farmer was not fulfilling the contract. Do you agree that CSP contracts should be renewable, as part of an ongoing program, and not limited to one-time contracts?

YES, I AGREE.

3. Your additional comments on CSP and the USDA's proposed rules:

UNTIL ABOUT 4 YEARS AGO MY FAMILY FARMED AS WERE THE MAJORITY OF THEIR NEIGHBORS. SADLY, IN THAT SHORT TIME, ALMOST ALL THOSE FAMILY FARMS ARE GONE. WHAT USED TO BE ONE DIVERSIFIED FARM IS NOW ONE FIELD, ONE YEAR CORN, THE NEXT SOYBEANS. A PROMINENT UNIV. OF MINNESOTA AG RESEARCHER HAS CONCLUDED THAT THIS TYPE OF FARMING IS NOT SUSTAINABLE.

I URGE YOU TO IMPLEMENT A STRONG CONSERVATION PROGRAM, NOT A PUBLIC RELATIONS SALES JOB

Name (if not signed on front):

SINCERELY, P. O. STA

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Natural Resources Conservation Service
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Sincerely,

Jon Peterson
Hill View Farm

(Additional comments on back)

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yes, yes

2. NRCS is proposing that CSP contracts in general not be renewable, except in special circumstances. The law, on the other hand, leaves it up to the farmer to decide if he or she wants to renew the contract, and USDA would renew unless the farmer was not fulfilling the contract. Do you agree that CSP contracts should be renewable, as part of an ongoing program, and not limited to one-time contracts?

yes

3. Your additional comments on CSP and the USDA's proposed rules:

CSP must recognize farmers that are already doing conservation practices for example

rotational grazing

organic farming

crop rotations

Name (if not signed on front):

Jan Peterson

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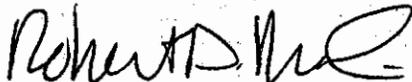
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All payments should be distributed to real persons not corporate entities. Also the payment limits as set in the law should be retained

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① I agree to the one producer one contract approach. ② I agree that all CSP payments should be attributed to real persons. ③ I agree with the payment limits set in the law.

2. NRCS is proposing that CSP contracts in general not be renewable, except in special circumstances. The law, on the other hand, leaves it up to the farmer to decide if he or she wants to renew the contract, and USDA would renew unless the farmer was not fulfilling the contract. Do you agree that CSP contracts should be renewable, as part of an ongoing program, and not limited to one-time contracts?

yes - contracts should be renewable

3. Your additional comments on CSP and the USDA's proposed rules:

on separate sheet

Name (if not signed on front):

Organic Valley Family Farm

On our 250 A. Organically Certified Dairy farm following NOP rules we feel regulations automatically should entitle us to be members of CSP also provided all standards are met.

Since we are mostly grassland farmers, erosion is not a problem. Spring plowing is quickly seeded down for fast regrowth. Also absolutely no chemicals, no herbicides, or no insecticides are ever used. Most fields are left in grass for about 10 years. Our cattle are fed strictly organic mineral and organic feed - so the manure used for fertilizer is strictly organic. All land is certified organic.

Organic farming is the only way preserve the soil, the environment, and wildlife - We want to be part of the CSP since we feel the organic farmer already has a good headstart on approved practices.

Higher prices for our products makes for less need for government involvement.

Sincerely,

Daniel Krizan