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To: FarmBillRules <FarmBillRules@USDA.Gov>  
cc:  
Subject: Attn: Conservation Security Program

09/20/2004 02:40 PM

September 20, 2004

The Yellow Medicine Soil and Water Conservation District would like to make comments on the Conservation Security Program(CSP) Interim Final rule. Please see the attached file for our comments

Thank you for giving us the opportunity to comment on the CSP Interim Rules.

Lou Ann Nagel  
Yellow Medicine SWCD Manager

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CSP Comments Interim Rule September 2004.doc

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**YELLOW MEDICINE SOIL AND WATER CONSERVATION DISTRICT  
COMMENTS TO CONSERVATION SECURITY PROGRAM (CSP)  
INTERIM RULES  
September 20, 2004**

The Yellow Medicine SWCD would like to make the following comments to the Conservation Security Program (CSP) Interim Rules:

- All landowners in United States should be eligible for the CSP Program. Please remove restrictions limiting enrollment to only a few watersheds and certain group of landowners. Everyone who is practicing conservation under the rules of CSP should be eligible to enroll in the program.
- It appears as though they have restricted the resource concerns that are eligible for consideration. They need to expand eligibility to all resource concerns.
- Eliminate the new "per acre" cap on contract payments. It appears as though the larger farms are given priority over the smaller farmers. It is usually the smaller farms who are doing a better job of practicing conservation.
- In the CSP Interim Rules there appears to be cost share for achieving CSP goals. Currently there are funds through the EQIP program for cost sharing conservation practices. Cost share for installing conservation practices should be taken out of the CSP Program. If cost share is needed, than EQIP funds should be utilized.

It appears that the interim rules for the Conservation Security Program are so restrictive that the intent of the program is being compromised. The final rule should make the CSP program into the nationwide and effective program intended by Congress to reward landowners for protecting and improving the environment.

Please take these comments into consideration when writing the final rule for the Conservation Security Program.