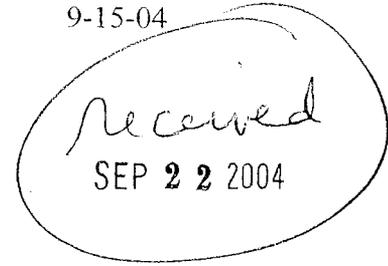


Harry and Elaine Hamil
15 John Myra Ave., Black Mountain, NC 28711

W021

9-15-04

Craig Dickerson, Program Manager
Financial Assistance Programs Division
Natural Resources Conservation Service
P.O. Box 2890
Washington, DC 20013-2890



Subject: Comments on Conservation Security Program Interim Final Rule

MAF RECEIVED

AEEC RECEIVED

SEP 28 2004

Dear Mr. Dickerson:

SEP 29 2004

The Conservation Security Program (CSP) is an important and innovative step forward in our nation's approach to conservation and a critical new component of U.S. farm policy. CSP holds great promise for rewarding farmers based on how they protect and improve the environment. Participating farmers hold great promise for rewarding all citizens with cleaner water, cleaner air and the enjoyment of thriving natural habitats. As intended by Congress, CSP is to be nationwide program available to all types of producers to the benefits of all types of citizens, in all regions of the country, with all types of conservation objectives.

Great potential without appropriate implementation is worse than no law at all because it leads ^{to} cynicism among citizens. As I understand your current interpretation of the rules, the promise of the CSP will NOT be fulfilled. I urge the USDA to review the program and to write guidelines that will support us, ^{the} farmer, in providing leadership in environmental stewardship. My specific greatest concerns with the current rule are as follows:

1. Restrictions that now limit enrollment to only a few watersheds and certain "categories" of farmers and ranchers. CSP should be nationwide, without geographical restrictions. Participation in CSP should NOT be limited to particular watersheds.
2. Expand eligible resource concerns to all types of conservation objectives. Participation in CSP needs to include farmers and ranchers in all types of agriculture who are willing to commit to significant conservation practices. It ~~is~~ goes against the intent of the legislation to restrict it to particular categories and subcategories of farmers and ranchers.
3. The "per acre" cap on contract payments favors large farms over small farms, those with high land rents over those with lower rental rates and flat land farmers over those of us farming in the mountains ^{we} ~~are~~ farm more intensively even if those farms may be practicing less conservation; therefore, ^{we} ~~ask~~ ask that they be eliminated.
4. Enhancement payments need to include the full range of options in the law, including crop rotations, rotational grazing, buffers, energy conservation, conservation and regeneration of plant and animal

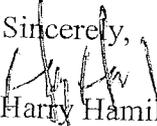
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germplasm, environmentally sound management of invasive species, agro forestry practices, native prairie restoration, pollinator protection and enhancement, continued enhancement payments for on-farm/ranch research and demonstration activities and for on-farm/ranch assessment and evaluation activities.

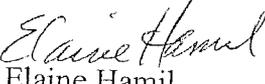
5. Increase the cost-share rate for new practices; so that greater innovation will occur.
6. Remove requirements for a prior history of meeting high environmental standards, and instead require that high standards be met in a reasonable time after participating in the CSP; otherwise new farms have no chance of participating and getting off on the right foot.

The CSP has not only the potential, but also the imperative, to provide farmers and ranchers with meaningful incentives and rewards for implementing comprehensive protection of the nation's extremely valuable, natural resources.

Thank you for this opportunity to comment on this very important program. Please remember that it is the American people that you are ultimately accountable to. There's no point in having civil service protection for career employees if they do not stand up for us regardless of who is in power.

Sincerely,

Harry Hamil

Owner of Harry's Bloomers


Elaine Hamil

Owner of Black Mountain Farmers Market
Coordinator of Black Mountain Tailgate Market
Secretary of the Mountain Tailgate Market Assn.

NO21

AHMLL
151 S. Parkway Ave #4B
BM, SC 28711

Craig Dickerson Program Manager
Financial Assistance Programs Division
National Research Council on Science
PO Box 2890
Washington DC 20013-2890

