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From: Kris O'Connor [kris@vineyardteam.org]
Sent: Monday, September 20, 2004 12:07 PM
To: FarmBillRules
Cc: mnoble@msawg.org; pam@sustainableagriculture.net; Claudia Reid
Subject: Conservation Security Program Rules Comments

Importance: High

Attachments: tmp.htm



tmp.htm (6 KB)

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

RE: Comments on Conservation Security Program Interim Final Rule

Dear Mr. Dickerson:

The Central Coast Vineyard Team is a non-profit grower group whose mission is to promote farming practices that are protect both natural and human resources while remaining profitable. Our growers own or manage over 50,000 acres of the winegrape acreage on the Central Coast of California and represent a significant leader in our industry. We are committed to developing innovative farming practices that reduce risks and improve quality -- these solutions must be tailored to meet the site specific circumstances of each individual vineyard. Not only does development and implementation of best management practices help the farmer, but it helps the public by protecting valuable open space, habitat, clean air, clean water, and a healthy environment for our workers and community.

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. As intended by Congress, CSP should be nationwide program available to all types of producers, in all regions of the country, with all types of conservation objectives.

CSP has the potential to influence agricultural practice to promote agricultural stewardship, but the rules need to be modified so that the CSP meets the original vision of the law. In many cases, the current rules directly contradict the original intent of the legislation.

1. Remove restrictions that limit enrollment to only a few watersheds and certain "categories" of farmers and ranchers. CSP should be nationwide, without geographical restrictions.
2. Expand eligible resource concerns to all types of conservation objectives. Participation in CSP should include farmers and ranchers in all types of agriculture who are willing to commit to significant conservation practices. Participation should not be restricted to particular categories and subcategories of farmers and ranchers.
3. Eliminate the new "per acre" cap on contract payments. It favors large farms over small farms and those with high land rents over those with lower rental rates even if those farms may be practicing less conservation. In areas like California with high values, the current caps will be a disincentive and represent serious barriers for participation.

2043

4. Expand enhancement payments to include the full range of options in the law (i.e., on-farm/ranch assessment and evaluation activities, crop rotations, buffers, energy conservation, environmentally sound management of invasive species, pollinator protection and enhancement, continued enhancement payments for on-farm/ranch research and demonstration activities). There are numerous activities that farmers do that should make them eligible for enhancement payments, but they are not eligible under the current rules. Growers that are willing to share information through outreach, research, assessment and evaluation should be eligible for enhancement, because that federal dollar is being spread beyond a single grower.

5. Increase the cost-share rate for new practices. Growers are assuming risk when they take on new practices. These new practices and risk can be mitigated with an increase in the cost-share rate for such practices.

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. This will allow more growers to join the choir, rather than preaching to the already converted.

The CSP has not potential and imperative to provide farmers and ranchers with meaningful incentives and rewards for implementing comprehensive protection of the nation's extremely valuable, natural resources. But it requires rules changes to meet the original intent of the legislation!

Thank you for this opportunity to comment on this very important program.

Sincerely,

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