

NRCS Forest

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From: jbobbe@itol.com
Sent: Tuesday, September 21, 2004 6:52 AM
To: FarmBillRules
Subject: Attn: Conservation Security Program

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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:

As a concerned Institute for Rural America I submit these comments:

Conservation initiatives to preserve our environment, land, people, wildlife and resources is very important to people who live in rural communities.

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.

Clean air, clean water, habitat and soil protection, are important to all of us who live in rural America. The CSP should recognize and reward actual conservation benefits produced by farmers on their farms and provide incentives for farmers to address and solve critical resource problems. As stated by the NRCS, "In short, CSP should reward the best and motivate the rest."

I urge you to ensure that CSP fulfills its promise. The following points are essential for CSP regulations to ensure implementation of CSP's legislative intent:

1. Remove 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 should include farmers and ranchers in all types of agriculture who are willing to commit to significant conservation practices. It 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.
4. Expand enhancement payments 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 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.
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.

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.

NRCS

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

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Sincerely,

John A. Bobbe, Executive Director
Institute for Rural America

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