

nrCS

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From: ahchristian@earthlink.net
Sent: Tuesday, October 05, 2004 10:13 PM
To: FarmBillRules
Subject: Attn: Conservation Security Program
Importance: High
Attachments: ATTACHMENT.TXT; image001.jpg; SSAWGCommentsInterimFinalRule10-04.doc

Dear Friends at NRCS, I emailed this message at 4:24 this afternoon, Tuesday, Oct. 5.

I received the following on behalf of Mail DeliverySubsystem [MAILER-DAEMON@hm1.usda.gov]

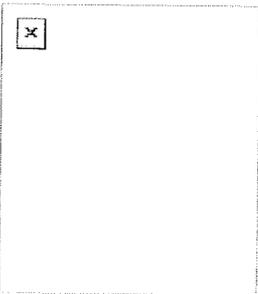
----- The following addresseshad delivery problems ----- "nrCS-csp@fs.fed.us"<nrCS-csp@fs.fed.us>
because:Internal software error

I am trying again.

Thank you.

Archer H.Christian

Southern SAWG Policy Committee



Southern SAWG
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October 4, 2004

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 ProgramInterim Final Rule

Dear Mr. Dickerson:

AEEC RECEIVED

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Southern Sustainable Agriculture Working Group (Southern SAWG) is a not-for-profit organization linking more than 100 constituent organizations and many unaffiliated individuals throughout the 13 Southern states of Alabama, Arkansas, Georgia, Florida, Kentucky, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas and Virginia. We provide education, training, technical assistance and networking to empower farmers, organizations and consumers to create a more ecologically sound, economically viable, socially just and humane agricultural and food system in our region and this country. Farmers and ranchers in our growing network include small to moderate size market gardeners, row crop farmers, and pastured livestock producers, as well as small-scale processors and other value-adding entrepreneurs.

Our constituents have a significant stake in how the Conservation Security Program is designed and implemented. We, therefore, respectfully submit the following comments on the Interim Final Rule for this extremely important program:

- 1. Remove any and all restrictions on enrollment that would limit participation to certain watersheds or "enrollment categories" in future years.** We understand that the budget caps in place at the time that the Interim Final Rule was developed created a difficult position for the NRCS. However, the program limits need not be permanent. With a proposal from the Senate to remove the cap, now is the time to issue a Rule that reflects the original intent of the CSP legislation. The Interim Rule should state NRCS's clear intention to implement a nationwide open enrollment program. Only with open enrollment can the CSP realize its great potential to enhance both the health of our environment and the economic sustainability of the nation's farms and ranches.
- 2. Change eligibility requirements to include willing and able producers, even if they have not achieved the highest NRCS conservation standards for soil and water quality prior to enrolling.** The original intent of the CSP was to help *any and all producers who want to improve their ecological footprint* to do so, and to require that these high standards of stewardship be achieved *during the course of a contract*. As the NRCS stated in issuing the first Proposed Rule, the CSP should "reward the best and motivate the rest." To do this, the Final Rule should impose high environmental and conservation standards to be achieved as a result of participation in a CSP contract, but not as a prerequisite for eligibility. NRCS can utilize the program's tier structure, requiring higher tier participants have a demonstrated history of non-degradation, in order to ensure the program is not abused.
- 3. Expand eligible resource concerns and conservation practices to include all kinds of agriculture in all bioregions.** Resource concerns are numerous and their interactions complex. Soil quality and water quality are just two of the very pressing resource concerns in many parts of the country. Soil erosion, water conservation, environmentally sound pest control, nutrient leaching, germplasm conservation and air quality are equally important in some regions. Each farm will require a different suite of conservation practices to fully address the most critical resource concerns for that farm. The CSP must not be limited to a short list of "resource concerns" that would make the program available only to certain types of operations and not others.
- 4. Eliminate the per acre caps on total payments for stewardship, existing practices and enhancement activities.** The payment caps of 15% (Tier 1) to 40% (Tier 3) of the unadjusted stewardship payments discriminate against smaller producers and those farming land with lower rental rates. Under the Interim Final Rule, a Tier 1 producer operating a 300-acre vegetable farm in a region where land rents for high value crops are \$70/acre (e.g., Kentucky) would have total payments capped at \$157. The payment cap for a Tier 3 producer farming 150 acres of \$30/acre cropland (e.g. Oklahoma) would be only \$270. Many producers in the South have land holdings less than 100 acres. *In fact, according to the 2002 census, more than 70% of the roughly 868,000 farms in the 13 southern states are smaller than 180 acres* (Conservation practices on these farms could dramatically improve the ecosystems within which they operate. However, the small sums all but a few producers would receive under the current Interim Final Rule would not even pay for the time and energy invested in filling out the application! The only caps on total payments for CSP contracts should be the \$20,000, \$35,000 and \$45,000 per annum for Tiers I, II and III respectively, established in the original legislation.

- 5. Make enhancement payments available for the full range of options in the law,** including crop rotations, management intensive grazing, buffers, conservation and regeneration of plant and animal germplasm, environmentally sound management of invasive species, agro forestry practices, native prairie restoration, and pollinator

protection and enhancement. The Rule should offer incentives for a much wider range of complex management systems, since these are increasingly demonstrating conservation and resource enhancement benefits. We were pleased to see energy conservation, on-farm/ranch research and demonstration and on-farm/ranch assessment and evaluation activities listed as eligible enhancement practices in the Interim Final Rule, and recommend retaining these.

6. Restore the cost share for new practices to the statutory limit of 75% to provide meaningful incentives for adoption of additional conservation practices. The Interim Rule's 50% cost share cap could serve as a disincentive to the comprehensive approach to conservation the CSP is intended to promote and support.

We appreciate this opportunity to examine the Interim Final Rule and submit comments, and we thank you for taking these concerns into consideration in developing the Final Rule for the CSP.

Sincerely,

Pamela Corcoran
Executive Director