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From: Heathcote@earthweshare.org
Sent: Tuesday, October 05, 2004 4:54 PM
To: FarmBillRules
Subject: Attn: Conservation Security Program
Attachments: ATTACHMENT.TXT; IEC's CSP comments 10-5-04.doc

IOWA
ENVIRONMENTAL
COUNCIL

October 5, 2004

Mr. Craig Derickson, Conservation Security Program Manager,
 Financial Assistance Programs Division,
 USDA NRCS,
 P.O. Box 2890,
 Washington, DC 20013-2890

Re: Interim Final Rule for the Conservation Security Program

Dear Mr. Derickson:

The Iowa Environmental Council would like to offer the following comments on the Interim Final Rule for the Conservation Security Program (7 CFR 1469), published in the Federal Register on June 21, 2004 (Fed. Reg. Vol. 69, pages 34501-34532). These comments represent the views of the Iowa Environmental Council, an alliance of 75 organizations working in partnership to protect and enhance Iowa's natural resources. Together with our member organizations, the Council represents over 80,000 Iowans.

Since more than 90 percent of the land area in Iowa is working agricultural land, the Iowa Environmental Council is a

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strong supporter of the Conservation Security Program (CSP). During the debate on the 2002 Farm Bill, the Council advocated for this new program because we recognized that significant environmental improvements in Iowa will require a commitment on the part of all citizens to support conservation practices on working agricultural land. In addition to the food and fiber they produce, conservation farmers provide clean air, clean water, healthy soil, and habitat for wildlife that benefits all Americans.

At a time of declining farm income, the Council sees an urgent need for the CSP as authorized in the 2002 Farm Bill. This program was designed to reward farmers who have already implemented good conservation practices on their land, with increasing rewards for adoption of additional practices on the whole farm. The program was also designed to provide incentives for more farmers to take a whole farm management approach to conservation on their land.

Unfortunately, the interim final rule for CSP is not consistent with the language and intent of the law as passed by Congress. We understand that at the time these rules were written, the CSP was a capped entitlement program. However, with passage of the '04 Omnibus bill, the program is once again an uncapped entitlement. Where limited funds are available to implement the program, such as was the case in 2004, this issue should be handled administratively, rather than through restrictions in the program rules.

The Iowa Environmental Council is concerned that without major changes, the CSP will fail to meet the important conservation goals for which it was designed.

Specific areas in the rules that need improvement include:

1.2.3.

4.5. We further recommend that the final rule provide a 15% bonus for cost-share payments to beginning farmers and ranchers to make sure that they can plan for and implement sound conservation practices and systems on their farms and ranches.

The Iowa Environmental Council appreciates the opportunity to offer these comments and we look forward to working with USDA to implement this critical new conservation program. If you have any questions or need clarification on these comments, please do not hesitate to call.

Sincerely,

Susan Heathcote

Research Director

Iowa Environmental Council

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