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**From:** lelandswenson@sbcglobal.net  
**Sent:** Tuesday, October 05, 2004 2:51 PM  
**To:** FarmBillRules  
**Subject:** Conservation Security Program Comments  
**Attachments:** ATTACHMENT.TXT; CSP Comments 9-5-04.doc

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

Dear Craig:  
I have attached the comments of the Community Alliance with Family Farmers regarding the Conservation Security Program Interim Rules.

Thank you for the opportunity and consideration.

Sincerely,

Leland Swenson  
Executive Director

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

Re: Conservation Security Program comments

Dear Mr. Dickerson:

The Community Alliance with Family Farmers (CAFF) is a statewide non-profit organization of family farmers and other citizens working together to enhance our natural resources, improve the economic well-being of family-farmers, and address social justice issues.

CAFF would like to express our disappointment as to the way USDA has implemented the Conservation Security Program (CSP) through its Interim Final Rule. When Congress passed the CSP in 2002, it created an innovative program that has been strangled and distorted by the highly restricted access, unsupportive funding priorities and overly burdensome rules imposed by USDA. The CSP still has potential to reward farmers based on how well they protect and improve the environment, and to balance the excessive incentives of the commodity programs. CAFF urges USDA to issue a CSP Final Rule that will achieve the CSP legislative goals: provide all farmers and ranchers, nation-wide, with a conservation program for working agricultural land that provides comprehensive protection of the nation's natural resources; provide adequate rewards for farmers and ranchers who manage their land with sound, sustainable systems and practices; and provide real incentives to other producers to reach a high level of environmental performance and resource conservation on their farms and ranches. We respectfully request that you consider our comments, which follow.

### **1. The CSP Should Be a Nationwide Program, without Geographic Restrictions or Other Restrictions Created by USDA to Limit Enrollment.**

**Problem:** Under the Interim Final Rule, USDA limited CSP eligibility for each sign-up to farmers and ranchers within a small number of watersheds, designated by the Administration shortly before the sign-up period. Moreover, within those watersheds, USDA established certain "enrollment categories and subcategories" of eligible farmers and ranchers, also designated at the last minute, and USDA further restricted the sign-up to a limited list of resource concerns. These restrictions are completely contrary to the law, and result in uncertainty and confusion for farmers and ranchers who wish to participate in the CSP. The restrictions also result in far less progress in solving environmental natural resource problems, as well as the significant likelihood that the CSP may be manipulated for political purposes.

**Solution:** We urge you to modify the CSP rule by removing the restrictions limiting enrollment to selected watersheds, certain classes of farmers and ranchers, and to a limited set of resource concerns. The CSP should be a nationwide program available to all types of producers in all regions of the country with all types of conservation objectives, as provided for in the 2002 Farm Bill.

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**2. Provide CSP enhancement payments to farmers and ranchers who establish and maintain complex management systems and practices that provide a high level of environmental and natural resource benefits.**

**Problem:** The Interim Final Rule ignores the CSP legislative directives on enhancement payments for farmers and ranchers who have established or will establish complex management systems and practices. Instead USDA appears to be setting high payment rates for simple conservation tillage systems in many regions, while ignoring other systems and practices which may require more management but provide higher returns to the public in environmental and natural resource benefits.

**Solution:** We urge you to provide a more comprehensive package of enhancement payments, including the following:

- For cropland, the CSP rule should include enhancement payments for complex Resource Conserving Crop rotations with a diversity index for enhanced payments.
- Enhancement payments should also be available for rotational grazing systems, conservation buffers, conservation and regeneration of plant and animal germplasm, environmentally sound management of invasive species, agroforestry practices, native prairie restoration, and pollinator protection and enhancement.
- Continue the enhancement payments for energy conservation provided in the Interim Final Rule.
- Retain the enhancement payments for on-farm/ranch research and demonstration activities and for on-farm/ranch assessment and evaluation activities provided in the Interim Final Rule and ensure that these enhancement payments are provided for in every state and sign-up.

**3. Improve the CSP cost-share payment for new practices by removing the 50% cost-share cap and restore the 15% bonus for beginning farmers and ranchers.**

**Problem:** USDA has set a cap on CSP cost-share payments for new practices at 50% of the costs. This cap is much lower than cost-share payments established for conservation practices in many other farm conservation programs and may serve as a disincentive for farmers and ranchers to participate in the comprehensive approach to conservation provided in the CSP. In addition, the Interim Final Rule did not include a 15% bonus for cost-share payments provided to beginning farmers and ranchers.

**Solution:** We urge you to remove the 50% cap off the CSP cost-share payments and bring CSP cost-share payments into line with other Farm Bill conservation programs. Also, establish in the CSP rule a 15% bonus for cost-share payments to beginning farmers and ranchers to ensure that they can plan for and implement sound conservation practices and systems into their operations.

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#### **4. Restructure the new “per acre” cap on contract payments.**

**Problem:** This cap favors large farms over small farms and farms with high land rents over those with lower rental rates, even if those farms may be practicing less conservation. In California, which has very high land values, the current caps will be a disincentive and represent serious barriers for participation.

**Solution:** Restructure the cap so that adjustments can be made per state as to current land values and rental rates. This would enable smaller producers in CA to participate in a nation-wide, conservation program designed to include all farmers.

#### **5. Remove the requirement that farmers and ranchers must meet specific quality criteria for soil and water quality in order to be eligible to apply for the program and instead require that farmers and ranchers meet high soil and water quality criteria within a reasonable time after participating in the CSP.**

**Problem:** Under the Interim Final Rule, USDA prohibits many farmers and ranchers from eligibility to participate in the CSP if they do not meet specific, high soil and water quality criteria when they apply for a CSP contract. This restriction may be imposed because the applicant does not have full recordkeeping nor has one year with a high nitrogen application or needs to establish a conservation practice such as stream fencing to meet the quality criteria, etc. This restriction eliminates from CSP participation many farmers and ranchers who could provide significant environmental and conservation benefits by participating in the CSP.

**Solution:** We urge you to retain high environmental standards as CSP contract goals. But rather than disqualifying farmers and ranchers who do not meet high soil and water quality criteria at the time of application for the CSP, USDA should require that participants in a CSP conservation plans or contract will meet specified high soil and water quality criteria within a reasonable time period.

The Community Alliance with Family Farmers thanks you for taking these comments into consideration.

Sincerely,

Leland Swenson, Executive Director