**nrcs** N456

**From:** cynthiapansing@mrba.org
**Sent:** Tuesday, October 05, 2004 4:47 PM
**To:** FarmBillRules
**Cc:** dougdaigle@mrba.org
**Subject:** Attn: Conservation Security Program
**Importance:** High
**Attachments:** ATTACHMENT.TXT; image001.jpg

F 2 like

October 5, 2004

To the Conservation Security Program:

Onbehalf of the Mississippi River Basin Alliance (MRBA), I am writing this letterto provide our comments on the Interim Final Rule for the Conservation SecurityProgram (CSP) of the 2002 Farm Bill.

TheMississippi River Basin Alliance is a coalition of about 150 diverseorganizations throughout the basin that works to protect and preserve theriver, its communities, and landscape. The agricultural sector is animportant contributor to the health of the river ecosystem and is thus an area of major concern forus.

Byway of background, MRBA strongly supported the inclusion of CSP in the 2002Farm Bill, and the intent of Congress to make it widely available to farmersand ranchers throughout the nation. The CSP has the potential to be a majordriver in sustaining the farm sector. It also has the potential toachieve significant progress in addressing systemic environmental problems likenutrient pollution, including those such as hypoxia in the Gulf of Mexico thathave an impact on local, regional, and national economies.

MRBAsupports the goal of CSP being a nationwide program that rewards farmers andranchers who practice good stewardship and sustainable land management to ahigh level of environmental performance and resource conservation. A consistentlevel of environmental performance should be a goal but not an endpoint. Makingsignificant progress toward this goal should be rewarded on par with highenvironmental performance.

MRBAsupports the goal of CSP being made available to all farmers and ranchers, bothin terms of geography, and in terms of the full range of resource concerns thatcan be addressed by responsible land and resource management – no matterhow seemingly complex is the management

AEEC RECEIVED

strategy. Sometimes complex systemicsolutions are more preferable to those that address a solitary conservationchallenge. The goal should be for CSP to become a nationwide program availableto all types of producers in all regions of the country, and address a widerange of conservation objectives, as provided for in the 2002 Farm Bill.

Wealso recommend that the USDA expands the CSP beyond the initial set of targetwatersheds designated in the program's first year in an effort to make theprogram more widely available. Again, we recommend this because of thegreat potential the CSP has for sustaining the farm economy by rewarding with incentivesas an alternative to supporting with subsidies.

Wehope that you will incorporate these comments and similar ones from otherorganizations into the drafting of the Final Rule for the CSP. We believe thatby doing so USDA will strengthen the CSP and re-root it in its originalintention when the Farm Bill was first passed. Thank you.

Sincerely,

Mississippi River Basin Alliance

708 North First Street, Suite #238

Minneapolis, MN 55401