

nrCS

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From: formo@mncorn.org
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To: FarmBillRules
Subject: Attn: Conservation Security Program
Attachments: ATTACHMENT.TXT

The Minnesota Corn Growers Association offers the following comments regarding the CSP.

The documentation required for compliance with sound nutrient management plans is currently unduly burdensome. We suggest that in keeping with the philosophy of a voluntary, incentive based program, the NRCS eliminate the requirement to provide soil test and fertilization records. Producers should show that they have these records, but NRCS should not take on the task of maintaining these records in its files. This will make the application process more user friendly and protect the NRCS from the burden of maintaining such extensive documentation.

The launch of the program also revealed a significant weakness in the rules as written relative to following fertilizer recommendations. Our suggestion is to write more flexibility into the rules to allow, and actually encourage, fertilizer rates to be tailored for differing soil types and farming practices, to provide for better agronomic and environmental results. Good nutrient management and acceptable rates do not recognize state boundaries. Flexibility will also allow land grant universities an opportunity to "catch up" to new science and farming methods, which can reduce the agronomic and environmental risks of nutrient application.

We would emphasize that changes to the rules should be in keeping with the original intent of the CSP, "to reward the best and motivate the rest." The program must not be allowed to become regulatory in nature. We thank you for the opportunity to provide comments and for your continued work as the CSP evolves.

Submitted on behalf of the Minnesota Corn Growers Association by

Warren Formo, Program Manager

Minnesota Corn Growers Association

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