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NRCS Forest

From: roger@kitchengardeners.org
Sent: Tuesday, October 05, 2004 9:41 AM
To: FarmBillRules
Subject: Attn: Conservation Security Program

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 Program Interim Final Rule

Dear Mr. Dickerson:

As a concerned agriculture professional I submit these comments:

I've been working on promoting and, in my own little way, shaping the Conservation Security Program (CSP) through public outreach efforts in the Northeast over the past couple of years. If I've done so, it's because my organization recognizes that the CSP is an important and innovative step forward in our nation's approach to conservation and a critical new component of U.S. farm policy.

CSP holds great promise for rewarding farmers based on how they protect and improve the environment. As intended by Congress, CSP should be nationwide program available to all types of producers, in all regions of the country, with all types of conservation objectives.

Conservation farmers provide many essential benefits to all Americans in the form of clean air, clean water, habitat and soil protection, and more. The CSP should recognize and reward actual conservation benefits produced by farmers on their farms and provide incentives for farmers to address and solve critical resource problems. As stated by the NRCS, "In short, CSP should reward the best and motivate the rest."

I urge you to ensure that CSP fulfills its promise. The following points are essential for CSP regulations to ensure implementation of CSP's legislative intent:

1. Remove restrictions that now limit enrollment to only a few watersheds and certain "categories" of farmers and ranchers. CSP should be nationwide, without geographical restrictions. Participation in CSP should not be limited to particular watersheds.

2. Expand eligible resource concerns to all types of conservation objectives. Participation in CSP should include farmers and ranchers in all types of agriculture who are willing to commit to significant conservation practices. It should not be restricted to particular categories and subcategories of farmers and ranchers.

3. Eliminate the new "per acre" cap on contract payments. It favors large farms over small farms and those with high land rents over those with lower rental rates even if those farms may be practicing less conservation.

4. Expand enhancement payments to include the full range of options in the law, includ crop rotations, rotational grazing, buffers, energy conservation, conservation and regeneration of plant and animal germplasm, environmentally sound management of invas species, agro forestry practices, native prairie restoration, pollinator protection a enhancement, continued enhancement payments for on-farm/ranch research and demonstrat activities and for on-farm/ranch assessment and evaluation activities.

5. Increase the cost-share rate for new practices.

6. Remove requirements for a prior history of meeting high environmental standards, instead require that high standards be met in a reasonable time after participating

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The CSP has not only the potential, but also the imperative, to provide farmers and ranchers with meaningful incentives and rewards for implementing comprehensive protection of the nation's extremely valuable, natural resources.

Thank you for this opportunity to comment on this very important program.

Sincerely,

Roger Doiron
Northeast Sustainable Agriculture Working Group (NESAWG)
58 Bayview Avenue
Scarborough, ME