

NISSZ

Subject: Fw: Comments on CSP Interim Final Rule
From: Chris J Miller <chrismiller@fs.fed.us>
Date: Tue, 12 Oct 2004 13:20:20 -0600
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----- Forwarded by Chris J Miller/WO/USDAFS on 10/12/2004 01:20 PM -----

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>
Final Rule

To: FarmBillRules
cc:
Subject: Comments on CSP Interim

09/14/2004 04:55

PM

Please consider the following four comments on the Conservation Security Program Interim Final Rule.

Thanks,
Les Everett
Program Coordinator, Agricultural Programs
University of Minnesota Water Resources Center

1. For the sake of NRCS field staff, simplify the rule. Your field staff were "deer in the headlights" trying to explain this extremely complicated rule to groups of farmers. (I attended one of the informational sessions.)

The program as written in the law does not call for the many layers of caps and restrictions that were added in the rule. Trying to implement this rule in one watershed in the state was tough, but it would be excessively taxing to add more watersheds the way this is written. Count on substantial staff loss if it stays as is. The producer work-book was an excellent tool, but inadequate to overcome an overly-complicated rule.

2. Remove the two-year pre-requisite performance requirements for soil and water quality to get into the program. They are not in the law, and they induced excessive political pressure on NRCS (from Senators and Congressmen

called by producer groups) to bend the standards to get farmers into the program. This had the effect of compromising practice standards that are written and work well for all programs (like EQIP). Farmers did not know these pre-requisites were coming, did not have two years of adequate documented performance, and are angry that they are out with no chance to get in again for 8 years. This scene will be repeated in the next sign-up,

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because there will still not have been sufficient warning for them to have had two years of documented adequate performance. Farmers will meet the standards without serious complaints (as they have with EQIP) once they sign up. Absent that option, the political pressure will cause practice performance standards to be compromised....quite counter-productive.

3. Increase the incentives (enhancement payments, selection priority, etc.)

for rotations beyond two crops, for rotational grazing, and other ways to increase nutrient and soil retention. The hypoxia problem in the Gulf of Mexico is only partially addressed by good nutrient management....corn/soybeans will always be a nitrogen-leaky system when combined with tile drainage. We need longer rotations with sod crops included, and this program should be providing substantial movement in that direction.

4. The commodity support programs have skewed land rents and prices in areas of supported commodity crop production. It is not a good idea to lock those in by indexing CSP payment limits on current rental payments. Better to place limits based on the cost of conservation than rental rates per acre....this is not CRP where you are actually renting land in a competitive market.