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Wells County Soil Conservation
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Wells County Soil
Conservation
District
Board of
Supervisors

Mr. David McKay
Conservation Planning Team Leader
Conservation Operations Division
USDA NRCS
P.O. Box 2890
Washington, DC 20013-2890

February 27, 2004

Byron Nelson,
Chairman
Hamberg

Loren Patrie
Bowdon

David Lutt
Harvey

Chris Sellie
Cathay

Mitch Lloyd
Fessenden

Attention: Conservation Security Program

Dear Mr. McKay:

The Wells County Soil Conservation District is pleased to submit comments on the proposed rule to implement the 2002 Farm Bill Conservation Security Program. First, we applaud NRCS for developing a proposed rule in the face of the number of legislative changes that were made to the program following its enactment.

We have several concerns relative to the proposed rule. We understand that during the development of the proposed rule changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change, NRCS proposed a much more limited program that would be available only to a relatively small number of producers in highly targeted watersheds. The proposed rule also placed significantly lower limits on cost-share rates and base payments than were allowed in the statute; restricted the number and types of practices that would be eligible for payment; and required producers to address resource concerns prior to enrolling in the program.

The enactment of the 2004 Consolidated Appropriations Bill, however, restored the CSP to an uncapped entitlement as it was originally written. Given that fact, we strongly urge NRCS to prepare a rule to implement the program as originally intended and without the severe restrictions in the currently proposed rule. The principal issues that need to be addressed in the supplement to properly implement the CSP as an uncapped entitlement include:

- allowing open enrollment to all eligible producers nationwide with no preference for producers in targeted watersheds;
- providing the full cost-share, maintenance and base payments as provided for in the statute;
- removing the limitation on the types of practices eligible for payment; and
- making the CSP a true rewards program by allowing producers to use CSP to address resource concerns after enrollment.
- allowing that any land for which the producer cannot demonstrate control for five or more years will not be eligible for payments, and need not be maintained at the same conservation standard as the rest of the operation.
- accepting applications in a continuous sign-up, allowing much greater producer access than periodic sign-ups.

We appreciate the opportunity to provide our comments on the CSP proposed rule.

Sincerely,

Anne Ehni, Manager/Field Technician
Wells County Soil Conservation District
anne.ehni@nd.usda.gov



**MORTON COUNTY SOIL
CONSERVATION DISTRICT**

2610 OLD RED TRAIL
MANDAN, ND 58554
701-667-1163 - Ext. 3

February 20, 2004

Mr. David McKay
Conservation Planning Team Leader
Conservation Operations Division
USDA-NRCS
PO Box 2890
Washington, D.C. 20013-2890

RE: Conservation Security Program

Dear Mr. McKay:

Thank you for the opportunity to comment on the proposed rule to implement the 2002 Farm Bill Conservation Security Program.

We have several concerns relative to the proposed rule. We understand that during the development of the proposed rule, changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change, NRCS proposed a much more limited program that would be available only to a relatively small number of producers in highly targeted watersheds. The proposed rule also placed significantly lower limits on cost-share rates and base payments than were allowed in the statute; restricted the number of types of practices that would be eligible for payment; and required producers to address resource concerns prior to enrolling in the program.

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- Allowing open enrollment to all eligible producers nationwide with no preference for producers in targeted watersheds;
- Providing the full cost-share, maintenance and base payments as provided for in the statute;
- Removing the limitation on the types of practices for payment; and
- Making the CSP a true rewards program by allowing producers to use CSP to address resource concerns after enrollment.

We strongly urge NRCS to make these major changes in the rules to reflect the intent of the CSP legislation. Farmers and the conservation community developed it; it allowed for the one-stop approach for conservation. All producers were to have been eligible and payments were expected to reward good stewardship practices, on an ongoing basis.

The CSP rule can and should reflect the intent of the legislation. We urge USDA and NRCS to issue a new rule more in-tune with the intended legislation. The CSP rule should reflect the nation-wide, entitlement program for good working lands stewardship as it was passed by Congress.

We appreciate this opportunity to provide our comments on the CSP proposed rule.

Sincerely



Duane Olsen *sb*
Chairman
Morton County SCD



Cumberland County Soil and Water Conservation District
201 East Main • Toledo, IL 62468 • Phone: (217) 849-2201 Ext. 3

Mr. David McKay
Attention: Conservation Security Program
Conservation Planning Team Leader
Conservation Operations Division
USDA NRCS
P.O. Box 2890
Washington, DC 20013-2890

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We have several concerns relative to the proposed rule. We understand that during the development of the proposed rule changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change, NRCS proposed a much more limited program that would be available only to a relatively small number of producers in highly targeted watersheds. The proposed rule also placed significantly lower limits on cost-share rates and base payments than were allowed in the statute; restricted the number and types of practices that would be eligible for payment; and required producers to address resource concerns prior to enrolling in the program.

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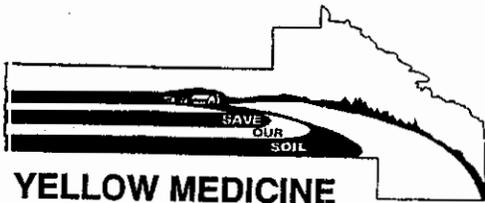
- allowing open enrollment to all eligible producers nationwide with no preference for producers in targeted watersheds;
- providing the full cost-share, maintenance and base payments as provided for in the statute;

- removing the limitation on the types of practices eligible for payment; and
- making the CSP a true rewards program by allowing producers to use CSP to address resource concerns after enrollment.
- Make payments to producer or producers with risk in crop or livestock in operation
- Set rental rates on a district by district basis' through a local working group with final OK by state committee

Sincerely,

Robert Lueaungon, Chairman
Roscoe Michole
Julian Nuffman
Roger James
Rogene Catey

Cumberland County IL Board Members



YELLOW MEDICINE

SOIL AND WATER CONSERVATION DISTRICT

626
1000 10th Avenue
P.O. Box 545
Clarkfield, Minnesota 56223
Telephone: 320-669-4442, Ext. 3
Fax: 320-669-7525

February 26, 2004

Mr. David McKay
Attention: Conservation Security Program
Conservation Planning Team Leader
Conservation Operations Division
USDA NRCS
P.O. Box 2890
Washington, DC 20013-2890

Email: david.mckay@usda.gov, Attention: Conservation Security Program

Dear Mr. McKay:

The Yellow Medicine Soil and Water Conservation District are we are pleased to submit comments on the proposed rule to implement the 2002 Farm Bill Conservation Security Program.

We have several concerns relative to the proposed rule. We understand that during the development of the proposed rule changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change, NRCS proposed a much more limited program that would be available only to a relatively small number of producers in highly targeted watersheds. The proposed rule also placed significantly lower limits on cost-share rates and base payments than were allowed in the statute; restricted the number and types of practices that would be eligible for payment; and required producers to address resource concerns prior to enrolling in the program.

The enactment of the 2004 Consolidated Appropriations Bill, however, restored the CSP to an uncapped entitlement as it was originally written. Given that fact, we strongly urge NRCS to prepare a rule to implement the program as originally intended and without the severe restrictions in the currently proposed rule. The principal issues that need to be addressed in the supplement to properly implement the CSP as an uncapped entitlement include:

- allowing open enrollment to all eligible producers nationwide with no preference for producers in targeted watersheds;
- providing the full cost-share, maintenance and base payments as provided for in the statute;
- removing the limitation on the types of practices eligible for payment;
- conducting a continuous sign up will allow producers and the local NRCS staff to better manage their time given the seasonal nature of agricultural production, and
- making the CSP a true rewards program by allowing producers to use CSP to address resource concerns after enrollment.

We appreciate the opportunity to provide our comments on the CSP proposed rule.

Sincerely,

Yellow Medicine SWCD Supervisor



Palmer Soil & Water Conservation District

259 S. Alaska Street, Palmer Alaska 99645
Phone: (907) 745-1441 • Fax: (907) 745-1443

CONSERVATION • DEVELOPMENT • SELF-GOVERNMENT

February 25, 2004

Attn: CSP

Re: Conservation Security Program Proposed Rule

Dear Secretary Veneman,

I am disappointed in the shortcomings of the proposed rule for the Conservation Security program and I urge you to issue a supplemental or revised rule reflecting the new law restoring the CSP's entitlement funding status. I also have some key concerns that should be addressed in a revised rule to bring the draft program implementation design in line with the requirements of the CSP section of the 2002 Farm Bill. Please issue this in a timely fashion, without adding significantly to the length of the existing public comment period, so farmers can still enroll in the program this year.

The proposed rule fails to provide a nationwide program available to all farmers and ranchers in all regions of the country who are practicing effective conservation, as required by law. It limits CSP eligibility to farmers and ranchers within a small number of watersheds and, within those watersheds, to certain "enrollment categories and subcategories" of producers. This would result in vastly lower participation levels and far less progress in solving natural resource problems. The rule should be modified by removing the restrictions limiting enrollment to certain watersheds, certain classes of farmers and ranchers, and to a limited set of resource concerns.

In addition, the proposed rule sets the entry point too high. The highest NRCS conservation standards for soil and water quality would have to be achieved prior to becoming eligible for the CSP. This is in stark contrast to the law, which says that relevant conservation standards must be met as a result of participation in the CSP. For Tier 3 participants, the proposed rule would require every single NRCS conservation standard to have been met prior to enrollment. The proposal would deny access to farmers who are transitioning to sustainable agriculture. The rule should be modified to retain high environmental standards, but to allow farmers and ranchers to achieve those high standards while in the program.

Instead of providing meaningful incentives and financial rewards for outstanding environmental effort and performance as envisioned by the law, the proposal demands that farm families cover

the vast majority of costs of implementing and maintaining conservation systems out of their own pocket. The payment structure needs to be radically revised or the program has no hope of succeeding. The rule should establish cost-share rates on par with cost-share rates under other USDA conservation programs. Cost-share rates for newly installed practices should be equivalent to the rates under the Environmental Quality Incentives Program. Cost-share rates for the management and maintenance of existing conservation practices should be set at the 75% maximum rate established in the CSP law. Base payments should be set at the rates established in the CSP law, not the 90% reduced rate in the proposed rule.

Enhanced payments should reward the most environmentally-beneficial systems and, to the maximum extent possible, pay for results. Enhanced payments for on-farm research and demonstration projects and for on-farm monitoring and evaluation activities should allow the producer to recover costs. The enhanced payments for treating resource problems to management intensity levels beyond the current NRCS standards, for addressing additional resource problems, and for collective action within a watershed should not be treated as cost-share but rather as real bonuses to reward exceptional performance. A revised rule should also explicitly recognize resource-conserving crop rotations, rotational grazing and buffers as practices receiving substantial enhanced payments, as required by law.

I look forward to commenting on a revised proposed rule that describes a fair and workable program that works for family farmers and the environment.

Thank you,


Wayne Bouwens, Chair

Palmer Soil & Water Conservation District