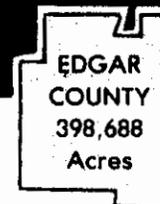




Edgar County

Soil and Water Conservation District

11757 IL Hwy 1 * Paris, Illinois 61944 * Phone 465-5325 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

Attention: Conservation Security Program

Dear Mr. McKay:

We are 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.
 - 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,

Edgar County Soil & Water Conservation District Board of Directors



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McDonough County Soil and Water Conservation District
1607 West Jackson Street - Macomb, IL 61455 - Phone (309) 833-1711 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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Sincerely,

Kenneth B. Burt, Chairman

McDonough County SWCD Board of Directors



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Sedgwick County Conservation District

2625 South Tyler Rd. - Wichita, Kansas 67215-8621 - (316) 660-7286 - FAX (316) 729-8938

David McKay
NRCS Conservation Operations Division
FAX: 202-720-4265

Re: Conservation Security Program Comments

This Board has studied the Conservation Security Program authorized by the 2002 Farm Bill. We wish to make comments about the proposed rule to administer the program.

First of all, it appears this work will be a "guided reward program" for only those who have received the benefit of conservation through an already government-subsidized program. This Board believes that the money could be better spent on subsidizing existing conservation programs not yet complete instead of simply rewarding existing practices.

Second, we do not believe it is fair to require that the land must be located within a "selected" priority watershed. This is discriminating against a very deserving operator simply because of "location".

Third, we have some compunction about the worthiness of the reward program itself. If we have 3.77 billion dollars to spend for conservation over and above the basic needs, why don't we use that money for a more necessary purpose? One that comes to mind instantly is to finish out or apply that money toward the basic watershed structures effort (PL 566) which would benefit many more people. Some of these watershed districts have been organized for over 40 years and are not yet complete because of lack of funds. A reward program might be in order if all of the basic necessary conservation work was completed and we had excess funds.

To cut to the chase, we believe it is time to step back and take another look at our priorities and forget about rewards (pork). The priority should be to increase the number of acres under conservation programs, or to continue existing programs, which are under-funded; not simply reward operators for already being in a government-subsidized program.

There is an old saying - *Smear The Fat Sow With Butter!* Is that exactly what we are doing?? Or is it time to tighten the belt? We think it is high time to take a hard look at Big Government spending. If we have this money to spend, use it where it will do the most good and benefit the most people.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wilmer Freund".

Wilmer Freund, Chairman
Sedgwick County Conservation District

Cc: Senator Sam Brownback
Senator Pat Roberts
Representative Todd Tiahrt
Representative Jerry Moran
Carl Jordan, Secretary-Treasurer KACD



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New Mexico Organic Commodity Commission

Bill Richardson, *Governor*

Erica Peters, *Agency Director*

Date: January 28, 2004

To: David McKay
Conservation Operations
NRCS, PO Box 2890
Washington, DC 20013-2890

From: Erica Peters
New Mexico Organic Commodity Commission Director
4001 Indian School NE, Suite 310
Albuquerque, NM 87110
Erica.peters@state.nm.us
(505)841-9064

Subject: CSP

A revised proposed rule is necessary for the Conservation Security Program. I urge the NRCS to quickly issue a revised proposed rule that is congruent with the requirements of the CSP section of the 2002 Farm Bill.

The current proposed rule is too limited and should provide a nationwide program available to all farmers and ranchers in the country who are practicing effective conservation. The new proposed rule should **not** limit eligibility to farmers and ranchers with a small number of watersheds or to certain classes of farmers and ranchers.

The proposed rule sets the entry point far too high and is not consistent with the law. The proposed rule denies access those transitioning to sustainable agriculture. Farmers and ranchers should be able to achieve high environmental standards through the CSP program. CSP contracts should specify that all applicable conservation standards should be met by the end of the third year.

The payment rates proposed are far too low. The payment structure should be revamped to be consistent with CSP law.

The rule should; include and define participation with the National Organic Program and the CSP, make all conservation practices eligible, restore a comprehensive, locally-driven approach to conservation, provide ongoing, not one-time support, not penalize cash renters, provide continuous sign up.