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**Beaufort Soil & Water Conservation District**  
**Agricultural Center**  
**155C Airport Road**  
**Washington, NC 27889-9684**  
**Telephone No.: 252-946-4989, Ext. 3**  
**Fax No.: 252-946-2501**

Fax Cover Sheet

Date: 3/2/04

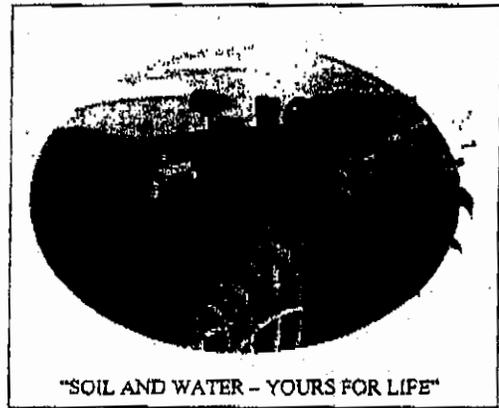
Number of Pages 2  
(Cover Sheet is Page 1)

To: Mr. David McKay

Fax #: 202-730-4245

From: Don Windley  
Beaufort SWCD

Fax #: 252-946-2501



Subject: CSP Comments

Comments: \_\_\_\_\_

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**Beaufort Soil and Water Conservation District**

Agricultural Center, 155 Airport Road - Washington, NC 27889-9684 - Phone (252) 946-4989

**Board of Supervisors**JAMES E. ALLEN  
LEX MANN  
HYRAM O. PAUL, JR.  
JOE E. ROGERS  
DAN WINDLEY

March 2, 2004

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

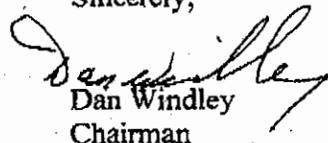
Dear Sir:

Here are comments on the Conservation Security Program on behalf of the Beaufort Soil and Water Conservation District.

- 1) CSP funds should only be used to reward producers, and not used for cost sharing on conservation practices (EQIP and, if available, state cost share program funds should be used for practice installation).
- 2) The program should strive to reward the best, while encouraging farmers to "go to school" with the goal of "graduating" to the top tier.
- 3) While leveraging CSP with state funds is a good idea, we currently see the need to do this more with EQIP than CSP.
- 4) Minimum level (lowest tier) should be meeting the corresponding resource management system.
- 5) Farmers not landowners (unless they are tending the land also) should receive CSP payments. While the 2002 Farm Bill recognized the need to "invest" more money on working lands, we are still falling short.
- 6) Only cropland should receive CSP funding. We recommend no requirements or funding of even incidental forest land.

We see this program as a grand opportunity for conservation and agriculture in this country. A properly managed program will be a great boost for the conservation effort. Thank you for the opportunity to comment.

Sincerely,

  
Dan Windley  
Chairman



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**Menard County Soil and Water Conservation District**

R.R. 3, Box 16 - Route 128 East - Petersburg, Illinois 62675 - Phone (217) 632-7590 - Fax (217) 632-4297

FAX

Date 03/02/04

To: David McKay

From: Sheryl Marfat

Fax #: 202-720-4265

Phone: \_\_\_\_\_

# Pages: \_\_\_\_\_  
(including cover page)

Re: Dear Mr. McKay,

this letter was sent  
via e-mail yesterday.

Don't know if you want  
Comments:

this faxed copy or not,  
but it has signatures.

Thanks!  
Sheryl

**Menard County Soil and Water Conservation District**

R.R. 3, Box 16 - Route 123 East - Petersburg, Illinois 62675 - Phone (217) 632-7590 - Fax (217) 632-4297

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:

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,

*Michael E. Thomas*

Michael E. Thomas, Chairman

*Jim Todd vice chairman*