



# Union Soil and Water Conservation District

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943 EAST 5TH STREET - MARYSVILLE, OHIO 43040 - PHONE (937) 642-5871 - FAX (937) 642-2825

February 25, 2004

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

Dear Mr. McKay:

Thank you for the opportunity to submit comments concerning the proposed rule for implementing the Conservation Security Program. The Conservation Security Program has the potential of being one of the best USDA programs ever offered to producers. In order for this potential to be realized, we feel that the CSP needs to be a full, nationally implemented program with a rewards system for conservation farmers as was originally intended by the law. The CSP could be a very big carrot to offer to producers of working agricultural lands who are meeting their resource conservation goals.

Additional issues which we would like to see addressed are as follows:

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

Thank you once again for the opportunity to provide our comments on the CSP proposed rule.

Sincerely,

Matt Staley, Chairman  
Board of Supervisors  
Union Soil and Water  
Conservation District

*Board of Directors*

MATT FURER  
11345 Hopewell Road  
Marysville, Ohio 43040

STEVE ROBINSON  
21199 S.R. 4  
Marysville, Ohio 43040

JAY RAUSCH  
15199 Scottslawn Road  
Marysville, Ohio 43040

MATT STALEY  
27791 Storms Road  
West Mansfield, Ohio 43353

BILL CONKLIN  
10881 US Route 36  
Ostrander, Ohio 43061



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Hancock County Soil and Water Conservation District

110 Buchanan Street - Carthage, Illinois 62321 - Phone (217) 357-2180 - FAX (217) 357-3412

March 1, 2004

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

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

The Hancock County Soil & Water Conservation District thanks you for your time and consideration of this important matter.

Sincerely,

*Adam Lucie* Resource Conservationist

Hancock County Soil and Water Conservation District

CONSERVATION - DEVELOPMENT - SELF-GOVERNMENT



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**Hancock County Soil and Water Conservation District**

110 Buchanan Street - Carthage, Illinois 62321 - Phone (217) 357-2180 - FAX (217) 357-3412

March 1, 2004

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

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The Hancock County Soil & Water Conservation District thanks you for your time and consideration of this important matter.

Sincerely,

*Betty Buckert, Administrative Coordinator*  
Hancock County Soil and Water Conservation District



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**McLean County Soil and Water Conservation District**  
402 N. Kays Drive • Normal, Illinois 61761  
309 452-3848 ext.3

February 19, 2004

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

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.

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- 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,



Sally Breese  
Board of Directors  
McLean County, IL Soil & Water Conservation District