

Attn: CSP Proposed Rule

14 Thoreau Ct.
Concord, MA 01742

Dear Mr. McKay,

My name is Campbell Watts and I am writing to you in my capacity as an employee of The Food Project, a nonprofit organization based in Lincoln and Boston, MA.

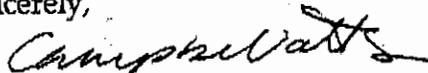
I believe that the CSP can be a very useful tool for helping organizations like The Food Project, which promotes and practices sustainable agriculture, conserve and improve natural resources, but only if the proposed rule is changed to reflect the original spirit of the program.

Specifically, I would like to recommend the following changes:

1. **Make All Farms Eligible:** the proposed rule restricts enrollment. Please restore eligibility for all farmers and ranchers who wish to take care of their land.
2. **Motivate Farmers:** the proposed rule allows only those who already practice conservation to participate. Please allow farmers to achieve high conservation standards while in the program, not as a precondition for applying.
3. **Make Incentive Payments Meaningful:** the proposed rule has very low payment rates that don't cover the farmer's costs. For this program to succeed payments to the participants must be increased so that farmers are financially rewarded for outstanding environmental performance.
4. **Broaden Conservation Efforts:** please allow farmers to address any or all natural resource concerns on their farm, and allow them to make use of all effective conservation practices, instead of restricting what can be done.

Thank you very much for considering these comments.

Sincerely,



Campbell Watts

Attn: CSP Proposed Rule

30 Lorne Street
Dorchester, MA
02124

Dear Mr. McKay,

My name is Blake Wilder and I am writing to you in my capacity as an employee of The Food Project, a nonprofit organization based in Lincoln and Boston, MA.

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Thank you very much for considering these comments.

Sincerely,



Blake M. Wilder

Attn: CSP Proposed Rule

130 Avon St, Apt 2
Malden Ma, 02148

Dear Mr. McKay,

My name is Kieran Prescott and I am writing to you in my capacity as an employee of The Food Project, a nonprofit organization based in Lincoln and Boston, MA.

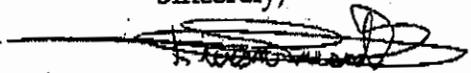
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Thank you very much for considering these comments.

Sincerely,



Kieran Prescott

Attn: CSP Proposed Rule

32 Carl St.
Newton, MA, 02461

Dear Mr. McKay,

My name is Marissa Drossos and I am writing to you in my capacity as an employee of The Food Project, a nonprofit organization based in Lincoln and Boston, MA.

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Thank you very much for considering these comments.

Sincerely,



Marissa Drossos

Mark and Angela Jones
RR 1, Box 102C
Summersville, MO 65571
jonested@fidnet.com

February 29, 2004

Ann Veneman
Secretary of Agriculture
agsec@usda.gov
202-720-3631/2166 fax

Dear Ms. Veneman,

Greetings! We are members of the Missouri Farmers Union, and received word from the Sustainable Agriculture Coalition about the Conservation Security Program. We'd like to take advantage of the public comment period and ask you to please issue a revised, proposed rule for the CSP to restore it to its 2002 Farm Bill status as an uncapped program.

Could you redesign the rule to provide genuine stewardship incentives to farmers and ranchers *nationwide* who are ready to farm sustainably in ways that protect and enhance the environment? It would be helpful and meaningful to those willing and able to participate if the CSP would: 1) have cost-share rates that are on par with cost-share rates under other USDA conservation programs such as the Environmental Quality Incentives Program; 2) reward resource conservation crop rotations and buffers; 3) treat grass-based agriculture fairly; 4) respond to the needs of organic producers; 5) restore a comprehensive locally-driven approach to conservation; 6) make all conservation practices eligible; 7) provide for ongoing, not one-time support; 8) not penalize cash renters; and 9) provide for a continuous sign-up process.

Thank you very much for your time and consideration for family farmers/ranchers and the environment of which we are stewards. :)

Sincerely,

Angela Jones for
the Jones family

cc: David McKay
Conservation Operations
NCRS
202-720-4265 fax

Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013

I am writing to suggest important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the CSP as a nationwide conservation program focused on working farmlands and which would reward the best, and motivate the rest. As intended by Congress, the CSP should be open to all farmers in the U.S. practicing effective conservation.

First, USDA should issue a supplement to the rule, which would be open for public comment for 30 days. This should be done immediately to fix major problems with the proposed rules issued on January 2, 2004, which are not consistent with the law authorizing the CSP nor with the funding allocated by Congress making CSP an uncapped national entitlement program.

In addition,

1. USDA's preferred approach in the proposed rule would severely and unnecessarily prevent most farmers from gaining access to the CSP. USDA must adhere to the law, and to the recently appropriated full funding of CSP by Congress, and make CSP available nationwide to all farmers practicing effective conservation. The USDA needs to get rid of the idea of restricting sign-up for CSP to a few selected watersheds and undefined categories.
2. The USDA's proposed rules fail to make anywhere close to adequate payments for environmental benefits being produced by farmers currently practicing effective conservation. The best way to secure the vital conservation of our soil and other resources is to recognize and reward it when and where it is being done. Paying the best practitioners for results is sound economics and smart policy, providing both reward and motivation. CSP base payments should be set at the local rental rates based on land capability without the 90% reduction proposed by USDA. Enhanced payments should reward the most environmentally-beneficial systems and to the maximum extent possible pay for results. The enhanced payments should not be treated as cost-share but rather as real bonuses to reward exceptional performance.
3. CSP needs to recognize and reward resource-conserving crop rotations and managed rotational grazing as proven conservation farming systems that deliver environmental benefits to society. Both are specifically mentioned for enhanced payments in the CSP statute. The final rule should highlight substantial enhancement payments for these systems, as well as payments for management of existing practices.
4. USDA should not penalize farmers for shifting former cropland to pasture as part of a managed grazing system. Former or potential cropland that is pastured and put into a managed rotational grazing system must receive equal payment rates to other cropland, and not the lower rate of pastureland. The rules should establish base payments based on NRCS land capability classes, not current land use.
5. CSP should allow farmers with USDA-approved organic certification plans under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both. No need to tie farmers up in red tape.

Sincerely,

Steffen Helgaas

s/helgaas

Janet Helgaas

Janet Helgaas

(Additional comments on back)

