

**Hellyer Limited Partnership**  
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Ph/Fax 307.332.4610

February 26, 2004

David McKay  
Conservation Planning Team Leader  
Conservation Operations Division  
NRCS  
P.O. Box 2890  
Washington, D.C. 20013-2890

Dear Mr. McKay,

We, HLP, are a family ranch located in western Wyoming. Our operation consists of a mix of private, state, and federal lands. On the whole, our ranch is a relative newcomer concerning participation in programs such as the CSP. Our previous relationships with the NRCS has consisted of mainly financial assistance to upgrade/repair water delivery systems. Consequently, we find ourselves at somewhat of a disadvantage when it comes to the in's and out's of programs that consist of annual payments.

It is our hope that the CSP program will be open to us as well as producers who have larger blocks, as opposed to scattered parcels, of private land. We would like to see a program that would reward us for protecting a landscape. Protection being defined in our terms as keeping the 40 acre subdivision at bay by keeping the various parcels that make up the ranch intact. In this sense we hope the CSP would provide enough of an incentive that future generations of ranchers won't look to the land developer to diversify their income.

Concerning the criteria that indicate good management/conservation practices we submit the following:

1. The best management practice possible will not deter a developer.
2. Ranches that exist alongside BLM grazing permits are on a roller coaster of up's and down's due to the political winds that blow with the federal election cycles.
3. Most ranches in western Wyoming are found along river, stream, or well watered areas.
4. River and stream corridors are the place of choice for land developers due to the scenic values associated with this type of geography.
5. Landowner self-certification of good practices/conservation will encourage participation in CSP.
6. The Grassland Reserve Program is a good start and should be expanded. However, it may have the unintended consequence of creating a leapfrog effect

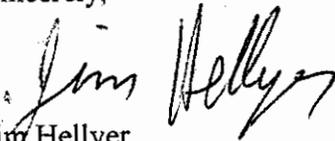
whereby development simply jumps over the immediate areas that are covered by the Grassland Reserve Program and takes root a farther distance from town. Therefore, CSP should concentrate in areas that are not yet experiencing rapid development, which would mean concentrating on ongoing ranching areas regardless of the distance from a populated area.

7. The growth rates in the western states are well documented. So too are the effects of loss of habitat due to development.

Due to these concerns we suggest that CSP recognize the value of intact western ranches and concentrate efforts and funds there.

Thank you for the opportunity to provide comments. Good luck with the pilot project and please feel free to respond if you have any questions or comments about our ideas.

Sincerely,



Jim Hellyer

26523 200<sup>th</sup> Street  
Belle Plaine, MN 56011-9302  
February 24, 2004

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

Dear Mr. McKay:

Here are my suggestions for important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the intent of Congress—that CSP be open to ALL farmers in the US practicing effective conservation on working farmlands.

1. Fix problems with the proposed rules issued on January 2, 2004. USDA should issue a supplement to the rule which would be open for public comment. The proposed rules are not consistent with the law authorizing the CSP nor with the funding allocated by Congress making CSP an uncapped national entitlement program.
2. The USDA's preferred approach of restricting sign-up to a few selected watersheds would unnecessarily prevent most farmers from gaining access to the CSP. Please get rid of this.
3. USDA's proposed rules fail to make adequate payments for environmental benefits produced by farmers currently practicing effective conservation. CSP base payments should be set at the local rental rates based on land capability without the 90% reduction proposed by USDA. The enhanced payments should not be treated as cost-share. Treat them as real bonuses and reward exceptional performance. Recognize and reward conservation of our soil and other resources.
4. Both resource-conserving crop rotations and managed rotational grazing are specifically named 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. Recognize and reward those farmers who practice these important conservation tools.
5. Don't 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. Establish base payments based on NRCS land capability classes, not current land use.
6. 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.

(10)

In addition,

- Use the one-producer, one-contract approach to CSP Contracts and make all CSP payments applicable to only real persons, not corporate or business entities.
- Maintain the payment limits--namely \$20,000, \$35,000 and \$45,000 for Tiers 1, 2, and 3.
- Make the contracts renewable and leave it up to the farmer to decide whether to renew or not.

In short, please honor the intent of the law as passed by Congress when issuing a supplement to the rules and then again give us a period of time to comment.

Sincerely,  
*Mary Myles Schwann*  
Mary Myles Schwann

Scott Kravitz  
2796 Casiano Rd.  
Los Angeles, CA 90077  
(310) 476-4757

Conservation Security Program  
2004  
Attn: David McKay, Conservation Operations Division  
P.O. Box 2890  
Washington, D.C. 20013

25 February,

Dear Mr. McKay:

I would like to add my comments regarding the proposed rules for the operation of the Conservation Security Program (CSP). It seems that the latest proposals are designed to weaken the CSP, making it less friendly to small farmers and more bureaucratic than it need be. To begin with the program must be made available to all farmers who utilize farming practices which focus on conservation. To limit the program to certain areas or groups will defeat the program's intent and severely limit its effectiveness.

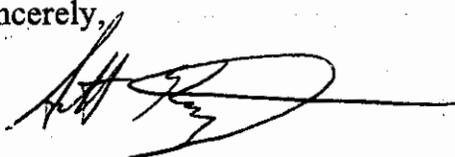
Additionally, the rewards offered by the program should be higher. At the proposed level, these payments will not effectively serve as incentives, and they will fail to recognize the actual benefit which the farmers are providing.

It also seems self evident that farmers with USDA organic certification plans under the NOP should be able to simultaneously certify under the CSP (provided they meet the requirements for both).

Finally, the program should be protected against abuse by corporations. Only real persons should be eligible for payments, and those payments should be renewable so long as the farmer maintains an effective farmland conservation program.

This is a long term program with long term goals. I am worried that the current proposals lack the understanding of what is required to make the CSP accomplish what it was meant to do.

Sincerely,





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**Wise Soil and Water Conservation District No. 548**

1604 West Business 380, Suite B – Decatur, Texas 76234 -

Telephone (940) 627-2942

2-26-04

CSP Comment S  
ATTN: David McKay  
NRC SP.O. Box 2890  
WASHINGTON, DC 20013 ..

Comments are attached.

**WISE SOIL & WATER CONSERVATION DISTRICT**  
1604 W. BUS. 380, SUITE B  
DECATUR, TX 76234