

Dava Weinstein  
315 W.86 St.  
NYC 10024

February 20, 2004

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

Dear Mr. McKay,

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 that will reward the best working farmlands and motivate the rest. As intended by Congress, the CSP should be open to all farmers in the U.S. practicing effective conservation.

Most importantly, USDA should issue a supplement to the rule. This should be done immediately to fix major problems with the proposed rules issued on January 2nd. These are not consistent with the law authorizing the Conservation Security Program. The main changes to make are:

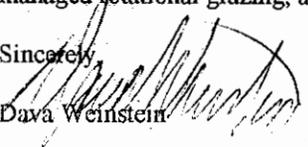
Restore Green Payments - The proposed rule calls for pennies per acre for base payments, 5% cost-share payments for practices, and enhanced payments that only cover the farmer's costs. Restore meaningful incentive payments so that farmers are adequately rewarded for outstanding environmental performance.

Make All Farms Eligible - Restore eligibility for all by eliminating the selection of "priority watersheds" and the undefined "categories" for enrollment.

Motivate Farmers - Allow farmers to achieve high conservation standards while in the program, not as a precondition for applying. The proposed rules set the bar too high for entry into CSP.

Restore Comprehensive Conservation Approach - Allow farmers to address significant natural resource concerns on their farm. Allow use of all effective conservation practices, instead of severely restricting what may be done.

Reward High Performance - Add significant enhanced payments for resource conserving crop rotations and managed rotational grazing, as provided in the law.

Sincerely,  
  
Dava Weinstein

Conservation Operations Division  
Natural Resources Conservation Service  
ATTN: Conservation Security Program  
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Washington, DC 20013-2890

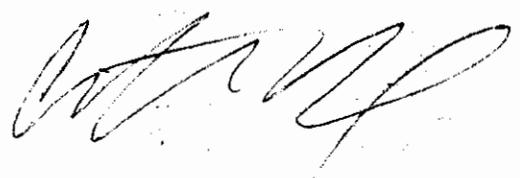
I am writing to suggest important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the CSP as a nationwide conservation program focused on working farmlands and which would "reward the best, and motivate the rest." As intended by Congress, the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

As stated in the proposed rule, the USDA must 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 eliminate the restrictions on participation in the CSP to a few "selected watersheds" and undefined "categories."
2. The USDA's proposed rules fail to make adequate payments for 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.
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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.

Sincerely,



(Additional comments on back)

## **Additional Comments:**

1. NRCS is seeking comments on the idea of a one-producer, one-contract approach to CSP contracts, as a way to provide the fairest treatment of all producers and to guard against program fraud and abuse. Do you agree with this approach? Do you agree that all CSP payments should also be attributed to real persons (not various corporate or business entities)? And do you agree that the payment limits set in the law (\$20,000 per year for Tier 1, \$35,000 per year for Tier 2, and \$45,000 per year for Tier 3) should be maintained?
  
2. NRCS is proposing that CSP contracts in general not be renewable, except in special circumstances. The law, on the other hand, leaves it up to the farmer to decide if he or she wants to renew the contract, and USDA would renew unless the farmer was not fulfilling the contract. Do you agree that CSP contracts should be renewable, as part of an ongoing program, and not limited to one-time contracts?
  
3. Your additional comments on CSP and the USDA's proposed rules:

Name (if not signed on front): \_\_\_\_\_

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P.O. Box 2890  
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Sincerely,

*I am a certified organic farmer. Under the proposed rules my farming practices would be penalized.*  
Ernest Brokemeier

(Additional comments on back)

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I agree that all CSP payments should be attributed to real persons & not various corporate or business entities.

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Yes, I agree that CSP contracts should be renewable, as part of an ongoing program.

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CSP is a real benefit to American farmers and the land.

There are major changes necessary to the USDA's proposed rules to make that

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Sincerely,

*David W. Peterson*

(Additional comments on back)



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I agree that family farms and real people who work the farms should be recipients of the payments and the payment limits set by law should be maintained.

2. NRCS is proposing that CSP contracts in general not be renewable, except in special circumstances. The law, on the other hand, leaves it up to the farmer to decide if he or she wants to renew the contract, and USDA would renew unless the farmer was not fulfilling the contract. Do you agree that CSP contracts should be renewable, as part of an ongoing program, and not limited to one-time contracts?

The CSP contracts should be renewable as part of an ongoing program and not limited to one-time contracts.

3. Your additional comments on CSP and the USDA's proposed rules:

Please have the rules reflect the letter and spirit of the law and include "best practices" as preferred means of full fulfilling CSP.

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Sincerely, *Ronald B. Hanson*

(Additional comments on back)



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