

Conservation Operations Division
Natural Resources Conservation Service
ATTN: Conservation Security Program
P.O. Box 2890
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.
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.

Sincerely,

Rich Lange, Lange Farms

(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?

Definitely need to be - one producer - one contract.
(more practices will be done at this level)

- No Corporation
- Need the Tier system

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?

We need the availability of ongoing contracts, as some practices are more than one year and ~~and~~ need added time to complete.

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

Very good idea, but needs to be on a one-producer ~~basis~~ basis.

This is the type of program we need to keep the beautiful scenery of some areas for our grandchildren to see & enjoy.

Thanks for hearing my concerns.

Name (if not signed on front):

Pat Lange

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

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Payments should be to a real person +
payments not ever done on factory farms.

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They should be renewable!

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

Organic farmers save alot of soil, water +
carbon + air quality. They should be
rewarded very well for their hard efforts!

Thanks

alot

Name (if not signed on front):

Ray Curtis

Conservation Operations Division
Natural Resources Conservation Service
ATTN: Conservation Security Program
P.O. Box 2890
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.

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Sincerely, *J. Michael Green*
Certified Organic Dairy & Beef Producer

(Additional comments on back)

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yes

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?

yes

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

It is my opinion that not enough emphasis is being placed on organic farming practices. Farmers that are utilizing organic farming practices and are certified organic producers are contributing far more to conservation of natural resources than the average "conventional" farmer simply by not using pesticides, herbicides and commercial fertilizers. If all farmers followed these practices, these programs would not

Name (if not signed on front):

Michael Green - organic dairy & beef producer

be necessary. Farm prices would not have to be subsidized by the government and farmers would be economically better off.

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

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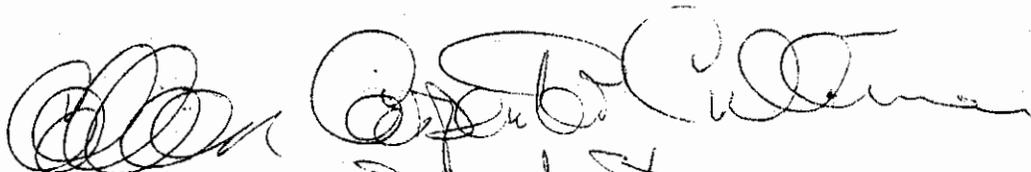
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First, USDA should issue a supplement to the rule, which would be open for public comment for 30 days. This should be done immediately to fix major problems with the proposed rules issued on January 2, 2004, which are not consistent with the law authorizing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

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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.
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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. No need to tie farmers up in red tape.

Sincerely,



219 N. Third St.
Montevideo, MN 56265

(Additional comments on back)

Additional Comments:

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YES

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?

YES

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

Name (if not signed on front):

Colleen Depewat Allina

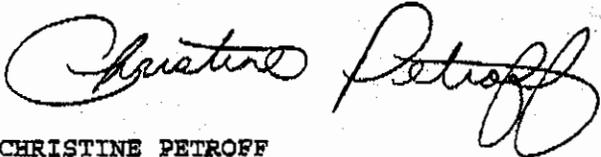
CONSERVATION SECURITY PROGRAM RULE COMMENTS
c/o DAVID MCKAY, USDA NRCS
PO BOX 2890
WASHINGTON, DC 20013-2890

THE CONSERVATION SECURITY PROGRAM DRAFT RULES RESTRICT CSP TO A HANDFUL OF LOCATIONS, AND KEEP MANY FARMERS AND RANCHERS OUT OF THE PROGRAM.....IMMEDIATELY ISSUE A REVISED RULE, ESTABLISHING A NATIONWIDE PROGRAM, AVAILABLE TO EVERY FARMER AND RANCHER WILLING TO BE A BETTER LAND STEWARD.

ALSO, PROVIDE MEANINGFUL STEWARDSHIP INCENTIVES THAT ARE COMPARABLE TO WHAT PRODUCERS WOULD RECEIVE UNDER OTHER USDA CONSERVATION PROGRAMS.

THE USDA HAS ALREADY MISSED THE CHANCE TO ISSUE CSP CONTRACTS IN 2003.....IMMEDIATELY ISSUE REVISED RULES THAT MEET THE LETTER AND INTENT OF THE LAW, AND ALLOW FARMERS AND RANCHERS TO OBTAIN CSP CONTRACTS THIS YEAR!!

THANK YOU FOR YOUR CONSIDERATION,



CHRISTINE PETROFF
2208 GLENWOOD AVE
PAPILLION, NE 68046

David McKay
202-720-4265