

495

Michael D. Hoff  
5106 Straightline Pike  
Richmond, IN 47374

February 18, 2004

Conservation Security Program Comments  
NRCS Conservation Operations Division  
P.O. Box 2890  
Washington, D.C. 20013

Attn: David MCKAY

Dear Mr. McKay:

I am very concerned about certain aspects of the CSP proposed draft rules.

On balance, it appears to me that net result as presently proposed is more likely to protect jobs of bureaucrats than the soil and water of the United States...

Is the program so underfunded that the niggardly pittance proposed as the base payment per acre is the draftors' notion of how to stretch the funding shortfall? Would that be the reason for limiting the CSP to a few watersheds?

The latter would thus be far more justifiable than the former, in my mind, but both risk making the end result a travesty of that legislation for which the Congress voted.

Do you have children or grandchildren, nieces or nephews? Do the draftors of these proposals think TECHNOLOGY will save "the children" some day when we have so eroded and poisoned the soil and water that they will otherwise be unable to sustain useful agriculture?

Mr. McKay, I am 54 and in these 54 years the population of the U.S. has more than doubled and we are now the 3rd most populous nation in the world? We have huge deficits that will probably "bury" the next generations anyway, but if they are to have any chance, let us at least have caused some of that deficit in preserving the ability for them to eat.

Please help make sure the CSP becomes more useful for conservation than the proposed rules suggest is likely. NOTE: I do believe, however, unlike some who share my other concerns in this matter that it would be better to focus on a limited section of the country if that is what it takes to prove CSP's value, a la a pilot program; just make it enough worthwhile that there is truly incentive for those farmers who do not yet care what they are doing to the land to mend their ways.

Finally, I downright angry that the proposed rules provide no recognition, contra the law enabling CSP, for conservation systems such as intensive rotational grazing systems, etc. "Reward the best, motivate the rest" is at risk of becoming a hollow mockery."

Sincerely,



Michael D. Hoff

cc Senator Richard Lugar, (Indiana)

155 60<sup>th</sup> St NW  
Benson, MN 56215  
Marciagarden@yahoo.com  
February 20, 2004

David McKay, NRCS Conservation Operations Division  
P.O. Box 2890  
Washington, DC 20013

Dear Mr. McKay:

When I first heard of the Conservation Security Program, I was elated. It sounded like the best program to come along for farmers—and their land—that has ever existed. Currently, the incentives are to damage the land through overproduction, rather than to be a steward of it. The CSP program could have some impact on reversing that trend.

I am a landowner and rent two relatively small farms out. I was hoping the CSP program would help me in encouraging better production practices on the part of the renters. However, as the rules appear to now be written, I suspect CSP will have little, if any, impact.

The changes I would like to see:

- 1) The need for five year control of the land by the renter should be limited to three years to be in concert with most land rental agreements and to take into consideration potential estate issues that can ensue.
- 2) Crop producers across the nation should be eligible for the program, not just those in certain watersheds.
- 3) The payments should be substantially increased from those in the proposed rules. If not, this program is doomed to failure and the farmers and their land will continue to suffer the consequences which will be most heavily born by subsequent generations.
- 4) Contracts should be renewable, assuming the farmer has made appropriate improvements, to continue to reward farmers who practice excellent conservation practices.

Thank you for your consideration.

*Marcia Neely*  
Marcia Neely

1-20-04

attn: CSP



Farm Organics

Box 53 \* Foreston MN 56330\* 320-983-2289

Dear Mr. McKay,

I am concerned about proposed rule for CSP funding and urge you to be faithful to the intent of the rule as passed in Congress. I think it is very important that payments per farm be capped as proposed but that the program as a whole be uncapped to permit payments to all participants whose practice entitles them to payments. This is essential to the conservation of our most important resources - good land and clean water.

Good conservation practices need to be rewarded, especially as land prices and development threaten farms. More funds should be directed to those who have practiced conservation than those whose abuse of the land now requires substantial remediation. I urge you to keep third tier programs for demonstrated commitment to conservation.

These programs are too important to not be available to any farmer in any watershed who will make a long term commitment to conservation. This must be accomplished at rates that make it viable.

Sincerely,  
Neth Han

February 25, 2004

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

To Whom it May Concern:

Thank you for providing public comment on the USDA's proposed rules for the Conservation Security Program. However, the proposed rules for the CSP needs to eliminate the restrictions on participation in the CSP to a few "selected watersheds" and undefined "categories."

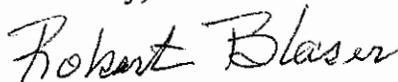
As a certified organic farmer, it is my view that the CSP should be a nationwide, accessible program, open to ALL farmers! CSP should allow farmers with USDA-approved organic certification plans under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both.

Also, the USDA's proposed rules fail to made adequate payments to farmers currently participating in effective conservation practices. It is my opinion that enhanced payments and NOT cost-share payments, should reward those farmers who participate in environmentally-beneficial systems. CSP payments should be set at the local rental rates based on land capability without the 90 % reduction proposed by the USDA!

Finally, your proposed rules should address managed rotational grazing and resource conserving crop rotations. Please be reminded that managed rotational grazing is recognized by scientists and farmers as an excellent way to protect our soil and water. Also, it has been scientifically proven that diversified crop rotations effectively build and improve soil while managing pests and reducing erosion.

Again, thank you for allowing public comment on the proposed rules. With genuine concern, I ask that the CSP be offered to ALL of America's farmers, especially certified organic farmers, to preserve our nation's natural resources for future generations.

Sincerely,



Robert Blaser  
8550 Gohr Road  
Krakow, WI 54137

26889 County 9 Blvd.  
Goodhue, MN 55027  
February 26, 2004

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

Dear Mr. McKay:

I find the USDA's proposed rules for the implementation of the Conservation Security Program (CSP), as released on January 2, 2004, appalling and in stark contrast to the intent and letter of the law as passed and funded by Congress. I believe the CSP should be a nationwide conservation program for working farmlands that is open to all farmers in the U.S. practicing effective conservation. The CSP should also fully reward existing conservation practices, rather than be used as just another cost-share program. USDA should immediately issue a supplement to the rule, followed by a 30-day comment period. This would allow rules to be changed to make them consistent with the law authorizing the CSP, as passed by Congress.

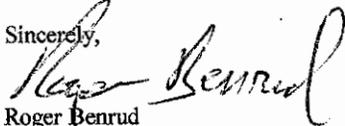
The USDA needs to make the CSP a nationwide entitlement program, not a restricted program available only in a few watersheds. The law as passed and funded by Congress is very clear on this issue. Also, payments should be meaningful rewards for good conservation. USDA's proposed rule reduces base payments, as set forth in the law authorizing CSP, by 90%. Enhanced payments are shifted from rewards for exceptional conservation performance to a cost-share based only on intent, rather than results. The base payment rate must be fully restored and the enhanced payments need to be real bonuses for exceptional stewards.

Perhaps the biggest flaw in the USDA's proposed rules is the effective penalization of a "whole systems approach" such as the use of managed rotational grazing and soil-conserving crop rotations. The law passed by Congress specifically addressed these practices as proven conservation measures eligible for enhancement payments. Not only does the proposed rule ignore these practices, it penalizes farmers who have moved cropland into a managed grazing system by reducing the base payment rate for these acres to the lower rate of pasture. Tillable acres in a managed grazing system must be valued at the cropland rate. The potential of the land is the same. Only the crop has changed. The base payments should be based on the capability of the land, not the use. Enhanced payments for management systems such as soil-conserving crop rotation and managed grazing, however, should be based on land use and conservation results. Further, these enhanced payments should be substantial rewards for current ongoing systems of management, as well as promote new conservation measures. Management systems that utilize perennial forages should be rewarded for their outstanding stewardship results, not penalized for going against the commodity blueprint.

The CSP should allow farmers with USDA-approved certification plans under the National Organic Program (NOP) to simultaneously certify under the CSP if they meet the standards of both programs. This would eliminate a mountain of red tape for the thousands of NOP certified farmers as well as NRCS workers.

The implementation of the CSP should be limited to one contract for one producer and the payments should go to a real person, rather than a business entity. The payment limits set forth by Congress must be maintained at \$20,000 per year for Tier 1, \$35,000 per year for Tier 2, and \$45,000 per year for Tier 3. The CSP contract should be renewable, provided the farmer is fulfilling the contract. The CSP contract needs to be part of an ongoing program of soil conservation and land stewardship that secures our valuable resources for many years to come.

Sincerely,

  
Roger Benrud

200 Nolden Lane  
 Jordan, MN 55352  
 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.

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,

*Lalande Hennen*  
 Lalande Hennen

Feb 23 - 2004

South Wayne, Wi. 53587  
Safayette county

Dear Sir,

I started farming in 1951, so I have had the opportunity to participate and observe the value of all the Federal farm programs for more than fifty years. The result of these programs has been to encourage expansion and put dollars into the farmers pocket, but it did not help the smaller farmer or the rural community, and these programs did very little to encourage a comprehensive approach to conservation on the land.

I believe this C.S.P. program should encourage farmers to employ every possible conservation measure to prevent erosion, build soil, protect our water. Farmers should be encouraged to use contour strips at least three crop rotations, cover crops and minimum tillage. Farmers should be encouraged to develop a sustainable farming system.

This program if properly implemented would be good for the farmer, the sportsman and the environment, and a good investment for the American tax payer.

Sincerely, John C. Detry