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DANIEL W. PORT  
2690 HWY 104  
IONE, CA 95640

FEBRUARY 17, 2004

DAVID MCKAY  
CONSERVATION OPERATIONS, NRCS  
PO BOX 2890  
WASHINGTON, DC 20013-2890

ATTN: CSP

DEAR MR. MCKAY,

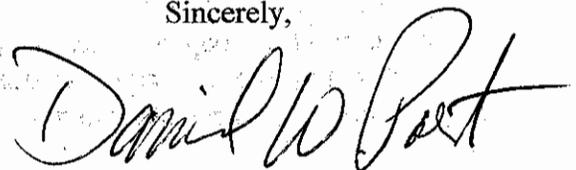
I operate a diversified vegetable and cattle ranch in Northern California. I am a member of the California Farm Bureau and the Community Alliance with Family Farmers. I strongly support the Conservation Security Program and I am writing to express my disappointment in the proposed rule for implementation of the CSP.

Since the funding cap for the program has been removed, the proposed rule is too restrictive and does not provide enough incentive for farmers. The program should not be restricted to watersheds designated by the USDA. Congress intended this program to be available to farmers nationwide. Also, farmers should not have to meet the highest conservation standards to enter the program; the law passed by Congress says that conservation standards must be met as a result of participation in the CSP.

The payments in the proposed rule are not high enough since the funding cap has been removed. The program will not succeed unless real incentives are provided to compensate farmers for the cost and lost production resulting from the implementation of good conservation practices. The public benefits from these practices and farmers should be fairly compensated for farming in a sustainable manner.

Please issue a revised rule that reflects the intent of the law and the new funding provided by Congress. I also ask you to revise the rule soon so that farmers can enroll in CSP this year. Thank you.

Sincerely,



March 1, 2004

622  
Daniel Magers  
13724 Magers Rd.  
Howard, OH 43028

Dear NRCS – COD\*  
(Natural Resource Conservation Service)  
(Conservation Operations Division)

My name is Daniel Magers and I am a farmer in Knox County, which is in the central north east part of Ohio. I am taking a moment to let you know my thoughts on the Conservation Security Program.

When the CSP was first introduced in the 2002 Farm Bill, I was led to believe it was an entitlement program for farmers who are already good stewards to the land.

Now it appears that has been changed, focusing on priority watersheds. If they focus on priority watersheds, I feel that a lot of fellow farmers across America who are doing a great job will not benefit for a long time. For example, my farm is in the Kososing River watershed. It is ranked 13<sup>th</sup> in the state. The farmers in this area have done a great job working with the Conservation Office doing all kinds of conservation practices (waterways, no tilling, stream bank erosion control, and filter strips, etc.) By using these methods since the early 50's and up to current times, has helped that river become scenic.

Therefore, I feel those generations and the generations to come across this great nation should be rewarded for their continuation of practices.

This program will be good for the future if designed right, because the public is more apt to back up the funds, where as they are tired of commodity support programs.

The design of the Tiers I, II, & III could be set up as annual entry to multi years. This could help all the farmers with many landlords. For example, the farmer who owns his own land could sign up multi years plus having an option to sign up his annual rented farms as he rents per year. Payment should be adjusted according to practices.

This program needs to be focused on how good it can be in 10 – 20 years from now. We need to take care of the current stewards who are doing a good job with conservation practices now, and we will get others to join later.

In closing, I would like to take this opportunity to thank the Conservation Operations Division for giving 60 days for comment.

Sincerely,



Daniel Magers

# Concerns with Conservation Security Program (CSP) Proposed Rule Changes

(The Farm Security and Rural Investment Act of 2002)

These are a few major concerns that we as producers, conservationist, and stewards of the land have with the proposed rule changes to the Conservation Security Program.

- **Priority Watershed Restriction:** By law CSP is designed for all farmers, no matter their location across the nation, to be eligible for rewards for their stewardship of the land. The proposed rule would limit the program to those few who were located in "priority watersheds." What is a "priority watershed," and who is going to determine which farmers are located in them? These questions have yet to be answered.
- **The High Soil and Quality Standards:** By law CSP should include both existing and new farm conservation plans which are at or above sustainable use levels for our resources. It is only fair to reward those farmers who have been at sustainable levels for an extended period of time prior to the implementation of this program, and to reward new farm plans to encourage further growth.
- **Low Payments:** By law CSP is a 3 tier payment system.
  - Tier 1 – Base payments
  - Tier 2 – Cost-share payments
  - Tier 3 – Bonus payments for outstanding environmental action

Cost-share and base payments need to rise sufficiently if this program is going to take hold and enhance our environment in the years to come. Proposed CSP payments are just too low to encourage any sort of participation. Who and what will determine the farmers who are exceptional stewards of the land?

These practices have been implemented on our farm since 1982 –

- 12 acres of oak/hickory forest
- 5 acres of conifers
- 23 acres of prairie
- restoration of a native wetland
- restoration of a native oak/hickory forest
- 45 acres of field windbreaks
- grassed waterways and PTO terraces
- 2 man-made wetlands
- farmstead windbreaks
- food plots and nesting cover for wildlife
- rotational grazing
- notill farming practices
- 3 crop rotation
- cover crops (rye, vetch, buckwheat, oats, forage turnips)
- rebuilding of biological soils and balancing of nutrients
- Sustainable Agricultural Grant Program- Soil Structure Improvement for Better Sustainable Agricultural Systems
  - Water Infiltration
  - Soil Slaking Test
  - Water Stable Aggregate Test
  - Soil Penetration Test

Practices to be implemented in the next few years –

- reforestation of pasture
- man-made wetland

## **Yours for Sustainability?**

CSP and other conservation programs alike need full funding for those who are exceptional stewards of the land, and to encourage new ones!

The eminent French scientist and Nobel Peace Prize winner Dr. Alexis Carrel wrote as early as 1912 in his book Man the Unknown that since soil is the basis for all human life our only hope for a healthy world rests on re-establishing the harmony in the soil we have disrupted by our modern methods of agronomy.

Today soils are tired, overworked, depleted, sick, and poisoned by synthetic chemicals. Hence the quality of food has suffered, and so has health. Malnutrition begins with the soil. Buoyant human health depends on wholesome food, and this can only come from fertile and productive

soils. Minerals in the soil, said Carrel, control the metabolism of cells in plant, animal, and man. Chiefly destroying the harmony reigning among mineral substances present in infinitesimal amounts of air, water, food, but most importantly soil creates diseases.

Duane & Connie Dassow

*Duane Dassow*  
*Connie Dassow*

John Dassow

*John Dassow*

Joe Dassow

*Joe Dassow*

3341 N. 3350 E. Rd.  
Chatsworth, IL 60921

# Concerns with Conservation Security Program (CSP) Proposed Rule Changes

(The Farm Security and Rural Investment Act of 2002)

These are a few major concerns that we as landowners, conservationist, and stewards of the land have with the proposed rule changes to the Conservation Security Program.

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## Conservation Security Program

Thank you for providing the opportunity to comment on the Conservation Security Program. In some regions of the United States, private farm and ranch land contains many acres of forests, wetlands and grasslands that provide high quality wildlife habitat as well as producing America's food and fiber. However, in the Nation's corn belt, production of cash grains has greatly altered the natural landscape. In states like Illinois, Farm Bill programs, particularly the Conservation Reserve Program, literally determine the quality and quantity of wildlife habitat available. Cropland occupies 24 million of Illinois' 36 million acres.

Cash grain agriculture leaves Illinois and other corn belt states nearly devoid of undisturbed grasslands except for those enrolled in CRP, CCRP and CREP. The continued existence of Henslow's sparrow, greater prairie chickens and species important to sportsmen such as the ring-necked pheasant and northern bobwhite in Illinois is dependent on maintaining grasslands. Changes in the 1996 Farm Bill resulted in the loss of 200,000 acres of CRP grasslands in Illinois during the 15<sup>th</sup> and 16<sup>th</sup> sign ups. Slowly some of this acreage has been replaced with filter strips and other conservation buffer practices.

Much more needs to be accomplished in the corn belt states. There is a tremendous need for increased efforts to control agricultural nonpoint sources of sediment, nutrients and pesticides in the corn belt states that result in hypoxia in the Gulf of Mexico. In addition, grassland wildlife species have reached historic lows in the eastern half of the United States. These water quality and wildlife habitat problems cannot be completely addressed with buffer practices alone.

The Conservation Security Program offers a unique opportunity to improve soil quality, reduce nonpoint agricultural runoff and increase grassland wildlife habitat on Illinois farms. The program should include a practice that creates attractive incentives for producers to utilize soil building crop rotations on highly erodible cropland in Illinois. Many acres of valuable legume nest cover could be added by leaving legumes undisturbed during the nesting season. Producers should receive additional incentive payments for leaving cover undisturbed during the nesting season.

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