

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,

Keith Welsh
255 County Road Q
Highland, WI 53543

February 25, 2004

David McKay
Conservation Operations, NRCS
PO Box 2890
Washington, DC 20013-2890

Dear Mr. McKay,

This letter is in regards to endorsing a full, nationally implemented CSP. This program is important to meeting resource conservation goals on working agricultural lands

After reviewing ALR-12, the Conservation Security Program proposed rule, I have found the there are two significant shortcomings. One shortcoming is that the rule doesn't provide for the rewards for conservation farmers as originally intended by the law. The second is that it doesn't provide for a program nationwide.

One key issue that needs to be addressed is the removal of the funding cap limitation. CSP was authorized as an entitlement program with the 2002 Farm Bill. Congress has removed the appropriation cap limitation and now NRCS should amend the rule to reflect this action to make it an entitlement program.

The second issue I feels need to be addressed is the watershed limitation. The rule states that NRCS will identify and offer CSP only in high priority watersheds. This is NOT locally led conservation as so widely promoted in the 2002 Farm Bill. This creates the potential for this to become politically driven as to being available to all eligible producers nationwide.

Another issue is resource concerns. According to the law, all resource concerns in the USDA field Office Technical Guide such as soil, air and water quality, wildlife and plant habitat, and forest stewardship are eligible for participation. The proposed rule only requires that soil & water quality be addressed for all three tiers and places a lower priority on all other resource concerns.

An issue of concern is also the cost-share payments. The proposed rule requires cost-share payments to be less that EQIP. The authorization however provided a cost-share limit of 75% - the same as EQIP and other cost-share programs

We should also look at using the 2001 national rental rate, or an appropriate rate where the national rate does not correctly reflect local conditions, to establish CSP base payments. Currently, the proposed rule uses state and local rental rates, but reduces the payment base down to 10% of the already reduced rate in the law.

My final concern is that of eligible practices. NRCS is proposing to offer a reduced list of eligible practices. The law only provides for two limits: animal waste transport and storage, therefore all other practices should be eligible.

Mr. McKay, I hope that you will review the comments that you receive and enact the CSP program as it was intended, an entitlement program that is to be a nationwide program available to all eligible producers. We are looking to our agricultural producers to be leaders in helping to protect our environment. It is time to reward those who take conservation seriously and want to protect our environment.

Sincerely,



Ron Frisch
Seneca County, Ohio Producer

February 25, 2004

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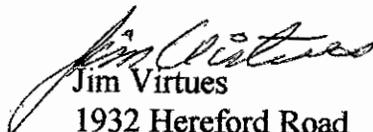
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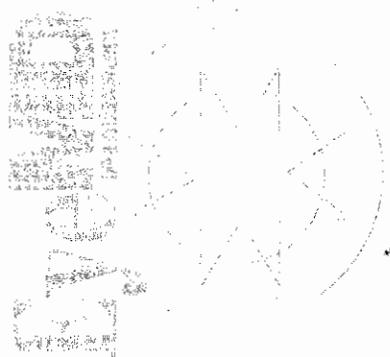
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Sincerely,



Jim Virtues

1932 Hereford Road
Little Suamico, WI 54141



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February 27, 2004

Conservation Security Program Rule Comments
c/o David McKay, USDA NRCS
P.O. Box 2890
Washington, DC 20013-2890

Dear Mr. McKay:

We need to fix the conservation Security Program Draft Rules. The law called for a nationwide program which would be available to every farmer or rancher willing to put into place high-level conservation practices.

As I understand the draft, this would restrict this to just a few locations, clearly against the intent. The draft rule appears to reduce the those incentives to pennies per acre, with cost-sharing as low as 5 percent of a farmer's cost. That's not going to get their attention, and they will ignore the rules.

We need to change the rules to make them work.

Sincerely,

William R. Schlichtemeier, M.D.

WRS/jk

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February 28, 2004

J. Read Smith
11751 Lancaster Rd
St. John, WA 99171
509.648.3922

Mr. David McKay
Attn: conservation security program
Conservation Planning Team Leader
Conservation Operations Division
USDA NRCS
P.O. Box 2890
Washington, DC 20013-2890

Dear Mr. McKay:

I appreciate the challenge NRCS faces with imposed (or temporarily imposed) spending limitations with the CSP. However, the very integrity of the program is vulnerable if the proposed rules were instituted. The intent and success of this necessary program is in the balance and future conservationists will certainly judge all of us by how we proceed these next few years.

- *Base payments with the soil and water eligibility requirement: by reducing the base payments to 10% of what the statute allows AND requiring soil and water resource concerns be met as a condition of eligibility you will create an enormous challenge in portions of the country. In the "Palouse", and I am sure in other challenging areas, to meet the soil and water resource concerns requires exceptional effort that very few producers have obtained. It most certainly would require a transition to direct seed (no-till) systems that fewer than 10% of local producers have implemented to date. I am very much in favor of creating an incentive to reward the best and motivate the rest, but if the reward is a small fraction of what the statute allows, there will be little incentive to "motivate" the rest to make a major investment and re-prioritize management attitudes.*
- *Ag operation definition: If not consistent with other USDA programs, this is a potential area of litigation and confusion. The time tested "entity" rule developed by FSA for commodity programs & CRP should be modeled into the CSP program. Don't reinvent a wheel that turns.*
- *Priority watersheds: All of us realize that some form of payment control needs to be in place until congress appropriates additional revenue or recognizes the program as a true entitlement as the law intended. Until such time, decisions about watersheds should be moved from the "beltway" to the States. A formula (that does not penalize the West) should allocate CSP dollars to the States, and the States should be allowed to determine which watersheds (or other appropriate geographical areas) are most appropriate (using the locally led process).*

- **The locally led role: Using this concept to fullest extent the law allows will certainly increase the probability this program, or any other program, will be a success. Local "stakeholders" can provide decision makers with invaluable insight on rental rate disparities, acceptable cost share rates, priority areas, other local resource concerns, other important practices for consideration and all enhancement activities. History will show that this switch from top down, prescriptive programs to those that utilize local input and decentralized control will be the turning point of conservation programs in the future.**
- **Obviously other concerns exist and most certainly will be addressed: The requirement of control of the operation over the life of the contract may prove very problematic for many tenants and landlords. A solution would be an orderly contract transfer policy from one operator to another and eliminate the "control" requirement. A policy that would renew contracts on completion is also necessary where both parties agree.**

NRCS needs to address, when appropriate, the new requirements that enactment of the 2004 Consolidated Appropriations Bill will necessitate. The rules should reflect the statute's intent as passed by Congress and signed by the President. A conservation program that is open to all producers of all commodities. One that is a true "green light" entitlement program that, unlike past and existing programs, will reward those stewards that have implemented and maintained conservation systems at their own expense for the benefit of the general public. The program needs to be TSP and operator friendly with efforts to reward the operators and not the landlords. It needs flexibility to incorporate new, emerging complementary efforts such as carbon credit trading and most important it needs to utilize the locally led process to the fullest extent possible.

Thank you for your consideration,



**J. Read Smith
Washington State Producer
Conservation District Official**