

February 27, 2004

Conservation Security Comments  
Attn: David McKay  
NRCS Conservation Operations Division  
PO Box 2890  
Washington, DC 20013

Dear Mr. McKay and NRCS,

I am writing to comment on USDA's proposed rule for the Conservation Security Program (CSP). My comments include this note as well as the accompanying pre-printed comment letter. I'd like to emphasize the following comments:

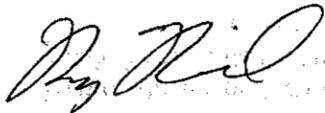
- 1) CSP needs to be an uncapped, national entitlement program.
- 2) CSP should use local (not national) rental for payment calculations and should remove the 90% reduction currently proposed by NRCS. Base payments should be awarded for current conservation practices, not plans, projects, or future activities. Base payments need to be set at the rates established in the CSP legislation – they need to reflect meaningful payments. They need to come through on the promise of “rewarding the best.”
- 3) CSP should place an emphasis on soil conservation. Accordingly, CSP needs to recognize and reward farming practices that conserve soil. The best way to conserve soil is to keep it in place with plants. Aboveground plant parts prevent/deflect the impact of water, and roots hold tightly to soil aggregates.

To provide this protection year-round requires exceptional farm management – management that should be rewarded. Thus, permaculture systems should score highly – e.g. vineyards, orchards, bramble plantings, pastures. Grazing on pastures should be highly rewarded. Farmers who move from annual cropping systems to perennial/permaculture systems should be rewarded.

Annual cropping systems open the soil up (tillage) and expose it to erosion forces. Thus annual cropping systems should be a lower tier than perennial/permaculture systems. Annual systems should be rewarded for having longer rotations that include a soil-conserving crop (e.g. alfalfa) and for rotations that include cover crops.

Annual systems that include cover crops and soil-conserving crops (i.e. living plants) should be rewarded more highly than systems that use exclusively dead plant matter for cover (e.g. conservation tillage). Living plants address several resources of concern (e.g. water quality, wildlife habitat, nutrient management) whereas dead plant matter does not.

Thank you for your attention to these comments. Sincerely,



Ray Kirsch  
93 Milton St. N #3  
St. Paul, MN 55104

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

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.

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.

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

Sincerely,



(Additional comments on back) →



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March 1, 2004

2315 Road S  
Milligan, Nebraska 68406-4113  
phone 402-295-2344

Mr. David McKay  
USDA -- NRCS  
P.O. Box 2890  
Washington, DC 20013-2890

Dear Mr. McKay:

I am enclosing a notice I received regarding your implementation of the Conservation Security Program. Please be guided.

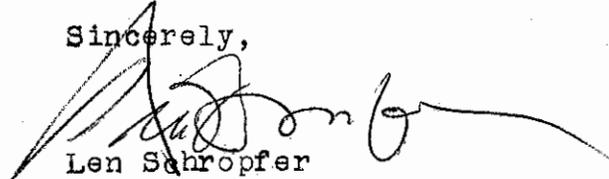
I am a diversified dryland farmer with lots of conservation practices. I have not taken any Federal ag subsidies except the "production flexibility" payments.

I am very disappointed to see a farm policy which cuts money for conservation, cuts it in the wrong way, and continues to fund the per-bushel subsidies which simply encourage more waste of water, more industrialization/monocropping, and more volume of production which obviously keeps grain prices low.

I am also enclosing a copy of my letter to Secretary Veneman (for which I have not yet received an acknowledgment) of March 26, 2001, regarding ways to keep grain prices up and keep people on their farms.

Congressman Bereuter's office has since suggested, and our Center for Rural Affairs confirmed, that it might be possible to fit an agriculture conservation treaty into the World Trade Organization. Signers of the treaty would get most favorable price on ag products they import from other signers.

Thank you for your attention!

Sincerely,  
  
Len Schropfer

Copies:

- Secretary Ann Veneman
- Senator Chuck Hagel
- Senator Ben Nelson
- Congressman Tom Osborne
- Congressman Doug Bereuter

## Our View: Commenting to USDA on the CSP Draft Rule

□ **The basics** -- Include your name, address, and the reason for your interest in the CSP (e.g., you are a farmer, or rancher, or love wildlife, or need clean streams). Use your own words, be as clear as possible.

**1. We need a revised draft rule now!** Farmers and ranchers need to be able to enroll in the CSP this year! Urge USDA to issue a revised proposed rule to bring the draft rules in line with the 2002 Farm Bill.

**2. Keep the CSP a Nationwide Program!** The draft rule would limit the CSP to a small, select number of watersheds – perhaps just 20 out of more than 2,100 in the USA. *The CSP rules should follow the law, which calls for a nationwide program available to all farmers and ranchers in every state.*

**3. Every Farmer or Rancher Ready, Willing, and Able Should be Eligible!** The draft rule would require that farmers and ranchers meet the very highest set of USDA soil and water conservation standards *before* being eligible for a CSP contract. That would leave out all but a few farmers. The draft rule should follow the law, which says that conservation standards must be met *as a result of* participation in the CSP. High environmental standards should be maintained, but the rules should allow farmers and ranchers to achieve those high standards while in the program.

**4. The Stewardship Incentives Must be Meaningful!** The draft rule adopts incredibly low payment rates. The draft rule is very vague, but it appears farmers and ranchers would only be eligible for :

- Cost-share payments as low as 5%, far lower than any other USDA conservation program.
- Base payments for maintaining good conservation practices of just pennies per acre.
- Payments for exceptional conservation efforts at just 10-20% of the farmer's cost.

The draft rule demands that farm families cover the vast majority of the cost of implementing and maintaining conservation systems that benefit all of us. The rule should use *cost-share rates* similar to other USDA conservation programs, typically 50-75% of the installation or maintenance cost. *Base payments* should be set as envisioned in the law, not one-tenth that amount. *Enhanced payments* should provide meaningful incentives that pay for results, reward exceptional performance, and reward the most environmentally-beneficial systems. Payments should reflect the value the public receives, minus any financial benefit the participant shares, from a particular practice.

**5. Resource-Conserving Crop Rotations, Rotational Grazing, and Buffers Must be Rewarded!** The draft rule ignores the law's clear requirement to provide incentives for farmers willing to grow low-input alternatives to corn, to use better managed rotational grazing systems, or to install conservation buffer strips that protect streams and wetlands. These practices are great for wildlife! *USDA should use enhancement payments to reward these highly beneficial conservation systems nationwide.*

**6. All Conservation Practices Should be Eligible.** The draft rule would pay incentives for a very small number of conservation practices, denying workable options to producers and stifling research and innovation. *The program should fund the full range of USDA-approved conservation practices*, and should encourage on-farm innovation and research that benefits producers and our natural resources.

**7. Farmers Need a Continuous Sign-Up Process, and Need to be Able to Re-Enroll.** The draft rule envisions short, infrequent, enrollment periods, which could leave many farmers out and further stress USDA employees trying to help farmers with applications. The draft rule doesn't give farmers the option to continue to be part of the program by continuing to provide conservation benefits. *The rule should provide for a predictable, continuous, nationwide sign-up process, and should allow for re-enrollment.*

**8. State and Local Problems Need to be Addressed.** The draft rule sets two nationwide priorities: water quality and soil quality. Nebraska has its own concerns, like wildlife habitat and water quantity, that should also be addressed. *The rule should allow conservation priorities to be modified at the state level* so our key state and local problems can be addressed.

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