

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,



Vince Murphy
5586 Steinkraus Lane
Abrams, WI 54101

February 24, 2004

Mr. David McKay
Attention: Conservation Security Program
Conservation Planning Team Leader
Conservation Operations Division
USDA NRCS
P.O. Box 2890
Washington, DC 20013-2890

Dear Mr. McKay:

I am pleased to submit comments on the proposed rule to implement the 2002 Farm Bill Conservation Security Program. First, I applaud NRCS for developing a proposed rule in the face of the number of legislative changes that were made to the program following its enactment.

I have several concerns relative to the proposed rule. I understand that during the development of the proposed rule, changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change, NRCS proposed a much more limited program that would be available only to a relatively small number of producers in highly targeted watersheds. The proposed rule also placed significantly lower limits on cost-share rates and base payments than were allowed in the statute; restricted the number and types of practices that would be eligible for payment; and required producers to address resource concerns prior to enrolling in the program.

The enactment of the 2004 Consolidated Appropriations Bill, however, restored the CSP to an uncapped entitlement as it was originally written. Given that fact, I strongly urge NRCS to prepare a rule to implement the program as originally intended and without the severe restrictions in the currently proposed rule. The principal issues that need to be addressed in the supplement to properly implement the CSP as an uncapped entitlement include:

- allowing open enrollment to all eligible producers nationwide with no preference for producers in targeted watersheds;
- providing the full cost-share, maintenance and base payments as provided for in the statute;
- removing the limitation on the types of practices eligible for payment; and
- making the CSP a true rewards program by allowing producers to use CSP to address resource concerns after enrollment.

I appreciate the opportunity to provide my comments on the CSP proposed rule.

Sincerely yours,

Charles F. Schuchman
 Farmer & Supervisor of
 Sandusky County Soil & Water

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RICHARDS FARMS, INC.



WILLIAM J. RICHARDS
Chairman

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Date: 3-2-04

To: David McKay - CSP Comments

Fax No: 202-720-4265

No. of Pages: 3

From: William Richards

Fax No: 740-474-9364

Telephone: 740-474-3602

Dave -

I hope you and "others" will
accept my comments as constructive.
I'm sorry to disagree but these comments
come from the heart.

Bill

Mr. David McKay
Attention: Conservation Security Program
Conservation Planning Team Leader
Conservation Operations Division
USDA NRCS
P. O. Box 2890
Washington, DC 20013-2890
Email: davidmckay@usda.gov, Attention: Conservation Security Program
Fax 202-720-4265

Dear David:

My comments to the proposed rule to implement the 2002 Farm Bill Conservation Security Program:

In general I fully understand the problem Chief Knight has with the administration and the OMB restraints and I realize we are at war, but we must think and look long run - not just at the budget problems of today.

CSP can be the model conservation and agricultural program for the future that will return benefits to the public and to the environment and long run save or cut total agricultural expenditures. It will raise the conservation ethic and a change of behavior that will last for generations.

The present proposed rule is so restrictive that commercial producers (those of us producing 80% of total volume and value) can not and will not participate. I urge NRCS, especially since 2004 Consolidated Appropriations uncapped CSP, to prepare new rules that reflect the latest and original intent of Congress.

Some specific problems and comments:

1. Watershed Targeting – While practical to NRCS workload in the short term, long term it will prove to be a mistake.
2. Base Payment Reductions – 10% of 10% of average land rent or .70/acre not \$7./acre Commercial farmers won't bother with the program, it's a turn-off, signals conservation must not be important. It violates the spirit of rewarding producers for past stewardship, the break through in the legislation that is fair and just and gains the respect of the responsible stewards of the land. I realize you wish to restrict the base payments in favor of enhancement but what of the steward who is already using the best technology available to protect and enhance the environment while producing food and fiber? Are we "rewarding the best while motivating the rest"? I fear not!
3. Ag. Operations – 45,000 limit x 10 = 450,000. I understand and agree with limits set by Congress, but what is an operation and what is tenure? The typical family grain farm has two to five family members, four to twelve landlords, and in a five to ten year period will lease, buy, sell, and trade farms and tracts of land several

times. That's the nature of our business today and it will probably intensify. These producers must participate for CSP to be successful and to get conservation on the land. We must not lose credibility with these producers. The present rules penalize a family working together efficiently, sharing talents and specialties, producing for the market and getting conservation on the land. These successful model stewards are considered one operation and can have only one contract.

Now, for example, if members of these operations were to get mad, fall out, break up the family, lose their production, purchasing, and marketing efficiency and their profitability they would be eligible for multiple operation limits and contracts. Not fair and not practical. Would they get more conservation on the land? I think not!

Your rules must reflect the real world producer and be flexible to continuing change of ownership and tenancy. To capture the opportunities intended by Congress, I see the need to re-certify each producer, each year, the same as with FSA and the commodity programs. Sign up and contract for the land and require and reward stewardship to whoever owns and operates the land.

CSP is innovative, complex, visionary, etc. and I compliment the agency for all you have done. You have had a tremendous challenge. I know you must find ways to restrict participation but you must also find ways to reach the vast majority of the land controlled by commercial producers and we must demonstrate its value to these producers in the first few years of the program. We must not set precedents and use restrictive rules that will doom the concept for future farm bills. Let us compete on the merits of our stewardship, selecting one per county, district, watershed, etc. To limit participants I would compete in a lottery rather than be ruled out. This program must be successful -- a model for the world.

Thank you for the opportunity to comment. I hope you will understand, this comes from my heart.



William J. Richards
Conservation Farmer and
Former Chief of SCS

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March 2, 2004

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

I am a livestock and grain farmer from Livingston County, Missouri, who has benefited significantly from effective conservation programs in the past. I am writing today about the USDA's proposed rules regarding the new Conservation Security Program. CSP was created by farmers and farm groups as a way to reward farmers for including environmentally-friendly farming practices. USDA's proposed rules violate the intent and spirit of the program as it was passed in the 2002 farm bill.

In the farm bill version of CSP, payments were supposed to be significant for farmers. I was expecting to be paid between 5-15% of my county's average rental rates for land I could enroll in CSP. USDA's proposed rules make the payments even smaller—less than 1% of average county rental rates. With these low payments, the paperwork involved for me and the local USDA office would hardly make the program worthwhile.

Please reject the proposed rules to CSP and make sure the payments are based on the original amounts that passed as part of the farm bill.

Thank you for the opportunity to make comment.

Sincerely,

Bill Christison
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Chillicothe, MO 64601

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Robert S. Warriner
Agawam Farms RD#4
Montrose, PA 18801
570-278-1736

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

February 25, 2004

Dear Mr. McKay,

After carefully perusing the literature on the Conservation Security Program (CSP), I have a few comments to share with you.

Agawam Farms is a steward of environmental conservation, working closely with like minded groups to use resources wisely. Following are some of the programs we have implemented:

- Agawam Farm is a third generation farm, in operation since 1926.
- Agawam has been a Conservation District cooperator since 1958.
- Agawam has used ACP funds form BMP's until 1995.
- Agawam received honorable mention in FARMING IN THE FLYWAYS, 1989.
- In 1997, the farm was granted an AG easement.
- Effective since March 8, 2001, this farm has worked with the Chesapeake Bay Foundation to fence wetlands, stream banks, and lake shore. In addition, we have built a compost pad for manure and installed two stream crossings to reduce/eliminate erosion.

The concept of CSP is "Reward the best and motivate the rest." However, it appears that CSP is under funded to meet this goal. Some suggestions follow:

- EQUIP monies appear to reward Tier I and some low Tier II farmers, possibly EQUIP and CSP should be linked.
- EQUIP monies could be used to elevate Tier I to Tier II.
- As Tier I farmers become better stewards of their resources, they would receive a larger annual payment and therefore require less EQUIP money.
- Many Tier I farmers are not able to implement the multitude of BMP's required in an EQUIP contract. They do not have enough management experience and the contracts are overwhelming. To be successful, this would need to be addressed.
- As Tier I and Tier II farmers advance to the next tier, there would be less need for EQUIP monies. Their annual payments would increase (CSP) along with productivity. Long range planning suggests that there would be an overall savings for the USDA.

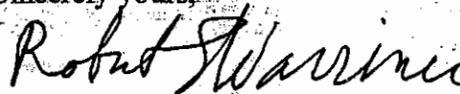
- Annual payments to farmers to care for our soil and water are more cost effective than the government doing the same.

By doing the above, we would reward the best and truly motivate the rest to become better stewards of our soil and water. This would be beneficial to all of society, ultimately with a lower price tag (win-win scenario).

Certainly the NCRS would be able to implement such a plan. They were formerly known as the SOIL CONSERVATION SERVICE.

CSP would then accurately REWARD THE BEST AND MOTIVATE THE REST.

Sincerely yours,



Robert S. Warriner