

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,

Rhoda P. Gilman

(Additional comments on back)

Additional Comments:

1. NRCS is seeking comments on the idea of a one-producer, one-contract approach to CSP contracts, as a way to provide the fairest treatment of all producers and to guard against program fraud and abuse. Do you agree with this approach? Do you agree that all CSP payments should also be attributed to real persons (not various corporate or business entities)? And do you agree that the payment limits set in the law (\$20,000 per year for Tier 1, \$35,000 per year for Tier 2, and \$45,000 per year for Tier 3) should be maintained?
2. NRCS is proposing that CSP contracts in general not be renewable, except in special circumstances. The law, on the other hand, leaves it up to the farmer to decide if he or she wants to renew the contract, and USDA would renew unless the farmer was not fulfilling the contract. Do you agree that CSP contracts should be renewable, as part of an ongoing program, and not limited to one-time contracts?
3. Your additional comments on CSP and the USDA's proposed rules:

As an environmentalist, I see our nation's farm policy as one of the most basic cornerstones in making our country a prosperous and livable place for future generations. The Conservation Security Program is one step in that direction, and I urge you to change your proposed rules to fully implement the law as intended.

Name (if not signed on front): Rhoda R. Gilman

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February 27, 2004

Re: Conservation Security Program Proposed Rule

Dear Secretary Veneman,

As NW Iowa farmers, we are disappointed in the shortcomings of the proposed rule for the Conservation Security program and I urge you to issue a supplemental or revised rule reflecting the new law restoring the CSP's entitlement funding status. I also have some key concerns that should be addressed in a revised rule to bring the draft program implementation design in line with the requirements of the CSP section of the 2002 Farm Bill. Please issue this in a timely fashion, without adding significantly to the length of the existing public comment period, so farmers can still enroll in the program this year.

The proposed rule fails to provide a nationwide program available to all farmers and ranchers in all regions of the country who are practicing effective conservation, as required by law. It limits CSP eligibility to farmers and ranchers within a small number of watersheds and, within those watersheds, to certain "enrollment categories and subcategories" of producers. This would result in vastly lower participation levels and far less progress in solving natural resource problems. The rule should be modified by removing the restrictions limiting enrollment to certain watersheds, certain classes of farmers and ranchers, and to a limited set of resource concerns.

In addition, the proposed rule sets the entry point too high. The highest NRCS conservation standards for soil and water quality would have to be achieved prior to becoming eligible for the CSP. This is in stark contrast to the law, which says that relevant conservation standards must be met as a result of participation in the CSP. For Tier 3 participants, the proposed rule would require every single NRCS conservation standard to have been met prior to enrollment. The proposal would deny access to farmers who are transitioning to sustainable agriculture. The rule should be modified to retain high environmental standards, but to allow farmers and ranchers to achieve those high standards while in the program.

Instead of providing meaningful incentives and financial rewards for outstanding environmental effort and performance as envisioned by the law, the proposal demands that farm families cover the vast majority of costs of implementing and maintaining conservation systems out of their own pocket. The payment structure needs to be radically revised or the program has no hope of succeeding. The rule should establish cost-share rates on par with cost-share rates under other USDA conservation programs. Cost-share rates for newly installed practices should be equivalent to the rates under the Environmental Quality Incentives Program. Cost-share rates for the management and maintenance of existing conservation practices should be set at the 75% maximum rate established in the CSP law. Base payments should be set at the rates established in the CSP law, not the 90% reduced rate in the proposed rule.

Enhanced payments should reward the most environmentally-beneficial systems and, to the maximum extent possible, pay for results. Enhanced payments for on-farm research and demonstration projects and for on-farm monitoring and evaluation activities should allow the producer to recover costs. The enhanced payments for treating resource problems to management intensity levels beyond the current NRCS standards, for addressing additional resource problems, and for collective action within a watershed should not be treated as cost-share but rather as real bonuses to reward exceptional performance. A revised rule should also explicitly recognize resource-conserving crop rotations, rotational grazing and buffers as practices receiving substantial enhanced payments, as required by law.

I look forward to commenting on a revised proposed rule that describes a fair and workable program that works for family farmers and the environment.

Thank you,

Mary & Ray Nichols
20620 232 Ave.
Milford, IA 51351
712-262-1286, FAX 712-262-3294
hmci@rconnect.com

*Mary Nichols
Ray & Nichols*

2-26-04

Dear Mr. McKay,

I am writing regarding the proposed CSP Rules. I am extremely disappointed to learn that they would restrict participation to only a few areas of our country and pay only token amounts to farmers currently practicing effective conservation. I fail to see any benefits for long term resource management from implementation of these proposed rules. It certainly will not induce any farmers to join in the effort to reduce soil erosion and increase soil fertility. I do not believe that Congress had this limited scope of operation in mind when enacting this portion of the Farm Bill.

Please consider making this a nation wide assessable program and increasing payments for program participation.

Thank you,

Helen DAVIS
714 Washington
Winona Mn. 55987

Feb 27, '04

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Dear David McKay

Please correct the proposed rules on the CSP bill to reflect the intended purpose of the author, Senator Hawkins.

I supposed the following provisions to fulfill the INTENT of the CSP bill:

- a) full funding for all farmers practicing effective Conservation.
- b) rewarding existing Conservation practices.
- c) setting base payments as established by CSP law
- d) treat enhanced payments as real bonuses - not as cost-share
- e) reward managed rotational grazing.
- f) reward resource conserving crop rotations.
- g) reward organic production.

Please correct the rules to reflect these provisions.
Thank you, Paul Rohovec