

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,



Phil Cooper
Brown County, Ohio Producer

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,



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

Sincerely yours,

Bernard Lehmann

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,

Russell Brodtke
2921 Brodtke Lane
Cato, WI 54206

February 25, 2004

Conservation Operations Division
Natural Resources Conservation Service
ATTN: Conservation Security Program
P.O. Box 2890
Washington, DC 20013-2890

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Sincerely,



Leslie Kolesar
9943 West Upper Road
Saxon, WI 54559

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Conservation Operation Division
P.O. Box 2890
Washington, D.C. 20013-2890

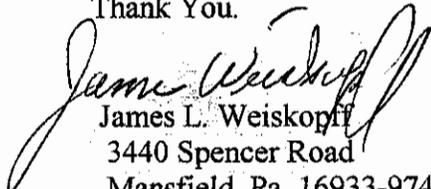
Dear Sirs:

I participate in the Chesapeake Bay Watershed and support your program to clean up the Bay.

I am a small farmer on 127 acres. I raise a few beef cows fed from our totally grassland farm. I try to use practices that protect our environment and believe conservative programs should be a part of it.

Thank you for your initiative in this matter

Thank You.



James L. Weiskopf
3440 Spencer Road
Mansfield, Pa. 16933-9742