

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 farmland and which would "reward the best, and motivate the rest." As intended by Congress, the CSP should 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 problem 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"
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 rate based on land capability without the 90% reduction proposed by USDA. Enhanced payments should reward the most environmentally-beneficial system 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 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.
6. NRCS should utilize the 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. All CSP payments should be attributed to real persons (not various cooperate or business entities). Payment limits set in law (\$20,000 per year for Tier 1, \$35,000 per year for Tier 2, and \$45,000 per year for Tier 3) must be maintained.
7. CSP contracts should be renewable, as part of an ongoing program, and not limited to one-term contracts. NRCS' proposal that CSP contracts in general not be renewable, except in special circumstances, conflicts with the law, which leaves it up to the farmer to decide if he or she wants to renew the contract, which USDA would renew unless the farmer was not fulfilling the contract. NRCS' proposed restriction to one-time contracts is contrary to the entire purpose of the CSP to secure ongoing conservation of our nation's national resources.

*Sister Angie Keil
407 N. 61st St.
Milwaukee, WI 53213*

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.

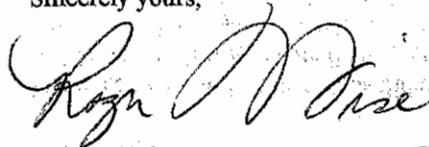
I have several concerns relative to the proposed rule. I understand that during the development of the proposed rule, changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change, 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,



Supervisor, Sandusky County, Ohio SWCD

February 23, 2004

ATTN. CSP

David McKay
Conservation Operations
NRCS
P.O. Box 2890
Washington, DC 20031-2890

Dear David McKay:

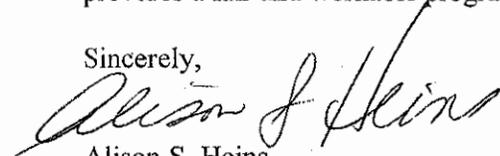
I am writing about the proposed rule to guide the implementation of the Conservation Security Program. After waiting an unduly long time for the rule to be released, I am very disappointed and concerned that the rule differs dramatically from the intent of the program. I had hoped that the CSP program would provide strong incentives for farmers and ranchers across the country to initiate and maintain practices that truly protect and enhance the environment.

I work as a technician at an agricultural experiment station. Much of our work with the local fruit farmers is to help them adopt innovative sustainable practices and run profitable operations. I feel that it is extremely important that the farmers remain on the land and continue a way of life that reaches back several generations. But they must do so in ways that protect the natural resources. I belong to a local food cooperative which promotes local products that are produced in a sustainable manner. I have a strong interest in the CSP because of its potential benefits to the growers, to the environment, and also to consumers who seek out conscientiously raised products.

Please issue a revised proposed rule, in a timely manner, to bring the draft program implementation design in line with the requirements of the CSP section of the 2002 Farm Bill. It should be a nation-wide program, not restricted to farmers within a small number of watersheds. The rule should be modified to allow farmers and ranchers to achieve high environmental standards *while in the program*, not prior to becoming eligible. CSP contracts should require that all applicable conservation standards be met by the end of the third year. The revised rule should also establish cost share rates on a par with other USDA conservation programs. Farm families should not be required to cover the vast majority of costs to implement and maintain conservation systems out of their own pocket. Also, the rule should respond to the needs of organic producers by including a clear mechanism to coordinate participation in both the CSP and the National Organic Program.

I urge the NRCS to issue a revised rule promptly. I look forward to a new proposed rule that provides a fair and workable program for family farmers nationwide as intended by Congress.

Sincerely,



Alison S. Heins
3000 E. Cedar Valley Rd.
Traverse City, MI 49684
231/228-7029

February 24, 2004

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Conservation Planning Team Leader
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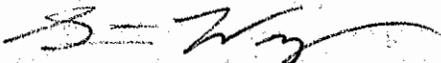
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Sincerely yours,


STEVE WARNER

February 24, 2004

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Sincerely yours,

David R. Wagner

February 24, 2004

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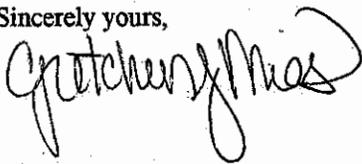
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I appreciate the opportunity to provide my comments on the CSP proposed rule.

Sincerely yours,



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.

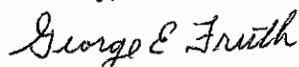
An issue of concern is also the cost-share payments. The proposed rule requires cost-share payments to be less ~~than~~ ^{that} EQIP. The authorization however provided a cost-share limit of 75% - the same as EQIP and other cost-share programs

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,



George E. Fruth
Seneca County, Ohio Producer