

727

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.

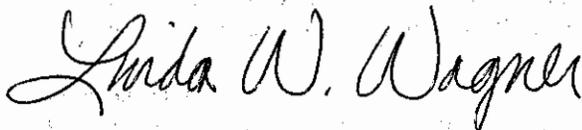
I have several concerns relative to the proposed rule. I understand that during the development of the proposed rule, changes were made to the statute that altered it from an uncapped entitlement program to a "capped entitlement" to be funded at approximately \$3.8 billion over 10 years. Given that change,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



1913 S.W. Warner Ct.
Topeka KS 66604
February 23, 2004

725

David McKay, Conservation Operations
NACS
P.O. Box 2890
Washington, DC 20013-2890

Re: Conservation Security Program

Dear Mr. McKay,

I am interested in the CSP because of my concern for good food for myself and the nation. We need conscientious concerned farmers who care for our land and we need to keep these farmers practicing their trade. Since full funding has been restored to the CSP for 2005 the restrictions of the President's "proposed rule" should be lifted.

Please revise the rule so that farmers can enroll in CSP during 2004. This rule should be nation wide, open to all farmers and ranchers who practise conservation as required by law.

High environmental standards are needed but farmers and ranchers must be allowed to reach these goals while still in the program not prior to entry. In addition incentives - payment rates - should not be subject to the 90% reduction from the level established by law. These should be bonuses for outstanding work. The farmers and ranchers should be able to recover costs.

I hope you can act soon to revise the proposed rule now that there is adequate funding.

Thank you for your attention.

Nancy J. Sargent

A note from
M Willard A Kreitlow

716

Dear Sirs

There is now the opportunity to
make CSP a valuable environmental
tool something that will benefit
the conservationist and the
public.

Crops and changed to pasture
must be rewarded, not penalized.

Resource conserving
crop rotations value must
be recognized.

Payments should equal or
exceed the commodity
program payments
which actually enhance
erosion in many cases.

Let's give this program
the support it deserves.

Sincerely,
60+ year
Conservationist -

The Nature
Conservancy 

Mr. Willard A. Kreitlow
7616 25th St SW
Howard Lake, MN 55349

David McKay
NRCS Conservation Operations
PO Box 2890
Washington, DC 20013-2890
Attention: CSP

Dear David McKay,

I am a farmer writing about the Conservation Security Program (CSP). The current proposal does not meet the intent that the 2002 Farm Bill set out—that is to provide incentives for farmers and ranchers to farm in ways that preserve farmland and protect the environment.

In order to meet the intent of the law and to provide a program that enhances soil and resource conservation, the proposal should be changed in the following ways:

- 1) CSP should be a nationwide program available to all types of producers.
- 2) Farmers and Ranchers need to be allowed into the program before meeting the highest NRCS standards. They need the incentive to work toward the standards.
- 3) Payment rates need to be increased to adequately provide an incentive to use more environmentally beneficial ways of farming. Payments should have the "Base" rates set in the 2002 Law with greater payments for the best systems.
- 4) Payments should be a direct incentive to farmers to use resource-conserving systems such as crop rotations, managed grazing and organic farming.
- 5) Base payments should be based on NRCS land capability classes, and not on the current land use to reward producers who are currently grazing land.
- 6) CSP participation should compliment the National Organic Program.
- 7) Conservation resource priorities should be set at the state or local level.
- 8) All NRCS-approved practices need to be included for payment.
- 9) The program should have a renewable and continuous signup.
- 10) Tenants need to be allowed into the program as long as they meet CSP standards.

These comments follow the program as set by law and if implemented, will provide the best use of taxpayer money to reward good conservation and stewardship.

Joseph M. Guiney

Sincerely,
Joseph M. Guiney, Farmer

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,



Robert Manzke
N8646 Miller Road
Seymour, WI 54165

700
Roger Hopfeld
1031 Langford Ave
Liscomb, Ia 50148

Conservation Operations Division
N R C S
PO Box 2890
Washington, D.C. 20013-2890

Dear Sirs,

I'm writing concerning the proposed new rules of the Conservation Security Program.

I farm in Central Ia and raise corn - soybean on a 50/50 rotation. When CSP was announced I thought maybe finally we may be rewarded for our good conservation practices.

Since 1989 I have been virtually 100% no-till & in the last 4 years have grid-mapped 90% of our land to put the correct amount of nutrients in the correct spot.

The proposed rules will only help a very small amount of farmers and seems to take the intent out of the law that Congress intended.

I hope you will take another look at these rules for the sake of the farmers & the environment we protect.

Sincerely,
Roger Hopfeld

619

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,



Leslie Kolesar
9943 West Upper Road
Saxon, WI 54559

708

Burke Soil Conservation District
Post Office Box 336
Bowbells, ND 58721

Conservation Security Program Comments
Attn: David McKay
Conservation Operations Division, NRCS
Post Office Box 2890
Washington, D.C. 20013

Dear Mr. McKay:

The Burke Soil Conservation District is grateful for the opportunity to comment on the proposed rules for the Conservation Security Program.

We urge NRCS to make changes in the rule to better reflect the intent of the CSP legislation. The following are those issues we feel need to be addressed:

- ❖ The legislative intent is to allow all agriculture producers to participate equitable in the program and that the Secretary will not employ a ranking system. The priority watershed approach is in direct conflict with the legislation. The watershed limitation should be removed.
- ❖ The legislation states "the Secretary shall not provide a rate lower than the national average rental rate." Again the proposed rule is in direct conflict with the legislation when it proposes to reduce the base payments. There should be no reduction factor in the base payments.
- ❖ In order to ensure that conservation is enhanced the full list of eligible practices should be restored. The cost-share rate for these practices should also be raised to the 75% limit.
- ❖ The proposed rule to require land that is not in control of the producer for the length of the contract to be maintained at the same conservation level will discourage participation in the CSP. This requirement should be removed from the rule.
- ❖ Whenever resource concerns are considered we encourage consultation with local agriculture producers and local conservation working groups.

Our hope is that with changes to the proposed rule the Conservation Security Program becomes the conservation program of the 21st Century, rewarding the stewards of our nation's working lands.

Respectfully submitted,

Marshall Chrest
Marshall Chrest
Chairman, Burke SCD