

Montgomery
1120 Peters Pike Rd
WITZ, VA 24184

Conservation Security Program
Attn: David McKay
NRCS
PO Box 2890
Washington DC 20013



2-9-04

Conservation Security Program Comments

David McKay

NRCS Conservation Operations Division

P.O. Box 2890

Washington, D.C 20013

fax 202-720-4265

Dear David,

With Iowa's budget in the RED, farmers are in the process of losing their tax exemption on old growth timber thru the Iowa legislature. This will result in thousands of acres being cleared by dozers. This land should not be grazed or farmed as most is in highly erodible areas. This land currently does not qualify for any federal assistance. Could this program be used to reward farmers in leaving this land wooded?

Thank you,

Jason Joney

26573 Iure Haute Road

Lamoni Iowa 50140

111
104 Wildflower Lane
Shepherdstown, WV 25443
February 6, 2004

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

ATTN: Conservation Security Program; Comments on Proposed Rule

Dear Mr. McKay:

This is a supplementary letter to and differs in content from my previous email.

I am writing to you in my capacity as a farmers' advocate for family farmers in Jefferson County, West Virginia.

The Conservation Security Program (CSP) has much promise for helping farmers in my area to conserve and improve natural resources, but *only if the proposed rule is changed* to reflect the original spirit of the Program.

Specifically, I would like to recommend the following changes:

1. Make All Farms Eligible: Restore eligibility for all by eliminating the selection of priority watersheds and limited "categories" for enrollment.
2. Motivate Farmers: Allow farmers to achieve high conservation standards while in the program, not as a precondition for applying.
3. Green Payments: Restore meaningful incentive programs so that farmers are financially rewarded for outstanding environmental performance. The proposed rule calls for payments that give merely lip service offering pennies an acre for base payments, 5% cost-share payments for practices, and enhanced payments that don't even cover the farmer's costs.
4. Comprehensive Conservation: Allow farmers to address any or all significant natural resource concerns on their farm, and allow them to make use of all effective conservation practices, instead of severely restricting what can be done.
5. Reward Resource-Conservation Crop Rotations, Rotational Grazing, and Buffers: USDA should make the enhancement payments for these big pay-off conservation systems a highlight of the program. Amend the rule to name these conservation systems in the rule as qualifying for enhanced payments on a nationwide basis.

Buckner--2

6. Treat Grass-Based Agriculture Fairly: Establish base payments based on NRCS land capability classes, not based on current land use.

7. Respond to the Needs of Organic Producers: The rule should include a clear mechanism for coordinating participation in the NOP and the CSP. USDA staff should deliver these complementary programs in the most farmer-friendly, least burdensome fashion possible.

8. Restore a Comprehensive, Locally-Driven Approach to Conservation: Allow the conservation resource concern priorities to be set at the state level so the program can be as responsive as possible to the major resource issues in each region of the country. One solution would be to have each state include soil quality and water quality among their top 5 resource concerns and have farmers choose to address at least 2 of the 5 (tier 1 and tier 2) and all 5 (tier 3).

9. Provide for Ongoing, Not One-Time Support: To succeed in maintaining and enhancing conservation systems long term, farmers must be able to remain in the program. The rule should comport with the law and allow contracts in good standing to be renewed at the option of the producer.

10. Don't Penalize Cash Renters: The rule should provide fair treatment for tenants, allowing a tenant's CSP contract to exclude such land entirely, or allowing the farmer or rancher to receive CSP payments on land meeting CSP standards as long as the tenant controls the land.

11. Provide for a Continuous Sign-Up Process: The rule should provide for a predictable, continuous, nationwide signup process.

I will appreciate your attention to these points. Thanks for your consideration.

Sincerely,



Marian Buckner

BRUCE E. STEPHENS
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Lincoln, NE 68508

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February 6, 2004

David McKay
USDA NRCS
PO Box 2890
Washington DC 20013-2890

Dear Mr. McKay:

This letter is to request that you promptly issue a revised draft rule for the Conservation Security Program that is consistent with the law passed by Congress and signed by the President.

I was born and raised on a farm and my family still owns a farm. I am also an avid hunter and wildlife enthusiast. The United States needs a revised draft rule now because farmers and ranchers need to be able to enroll in the CSP this year. We need a revised proposed rule to bring the draft rules in line with the 2002 farm bill.

The draft rule should not limit the CSP to a small, select number of water sheds. Instead, it should follow the law, which calls for a nationwide program available to all farmers and ranchers in every state.

Every farmer or rancher should be eligible for this program. Also, the stewardship incentives must be meaningful. Your draft rule adopts incredibly low payment rates. Your draft rule demands that farm families cover the vast majority of the cost of implementing and maintaining conservation systems that benefit all of us, as well as the wildlife. Your rule should use cost-share rates similar to other USDA conservation programs. Base payment should be set as envisioned by law, not one-tenth that amount.

Resource conserving crop rotations, rotational grazing, and buffers must be rewarded, which your draft rules do not. These practices are great for wildlife as well as the family farm. The USDA should use enhancement payments to reward these highly beneficial conservation systems nationwide.

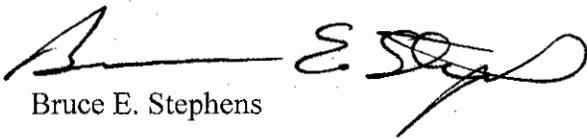
All conservation practices should be eligible. The program should fund the full range of USDA-approved conservation practices and should encourage on-farm innovation and research.

The farmers need a continuous sign-up process, and need to be able to re-enroll. The rule should provide a predictable, continuous, nationwide sign-up process, and should allow for re-enrollment.

The state and local problems need to be addressed. Nebraska has its own concerns, like wildlife habitat and water quantity, that should be addressed as well. The rules should allow conservation priorities to be modified at the state level so that key state and local problems can be addressed.

I would encourage you to follow the law and do the right thing in this case, rather than play politics with something so important.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce E. Stephens", written in a cursive style. The signature is positioned above the printed name.

Bruce E. Stephens

Price E. Stephens
Attorney at Law
224 "K" Street
Lincoln, NE 68508



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