

DATE: *March 1, 2004*

ATTN: David McKay  
NRCS Conservation Operations  
PO Box 2890  
Washington, DC 20013-2890  
Fax 202-720-4265

Dear Mr. McKay,

I support the CSP as a nationwide conservation program focused on working farmlands and ranchlands that will "reward the best, and motivate the rest."

CSP can be a very useful tool for helping farmers to conserve and improve natural resources, but only if the proposed rule is changed to reflect the original spirit of program. USDA should issue a supplement to the rule, which would be open for public comment for 30 days. This should be done immediately to make the rule consistent with the law authorizing the CSP, and with the funding allocated by Congress restoring it to its uncapped, national entitlement program status.

Specifically, I recommend the following changes:

- **Restore Green Payments** - Farmers should be financially rewarded for outstanding environmental performance. The proposed rule calls for pennies per acre for base payments, as low as five percent cost-share payments for practices, and enhanced payments well below the farmer's costs. It is doubtful farmers would bother to apply with these low payments. Restore payments to the levels called for in the law.
- **Make All Farms Eligible** - Restore eligibility for all by eliminating the selection of priority watersheds and limited categories for enrollment.
- **Motivate Farmers** - Allow farmers to achieve high conservation standards while in the program, not as a precondition for applying.
- **Restore Comprehensive Conservation Approach**- Allow farmers to address significant natural resource concerns on their farm. Allow use of all effective conservation practices, instead of severely restricting what can be done. Allow states to add up to three other resources of concern to the national resource concerns of soil quality and water quality.

Sincerely,

*Rebecca King*  
*Rebecca King*

Name  
Organization  
Address

*PO Box 68*  
*Earl Clark, Mt 49111*

DATE: 2/29/04

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NRCS Conservation Operations  
PO Box 2890  
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Sincerely,

*Gordon A. Bartels*

Name Gordon A. Bartels  
Organization  
Address 1120 Kenly Ave. Apt. 5  
Hagerstown, MD 21740

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Sincerely,

Rosalynn L. Evans

Name Rosalynn L. Evans  
 Organization Georgia Poultry Justice Alliance  
 Address  
 8097 Roswell Rd.  
 Bldg. C Suite 200  
 Atlanta, GA 30328

URGENT!

URGENT!

I raise Beef on 225 acres in Wyoming, Co. (your location). I try to farm in ways to protect the environment, while making a profit. I am very concerned about the draft for the Conservation Security Program. This is a program that could be very helpful to Pennsylvania farmers, and this program as currently proposed would short-change us once again.

The Conservation Security Program that Congress envisioned would make a tremendous difference to my family and me. It would allow us to do even more to protect the environment while remaining profitable. Please issue a revised rule that:

1. Ensures that all farmers who farm in ways to protect natural resources are eligible.
2. Provides the true financial benefits promised by the legislation.
3. Sets the environmental standards so that the majority of farmers are eligible to participate, establish and maintain conservation practices, and improve their environmental stewardship.

If you have any questions feel free to contact me at (your contact information).

Sincerely,  
John/Jane Doe

*Larry Spadone*  
RD # 2 Box 2379  
Midway, Pa. 18446

# Total Crop Management, LLC

633

Tom & Tracey Novak  
N3814 Jefferson Street  
Sullivan, WI 53178  
Phone & Fax (262) 593-2900  
E-mail: [tntfarm@execpc.com](mailto:tntfarm@execpc.com)

2/27/04

Conservation Security Program Comments  
Attn: David McKay  
Conservation Operations Division  
NRCS  
PO Box 2890  
Washington, DC 20013

Dear Sir:

I have worked as an Independent Crop Consultant with 25 growers on approximately 12,000 acres for the past 15-years. When the Conservation Security Program was announced a few years back I was impressed with the direction it was going to take our conservation initiative. However, after watching and participating in various conservation programs over the years I was extremely skeptical that the final rules would look anything like what was originally proposed. And to be blunt about it – I haven't been disappointed by the proposed rules as USDA has turned a potentially simple program into a muddled mess. The following are a few of my concerns with the proposed rules.

1- Fully fund the program:

With current national funding of only \$41 mil. for 2004 there are hardly enough dollars available to even call the accepted farms "pilot projects". Environmental benefits will be very difficult to show at less than 1 farm per county.

2- Limiting sign-up to the "best" producers is a poor choice:

These producers have already addressed the most pressing needs on their farms and they should be rewarded. However, it does not allow access to funds for other producers that are trying to attain the level of conservation that the "best" are at. The proposed rule will put these producers at a competitive disadvantage and that was not the intent of the 2002 Farm Bill. Too many producers will be left behind using this pick and choose method.

3- Sign-up process/periodic sign-ups:

It appears this will be a lengthy, time-consuming process that will discourage many from considering the program. Furthermore, due to the amount of material that must be put together to actually apply, if only periodic sign-ups are allowed a producer may miss the time frame allotted for the sign-up. I strongly encourage a continuous sign-up be allowed.

# Total Crop Management, LLC

Tom & Tracey Novak  
N3814 Jefferson Street  
Sullivan, WI 53178  
Phone & Fax (262) 593-2900  
E-mail: [tntfarm@execpc.com](mailto:tntfarm@execpc.com)

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4- Limited sign-up to priority watersheds:

This discriminates against those outside of "priority" areas even if they have done an excellent conservation job so far or are in need of funding to address a pressing local need. Too many producers will be over-looked with this strategy.

5- Eligibility requirements:

It is important that the money go to the person that is involved in the day to day conservation activities as stated in the proposed rules. My clients in SE Wisconsin cash rent 60-70% of the acres they farm. It is proposed that the producer have control of all land enrolled for the life of the contract (5 to 10 years). This is an unrealistic expectation as most producers have a difficult time obtaining a 3-year cash rent lease just to crop the land. Typically most producers have lengthy relationships with the people they rent from, but most land owners balk at a long-term written agreement. This control for the life of the contract will be a significant stumbling block in getting producers to sign up. A better approach may be to attach the conservation activities to the land base regardless of operator. If the land is signed up with certain conservation practices all future operators will have to follow what was started by the previous operator.

6- The CSP is non-trade distorting:

This program creates an opportunity to funnel more dollars to our producers for doing an excellent job protecting our natural resources without being looked upon as subsidizing commodity prices. This benefits all of society and I urge you not to overlook this important financial incentive for our producers.

Without adequate, meaningful funding and opening the application process to all producers as originally intended, this program will fail to meet its objectives. Unfortunately, failure has been the fate of most of the previous USDA programs and that has left most producers and crop consultants very wary and skeptical of new initiatives. You can only go back to the well so many times before it's dry.

Sincerely,



Thomas P. Novak  
NAICC Certified Professional Crop Consultant – Independent  
#0143

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Attn: CSP Proposed Rule

62 Clark Road  
Brookline, MA, 02445

Dear Mr. McKay,

My name is Daniela Petuchowski and I am writing to you as a youth member of The Food Project, based in Lincoln and Roxbury, MA.

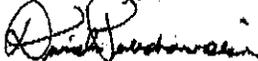
I believe that the CSP can be a very useful tool for helping our farm and farms all over the country to conserve and improve natural resources, but only if the proposed rule is changed to reflect the original spirit of the program.

Specifically, I would like to recommend the following changes:

1. **Make All Farms Eligible:** the proposed rule restricts enrollment. Please restore eligibility for all farmers and ranchers who wish to take care of their land.
2. **Motivate Farmers:** the proposed rule allows only those who already practice conservation to participate. Please allow farmers to achieve high conservation standards while in the program, not as a precondition for applying. This is very important because I believe in the accessibility of healthy produce for people of all economic statuses.
3. **Make Incentive Payments Meaningful:** the proposed rule has very low payment rates that don't cover the farmer's costs. For this program to succeed payments to the participants must be increased so that farmers are financially rewarded for outstanding environmental performance.
4. **Broaden Conservation Efforts:** please allow farmers to address any or all natural resource concerns on their farm, and allow them to make use of all effective conservation practices, instead of restricting what can be done.

Thank you very much for considering these comments.

Sincerely,



Daniela Petuchowski