

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 farmlands and which would "reward the best, and motivate the rest." As intended by Congress, the CSP should be 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 problems 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 watersheds" and undefined "categories."
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 rates based on land capability without the 90% reduction proposed by USDA. Enhanced payments should reward the most environmentally-beneficial systems 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 a 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 corporate or business entities). Payment limits set in the 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-time 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.

Additional Comments:

Signed: *Agnes Siebenaler*

Name: *Agnes Siebenaler*

City or Town, and state: *Tiffin, OH*

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Additional Comments:

*I come from many generations of farmers and it saddens me to see good farm lands disappear and small farmers be swallowed up.*

Signed:

*Beatrice Koemper*

Name:

City or Town, and state:

*Tiffin, Ohio*

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Additional Comments:

Signed:

*Judy Leibengood, OSF*

Name:

*Judy Leibengood*

City or Town, and state:

*Lima, OH 45805*

352  
1191 Wildwood Rd  
Curtis, WA 98531  
Feb 14, 2004

Dear Mr. McKay;

When I first heard about the Conservation Security Program it sounded good. Finally a program to reward farmers for doing what they should rather than farming for the Federal Government. After looking at limited specifics available, it is going to be an absolute failure in that respect. It will be more of the same that the last 20 years has seen from the USDA and NRCS.

My background. We have been here 28 years, operating as a partnership that was a dairy-crop farm. We have evolved into a fairly large diversified operation that raises processing sweet corn and peas, vegetable seed, small grain, hay, dairy heifers and some beef. Since we stopped the dairy about 13 years ago we have received three small disaster payments from NRCS.

We have attempted to grow crops that stood on their own economically and fit into a rotation scheme to keep healthy and productive soil. In the meantime producers of some commodities that are usually in surplus have individually received up to millions of dollars!

Specifically CSP. I am 58 and my brother

We rent a large portion of what we farm. A ten year CSP contract is out of the question. It appears even a sale of owned land to children would trigger a cancellation of contract and repayment requirement.

From what little information I have been able to pry out of the local NRCS office, the money offered will come close to paying for even the time required to sign up. Government employees seem to be the only ones getting money from CSP as it was approved 2 years ago.

I am having trouble making specific comments as to what I have seen is so ambiguous as to make many specific comments impossible. CSP was touted as a way to reward farmers who have not been part of traditional commodity programs. It appears those same people will be the major groups to benefit. They have the experience qualifying for these programs and learning to set up management and paper work to get maximum payments. I am sure that will continue.

The mere fact you are going through this "write and comment" process ensures these groups will get most of the money.

because of their organizations and experience straight forward, specific programs with annual or short term practices would be much more practical for diversified farms. Good stewardship practices in our area are not the same for all crops or soil types. Rewards for specific practices related to specific crops and soils are more realistic. They may change from year to year on a given field. For example a cover crop following peas is good. One following small grain is not necessary or even beneficial. Planting permanent grass (an average 5 year crop) is expensive the first year, but should also be rewarded each year for 5 years as it is a great conservation practice. After about 5 years a grass crop should be renovated as production usually will decline. This type of flexibility is not clear in looking through your current papers.

I am very disappointed in the Bureau's "market" in which I have been having trouble responding to your proposal as it is so vague. There are too many cooks stirring the soup.

Sincerely,  
Dwight Brown