

Janine Wojtalewicz
2095 110th St. S.W.
Appleton, MN 56208

February 23, 2004

Bruce I. Knight, Chief
Conservation Operations Division
Natural Resources Conservation Services
PO Box 2890
Washington, DC 20013-2890

RE: Conservation Security Program Rule

Dear Chief Bruce I. Knight:

I am writing about the new proposed rule regarding the Conservation Security Program. I grew up out here in western Minnesota and have lived here most of my adult life. I am strongly urging you to *please* have this be a fully working program for all of our family farms out here and across the country. When Congress made this law, they also approved plenty of money to make it work for our farms and our environment.

From what I understand about the new proposed rule, it is terrible! It would limit the conservation money to just a few farmers, many of whom are already doing good conservation practices, in a few isolated spots in our country. I have also heard that it would be unfair to farmers who had already changed their row crops to pastures, which is a better conservation use. This is NOT what our farmers and other conservation minded Americans asked Congress to do, and it's not what Congress did!

One of the best ideas about the CSP program was that it would get money to farmers who couldn't afford to do any good conservation practices yet on their farm fields. Our lakes and especially our creeks and rivers are polluted from agricultural runoff. We want this stopped! The money going to our farmers would be tremendous for our small town communities out here in western Minnesota. *Please change the rules so that the CSP program does what it was intended to do.*

Sincerely,

Janine Wojtalewicz
Janine Wojtalewicz
janine@maxminn.com

JW



ATTORNEYS:

James Kruzich
 (1950-1983)
 * Brian Wojtalewicz

139 North Miles Street - PO Box 123
 Appleton, Minnesota 56208-0123
 Fax: 320-289-2369
 Ph. 320-289-2363

STAFF:

Janine Wojtalewicz
 Laura Ascherman
 Norma Iseminger
 Carol Warner
 Jodi Sterud

February 23, 2004

Bruce I. Knight, Chief
 Conservation Operations Division
 Natural Resources Conservation Services
 PO Box 2890
 Washington, DC 20013-2890

Re: Conservation Security Program Rule

Dear Chief Bruce I. Knight:

Our family is writing to urge you to please have the Conservation Security Program be a fully working program for all of our family farms out here in western Minnesota, and across the country. Congress made this law and approved plenty of money to make it work for our farms and our environment.

The new proposed rule that we have heard about is terrible. It would limit the conservation money to just a few farmers in a few isolated spots in our country. This is not what our farmers and other conservation minded Americans asked Congress to do, and not what Congress did.

This proposed rule also would have the money going just to a few farmers who are already doing good conservation practices. One of the best ideas about the CSP program was that it would get money to farmers who couldn't afford to do any good conservation practices yet on their farm fields. We have heard that it would also be unfair to farmers who had already changed their row crops to pastures, which is a better conservation use.

Our lakes and especially our creeks and rivers are polluted from agricultural runoff. We want this stopped, and the money going to our farmers would be tremendous for our small town communities out here in western Minnesota. Please change the rules so that the CSP program does what it was intended to do.

Sincerely,

Brian Wojtalewicz
 brian@maxminn.com

BW/la

Offices in Alexandria & Appleton
 Alexandria Phone: 320-762-8382

*Civil Trial Specialist, Certified by the Minnesota State Bar Association
 & the National Board of Trial Advocacy

Fax Transmission

No. of pages incl. this one: 4

To: Conservation Security Program Comments
Attn: David McKay

From: Jerry Ackermann

Date: 3/1/04

If you do not receive all pages, please contact:

Jerry Ackermann
39750 820th St.
Lakefield, MN. 56150-3429
507-662-5577 Phone
507-662-5584 Fax

Subject: CSP

Special Instructions: *I agree with the proposed changes listed in the following letter written to Ann Veneman. I could have written a letter of my own, but it would have basically the same information. Since the USDA is to represent the American farmer, I think they should be paying attention to this.*

Thank you.

Sign-on Letter to USDA Urging Release of CSP Supplemental Rule

January 29, 2004

The Honorable Ann M. Veneman
Secretary, U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Dear Secretary Veneman:

We urge you to act expeditiously to issue a supplement to the proposed rule for the Conservation Security Program (CSP). In our view, the supplement should:

- be issued in a timely fashion in order to avoid the need for increasing the length of the existing public comment period;
- substantially revise the proposal, removing wide-ranging barriers to participation included in the initial proposal and incorporating genuine stewardship incentives into its payment structure; and
- comport with Congressional intent that the program be a nationwide, comprehensive, entitlement program.

The signatories are united in our strong support for the CSP as a landmark 'green payments' initiative for ongoing public support for excellence in private working lands conservation and provision of environmental services. We support a program with strong conservation and environmental standards that rewards sustainable farming systems with reasonable incentives.

We are heartened by the statement in the preamble to the proposed rule suggesting a revision to the proposal will be forthcoming upon adoption of the Omnibus Appropriations bill, a bill which removes the funding cap on the CSP and returns the program to its full entitlement status. With that bill about to be signed into law, we look forward to issuance of a thorough and far-reaching rule revision that encapsulates a fair and workable program implementation design that works for family farmers and the environment as Congress intended.

It is our collective judgment that the proposed rule issued January 2nd falls far short and indeed substantially outside the bounds of the letter and spirit of the law as enacted. The proposed rule's significant deficits indicate that collecting public comment on it, without supplementation to accommodate the passage of the Omnibus Appropriations bill, would confound the record and frustrate meaningful agency review of comments required by the Administrative Procedures Act. If the record before the agency is confused and incomplete, it will greatly complicate the task of preparing a final rule and program manual in a timely fashion. Timely issuance of the supplemental rule will conserve agency and public resources, as well as lead to a record based on a rule proposal that tracks both the farm bill and the omnibus spending bill.

Key issues that must be addressed in the supplement to the rule to bring it into harmony with the statute and congressional intent include but are not limited to:

- " removal of provisions to limit participation to particular watersheds and to particular categories of farmers and ranchers;
- switching to a farmer-friendly continuous sign-up process, a procedure which would also help spread the technical assistance workload over a broader timeframe;
- thoroughgoing revision of the base, cost-share, and enhanced payment structure so the program offers genuine cost-share assistance plus authentic stewardship incentives;
- equitable treatment of resources of concern such that tier one and two participants may choose from among major, actual resources of concern for their farm and locality, all tiers must reach the relevant RMS quality criteria within the contract period, and that no participant is required, as a condition of eligibility, to have already fully achieved the relevant RMS quality criteria;
- explicit incorporation of the statutory provision for enhanced payments for resource-conserving crop rotations, managed rotational grazing, and conservation buffers;
- removal of the prohibition on contract renewals and incorporation of the statutory mandate that contracts in good standing are renewable at the option of the producer;
- removal of the provision for enforcing CSP requirements on land for which no CSP payments will be made; and
- inclusion of the full range of NRCS-approved conservation practices as well as interim practices and pilot-testing of new, innovative practices.

We also encourage you to issue guidance to the states allowing them to implement the program in FY 04 with the limited funding provided for this partial, start-up year in as simple and straightforward a manner as they may devise. The thirteen-step process in the current proposed rule will only serve to discourage participation and must be simplified to meet the purposes of the authorizing legislation. In our view, given limited dollars and limited time remaining in FY 04, the time and money that are available would best be used to enroll producers in each state in a manner that will allow state and local offices to gain enrollment experience in the different farming and eco-regions within their boundaries. Such representative experience would no doubt assist with agency planning for full rollout of the program in FY 05.

The public investment to assist farmers and ranchers who develop and maintain conservation systems that solve critical natural resource concerns will pay big dividends by fostering public benefits such as clean water, clean air, improved wildlife habitat, healthy and stable soils, increased carbon storage, improved rangeland, and restored and enhanced wetlands and prairie. By taking a conservation systems approach rather than a single practice approach, by requiring that real resource problems be solved to a sustainable use level, and by emphasizing cost-effective management practices, resource enhancement, and monitoring and assessment, the CSP marks the most comprehensive and rigorous conservation incentive program to date. CSP payments, capped at a modest amount per farm per year and fully compliant with our international trade obligations, are also a prime model for the type of farm program that will gain and maintain public support. We urge you to craft a revised proposed rule and implementation plan worthy of these vital and widely-supported goals.

Thank you for your consideration of this urgent request. We would welcome the opportunity for further discussion with you and your staff on this matter.

Sincerely,

American Farmland Trust
American Society of Agronomy

Sign-on Letter to USDA Urging Release of CSP Supplemental Rule

Chesapeake Bay Foundation
Crop Science Society of America
Defenders of Wildlife
Horizon Organic Dairy
Land Trust Alliance
Minnesota Project
National Audubon Society
National Campaign for Sustainable Agriculture
National Center for Appropriate Technology
National Wildlife Federation
Natural Resources Defense Council
Northeast States Association for Agricultural Stewardship
Organic Farming Research Foundation
Organic Trade Association
Sierra Club
Soil Science Society of America
Sustainable Agriculture Coalition
Union of Concerned Scientists

[Conservation Security Program Home Page](#)