

Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013



Mr. Mark M. Giese
1520 Bryn Mawr Ave
Racine, WI 53403-3606

348

Mark M. Giese

E-mail: mark@juno.com

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.

Sincerely,

(Additional comments on back)

Additional Comments:

1. NRCS is seeking comments on the idea of a 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. Do you agree with this approach? Do you agree that all CSP payments should also be attributed to real persons (not various corporate or business entities)? And do you agree that the 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) should be maintained?

2. NRCS is proposing that CSP contracts in general not be renewable, except in special circumstances. The law, on the other hand, leaves it up to the farmer to decide if he or she wants to renew the contract, and USDA would renew unless the farmer was not fulfilling the contract. Do you agree that CSP contracts should be renewable, as part of an ongoing program, and not limited to one-time contracts?

3. Your additional comments on CSP and the USDA s proposed rules:

Name (if not signed on front): _____

**Robert S. Warriner
Agawam Farms RD#4
Montrose, PA 18801
570-278-1736**

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

February 25, 2004

Dear Mr. McKay,

After carefully perusing the literature on the Conservation Security Program (CSP), I have a few comments to share with you.

Agawam Farms is a steward of environmental conservation, working closely with like minded groups to use resources wisely. Following are some of the programs we have implemented:

- Agawam Farm is a third generation farm, in operation since 1926.
- Agawam has been a Conservation District cooperator since 1958.
- Agawam has used ACP funds form BMP's until 1995.
- Agawam received honorable mention in FARMING IN THE FLYWAYS, 1989.
- In 1997, the farm was granted an AG easement.
- Effective since March 8, 2001, this farm has worked with the Chesapeake Bay Foundation to fence wetlands, stream banks, and lake shore. In addition, we have built a compost pad for manure and installed two stream crossings to reduce/eliminate erosion.

The concept of CSP is "Reward the best and motivate the rest." However, it appears that CSP is under funded to meet this goal. Some suggestions follow:

- EQUIP monies appear to reward Tier I and some low Tier II farmers, possibly EQUIP and CSP should be linked.
- EQUIP monies could be used to elevate Tier I to Tier II.
- As Tier I farmers become better stewards of their resources, they would receive a larger annual payment and therefore require less EQUIP money.
- Many Tier I farmers are not able to implement the multitude of BMP's required in an EQUIP contract. They do not have enough management experience and the contracts are overwhelming. To be successful, this would need to be addressed.
- As Tier I and Tier II farmers advance to the next tier, there would be less need for EQUIP monies. Their annual payments would increase (CSP) along with productivity. Long range planning suggests that there would be an overall savings for the USDA.

- Annual payments to farmers to care for our soil and water are more cost effective than the government doing the same.

By doing the above, we would reward the best and truly motivate the rest to become better stewards of our soil and water. This would be beneficial to all of society, ultimately with a lower price tag (win-win scenario).

Certainly the NCRS would be able to implement such a plan. They were formerly known as the SOIL CONSERVATION SERVICE.

CSP would then accurately REWARD THE BEST AND MOTIVATE THE REST.

Sincerely yours,

A handwritten signature in cursive script that reads "Robert S. Warriner".

Robert S. Warriner

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Conservation Operations Division
Natural Resources Conservation Service
ATTN: Conservation Security Program
P.O. Box 2890
Washington, DC 20013-2890

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As stated in the proposed rule, the USDA must 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 eliminate the restrictions on participation in the CSP to a few "selected watersheds" and undefined "categories."
2. The USDA's proposed rules fail to make adequate payments for 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.
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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.

Sincerely, *Dave + Mary Egan - ORGANIC Dairy Farmers*
 51382 KOLBO RD
 Westby Wis. (Additional comments on back)
 54607

Additional Comments:

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*Hi. We have spent thousands of dollars
Changing from Row Crops to permanent
Pasture*

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3. Your additional comments on CSP and the USDA's proposed rules:

Name (if not signed on front): _____



February 19, 2004

THE KANSAS ASSOCIATION OF CONSERVATION DISTRICTS

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909 S. Colony Ave.
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Phone (620) 659-2546

RICHARD G. JONES

Executive Director

Mr. David McKay
Attention: Conservation Security Program
Conservation Planning Team Leader
Conservation Operations Division
USDA Natural Resources Conservation Service
P. O. Box 2890
Washington, DC 20013-2890

Dear Mr. McKay:

The Conservation Districts in Kansas appreciate the opportunity to comment on the proposed rule to implement the 2002 Farm Bill Conservation Security Program. We commend your Agency for developing the proposed rule and inviting review and comment from conservationists.

We do have some concerns relative to the proposed rule. We understand that the statute was changed from an uncapped entitlement program to a capped entitlement to be funded at approximately \$3.8 billion over a 10 year period. Your proposed rule puts further limits on the program by making it available to only a relatively small number of producers in highly targeted watersheds. The proposed rule also placed significantly lower limits for cost share and base payments than allowed in the statute. It also restricts the number and type of practices eligible for payment.

The 2004 Consolidated Appropriations Bill restored the CSP to an uncapped entitlement as it was originally written. We strongly urge NRCS to revise the proposed rule and implement the program as intended. The principal issues that need to be addressed to properly implement CSP include:

- Allowing open enrollment to all eligible producers with no preference for producers in targeted watersheds;
- Providing the full cost share, maintenance and base payments as provided in the statute;
- Removing the limitation on the types of practices eligible for payment; and
- Making the CSP a rewards program by allowing producers to use CSP to address resource concerns after enrollment.

Again, we appreciate the opportunity to provide you our concerns with the proposed CSP rule.

Sincerely,

Don M. Rezac
Don M. Rezac
President



Conservation Operations Division
Natural Resources Conservation Service
ATTN: Conservation Security Program
P.O. Box 2890
Washington, DC 20013-2890

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Sincerely,

Philip A. Stock

