

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

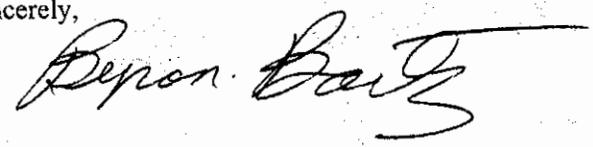
I am writing to suggest important changes to the USDA s proposed rules for the operation of the Conservation Security Program (CSP). I support the CSP as a nationwide conservation program focused on working farmlands and which would reward the best, and motivate the rest. As intended by Congress, the 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.

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): Byron Bartz, 17783 State Hwy 54 Barrett, MN  
56311  
Phoc 320-528-2301

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### Despite the steep hillsides, contour strips abandoned

**Letter to the editor:**

I have seen corn and soybean farmers completely destroy soil conservation contour striping in this area. I could never have thought that would happen in the Coon Creek Watershed area with these steep hillsides. They should at least try and work the land on the level or on the contour.

This coming summer I may see this on more

farms; even though they have real nice contour strip cropping already set up.

I wish that the owners of these farms would go to the Soil Conservation Service and collect payments on those crops — corn and oats, soybeans and hay.

Ernest Haugen  
Coon Valley

*I sent this article last year to our local newspapers to the Westby Times and the Vernon County Broadcaster. We practise soil conservation crop rotation on our farms. Corn 1 year, oats 1 year and hay several years. I wish that corn and soybean farmers would practise soil conservation crop rotation on hilly lands.*

*Sincerely,  
Ernest Haugen*

February 19, 2004

Name (if not signed on front): Ernest T. Haugen

51250 Scream Ridge Road

Coon Valley, Wisconsin 54623-8103

608-752-3545

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Sincerely,

*Steven E. [Signature]*

(Additional comments on back)

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*yes*

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*yes*

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Sincerely,

*Dana Jackson*  
814 Everett St. N.  
Stillwater, MN 55082

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*The intent of this program, as passed by Congress, was to provide incentives and rewards to independent farmers who use conservation practices that improve the environment. The NRCS should definitely employ the one-producer, one-contract approach in implementing the law.*

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?

*Yes, contracts should be renewable. It is in the public's best interest to reward farmers who are good stewards of the land and keep them managing our country's farm land.*

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

*As a citizen, I feel our democratic process is being cynically ignored. Congress passed a good bill to protect the land and water. The rules, as proposed, go against that law, which the President signed, and do not make it possible to implement the bill as passed. That says that the process of getting a bill passed and signed is irrelevant in the eyes of the USDA.*

Name (if not signed on front):

*Dana Jackson*