

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,

*GLA* *JK* 2/19/04

(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):

G. L. R.

2/19/04

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

330

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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.

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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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Sincerely,

*John Dilbeck*

—(Additional comments on back)

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YES.

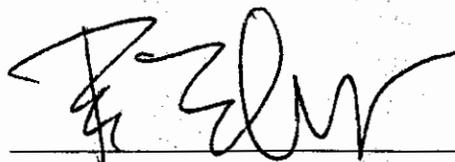
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YES.

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

FUND the Program for long term environmental benefits —

Name (if not signed on front):



ALBERT LEA SEED  
ALBERT LEA, MN  
TOM. EHRHARDT

56007

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ATTN: David McKay  
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Sincerely,

Willard Kreitlow 7616 25th St. SW  
Howard Lake MN 55349  
Phone 320 543 3394

(Additional comments on back)

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*I agree with the above comments.  
The payment limits are reasonable, more so  
than the excessive limits for the commodity program  
limits.*

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?

*Of course contracts should be renewable if  
the conservation and ecological desired  
results are being achieved. This is a  
program that has great and long lasting  
public benefits.*

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

*Cropland changed to pasture should be rewarded,  
not penalized.  
payments should certainly equal or exceed those  
given to production ag, (corn and soybeans in this area)  
and reward those who have foregone those subsidies  
for years by voluntarily doing that which  
CSP is encouraging.*

*I have been using most of the recommended  
conservation practices since 1944, and am still  
farming at age 81, and have been a conservation  
superstar 4 3 years and a part 8 commissioner 4 2 years.*

Name (if not signed on front): Willard Kreilow

*Please make E & P a viable program! Thank  
you.*