

SPRINGHILL FARMS

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319

February 18, 2004

Conservation Operations Division
Natural Resources Conservation Service
P. O. 2890
Washington, D.C. 20013-2890

Dear Mr. McKay:

I want to commend the NRCS for the opportunity to express my support for the proposed Conservation Security Program (CSP). As a full-time row crop farmer, that firmly believes in no-till and waterways, the CSP finally offers me what I feel the current farm bill totally neglects.

First, Conservation of our Natural Resources must be the building blocks of our Agricultural Industry. Financial payments that require nothing in return has not improved the resource base nor the family farm in my opinion.

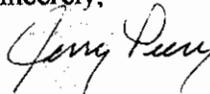
Secondly, as conservation programs have evolved throughout the years, the same eligibility criteria has remained the same. If a producer was doing a good job of resource stewardship, they would not be eligible. This denied cost-share for certain practices such as grass waterways and grade stabilization structures because they already existed making improvements to these practices ineligible. There should not be a penalty for not having a cropping history when it applies to conservation practices.

I support the CSP in general as it is proposed; I realize that not all applicants can be funded. For the program to be a success, it must be funded across the nation on a wide range of farming operations that will promote the success of conservation practices and that it does pay to implement them.

To facilitate this program at the field level, NRCS Staff must be allowed to work with producers in the field. This is the place where success stories can be accomplished, this "one on one" contact, as the old "SCS" was known for and the new "NRCS" has forgotten, is the key to producer participation.

In closing I support the Conservation Security Program and look forward to participating. I feel that the statement that CSP, "should reward the best and motivate the rest" states what this program will accomplish for conservation of our natural resources.

Sincerely,



Jerry Peery
Springhill Farms

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

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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.

Without adequate payments, this program is just lip-service and a complete waste of everyone's time + energy. Young included!

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?

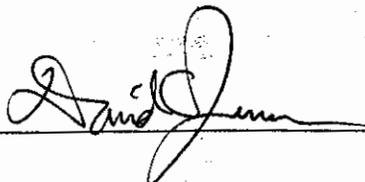
2. NRCS is proposing that CSP contracts in general not be renewable, except in special circumstances. The law, on the other hand, leaves it up to the farmer to decide if he or she wants to renew the contract, and USDA would renew unless the farmer was not fulfilling the contract. Do you agree that CSP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

Not be renewable? If the program isn't worth renewing if and when it works, what is the point of going through all this work to implement it in the first place? Please encourage it to be renewable.

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

Please make this program worthwhile!

Name (if not signed on front):



Conservation Security Program Comments

ATTN: David McKay

NRCS Conservation Operations Division

PO 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.

First, CSP must be available nationwide to all farmers practicing effective conservation. To restrict the program to a few watersheds is contrary to Congressional intent and contrary to the spirit of the law.

Second, CSP must reward existing conservation. The best way to secure the vital conservation of our soil and water resources is to recognize and reward it when and where it is being done. CSP base payments ~~must~~ be set at the rates established in the CSP law without the 90% reduction.

Finally, CSP should recognize the ability of organic production to protect soil, water and wildlife. Producers with USDA-approved organic certification plans under the National Organic Program (NOP) should have the option

(on back)

to simultaneously certify under both the CSP
and NOP if they meet the standards of both.

Sincerely,

Jennifer Kellen

Jennifer Kellen

17010 170th St

Lismore, MN 56155

Conservation Security Program Comments

ATTN: David McKay

NRCS Conservation Operations Division

P.O. Box 2890

Washington, DC 20013

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