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

297

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.

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.

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.

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?

The one producer, one contract approach, with the contract attributed to real persons seems reasonable to me. The only problem I see is that in cases like ours, where our small 5th generation family farm is incorporated, even though it is strictly operated by a mom-dad-teenage son, I would not want the "Inc" to disqualify worthy participants.

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?

Conservation-wise, you get the biggest bang for your buck from long-term, sustained efforts. Renewable contracts would encourage the necessary longevity.

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

Have "selected watersheds", if currently the most endangered certainly need attention, but key is maintaining & rewarding the existing efforts. For sure include rotational grazing areas - often times they are incorporated into a broader conservation/wildlife plan, and complement those projects.

Name (if not signed on front): Loretta Jones

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

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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.

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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,

Phillip Batelden

(Additional comments on back)

Additional Comments:

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I agree that NRCS should use the idea of one-producer, one contract approac to CSP Contracts.
I agree that payments should be attributed to real persons, not corporations.
I agree with payment limits of $20,000 - Tier 1, $35,000 - Tier 2, $45,000 - Tier 3

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?

CSP contracts should be renewable and not limited to one-time contracts.

3. Your additional comments on CSP and the USDA s proposed rules: make rules for the benefit of small family farms, and not another subsidy for large farms

Name (if not signed on front): Phillip Batelden

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

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Sincerely, Mark Kruse
V.P. CROPP Board

Mark/Marcia Kruse
2601 Lafayette Ridge DR
Lansing, IA 52151

(Additional comments on back)

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

If you compare 2 farmers with the same amount of tillable land and size. One is a corn, beans rotation farmer, the other a conservation minded farmer with hay and pasture ground in is rotation. The crop farmer will receive more government money every time and for what! I think the main propose of a conservation program is to conserve are valuable soil for

Name (if not signed on front): _____

future generation to use. Thank You for this consideration. Mark Kruse

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

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Sincerely,

Mary Ellen Frame
31679 Dahomey Ave.
Northfield, MN 55057

(Additional comments on back)

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   It should be one-producer: one contract. And all payments should be attributed to real persons. The payments set in the law should be maintained.

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   They (the contracts) should be renewable.

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

Name (if not signed on front): Mary Ellen Frame