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Roald Evensen

N8777 1090th Street, River Falls, Wisconsin 54022 (715)-425-8427

March 22, 2004

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

Dear Mr. McKay,

I am writing to offer comments about the proposed rules promulgated by the USDA for the implementation of the Conservation Security program (CSP). I was excited to see the CSP incorporated into the last Farm Bill as a way to provide important incentives to farmers for protecting the irreplaceable soil resources of agricultural lands across the nation. However, I have two major objections to the rules as proposed:

- 1) USDA has decided to promote the CSP only in selected watersheds and categories of farmland. This runs counter to the intent of the Congress to make CSP benefits available to all farmers across the nation. This restricted sign-up should be eliminated.
- 2) Many farmers are currently using environmentally sound practices and should be rewarded for their efforts. The proposed rule prioritize "additional effort" over the existing delivery of conservation benefits. The CSP should reward the farmers and their practices that produce the most environmentally positive benefits, irregardless of whether they are new projects or exiting outstanding conservation examples.

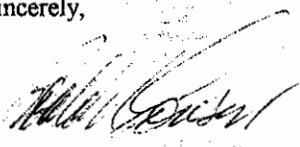
There are also three existing farming practices that should be recognized but are, in fact, ignored by the CSP rules:

- 1) *Managed rotational grazing*: The CSP statute states that a farmer will receive an enhanced CSP pay for practices that include managed rotational grazing, but the proposed rules would actually penalize farmers who have put former row-crop land into pasture as part of a managed grazing program.
- 2) *Resource conserving crop rotations*: The CSP statute indicates that "a crop rotation that includes at least one resource-conserving crop reduces soil erosion, improves soil fertility and tilth, interrupts pest cycles, and reduces depletion of soil moisture", and that such rotations should qualify for enhanced payments. Under the proposed rules, they do not, and this oversight should be fixed in the final rules.
- 3) *Organic Production*: The benefits of certified organic production are not recognized in the proposed rules. Farmers with USDA-approved organic certification plans under the National Organic Program (NOP) should have the option of simultaneously certify under both the NOP and the CSP if they meet the standards of both.

All three of these practices make substantial contributions to the protection of our soil and water resources, and should be recognized for payment enhancements under CSP rules.

I hope your Division will issue a supplement to the rules issued on January 2nd, and then provide another period for public review and comment. Thank you for your review of these comments.

Sincerely,



cc: Senators Herb Kohl and Russel Feingold
Representative Ron Kind

Conservation Security Program Comments
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Washington, DC 20013

Harris, Minn.
Feb. 23, 2004 269

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,

Ellen Farshaw
45701 S. Alamy Ave.
Harris, Minn. 55032

(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?

yes - absolutely

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

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

all my certified organic fields are in parcels from 4-13 acres to retard wind and water ~~run~~ erosion.

Name (if not signed on front): _____

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Sincerely,

J. Shaw

2/20/04

David F. Shaw 2/20/04

(Additional comments on back)

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David,
Let's make sure every farmer has to practice effective conservation.
But, Jeff 266

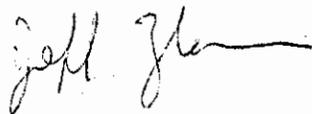
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*Yes, let's have real farmer interests
in this program*

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

*Most important result is getting margin
level into CSP.*

Name (if not signed on front):

Jeff J