

February 25, 2004

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

Dear Mr. McKay:

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. 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



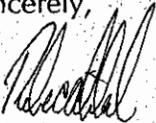
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substantial enhancement payments for these systems, as well as payments for management of existing practices.

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, as well as other nationally recognized sustainable agriculture certification programs, such as Food Alliance or Protected Harvest to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both. These farmers would not need to undergo the self-assessment process found on page 201. No need to tie farmers up in red tape. This would reduce the administrative burden for NRCS and reduce paperwork for applicants.

Sincerely,



Rebecca Siplak
NW Certification Coordinator

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?

I agree with all of the above approaches.

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?

I would like to see that farmers could choose to renew contracts. Do not limit CSP contracts to one-time contracts.

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

I would like to see that signups are continuous and not periodic. This process makes it extremely difficult to communicate with producers.

The NRCS should contract out some of their 'perceived' administrative burden with other like-minded organizations. I find it rather disheartening to see how government employees are complaining about an administrative burden that they have not even experienced yet. Get to work, the rest of us are working hard and not complaining!

Allow individual states and regions to work together and to be flexible in addressing issues that are important for the geographic location. Allow the NRCS Technical Guides to be edited for the current times to include innovative practices now being found and developed all over the country. For instance, some innovative practices that merit attention include:

- Monitoring water temperature and reducing water use for irrigation
- Monitoring and testing for soil Phosphorous levels, especially as it relates to animal feeding rations and manure management
- Creative harvesting techniques that preserve wildlife & beneficial organisms habitat
- Buffer strips managed around waterways, planted with indigenous plant material and free from all pesticide drift, synthetic or natural



Future Harvest – A Chesapeake Alliance for Sustainable Agriculture

Comments Submitted on Draft Conservation Security Program Rules

Dear Secretary Veneman,

We are submitting these comments on the draft rules for the Conservation Security Program.

Future Harvest – CASA is a non-profit agricultural organization that represents farmers and consumers in the Chesapeake Bay region. Our mission is to promote profitable and sustainable farming in the Bay region through education and policy activities.

We are very excited about the possibilities that the new Conservation Security Program will provide for farmers to further demonstrate their commitment to protecting the environment. The program has tremendous potential to help farmers protect water quality and improve soil health in ways that will benefit all of society.

We recognize that as you have drafted these rules you have had numerous constraints and pressures to deal with. Having to design a 'capped entitlement' program with uncertain funding levels has been a significant challenge. Recognizing these constraints we offer the following comments:

1. As you design the program, be sure that there is built in flexibility with these rules to allow for greater farmer participation as increased funding becomes available.
2. We think that the use of categories as you have defined them is a reasonable approach to limit eligibility. We do wish that the rules had included more details on categories, but we recognize the need to allow for some flexibility. We encourage giving the individual states as much

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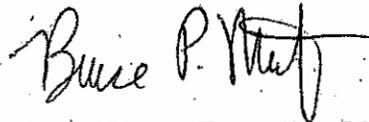
Future Harvest-CASA

responsibility in selecting categories as possible to meet each state's needs.

3. We do not like the restrictive use of resources of concerns to limit farmer participation. We would encourage you to return to the tier criteria stipulated in the law. The resources of concern should be used to ensure environmental benefits to the program, but should not be so restrictive as to limit most farmer participation. To limit participation to meet budget needs use the categories and subcategories, as these can be altered most easily to meet the available future budgets.
4. We like the emphasis on the enhanced payments portion of the payment structure. This ensures that environmental activities are given high priority, and that the program can justify its payments with concrete environmental benefits.

Thank you very much for the opportunity to comment. Please do not hesitate to contact me for any reason.

Sincerely,

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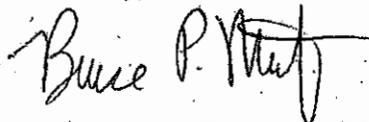
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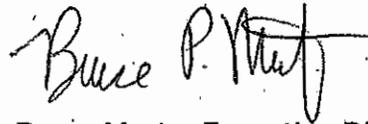
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