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**From:** kathy@sustainableagriculture.net  
**Sent:** Tuesday, October 05, 2004 11:12 AM  
**To:** FarmBillRules  
**Cc:** Pam@sustainableagriculture.net; lkemp@mnproject.org  
**Subject:** Attn: Conservation Security Program  
**Attachments:** ATTACHMENT.TXT; NCSAComments10-05-04.doc

Dear Mr. Dickerson,

Below and attached as a Word document are comments from the National Campaign for Sustainable Agriculture regarding the Conservation Security Program Interim Final Rule.

Thank you again for this important opportunity to provide input.

Sincerely,

Kathy Lawrence

# **NATIONAL CAMPAIGN FOR SUSTAINABLE AGRICULTURE**

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October 5, 2004

Craig Dickerson, Program Manager  
 Financial Assistance Programs Division  
 Natural Resources Conservation Service  
 P.O. Box 2890  
 U.S. Department of Agriculture  
 Washington, DC 20013-2890

RE: Comments on Conservation Security Program Interim Final Rule

Dear Mr. Dickerson:

Thank you for the opportunity to comment of the Interim Final Rule. The National Campaign for Sustainable Agriculture is an alliance of hundreds of grassroots, state, regional and national organizations, representing constituencies that include family farms, rural and urban communities, environmental and wildlife advocates, workers, students, indigenous peoples, consumers and faith-based institutions.

Our nationwide alliance has been working for years to promote the principles embodied in the Conservation Security Program legislation, and we maintain a very strong interest in seeing the program succeed and grow. The Conservation Security Program (CSP) is an important and innovative step forward in our nation's approach to conservation and a critical new component of U.S. farm policy.

Conservation farming provides many essential benefits to all Americans in the form of clean air and water,

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soil protection, habitat preservation, and much more. CSP holds out great promise for the environment by rewarding farmers based on how they protect our natural resources and solve difficult environmental challenges.

As intended by Congress, CSP should be a nationwide program available to *all* types of producers, in *all* regions of the country, with *all* types of conservation objectives. The fundamental purpose of the Program is to generate an increase in sustainable, conservation methods of farming in all areas. Thus it is essential that CSP reward farmers already protecting the air, water, and soil while extending to new farmers the incentives for addressing and solving these critical resource concerns. As stated by the NRCS, "In short, CSP should reward the best and motivate the rest."

We urge the Department of Agriculture to ensure that CSP fulfills its promise. Our comments below reflect the legislative intent of CSP and the concerns of farmers, environmental and wildlife advocates, urban and rural communities, and consumers:

1. **Provide for continuous enrollment.** Limiting enrollment to up to every eight years creates obstacles and disincentives for farmers trying to enter the program. Continuous enrollment is more fair to farmers, easier for USDA to manage, and has worked successfully in other USDA programs.
2. **Remove restrictions that now limit enrollment** to only a few watersheds and certain "categories" of farmers and ranchers. CSP should be nationwide, without geographical restrictions. Participation in CSP should not be limited to particular watersheds.
3. **Expand eligible resource concerns to all types** of conservation objectives. Participation in CSP should include farmers and ranchers in all types of agriculture who are willing to commit to significant conservation practices. It should not be restricted to particular categories and subcategories of farmers and ranchers.
4. **Eliminate the new "per acre" cap** on contract payments. This cap favors large farms over small farms and unfairly rewards those with high land rents over those with lower rental rates *even* if large farms may be practicing *less conservation*.
5. **Expand enhancement payments** to include the full range of options in the law, including crop rotations, rotational grazing, buffers, energy conservation, conservation and regeneration of plant and animal germplasm, environmentally sound management of invasive species, agroforestry practices, native prairie restoration, pollinator protection and enhancement, continued enhancement payments for on-farm/ranch research and demonstration activities and for on-farm/ranch assessment and evaluation activities.
6. **Increase the cost-share rate** for new practices. The 50 percent cap is much lower than cost-share payments established for conservation practices in many other farm conservation programs and will serve as a disincentive for farmers and ranchers to participate in the comprehensive approach to conservation provided in the CSP.
7. **Remove requirements for a prior history** of meeting high environmental standards, and instead require that high standards be met in a reasonable time after participation in CSP.

The CSP has not only the potential, but also the imperative, to provide farmers and ranchers with meaningful incentives and rewards for implementing comprehensive protection of the nation's extremely valuable, natural resources.

Thank you for this opportunity to comment on this very important program.

Sincerely,

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Kathy Lawrence  
Executive Director

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If you would like to join our \* free \* Action Alert Network, please e-mail, please name, address, phone, fax, and Please let us know if your contact information changes!

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