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From: Janet.Bartok@mdc.mo.gov
Sent: Tuesday, October 05, 2004 1:13 PM
To: FarmBillRules
Cc: Bill.White@mdc.mo.gov
Subject: Conservation Security Program

Attachments: Draft CSP Rule Comments.doc



Draft CSP Rule
Comments.doc (3...

Following are comments on the Conservation Security Program from the Missouri Department of Conservation. If you have questions, please contact Bill White at 573-522-4115, ext. 3512. A signed, paper copy will follow in mail.

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Financial Assistance Programs Division
Natural Resources Conservation Service
P.O. Box 2890
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Attn: Conservation Security Program

The Missouri Department of Conservation is a state agency responsible for the management of the fish, forest and wildlife resources of the state of Missouri. The Department provides technical assistance to USDA-NRCS in the implementation of Farm Bill conservation programs including the Conservation Security Program (CSP). We offer the following comments on the interim final rule for CSP:

We are concerned about the additional workload that CSP has created for NRCS in view of no staffing increases. The contracting, data entry, and payment processing duties normally conducted by FSA, are falling on NRCS, without any apparent change to NRCS FO staffing levels. NRCS is expected to handle EQIP in its entirety and CSP eventually might eclipse or replace some or all of FSA's crop subsidy programs, yet there has been no transfer of staff from FSA to NRCS. NRCS is having Soil Conservationists at the GS7-GS12 levels doing work that, in FSA, is done by clerks.

We recognize the additional "burden" that the USDA is expected to carry when it comes to the wildlife, as well as, other aspects of the program. Our concern is that NRCS field staff will not properly address or promote wildlife aspects of the program because they are overburdened with clerical duties associated with CSP and other programs.

The apparent "success" of CSP in its current form in Missouri's Little River watershed may not be realized to the same extent when CSP is extended to other parts of Missouri. The Little River watershed includes a large amount of rice and cotton acreage. These two crops require an increased level of management that is often left to crop consultants to perform. It is only for this reason, and this reason alone, that pesticide and nutrient management records are available. Most corn/bean/wheat producers do not hire crop consultants nor keep the minimum level of records necessary to qualify for CSP. For livestock producers, we expect that only those practicing management intensive grazing at the highest level will qualify for CSP.

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Wildlife has always been difficult to sell to the average crop and livestock producer in the Midwest. Likewise, wildlife in CSP could be a challenge. We need to recognize that an adequate "carrot" will be needed to bring about the changes in agriculture that will be necessary for farms to meet minimum quality criteria for wildlife. Much of what will be needed to address wildlife concerns will involve taking some land out of production in one way or another (i.e. field borders, etc.). The issues surrounding that need must be realized and addressed. Incentives or payments to accomplish this MUST be high enough to offset the cash-rent being paid by that operator who rents the land. Otherwise, there is little financial incentive, if any, for an operator to pay \$100 an acre rent on acres that are idled for payments less than that.

The effects of CSP on base acres is unclear. As stated earlier, wildlife practices will many times result in the idling of some land. Farmers have worked for years in many cases to get a "full crop base" on their farm, and the base affects the selling price or rent paid on that land, not to mention the annual payments from FSA. Suspension of payments per base acre NOT accompanied by loss of base is acceptable if the conservation program makes financial sense. However, any conservation program that will result in a loss of base acres is doomed to failure. We request clarification of the base acre issues for all USDA programs.

Wildlife practices such as field borders are often justified or make financial sense on the margins of fields due the decreased crop production realized there, due in part to tree competition for light and water. It is not too hard to sell a cotton farmer on field borders on sandy soils next to a treeline. However, we have to recognize that getting a producer to idle productive soils in a landscape devoid of trees is an entirely different matter! Overall, it is very challenging to get a large scale, farm after farm after farm, emphasis on wildlife habitat when crop production is clearly the only land use goal. It is important to recognize that in a landscape of 160 plus acre fields devoid of trees or other obstacles, that getting entire farming operations up to Tier 3, using Bobwhite Quail as a targeted species, will be challenging in the absence of adequate financial incentives. Quality criteria or the minimum standards should not be lowered, but USDA should make sure there is enough incentive to make wildlife practices for Tier 3 attractive to the producer.

There is consistently too little time to allow for the signups to occur, contracts to be signed, and payments to be made before the end of the fiscal year. With the amount of work involved, a staggered schedule for payments would be useful to spread out the workload over a longer period of time. Signups should occur earlier in the fiscal year if money has been made available or not. Once each state receives its appropriation, then acceptance can occur immediately, but the signup is out of the way.

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The requirements to qualify for the program appear too stringent. Expansion of the program will be difficult if most farmers don't even qualify for Tier 1. There were no contracts in Scott County, Missouri, for example, much of which was in the watershed and farmed by "professional grade" farmers.

The program was not designed or implemented in a way that was truly "do-able" at the ground level when dealing with the issues such as "Landlords, renters, lessees, control for the life of the contract, entire agricultural operation" and other terms. There was a lot of discussion over definitions of such terms. The requirements that all the fields in the entire agricultural operation be eligible, often led to problems in the real world because those fields might be rented from 10 different landlords, some short term cash rent and others long-term shares, some meeting specs but one not....

The list of questions in the self-assessment workbook was too long and unrealistic. One DC said that only 20% of his farmers could ever reach Tier 1. If this program is to expand as NRCS wants it to, either the program requirements for Tier 1 will have to be revised downward, or the program will have to be changed so that anybody can enroll as long as they have a plan and financial incentives in place to get to Tier 1 during the contract period.

We are pleased that the interim final rule has included wildlife/fisheries habitat as a factor in the watershed prioritization and identification process. Wildlife/fisheries habitat creation is also one of the factors that may be considered in development of enrollment categories and subcategories.

We oppose the inclusion of silvopasture as pastureland as described in Section 1469.3 Definitions, in the definition of Incidental Forestland. In Missouri, the 381 standard allows the use of oak forestland as silvopasture. This is inconsistent with the determination in CSP that incidental forestland means land that is managed to maximize wildlife. The new CSP ruling will allow forest to be thinned and the understory planted to such invasive species as fescue.....not a wildlife friendly practice and one which results in degradation to native forestland.

Thank you for your consideration of these comments and please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

JOHN D. HOSKINS
DIRECTOR
MISSOURI DEPARTMENT OF CONSERVATION