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From: Jim Crosswhite [jim@ecbarranch.com]
Sent: Wednesday, September 29, 2004 5:14 PM
To: FarmBillRules
Subject: Conservation Security Program

Attachments: tmp.htm



tmp.htm (5 KB)

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September 25, 2004

Financial Assistance Programs Division
Natural Resources Conservation Service
P.O. Box 2890
Washington, DC 20013-2890

FarmBillRules@usda.gov

Attn: Conservation Security Program

Dear Sir or Madam:

I am pleased to submit comments relative to the interim final rule (IFR) for the Conservation Security Program authorized by the Farm Security and Rural Investment Act of 2002.

The interim final rule uses a targeted watershed approach rather than a full national program and maintains soil quality and water quality as the only significant resource concerns.

The following are detailed comments and recommendations on issues that I have identified in the interim final rule.

Nationwide Program: Allow open enrollment for all eligible producers nationwide and delete all references to offering the program to producers only in targeted watersheds.

Stewardship Payments: While the IFR mitigates the reduction of stewardship (base) payments, the rate is still below the statutory level. The final rule should provide base payments as directed by the statute: ?A base payment under this paragraph shall be the average national per-acre rental rate for a specific land use during the 2001 crop year; or another appropriate rate for the 2001 crop year that ensures regional equity.? States should be given flexibility in developing ?another appropriate rate? to ensure regional and local equity specified in the law.

Cost-Share Rate: Provide the full, statutorily authorized cost-share payment of up to 75 percent of the average county costs of practices for the 2001 crop year for implementing new practices and for maintaining existing land management, vegetative practices and structural practices.

Resource Concerns: The determination of soil quality and water quality as national resource concerns places primary emphasis on these resource concerns rather than addressing the full range of other conservation concerns.

As a private landowner who has participated in over 15 state and federal conservation programs and implemented over \$1.4 million in soil and water quality projects along 3 miles of Nutrioso Creek, including 50% match with my own funds, I fully support placing soil and water quality as priority concerns.

CSP applicants who have participated in a Clean Water Act section 319(h) non-point source pollution water quality improvement grant program to address Environmental Protection

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Agency recommendations to meet Total Maximum Daily Load (TMDL) standards should be given top priority. Such applicants would have successfully implemented water quality improvement practices on a water body in accordance with specific TMDL recommendations. The result would be a win-win situation as the implementation costs to meet water quality objectives would already have been met and funded through the 319(h) program, thus reserving CSP funding for maintenance of those practices. Producers affected by TMDL report recommendations, but who had not applied to a 319(h) water quality improvement grant program, would have a new incentive to participate knowing CSP would pay maintenance expenses. Diminishing riparian areas would be restored and protected, perhaps creating a model for a National Riparian Protection Initiative Program.

I appreciate the opportunity to share my views and concerns on the CSP interim final rule. If you want further information about soil and water quality improvement practices on my ranch in northeastern Arizona, please see my website www.ecbarranch.com.

Sincerely,
James W. Crosswhite
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