

N464

nrCS

**From:** wsawg@ncat.org  
**Sent:** Tuesday, October 05, 2004 12:38 PM  
**To:** FarmBillRules  
**Subject:** Attn. Conservation Security Program final rules  
**Attachments:** ATTACHMENT.TXT

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

RE: Comments on Conservation Security Program Interim Final Rule

Dear Mr. Dickerson:

I am writing on behalf of the 100+ member organizations and individuals who support a sustainable western agriculture. For all of us, 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. CSP holds great promise for rewarding farmers based on how they protect and improve the environment. As intended by Congress and as recently reaffirmed by the United States Senate, the CSP needs to be nationwide entitlement available to all agricultural producers, in all regions of the country, who meet the significant high standards of conservation practices, need to be eligible

One of the most important reasons made by the NRCS that the CSP needed to be done on a watershed basis rather than a full national entitlement program as Congress and the President intended was the argument that literally all the farmers and ranchers would be eligible for CSP and that this would be difficult for the NRCS to handle and would be "budget busting."

In Montana which I know best, 49 CSP contracts were awarded this year in a watershed of 966 farmers, that's only 5% of the farmers in the watershed. Eleven of those contracts were to "tier III" farmers, who are considered the best conservation farmers in the watershed and country. In the first contract year that represents a total payment of \$873,000 or about \$17,800 on average per CSP contract. There were only 69 applications for the program or about 7% of the farmers in the watershed.

Therefore it seems clear from real data in Montana that it is NOT the case that large numbers of farmers and ranchers will be eligible for the CSP. Using Montana as an example, if 7% of the 2.2 million farmers and ranchers nationwide applied (154,000) and only 5% were granted CSP contracts that would represent only 110,000 farmers nationwide. Clearly this is not the 1.8 million farmers that the administration and certain members of Congress have suggested would apply if this were a true national entitlement program.

I urge you to ensure that CSP fulfills its promise. The following points are essential for CSP regulations to ensure implementation of CSP's legislative intent:

AECC RECEIVED

N464

1. 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.
2. 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.

-- Jeff Schahczenski Executive Director Western Sustainable Agriculture Working Group 3040 Continen