

United States Department of Agriculture



Natural Resources Conservation Service  
375 Jackson Street, Suite 600  
St. Paul, MN 55101-1854

---

SUBJECT: LTP - CSP Listening Sessions - Minnesota

Date: February 27, 2004

To: David McKay  
Resource Conservationist  
Conservation Operations Division  
Washington DC

File Code: 300

Attached you will find the transcripts from the Minnesota CSP Listening Sessions that were held during the timeframe of January 27, 2004 - February 25, 2004. In the event you should have questions about these transcripts, the Minnesota State Office will have the tapes on file from the various CSP Sessions.

Please contact Paul Flynn, State Resource Conservationist, at 651-602-7870 ([paul.flynn@mn.usda.gov](mailto:paul.flynn@mn.usda.gov)) or Julie MacSwain, Public Affairs Specialist, at 651/602-7859 ([julie.macswain@mn.usda.gov](mailto:julie.macswain@mn.usda.gov)) if you have any questions about any of these transcripts.

A handwritten signature in cursive script that reads "William Hunt".

WILLIAM HUNT  
State Conservationist

Attachment

Cc: w/attach  
Paul Flynn, RC, NRCS, St. Paul, MN  
Julie MacSwain, PAS, NRCS, St. Paul, MN

*Dave - We have held 6 CSP listening sessions around the state. The 7th session (for Homong farmers) will be held tomorrow morning.  
Bill Hunt*

## Listening Session - Kasson, Minnesota

- ❖ **Dan Franzen – Dodge County**
- ❖ **Dodge Center, MN**

I have been working on the Conservation Security Act for a number of years. As far as I am concerned, the rule making process so far has been a decent one.

When Congress passed the Farm Bill they intended it to be a program for all farmers for doing environmental work. The one they passed now is intended to be for all farmers – just not a very selective few. I would call on the USDA to implement a supplemental rule immediately.

It is really frustrating to pretend that this is going to be something that is going to be good for everybody. It appears as if USDA is actually going against the law. I think that are just wasting time with this little *part-time thing*.

I also agree that this money should not go to pre-selected waters in the areas – it should be offered among the states to do something to keep this thing going..

The public deserves to get what it is paying for. Obviously, the way the rules read, it seems like it rewards the best and discourages the rest.

If I had typical grounds and pasture for the farm, I get rewarded at the permanent pasture rental rate. And so, I would propose a new category of pasture/cropland be implemented. That land is productive land and can produce a crop. I would be willing to do that or add a pasture to it now and be rewarded to it at that rate, also

The best way to steer conservation on our Nation's soil and water is to recognize and reward farmers when the work is being done. There needs to be some kind of public acknowledgment of the people who are cleaning up the water and keeping the soil in place. Thank you.

**Listening Session, Kasson, Minnesota**

- ❖ **Joe Morland**
- ❖ **Farmer by Ely, Minnesota**
- ❖ **Ely, Minnesota**

My comment has to do with the basic legality of what has happened to this thing because there was legislation that came in 2000 through the White House. And after that process we went through a process of rule making with an agreement that isn't *even a quote* of what came out of the legislation.

I don't know whose authority it is to do that, but it just does not seem right. The rule making process need a law that they can write rules for. Perhaps they will have to go back to Congress and write a law that is fashioned after their rule and then they'll have full rule. Not change the legislation through rules out there.

Other comment has to do with the benefits of *John Q Public* with the advent of a good conservation program. The farmer is just the first step on the ladder and the only a small percentage of the population to benefit from a good conservation program.

Thank you.

## Listening Session – Kasson, Minnesota

- ❖ Jim LaRoe
- ❖ Winona, MN
- ❖ Serve on the USDA's National Organic Standards Task Force

My comments are my own. I see this as a very exciting program - rewarding the ecological practices on working land. I think that it is the future and I am excited to see the rules come, but I do have some concerns. Specifically this idea of the limitation to selected watersheds

I think is very short-sighted and it wasn't the intent of Congress. This was meant to be a broad-base entitlement for all producers to qualify and one of the problems I see with this, besides being short-sighted, is setting up a kind of turf wars. The amount of money from the program will be spent identifying these small claim watersheds with worse degradation - with money that should be going to farmers to reward practices. I think that will delay the program and before you know it we'll be in the next fiscal year anyway So I agree with Paul Flynn for writing a supplement rule for implementing the entire program and not focus on this fiscal year when the clock is already ticking.

I also am concerned with what I see as a discrimination against grazers, against life property issues, if you have grazing systems that was in the Act but it is not in the rules - that land is in rotational grazing certainly needs to be prioritized because that is defeating the goals of the program.

And payments need to be at comparable crop rates to keep the land in cover rather than putting it in corn-soybeans. I don't think the program should be rewarding producers in watersheds with pastures. That was not the intent. We have had too many farm programs that reward the producers based on their past abuse. Many qualified are doing the right thing and haven't qualified in the past.

If there is a shortage of money - let's look at taking some of the money from the Trade Authority and Commodity Program and direct towards this program that has *fallen from the trees*. I am very encouraged to see that the appropriation bill now calls for full funding in the future.

This does have to be an open enrollment -- no point in discarding these announcements of signup periods. Let's keep it open That was the intent. There needs to be real financial incentives. I am very concerned of what I heard about this 5% cost-share rate. And the base rate beginning in the neighborhood of fifty cents to \$1.50 an acre. Why should anyone even step in the door?

Also, producers should base their conservation plans prior to the contract whether then doing it after they sign up. So, I would ask the Secretary to issue a supplemental rule for fully-funded CSP and in the interim I think it is a good idea to do some pilot projects. But don't go through all the work of setting up this past work of watershed-based program when we are not going to need it in the future. Let's have an open program and let's have some real rules that are sustainable and sell. Thanks.

## **St. Cloud, Minnesota Listening Session**

**June Varner**

**President of Minnesota Co-Act**

**Non-Profit Organization in Minnesota with an estimated 2,000 farmers and members and 12,000 consumer members.**

This listening session was designed to take public comment on the CSP which was designed to encourage agricultural producers to use ongoing conservation practices. CSP was originally passed by Congress. That was an opportunity to encourage producers to avoid environmental problems by continuing to expand practices that enhance benefits unique to their operations in area.

The proposed changes are so vague that their implementation can be sequed to end up as an industrial agricultural handout and another taxpayers scam. A few years ago the conservation farm optionist similar program was passed, but not funded. Most recently the EQIP was changed so funding was mandated to go to industrial agricultural producers.

If the amended wording of this CSP proposal will result in taxpayers spending money to reward polluters, an entity that is not, in fact, on farm producers, it is better not to fund the program at all. If the program needs to be implemented, it must act as if it was originally intended by Congress.

We recommend alternative 1 on page 195 of 7CSR-149 of the January 2, 2004 Proposed Rule. Alternative One requires the CSP to be fully funded and fairly administered under NRCS guidance.

Thank you.

**St. Cloud, Minnesota Listening Session**

- ❖ **George Boody**
- ❖ **Land Stewardship Project**
- ❖ **White Bear Lake, Minnesota**

We are appreciative of the agency of moving forward with the CSP but as Loni Kemp indicated, it is time to issue an amended rule in light of the passage of the full-funding non-cap status of the Bill that was made the case last week. So that's the first major piece issue amended rule.

Secondly, by law, CSP was to provide enhance payments for management intensive rotational grazing and resource conserving crop rotation because of their excellent multiple conservation benefits and we urge the agency to take that into consideration as an issues and amended rule which we hope it will do soon.

We also encourage the agency to recognize the category something along the line of pasture crop plan to reflect the fact that pasturing, in lieu of cropping, can be an excellent practice and we don't want that to be under valued as we move forward.

Also, the CSP really needs to adhere to the law and that means that we need a meaningful base payment and cost-share payment up to 75% or perhaps 90% for beginning farmers.

In addition, enhance payments must be provided for sustainable farming practices again, as we mentioned such as management-intensive rotational grazing and resource conservation and crop rotations. And the significant portion of the CSP payments should go to those who are delivering actual benefits. Not disproportionately to subsidize implementation of new practices.

CSP was designed to be a program that pays people for producing excellent payments and we want to see them do that as well as helping people move into that. So there needs to be a better balance between those two. So we hope the agency will move forward quickly and issue an amended rule.

Thank you.

## St. Cloud, Minnesota Listening Session

- ❖ Linda Mischke - Farms
- ❖ Martin County
- ❖ Work for Blue Earth Watershed Basin Initiative

I would like to say that I am really excited about the opportunities that the CSP can bring to our region. And, I look forward to bringing us Federal dollars to help compliment some of our efforts that we are doing in our intense corn and soybean region of the State.

We are working with a program to promote soil health, promote third crops and reduce or improve nutrient management in our region. I think the CSP will really help us and the obstacles that we deal with in our region if we are going to solve our water quality problems.

I feel we need to get what I call the *Masses of the Farmers*. We need to get 80 to 90 percent of the farmers doing basic nutrient residue management, building soil health, diversifying their cropping systems and this program can really help us get there. It is not going to do it by itself and I think it certainly complements what we are trying to accomplish in the Blue Earth area.

The concerns that I have are -- and I agree with the comment that the Minnesota Project put forward -- and would certainly support those -- and that is to emphasize that we need to increase the base payments. The amount is low and even if you take it at 100%, it is low.

When we talk 10 bucks an acre -- and so think about that -- *what would you do for 10 bucks?* Would you change your farming operation? You know it is going to cost you more than that. Just think about that.

Also, I see EQIP as being a great compliment to this program to help producers get to that base level. And, I would be curious to hear about the mind set of the NRCS if they see EQIP as being that tool to get the farmers to that base level so that they can get into CSP and then advance from there.

Also, I would be interested in hearing about sort of the philosophy of how this program will be implemented in Minnesota and really throughout the Nation, but I tend to be an *out of the box* thinker and I would like to see the NRCS staff throughout the State have that mindset if they try to implement this program in Minnesota.

We can't continue to have a corn soybean mindset if we want to meet our water quality goals. And we need to be having that much broader mindset and think about these things in a little different way -- Just how they fit into the corn soybean system.

Thank You.

## Montevideo, Minnesota Listening Session

- ❖ Dick Kroeger, Temporary Employee
- ❖ CURE Conservation Agriculture Initiative Devise

I have had about 30 years of experience working for the Federal government so I know what predicament these people are in. We want to make this bill --this rule -- as *farmer-friendly* as possible so that many farmers get involved in it and it becomes a perpetual farm program for the future. So how do we do that? First of all, the final rule has to be written to meet the letter and the intent of the law. That means that it has to be an entitlement program that is available to all farmers -- that is the way the law is written. Right now the proposed rule is written just for this year that has severe restrictive funding caps.

It has to be written so that all farmers can qualify. Not just in the selective watersheds that are going to be selected in Washington D.C. We would favor giving up that 41 million this year so that NRCS employees in every state become fully *up-to-speed* on how the program should be implemented. That would be the best way to use that money right now. NRCS is limited to spending only 15% on administration, but they should have demonstration farm operations and ranch operations in every one of our states. That is the only way it is going to succeed.

CURE firmly supports rewarding the *best of the best*. And that is what the rule is set up to do. But we also believe -- and we know -- that this law specifically is written to motivate the rest on an active basis to help those farmers that are not achieving the minimum water quality and soil standards to achieve that. How many of you that have CRP would go ahead and put all that acreage CRP on the *off chance* that your watershed might be selected sometime in the future and you would have had the opportunity to apply to get CRP payments? None of you! We have to have a program that helps farmers achieve this minimal level of water quality and soils payments. The rule has to be more *farmer-friendly*. Now, there is language in there that is in our comments so it can become very punitive to farmers that get enrolled but then say their renter dies and it goes into estate and the land is sold. Well, what happens to that? My solution is that the farmer wouldn't be paid for those subsequent years. But, he shouldn't have to pay back the payments with interest because somebody died with no fault of his own.

Now Base payments and Enhancement payments - The base payments have just been reduced to a few dollars an acre. If this is going to be an effective program -- every farmer that participates in tier two and three that, I would say, has an average or above operational unit, say it would be corn and soybean operation -- up here and the average farmer farms 900 acres -- he should be able to achieve the maximum payment per that tier two or two tier three through the accumulation of base payments and enhancement payments practices. That is the only way it is going to succeed. It has to be lucrative for the farmers if they are going to actively pursue it.

What about the proposed rule right now? It is not written for farmers in the Upper Minnesota River Watershed to be involved and to succeed with. You have to write the rules as they were designed specifically for our area. Write your comments accordingly.

Thank you.

**Montevideo, Minnesota Listening Session**

- ❖ **Brian Walderich.**
- ❖ **Appleton, MN**
- ❖ **Chair, CURE**

I don't think that the Europeans and others are that dumb. If they see that this money is going just to the farmers who already do their Best Management Practices, they are going to call this the *Sky Commodity Payment* and not really *Green Payments*.

What I mean is that Green Payments truly should really be increasing the Better Management Practices. I think this is the sum of the rules that is really going to get us into trouble on an international level.

Also, I think the proposed rule is really contradictory for these reasons. You know that if they want it (the money) to go to the most environmentally challenged watersheds, but then they want the money to go to the farmers who already are doing some of the Better Management Practices, the way the rule is written really makes no sense.

## **Montevideo, Minnesota Listening Session**

- ❖ **Kylene Olson**
- ❖ **Director of Chippewa County Watershed Project**
- ❖ **Montevideo**

I feel that the priority watershed basis for CSP enrollment should be dropped.

As you know, even our Governor is now focusing on impaired waters in the State of Minnesota. And, with the new Draft going to EPA for impaired waters, there are over 400 breaches in the State that are listed as impaired waters.

How should it be decided in our State which watershed should be applied when we already have impaired waters in almost every one of the sub-watersheds in the State.

I feel it should be open Nationwide to any watershed or it should be available to anyone in the United States, and especially in the State of Minnesota, as we look at increasing quality of our impaired waters in the State

Thank you.

## Montevideo, Minnesota Listening Session

- ❖ Terry Vanderpool
- ❖ Granite Falls, Minnesota

I do feel compelled to say a couple of things. First of all, I would like to admire the presentations that were given this morning. – Good Job!

This is not in keeping with either the letter or spirit of what Congress did. I kind of suspect that the letter and spirit of what Congress did was to go ahead and pass CSP as an entitlement program so they could go home to their constituents and say *look what we did* and then as Congress and this administration does a lot of, fails to fund that – and just hope that nobody notices that. While they run around and bragging about all the great conservation initiatives that they have undertaken.

CSP is an entitlement program and that is the way it ought to be set up and that is the way it ought to be funded. I think we need to get rid of the idea of limited watersheds - go ahead and put it out there as an entitlement program – when the money runs out – in about 5 minutes we will at least have something to point to.

Congress did not do exactly what was going to do – that is to say - fully fund an entitlement program that is the Conservation Security Program. Get rid of the idea that it can be applied in selected watersheds. Make it accessible for all farmers who practice conservation – That is what the law says.

I want to state most strongly that devaluing pasture land – the way that the rules does – is really short sighted. And it is also really very unfair. The way the base payments are set up, the appeal lasts forever through shifting land from cropping and management of grazing systems, land that has been cropped or could be cropped should be considered pasture/crop land and valued the same as any other crop land.

There is ample evidence that management intensive grazing has many environmental benefits including soil improvements and productive way of managing land – value it! I do think we have to keep the bars high, especially on Tiers 2 and 3. Primarily, the CSP needs to be funded the way it was passed. A fully funded entitlement program!  
Thank You.

## Montevideo, Minnesota Listening Session

- ❖ Ian Cunningham
- ❖ Pipestone, Minnesota
- ❖ SWCD Supervisor, Pipestone County

I am a farmer that farms 800 acres Southwest of Pipestone. We have been farming in that neighborhood for about 120 years now. When I first started hearing about CSP a few years ago I thought, well fine, a program for people who are doctors and for people who have help take the lead in conservation rather than being bad actors.

It seems the government programs have always been aimed at rewarding the bad actors and try to get them to change. When CRP was originally rolled out, however how many years it was, there was only one field in Sweet Township for a farm that was eligible for CRP that is directly across the fence from the land I farmed today. Our land did not qualify because it was contoured, terraced and had residue management and was not having erosion such as was the land that went into the CRP. Ten years later it was to a neighbor who plowed it up and now it has big gullies today.

Our land never qualified. That particular piece of land I'd really love to put into rotation grazing systems instead of growing corn and soybeans on it every year. But I am a little afraid that once I plant grass there, suddenly it will be a lower value commodity.

We were vacationing in Pope County just this past summer and we had a lot of rain the week we were at the Lake Minnewaska. After a rain storm, we went out and the water was running into the lake and it was gray. The neighbors were all standing there watching it. One woman commented to me, *well at least we don't have those cows up there*. Well, I said, what do you mean? Well, there used to be cows up there and their poop was washing down into the river. The land adjacent to that lake was growing soybeans now, a few years it was a pasture with trees in it. They took the trees and sawed it out, and it is not being grazed on now. And I can assure you that after it rained the water was cleaner coming off that pasture even though there were cows pooping out there then all the nutrients that were coming off of that crop field ground. So., I would like to see CSP value pasture land.

I would like to see the early adopters of people who have been trying to conservation practices for the last 50 or more years finally recognized and rewarded. The government pays me a lot, fees and transition payments, market loss payments. Look me up on the web site and you can see the hundred and thousand of dollars that I have received from the government. I wouldn't mind being paid for being a good steward of the land. Thank you.

**Montevideo, Minnesota Listening Session**

- ❖ **Joe Stangel**
- ❖ **Renville SWCD**
- ❖ **Olivia, Minnesota**

This is my really first look at the CSP program. There are definitely some things that need to be worked out in the program. One thing that really jumped out at me is, and I feel there is a real concern for it, that the unintended competition with current land retirement programs such as CRP, WRP, CREP, and programs like that. They have benefits that we all gained from in the past.

What I am possibly afraid of is that CSP may unintentionally compete with those benefits and we may end up with a lot of land coming out of production and out of CRP to go into the CSP program. That worries me a little bit because there could be a definite loss of benefits even if there is no real loss of soil erosion -- and so on -- off those lands. Or we may lose resource benefits like Wildlife but mainly I am looking at large tracts of CRP.

Buffers provide habitat, but there are certain habitats that are provided by large tracts of grass lands. That kind of goes in as to what the grazers were talking about.

So, my concern is that we don't have two government agencies fighting each other.

Thank you. -

**Montevideo, Minnesota Listening Session**

- ❖ **Don Struckness**
- ❖ **Milan, Minnesota**

You do much of the rotational grazing from corn and soybean farm into grass and alfalfa. And took a severe cut for doing that because there is no LPD's, there is no price protection for the alfalfa at all or in fact, they don't even consider land planted to alfalfa as a crop.

Thank you.

## **Fergus Falls, Minnesota Listening Session**

- ❖ **Scott Swenson**
- ❖ **Producer from Elbow Lake Minnesota**
- ❖ **Board of Directors of MN Wheat Growers**

I am here to represent the Wheat Growers Association. First of all I would like to see the program go forward for full funding. Obviously, even as the present Bush's 2005 budget of 409 million -- that amount of money doesn't fully fund the CSP program. And with that, it would address a lot of these rules that we see today as being part of the watersheds -- the full funding -- obviously there will be money.

We believe that that the base payment is too low with a 90% reduction at the Secretary's discretion based on how we read the intent of the law that was passed. We are concerned with the administrative cost of being limited to 15%. The entrance levels of Tier one, we believe, are too high. The soil and water quality has to be addressed to degradation standards. We would like to see that it is an ongoing process. We agree to enroll in the Tier One process.

We would like to see a continuous signup program -- not a signup period. We believe that because most land in Minnesota is farmed either in parish land or shareholder there is going to be by laws between the tenants and the landlord and that will take some time. A small signup period will bring harm. Along with that, we plan to see the signup period for the CSP not 5 years but 3 years.

I believe most rental agreements are 3 year contracts with what would match rental agreements. One of the things we need to see the Sub-bill rules issued by the Secretary based on the new amount of money and then extend the commentary passed on March 2.

For 2004, given the small amount of money, would like to see each state target clean watershed for persons chosen and being part of the Pilot Programs that are fully funded and see the results of that.

Thank you.

## Montevideo Minnesota Listening Session

- ❖ **Lottie**
- ❖ **Farms with husband**

My husband and I farm near Montevideo here and are farm program participants. In 1999 we had the privileged of being part of some meetings of farmers sponsored by the Land Stewardship Project. But at meetings like that were really held all across the country that helped form the language for the conservation Security Act. So, it is really rewarding to come to this point to be able to provide input to the CSP rules.

It is my understanding that the proposed rule issued earlier this month is not quite congruent with the passage of the Ominous Spending Bill in the Senate on January 22. Congress has now funded CSP in a way in the Farm Bill as an uncapped National Entitlement Program available to all farmers practicing effective conservation and that is the great news. The passage of the spending bill now needs to propose rule is pretty much off base because the draft rule is designed to severely limit enrollment and payments to farmers under this program.

Once the rule will be written - not only for the staff year but beyond it. We are asking that the bill be passed as originally passed by Congress. We call for the USDA to issue a supplement to the rules immediately. The supplement should also make two corrections. The provision of the rule that only farmers in selected watersheds are eligible should be dispensed with and see if they should be made accessible to all farmers who practice effective conservation. This is what the law says. This is what USDA must do. These payments should not penalize farmers who have shifted land from cropping to management-intensive grazing. If the land has been and/or can be cropped, it should be treated as pastured crop land not permanent pasture which has a lower value.

People who have to make these kinds of decisions have been historically the franchise for farm country. In fact, the USDA's proposal will penalize grazers from moving to a very environmental and beneficial farming. The CSP needs to recognize and make payments on the basic of the environmental outcomes of the farming system or the practices used by a farmer.

CSP was an enacted by Congress to make payments to farmers based on how well they are protecting and enhancing the environment, specifically by conserving our Nation's natural resources on working farmlands. This is long-range Homeland Security. CSP must not be seen as primarily only a new cost-share program but as its name implies, a Conservation Security Program.

The best way to secure the absolutely vital conservation of our Nations soil and water and other resource is to recognize and are rewarded where it is being done. Do not do so to once again penalize current stewardship minded farmers who are delivering real conservation benefits every year to society by actually bypassing in favor of making payments to others for the future. If we can achieve and do two things - Reward real conservation benefits being delivered on existing and provide benefits to natural resource conservation. Thank You.

## **Bemidji, Minnesota Listening Session**

- ❖ **Wesely Frenzel**
- ❖ **Northup Minnesota**

My concern is the way this is being taken care of. The fact that they are going to pick watersheds nationally.

I'm concerned that people in some watersheds are doing a good job already and won't be considered. I think that they should take another look at how they pick their watersheds. Thank you.

## **Bemidji, Minnesota Listening Session**

**Paul Conklin**  
**Small farmer**  
**Salt Lake MN 56678**

I am a small farmer – 160 acres of diversified farm – beef, vegetables, chickens and eggs so I hope that our farm is that kind of operation that this is aimed for but I'm also generally concerned about our conservation policy, nationally. I guess that I would say that I agree that it seems like the supplemental rule is in order -- especially given the changes in funding. This rule is set out with caps in mind and then perhaps we need another rule without the caps in mind.

It seems like the way the funding is set up in terms of the enhancements - most of the funding is going to enhancements and it is not living up to reward the best and encourages the rest.

It seems like it, would say, if there are no reward for being the best if you are already doing the best you can, you can you might as well not take the time to do it because there is no money in it for you. I think that the idea is that we are trying to get paid for some of the benefits that these farmers are giving us. They are giving us the benefits that are free right now – that is to say, paying the farmers to give us the benefits -- and that is the way Congress intended it to be.

Lighten the rule -- and it also seems like right now USDA isn't doing it. Understand how to do cost-share so they have got this thing in Milac and they said let us see how we can turn it into a cost-share. But we will put some money in there and make it look like a Conservation thing, but actually it isn't -- put most of the money to cost-share.

I am concerned about the selection of watersheds. It seems like a watershed is doing great – Conservation Security means so we shouldn't pick the areas where people will mess things up and we need those to prioritize those and use those funds for paying people to do good stuff -- EQIP and other programs that we have are designed for fixing the problems, so to speak, .

Thank you.

**CSP Listening Session – Brooklyn Center, MN  
February 25, 2004**

- ❖ Bruce Bacon
- ❖ Ramsey, Minnesota
- ❖ Landowner, Farmer and a part time environmental planner

I appreciate the opportunity to be able to provide comments. I have a background in farming, urban marketing and was a 1977 Organically Certified Crop Producer.

I utilize three to four interns on my farming operation. CSP addresses working landscapes. My operation consists of non-timber forestry, wild herbs, and micro enterprises.

I am trying to have a specialty farm in concert with urban sprawl I have significant concerns over payments pinpointed in the CSP proposed rules.

I will be sending forth a copy of a document which I helped write about farming in urban sprawl areas.

**Brooklyn Park Listening Session**

**February 25, 2004**

- ❖ **Milissa Driscal**
- ❖ **Student at the U of M working on a Masters in Wildlife Biology**
- ❖ **St. Paul, Minnesota**

I have done research on the comparison of birds on grazing and non-grazing lands. I am concerned about what farms would be required to do. I would like farmers and NRCS to do monitoring on CSP lands

Monitoring is an important part of CSP. Thank you.

**Listening Session Comments in Rosemount, Minnesota**  
**Feb 28, 2004**

**The following comments were obtained at the Rosemount listening Session.. This session was the only one in the country which had interpretation that occurred into the Hmong language. The session was handled differently in hopes of being able to garner comments. The power point presentation that was given had both the English and Hmong language on the power point slides (side by side). This helped a great deal in providing an opportunity for the Hmong to fully participate in the listening session. Some of these questions that were raised were brought forth in Hmong and later interpreted in both English and Laotian Language.**

*"This is a proposed CSP Program. What we are looking for today is how this proposed rule can affect you. We want your input here today. What we are looking for today is how this proposed rule will impact producers. If you would like something different, this is the opportunity to provide comments to USDA so we change the rule to meet your needs. CSP is not a program right now. We are talking about a proposed program." -- William Hunt*

**Q Is \$45,000 the maximum payment you can get regardless on the amount of acreage one would have?**

**A Under the CSP proposed rule this would be the maximum payment. You are Correct. It's acreage neutral. Whether you have small acreage or if you have a large acreage this would be the maximum payment possible. We particularly want these producers to know what's involved with CSP. What's in it for you because every producer throughout the country is thinking about how is it I can participate? And what benefits are in it for me? We need to fashion a program that meets your need. This is an opportunity for you to shape a program to fit your particular needs. This is your opportunity to tell us what needs to be changed.**

Questions posed to the group: Do you think this program will help your farming operation? If not, what changes need to be made?

**Comment Number 1**

I am happy for this program and for this proposed rule as it's a good thing. Because we don't know how to rotate our crops, we figure we will use this program and some additional income and payment. We might keep track and keep our crop more rotated and keep out the soil and water.

**Comment Number 2**

With my experience here in Minnesota and California . After we use chemical and fertilizers in the soil, our soil will get better. Now we need NRCS to help us out

because right now in the United States folks want to go back to the city. People are not into farming anymore. If NRCS is not helping, we are not going to plant.

**Comment Number 3**

We need NRCS to help us maintain our soil and water quality on our farms. We need quality vegetable products. Thank you and hopefully you (NRCS) will help us.

**Comment Number 4**

I am concerned about property and the farmland if the program goes for 10 years. What will happen after the 10 years if the land is not good for a crop? What can we do for the land? Is there any help available?

**Questions**

**Q Can this program be used in Wisconsin (St. Croix County, Wisconsin)?**

A- Yes this is a national program and can be used in Wisconsin.

Q-If my farm is not in a designated watershed, how many years might it be for I could even apply?

A-You need to provide your comments to David McKay. (Stressed the importance to place the questions they had on designated watersheds in their comments).

**Q If my property is in Wisconsin yet I am living in Minnesota, what opportunities might I have with CSP?**

A-It depends where the farm records are headquartered. For example you might have records kept and maintained in Wisconsin. But you might have a farm that crosses the line that is frequently a situation with farms crossing over boundaries between Minnesota and Iowa. Generally it's where USDA has the records that would be where you would apply for CSP.

**Q-Is NRCS office in St. Croix County?**

A-Yes, in Baldwin, Wisconsin

**Comment Number 5**

I have a real problem with the priorities being placed on watersheds. I know you gentlemen have nothing to do with that. But I personally happen to believe that 90% of the watersheds in Minnesota are a priority. One way or another for clean water. The other comment that I have is that the Caps are too low because most producers will set down and figure what they are getting per acre and if you are farming in Southwest Minnesota, a thousand acres is not that big any more. If you sit down and break that out you are only getting a few dollars per acre, or so. Our comments to NRCS would be that they have to RAISE the CAPS and they have to get the costs per acre up whether you are a small or big farmer it costs you the same to farm, either way. There's going to be new equipment that will have to be purchased in order to

comply with CSP. And it's a great program – because WE were involved in trying to get CSP written. It simply needs some fine-tuning. "Thank you".

**Question**

**Q. If I am a renter, who will get the payment. Does the renter get the payment or does the owner get the payment?**

A-Depends on the arrangement between the owner and the renter. But who ever signs up for the program you must have control of the land for the duration of the contract. If the owner decides the renter is going to get the payment because the renter has to put the conservation practices on the land or an arrangement might be set up where the payment is split 50/50 between the owner and renter. It could be some other percentage depending on how they are sharing on the proceeds for the farm crop.

Soil and Water quality has to get down to the standards pinpointed in the Technical guide. Once you get your soil and water quality up to the requirements in the technical guide.. Can't have excess run off and can't be applying excess nutrients and pesticides. Once you get to that level the USDA won't pay you for anything as you have to do that yourself. USDA will get involved on those extra steps for enhancement.

**Comment Number 6**

I am happy this program is available for the farm community. And hopefully this will provide us with another opportunity.

**Question**

**Q - This program, has it been around for along time?**

A – The program just came out. We have a proposed rule that we are discussing here today.

**Question**

**Q-Will NRCS come to my property?**

A- NRCS wants to know how CSP will help or hurt you. Good soil and water is needed on a farm along with a good profit. And we are looking at you folks for making a profit as well as produce some environmental benefits for the Nation. We can do both with the Conservation Security Program (CSP). And now, with the new immigrant farmers, NRCS has a special outreach program. We are concerned that you know about the programs that are available. You need to tell us if CSP will work

out for you or not. Help us shape the CSP program. We don't want a program that will potentially exclude you. We want to be inclusive and not exclusive of all segments of the farming population. So, please tell us how this can better meet your needs if it is not doing that right now. CSP is a proposed rule right now. It is not final. This is your opportunity to provide input. Give us your feedback. Again if it won't make you any money then it probably won't sustain itself. Every producer throughout the United States is looking at CSP the very same way that you are. How is it going to help them? And how is it going to help the natural resources. We at NRCS through our 83 field offices and TIM (NRCS) through his area office and we have several of those offices in Minnesota. We are going to make certain the technical assistance is available. We will come to your place one-on-one, not in the office, to provide you technical assistance.

#### **Comment Number 7**

Concern expressed over if a crop was damaged or animals were lost. How would NRCS help in this situation?

*We are trying to have Pooh Vongkhamdy, Outreach Coordinator, further communicate information about NRCS.*

#### **Comments Number 8**

Bonnie Haugen  
Canton, Minnesota

Thank you for your time. I am glad to be here today. I am a grazing dairy farmer on 230 acres in Canton, Minnesota. I think CSP as it was originally proposed would directly benefit me, my farmers, my neighbors and my community. When it rains, snow melts, the water runs down the hillsides. When we have hills with corn and soybeans, the water runs down the hillsides much faster. When we have hills with hay on it, the rain runs much slower.

Bonnie shared 4 pictures from her farm to share with the participants. The water does not race down my hillside. When I look at my neighbor's land. The water runs down the hillside and along with it goes the soil in through my farm into the streams, creeks and the Root River, into the Mississippi River on into the Gulf of Mexico.

We can pay farmers to take care of their land so that we have more forages on the hillsides. It slows things down. I understand we have a huge budget problem. I understand that, I also think that putting money toward the CSP as originally was proposed is very important and it will be a long term benefit and will put money back into the small farmer's hands. It's going to slow the water down on those hillsides. It's going to slow the dirt down and it's going to minimize the chemicals that get to the Gulf of Mexico which causes the dead zone. It's also going to minimize the flooding problems. If we can keep the water up on the hillsides it will minimize the flooding problems.

There is a study done by Larry Gates who has documented that grazing dairy farm has a stream through its farm for about a mile. The study showed the water was cleaner at the end of the farm. I think it's important not just for that farmer or the neighbor's but for people, the neighbor's and the community. That's the type of thing I would really like to promote.

*Hmong farmers asked Bonnie for advise on what to do with their vegetable farms. She admitted she did not know much about vegetable farms though had done gardening years ago. I have a little garden but I did not put it on the hillside.*

People who do lawn scapes—they put down grass seed as quickly as they can to keep the area from eroding and transportation officials know what to do. As soon as a project is done the transporation officials seed the ditch area down. They do what they can to keep the dirt from washing away. A similar thing has to be done out on our farms.

A final rule needs to be released by USDA by the end of August so that farmers can complete the 2004 growing season and know what CSP will be about and make their fall decisions accordingly with good planning and foresight. We don't want the USDA to delay and want the final rule to be established as it was declared in the Law and ask for no more delays. We want an uncapped CSP and out in the end of August. Thank you.

**Comment Number 9**

I believe CSP is essential for the Nation. I would like to encourage you to look closely at the rules and the proposed changes as I am personally afraid it will exclude so many farmers because of the way the categories are set up. Thank you.

**Comment Number 10**

Myron Just  
Minnesota Project – St Paul, Minnesota

As you know most of Minnesota raises major Minnesota agricultural crops such as corn, soybeans and grazing. I think it would be of particular interest -- fruits and vegetables. As Mr Hunt said, this is a proposed RULE – CSP. Because your farming is a bit unique in Minnesota and Wisconsin, it would be particular interesting to have comments from the folks here today as to how CSP might be helpful to vegetable, fruit and flower growers like yourself on small acreages rather than the bigger acres, such as the corn, soybean and dairy. It is a proposed CSP rule. It would be particularly helpful for you folks to provide your comments on this rule.

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

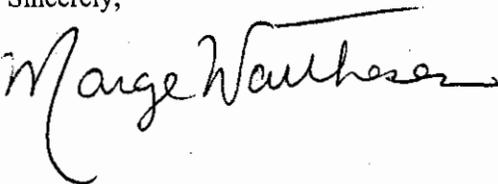
I am writing to suggest important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the CSP as a nationwide conservation program focused on working farmlands and which would reward the best, and motivate the rest. As intended by Congress, the 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 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 under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both. No need to tie farmers up in red tape.

Sincerely,



(Additional comments on back)



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

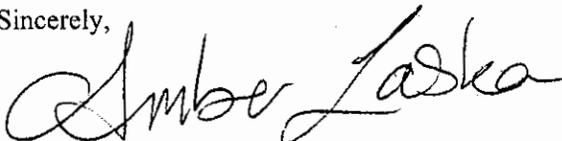
I am writing to suggest important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the CSP as a nationwide conservation program focused on working farmlands and which would reward the best, and motivate the rest. As intended by Congress, the 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 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 under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both. No need to tie farmers up in red tape.

Sincerely,



(Additional comments on back)

### 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?

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?

Yes - definitely .

3. Your additional comments on CSP and the USDA s proposed rules:

Name (if not signed on front): \_\_\_\_\_