

Conservation Operations Division
Natural Resources Conservation Service
P.O. Box 2890
Washington, DC 20013-2890

Dear Sirs:

Thank you for this opportunity to comment on the Conservation Security Program in advance of the NRCS rulemaking process (68 FR 7720). The CSP represents a new direction in farm programs, literally “rewarding the best and motivating the rest” with powerful incentives to make meaningful management changes that will raise environmental quality while sustaining agricultural production. This is an exciting and important new program, eagerly awaited by producers all over the country. I strongly encourage the NRCS to move forward with all haste in the implementation of the CSP.

I wish to address three issues related to the CSP that are now under consideration within Congress and the USDA:

CSP should be available nationwide.

The Conservation Security Program was initially conceived as a nationwide program, open to all producers who are interested and meet eligibility requirements. Recently it has been suggested by some members of Congress that the program should be scaled back to an Iowa-only pilot program. I strongly urge you to maintain the CSP as a nationwide program. Farmers and ranchers all over the country are eager to participate.

CSP should remain an entitlement program.

Recent appropriations and budgetary proposals would limit the CSP and threaten the program’s entitlement status. With a funding cap the program would be changed from the first-ever working lands conservation entitlement program available to all farmers who qualify and apply, to a program with limited enrollment, preferential bidding systems, and waiting lists. Funding for CSP was raided to pay for disaster assistance in the recently passed omnibus appropriations bill, but a bipartisan coalition of Senators has vowed to reinstate full funding as soon as possible. I urge you to support this effort fully, and to advocate for the maintenance of the CSP as a full entitlement program through future budget and appropriations processes.

CSP should maintain strong environmental standards.

The rule for the Conservation Security program should require strong conservation and environment standards, and reward strong environmental performance. Positive environmental outcomes achieved by innovative producers should be a major objective of the CSP.

The program should limit each producer to a single contract.

Though the enacting legislation does not explicitly limit producers to a single CSP contract, it is clear that the tiers of the program were conceived to reward producers for conservation performance across a wide range of natural resource concerns and up to the entirety of a farm operation. Producers should be rewarded for addressing multiple natural resource concerns and large percentages of their operation via higher tier payments, not multiple contracts.

Thank you for your attention to my comments as you move forward with implementation of the Conservation Security Program. I urge you to move forward with all speed in implementing the program so that it will be available to farmers in 2003.

Sincerely,