

HELP SHAPE THE CONSERVATION STEWARDSHIP PROGRAM

-- Act Now to Help Improve Rules Promoting Excellence in Land Stewardship --

Sustainable farmers and ranchers have waited a long time for the Conservation Stewardship Program (CSP) to become a reality on the ground on a nationwide basis. Thankfully, that time has arrived! The 2009 sign-up for the new CSP started August 10 and runs through September 30 – see www.sustainableagriculture.net and www.nrcs.usda.gov/programs/new_csp/csp for more information.

At the same time as sign-up is taking place, USDA is taking public comment on the Interim Final Rule that guides implementation of the new CSP. **Sustainable and organic farming advocates need to speak up now to help shape this comprehensive working lands stewardship program for years to come.** Public comments will shape the final rule that USDA will be writing later this year.

The interim final rule was published in the Federal Register (<http://edocket.access.gpo.gov/2009/E9-17812.htm>) on Wednesday, July 29. The **comment period closes September 28**, so please act now!

A few simple steps and helpful hints for submitting comments:

- Email comments directly to USDA at CSP2008@wdc.usda.gov
- Identify the Docket Number at the top of your letter = **“NRCS-IFR-09004”**
- Address your comment letter to: Mr. Gregory Johnson, Director, Financial Assistance Programs, US Department of Agriculture, Natural Resources Conservation Service, 1400 Independence Avenue SW, Room 5237-S, Washington, DC 20250-2890. You may also mail your letter to this address if you prefer not to email it.

Comment letters can be as short or as long as you want. Be sure to identify yourself and your interest in the program. Put your comments in your own words, and raise the points most important to you. Here are some key issues and talking points from which you might pick and choose, and feel free to develop any other points of particular concern to you.

KEY ISSUES AND TALKING POINTS

1. **Farmers and ranchers applying to participate in CSP should be ranked and paid based on environmental outcomes.**

The CSP is unique among federal conservation programs in that it focuses on outcomes, not on when conservation activities are adopted. If a farmer has previously adopted advanced conservation measures and systems, the program is designed to reward that behavior and help pay for continued active management and maintenance of those systems and practices no less so than the future adoption of the same measures, provided the farmer adopt at least one new conservation enhancement.

This feature is of critical importance to sustainable and organic farming. USDA specifically asked for public comment on this point, including whether the ranking and payment system, which is currently equally weighted between existing and new superior conservation, should be changed. USDA has indicated that serious consideration is being given to giving more weight to the adoption of practices,

resulting in smaller enrollment chances and smaller payments for farmers already practicing superior land stewardship.

Comment: Every aspect of program design and regulation should keep the two in balance with the sole measure being the environmental benefits secured by the total conservation system regardless of the timing of adoption of various parts of the system.

2. Acreage designated by Congress in the 2008 Farm Bill for the CSP should remain with the program.

The Farm Bill provides authority and funding for 12,769,000 acres to enter the program each year, or nearly 64 million acres after 5 years and 128 million acres over 10 years. Provided that environmental standards for program eligibility and ranking remain high, this total represents an unprecedented opportunity for farmers to participate in a comprehensive conservation initiative for working land and to be rewarded for providing important public benefits and ecological services.

However, the interim final rule as currently written is unclear at best whether CSP acreage remains available to the program if in any given year the full 12,769,000 acres is not enrolled or if contracts are voided prior to the end of the 5-year contract term (if, for instance, there is a death or illness in the family that prevents the farm operation from continuing).

Comment: The final rule should stipulate that all acres made available to the program in the Farm Bill remain with the program without regard to year-to-year fluctuations. No acreage should be lost to the program due to happenstance.

3. Resource-conserving crop rotations and management-intensive rotational grazing should receive strong support.

Cropping systems build around resource-conserving cropping systems and livestock systems based on rotational grazing are superior conservation approaches with high, multiple environmental benefits. In fact, the 2008 Farm Bill provides for supplemental CSP payments to farmers newly adopting or improving existing resource-conserving crop rotations.

Comment: Both resource-conserving crop rotations and management-intensive rotational grazing systems should receive high ranking and payment points and both should be fully rewarded whether they are an ongoing conservation system or a newly adopted one. The definition for resource-conserving crop rotations should specifically require a perennial grass, legume, or legume-grass mixture for use as a forage, seed for planting, or green manure to be part of the rotation.

4. Organic crop and livestock systems should be recognized for their environmental benefits.

As part of the 2008 Farm Bill, Congress required USDA to make a special effort to reach organic farmers through CSP, in recognition of the elevated resource and environmental benefits which can accrue from organic systems.

Comment: The regulations and overall design of the program should include specifically organic conservation activities as well as ensuring that all conservation activities rewarded under the program include appropriate variations relevant to organic farms where the standard conservation practice may be inappropriate for organic systems. Ranking and payment point values should be roughly equivalent for ongoing organic management and new

conversions or transition to organic. In addition, USDA should provide organic producers with clear, farmer-friendly, web-based information on how to apply for and participate in CSP and the National Organic Program (organic certification) simultaneously and what the comparative cross-requirements are with respect to a CSP Plan and an Organic Systems Plan.

5. Biodiversity and fish, wildlife, pollinator, and beneficial insect habitat should be specifically added as a priority resource concern to be addressed by CSP.

The program rule and design does very significantly include wildlife habitat measures, but the conservation activities for habitat are currently listed under the priority resource concerns labeled “plants” and “animals.” USDA specifically asked for public comment as to whether wildlife habitat should be identified specifically as a priority resource concern, along with those for soil quality, soil conservation, water quality, water conservation, air quality, and energy conservation.

Comment: The list of potential priority resource concerns for the CSP should include both biodiversity and wildlife habitat. These are in fact the resource concerns that are parallel to the other resource concerns in a much clearer, more meaningful way than are plants and animals.

Background in Brief

The Conservation Stewardship Program (CSP) is a comprehensive working lands conservation program designed to protect and improve natural resources and the environment for generations to come. CSP provides technical and financial assistance to farmers and ranchers to actively manage and maintain existing conservation systems and to implement additional conservation activities on land in agricultural production. CSP targets funding to:

- Address priority resource concerns in a given state, watershed or region;
- Improve soil, water, and air quality;
- Provide increased biodiversity and wildlife and pollinator habitat;
- Sequester carbon and reduce greenhouse gas emissions to mitigate climate change; and
- Conserve water and energy.

The 2008 Farm Bill authorizes a new nationwide, continuous sign-up for CSP which means farmers and ranchers anywhere in the country will be able to apply for the CSP any year and at any time of the year. Priority resource concerns will still be set by watershed, but all watersheds will be eligible each and every year. CSP contracts run for 5 years and there is a \$40,000 per year payment limitation.

Applicants will complete a Conservation Measurement Tool which will allow them to assess their current conservation activities and choose additional conservation activities they would like to implement. Periodically during the year, USDA’s Natural Resources Conservation Service (NRCS) – the agency that administers CSP – will rank applications, selecting those with the highest rankings until funding for that ranking period is completely allocated. Participants, working with NRCS, will then develop conservation plans and CSP contracts.

The new farm bill provides sufficient funding for the program to enroll 12.8 million acres each year. Acres are allocated to each state based primarily on the amount of farmland in that state relative to the national total. For more information, see <http://sustainableagriculture.net/publications/grassrootsguide/conservation-environment/conservation-stewardship-program/>.