

March 12, 2010

The Honorable Tom Vilsack
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Dear Secretary Vilsack:

We the undersigned organizations urge you to make critical improvements to the Conservation Stewardship Program (CSP) and to initiate a 2010 CSP sign-up as soon as possible.

We appreciate your consistently strong support for the CSP, the only program in the USDA tool kit that pays farmers for achieving positive environmental outcomes that improve farm resilience. It is the best means available to you as Secretary to help achieve over the long term many of your priorities, including climate change mitigation, energy conservation and sustainable biomass production, water quality and conservation, and improved wildlife habitat and biodiversity.

This program also points the way forward for US farm policy by providing a model for what the next generation of farm programs should look like. CSP rewards farmers for how they farm, not for what or how much they produce. CSP advances conservation practices on crop, pasture, range, and forested land and serves sustainable and organic operations, specialty crop farms, grazing operations, and diversified crop-livestock farms. It points the way to a brighter future for all of US agriculture.

Feeding ourselves and future generations will demand the expansion of sustainable production practices on working agricultural lands. Programs that reward our best stewards and encourage other farmers to make the transition to more sustainable farming practices are crucial to our food security.

According to the Farm Bill, CSP now operates as a year-round continuous sign-up. Unfortunately, that statutory directive was not met in 2009 and will not be again in 2010. While technically true that producers can sign-up now, doing so without knowledge of what they are signing up for because program details have not been announced would be foolish.

The original CSP suffered from repeated late season sign-ups throughout the Bush Administration, and the pattern regrettably seems to be repeating itself. Late sign-ups offered at farmers' busiest time unnecessarily weaken the program by reducing the number of program participants. It makes outreach and education around this new and innovative program that much more difficult. It makes effective technical assistance and reasonable work load distribution all but impossible for NRCS. It tends to defeat careful advance conservation planning. If the CSP is to succeed, farmers need to have a true continuous sign-up period, as promised by the 2008 Farm Bill.

We believe the Administration is ill-advised to hold up the announcement of the 2010 sign-up until the completion of a final rule for the program. Most of the important details about the program, including those most in need of change in 2010 and beyond, are not found in the rules but in

technical directives and program implementation tools. Moreover, many USDA programs, including conservation programs, have operated under interim final rules for multiple years. There is no urgent reason to complete a final rule before moving forward with the sign-up. We are fully supportive of moving toward a final rule, but not at the cost of losing a year of the program or rushing the program through with too little time to conduct a fair and effective sign-up.

We therefore urge you to be the champion for moving the program forward without any further delay. As you move forward with the 2010 sign-up, we urge you to make the following vitally important changes to the 2009 first year trial version of the program.

1. Focus on Outcomes -- Eligibility, payment rates and ranking points must emphasize environmental outcomes over when a particular activity, enhancement, or practice was adopted. If a farmer has previously adopted advanced conservation measures and systems, the program should reward that behavior and provide support for the continued active management and maintenance of those systems.

The 2008 Farm Bill clearly and unequivocally directs there be payment for both active management of conservation systems in place at the time the contract is accepted and for conservation activities adopted thereafter. These payments are directed at measures that address specific, identified resource concerns relevant to the location and management of a particular farming operation. Recognition that farmers are providing ongoing environmental benefits and incurring ongoing management costs and forgone income is essential to the success of the CSP.

By statute, the program must reflect cost, forgone income, and environmental benefits for both the adoption of new activities and the active management of existing activities in equal measure. The 2009 conservation activity delineations of existing and newly adopted activities and the payment formulas attached to those activities fall considerably short of that requirement and therefore must be altered to achieve this goal.

In addition, the list of existing conservation activities a producer may choose to continue under the program should be reasonably comprehensive and should also include all of the conservation practices and enhancements offered for consideration as newly adopted activities. That was not the case in the 2009 sign-up and should be revised accordingly.

2. Get the Points and Prices Right -- CSP is the first farm bill conservation program to explicitly incorporate environmental benefits in both its ranking and payment formulas. This is an incredibly important advance in conservation policy and it is important it be done right.

In the 2009 iteration of the program, there were advanced conservation enhancements that received fewer ranking and payment points than the more basic conservation practices to which they related, and other examples where the more advanced enhancements ranked just barely higher than the basic practice. This is conceptually wrong, and corrections are needed for 2010 and beyond.

Moreover, the CSP payment system should be constructed to the maximum extent possible to encourage farmers and ranchers to retain or adopt those conservation activities providing the greatest natural resource and environmental benefits. If, as seems true for 2009, the payment structure continues to under compensate activities with large environmental benefits but significant

cost while giving greater weight to lower cost activities that have low to medium benefit, the payment structure will defeat the purpose of the program. Revisions are needed.

3. Restore a Legitimate Resource-Conserving Crop Definition -- The definition of a resource-conserving crop rotation used by the predecessor Conservation Security Program was a good one and should be restored. Complex diversified crop rotations play a central role in addressing multiple resource concerns. The 2008 Farm Bill recognizes this by providing a special supplemental payment for them.

The 2009 sign-up definition, however, allows for a \$16 an acre supplemental payment for minimal environmental benefit, rewarding continuous program crop production on 100 percent of available cropland. Moreover, the \$16 an acre exceeds the payment rate for all other conservation activities by an over 8-fold factor. This is a blatant misuse of program resources, providing a new layer of subsidy on top of existing Title I subsidies with marginal benefit, especially given the existence of CSP paid enhancement activities that reward exactly the same systems. In essence, it creates a “triple-dip” without resource or environmental justification.

We urge you to restore a definition of a resource-conserving crop rotation for the 2010 and subsequent CSP sign-ups that requires perennials and forages in the system, as correctly provided by the interim final rule for the Conservation Security Program by the previous Administration. In addition, we urge you increase the point values and compensation for resource-conserving crop rotations, defined in precisely the same manner, recorded in the baseline inventory of existing conservation activities that will be actively managed and maintained during the contract period.

4. Restore the Pastured Cropland Designation -- In the 2009 sign-up cropland planted to grass was counted as pasture land and paid at the lower pasture payment rate. Under the predecessor program such land was treated as pastured cropland and paid at the cropland price. It is antithetical to the goal of achieving environmental benefits for the program to discourage and penalize the transition of cropland to grass-based agriculture. Continuation of this perverse disincentive sends entirely the wrong message and will result in inferior environmental outcomes. A pastured cropland designation should be restored for the 2010 sign-up and thereafter. To be fair, contract modifications should be offered for 2009 enrollees with pastured cropland.

5. Provide a minimum CSP payment. -- According to the 2007 Census of Agriculture, about 54 percent of U.S. farms range in size from 1 to 99 acres. Many of these farms provide high-value specialty crops while others are owned or operated by beginning farmers just starting to establish their own operations or are farms owned or operated by minority farmers. In addition, small acreage farms are not distributed uniformly around the U.S. but are more prevalent in New England, the Mid-Atlantic, and the Appalachian regions. Farmers in these regions have historically not participated in farm bill conservation or price and income support programs at the same rate as farmers in other regions.

These smaller acreage operations deserve an opportunity to participate in the program. Creating a minimum CSP annual contract value will help compensate for a payment formula largely driven by the number of acres farmed by land use type. It will allow society to reap the environmental benefits that can be obtained from the cumulative impact of CSP improvements on thousands of

smaller farms. Providing additional modest incentives to these farmers also will help achieve equitable geographic distribution of CSP funds and allow the program to serve a more diverse set of constituents, including the historically underserved.

We believe this program will provide solutions to some of our most pressing farming, environmental and economic challenges. But this is a critical year for the CSP. In its second year of national availability, it is essential that CSP be implemented in a timely and effective manner. We look forward to working together with NRCS to ensure needed refinements are made and effective outreach can begin to support an early spring commencement of the 2010 sign-up.

Sincerely,

American Grassfed Association
Grassroots International
Izaak Walton League of America
National Catholic Rural Life Conference
National Center for Appropriate Technology
National Latino Farmers and Ranchers Trade Association
National Organic Coalition
National Sustainable Agriculture Coalition
National Wildlife Federation
Organic Consumers Association
Organic Farming Research Foundation
Organic Seed Growers Trade Association
Slow Food USA
The National Young Farmer Coalition
Union of Concerned Scientists
United Farmers USA

Abundance Cooperative Market	NY
Adelante Mujeres	OR
Ag PALS San Diego	CA
Alternative Energy Resources Organization	MT
Ashland Food Coop	OR
Berkshire Co-op Market	MA
Biodiversity Project	IL
California Farmers Union	CA

Carolina Farm Stewardship Association	NC
Center for Rural Affairs	NE
Center for Sustainable Living	NY
Church Women United	NY
Citizens Organized Acting Together MN-COACT	MN
City Seed	CT
Clean Up the River Environment (CURE)	MN
Coastal Valley Growers	OR
Community Alliance with Family Farmers	CA
Community Involved in Sustaining Agriculture (CISA)	MA
Cornucopia Institute	WI
Dakota Rural Action	SD
Ecological Farming Association	CA
Emporia Farmers' Market	KS
Farm Fresh Rhode Island	RI
Fay-Penn Economic Development Council	PA
Federation of Southern Cooperatives	Southern States
Florida Organic Growers	FL
Food Democracy Now!	IA
Kirschenmann Family Farms	ND
Georgia Organics	GA
Grassworks, Inc.	WI
Growing Home, Inc.	IL
Heartland Center	IN
Illinois Stewardship Alliance	IL
Institute for Agriculture and Trade Policy	MN
Iowa Farmers Union	IA
Iowa Natural Heritage Foundation	IA
Island Grown Initiative	MA

Just Food	NY
Kansas Rural Center	KS
Kerr Center for Sustainable Agriculture	OK
Land Stewardship Project	MN
Madison Area Community Supported Agriculture Coalition	WI
Maine Organic Farmers and Growers	ME
Maine Sustainable Agriculture Society	ME
Maui Aloha Aina Association	HI
Michael Fields Agricultural Institute	WI
Michigan Land Use Institute	MI
Midwest Organic & Sustainable Education Service	WI
Minnesota Farmers Union	MN
Myskoke Food Sovereignty Initiative	OK
Nebraska Sustainable Agriculture Society	NE
New England Farmers Union	MA
New England Small Farm Institute	MA
New Entry Sustainable Agriculture Project	MA
Northeast Organic Farming Association Interstate Council	Northeast States
Northeast Organic Farming Association of Connecticut	CT
Northeast Organic Farming Association of Massachusetts	MA
Northeast Organic Farming Association of New Hampshire	NH
Northeast Organic Farming Association of New Jersey	NJ
Northeast Organic Farming Association of New York	NY
Northeast Organic Farming Association of Rhode Island	RI
Northeast Organic Farming Association of Vermont	VT
Northeast Pasture Consortium	Northeast States
Northern Plains Sustainable Agriculture Society	Northern Plains States
Northwest Coalition for Alternatives to Pesticides	Northwest States
Ohio Ecological Food and Farm Association	OH

Ohio Farmers Union	OH
Ohio State Beekeepers Association	OH
Oklahoma Composting Council	OK
Oregon Tilth	OR
Pennsylvania Association for Sustainable Agriculture	PA
Practical Farmers of Iowa	IA
Research, Education, Action and Policy (REAP) Food Group	WI
Rural Advancement Foundation International, USA	NC
Rural Life Committee, North Dakota Conference of Churches	ND
Slow Food First Coast	FL
Small Holders Alliance of Massachusetts	MA
Sustainable Agriculture Student Association, Iowa State	IA
Sustainable Highlands NJ, Inc.	NJ
Taos County Economic Development Council	NM
The Wedge Community Co-op	MN
Trappe Landing Farm & Native Sanctuary	MD
Vermont Association of Conservation Districts	VT
Vermont Grass Farmers	VT
Virginia Association for Biological Farming	VA
Western Sustainable Agriculture Working Group	NV
Willamette Farm and Food Coalition	OR
Wisconsin Farmers Union	WI