

January 20, 2015

Mr. Jason Weller
Chief
USDA-NRCS
1400 Independence Avenue
Washington, DC 20250

RE: Docket No. NRCS-2014-0008

Dear Chief Weller:

On behalf of the undersigned organizations, we thank you for the opportunity to submit comments in reference to the Interim Final Rule for the Conservation Stewardship Program (CSP).

Our groups represent hundreds of thousands of individuals spanning conservation organizations, agricultural groups, and businesses who work with and support the conservation efforts of the men and women who own and operate America's farms, ranches and forest lands. Our request to you is simple: please equalize how existing and new conservation activities are treated in CSP.

The CSP represents a different policy approach than traditional private lands conservation programs. It is a systems-based, outcome-oriented approach designed to provide financial and technical assistance to help producers maintain and enhance existing conservation activities, while simultaneously improving their performance by adopting new conservation enhancements.

Keeping excellent conservation on the land requires ongoing maintenance that must be repeated every year and modified and improved upon as necessary to meet the challenges of changing conditions. There is a continuing private cost in materials, management, labor, and foregone income for many existing conservation practices, and the CSP was intended to help shoulder that burden as well as require additional new efforts.

We believe CSP should focus on conservation outcomes and thus give equal weight in both the ranking and payment systems to the active management of existing conservation activities and the adoption of new conservation.

The CSP, as currently configured, weights new enhancements disproportionately higher for both ranking and payment amount decisions. The IFR appears to affirm that imbalance by stating, in section 1470.24(a) that “A split-rate annual payment structure is used to provide separate payments for additional and existing conservation activities in order to place emphasis on implementing additional conservation.”

We believe the current NRCS policy to minimize the ranking scores and payment values for existing conservation activities has gone much too far. We recommend that the language at the end of 1470.24(a) be changed to clearly state that payments should be based on actual or expected conservation and environmental outcomes, not on artificial distinctions relative to the timing of when a conservation practice was adopted.

We also urge you to review all the CSP payment factors, adopting the principle that all payment factors for the same activities be equalized, with the only differences being for differences in actual costs incurred and actual income forgone by the participant. As currently structured, the payment rates for ongoing conservation are discounted, unfairly, far below that level.

We greatly value the importance of new conservation within the CSP. We do not, however, believe that new activities should overshadow or outweigh retaining existing conservation in the program. We believe that supporting the active management, maintenance, and improvement of existing conservation activities, no less than adoption of additional conservation activities, represents a solid investment in achieving ongoing conservation benefits.

Sincerely,

Izaak Walton League of America
Land Improvement Contractors of America
National Association of Conservation Districts
National Farmers Union
National Sustainable Agriculture Coalition
Soil and Water Conservation Society