

The Whole Farm Planner

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CSP Is Here, Interim Final Rule Released—But What Is It?

By Mike McGrath

This month marks another milestone in the evolution of the Conservation Security Program (CSP). The Natural Resources Conservation Service (NRCS) has completed the rulemaking process and shifted in the direction of program enrollment so that actual farmer sign-up can begin this summer.

An Interim Final Rule was released on June 9, just as the training of key personnel in selected watersheds got underway. Targeted enrollment numbers of 3,000 to 5,000 farmers in 18 watersheds across the nation, by September 1 of this year, have been announced. By the end of July some conservation farmers will have filled out enrollment applications and completed their Conservation Stewardship Plans.

This first CSP sign-up is going to happen fast because there is \$41 million to be spent before September 30.

But an important question to ask at this historic conservation

milestone is, what Conservation Security Program is this? Or maybe even more importantly, whose Conservation Security Program is this?

Rules Designed for Capped Funding

Since the beginning of the year the NRCS has been advocating for a Conservation Security Program that is designed to be severely restrictive when it needs to be, or more open when it can be. Under this approach, the funding will determine whether the program is restricted or open, and funding depends on the direction the political wind is blowing.

This year, Congress has restricted the program to \$41 million so only 18 watersheds are being selected. However, last January Congress removed the funding cap on the Conservation Security Program after this fiscal year. But the President's 2005 budget proposal continues to show a cap on the program at \$209 million. Appropriations will likely be decided this summer.

So the NRCS has designed a Conservation Security Program that anticipates, right from the start, that there will be limited funding each year. Therefore, it incorporates layers of eligibility restrictions that include annual

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Soil Organic Matter Is Key Indicator for CSP Cropland Eligibility

By Tim Gieseke

Farmers competing to get into the Conservation Security Program will soon be learning some new acronyms. Applicants in the selected watersheds who have croplands will be ranked for acceptance according to a soil condition formula.

Determining if soil organic matter is trending toward an increase, a decrease, or maintaining a constant level, is the fundamental aspect of utilizing the Soil Conditioning Index (SCI) as a tool for CSP eligibility.

Increasing soil organic matter does not guarantee good soil health, quality, sustainability or productivity, but it is considered to be a prerequisite to improving and protecting soil quality and productivity in most cropping systems.

For a producer to be ranked in CSP's highest cropland category A – the SCI needs to be greater than zero.

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Interim Final Rule Released

By Loni Kemp

The Natural Resources Conservation Service released the Conservation Security Program Interim Final Rule in mid June. This rule will govern the 2004 sign-up, and will also be subject to another 90 day comment period before it is finalized.

How did NRCS respond to the 12,000 comments submitted on the draft rule? On many major points the interim final rule continues to diverge from the law. While several improvements were made, a totally new contract payment restriction was also created.

The most-noted criticisms of the draft rule were ignored. Despite the fact that Congress has lifted the funding cap for 2005 and beyond, the rule is written for a capped, limited program:

- CSP will only be implemented in a few selected watersheds each year
- There will be signup periods versus open enrollment
- An enrollment ranking system using various “categories” is retained
- Payments are scaled back from what Congress envisioned
- Participants will have to meet soil and water quality standards prior to enrollment
- There is no coordination with organic certification plans
- Renewal will only be possible when a farm’s watershed comes up again

Improvements Included in Interim Rule

The Interim Final Rule does, however, contain a number of changes that move CSP in a positive direction:

- The per-acre, contract base payment, now renamed the stewardship payment, had been proposed to be reduced by 90% across the board. But this has changed to a reduction factor of 75% for Tier 1; 50% for Tier 2, and 25% for Tier 3.
- When calculating stewardship payments, pastured cropland will be valued as cropland.
- Cost-share for new practices will be less than 50%, but similar to EQIP.
- Enhancement payments will be set at the time of signup, and will be either based on actual costs or commensurate with net environmental benefits.
- The list of allowable new practices will still be

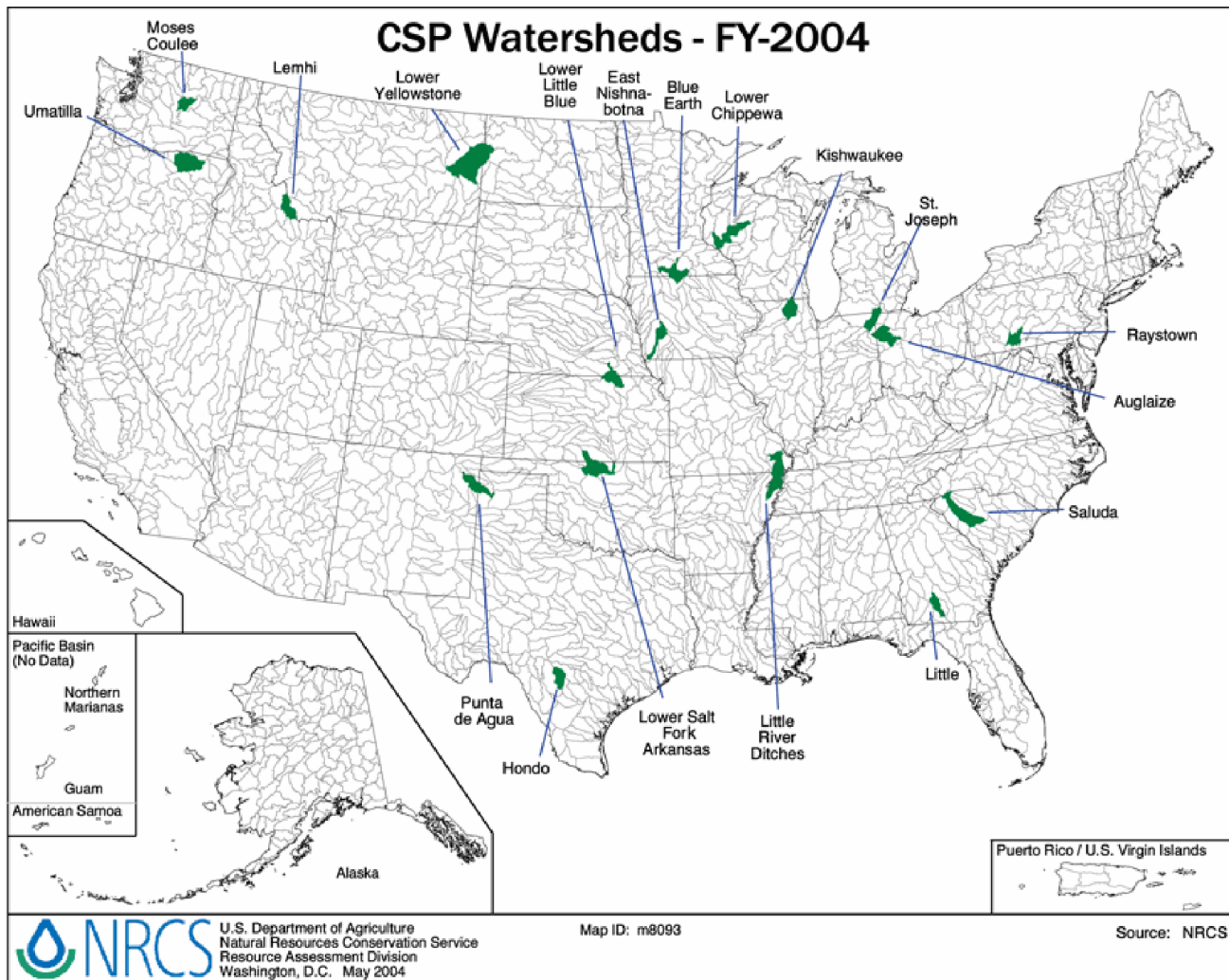
restricted for 2004, to be named at the time of signup. However, in future years the State Conservationists, with advice of their State Technical Committee, will tailor the list of practices and payments.

- An agriculture operation will be defined as a cohesive management unit that is operated with the same labor, equipment, accounting system and management that is separate from any other, and allows the use of Farm Service Agency farm numbers, either with one farm or aggregated farms. However, only one application per signup, and one active CSP contract per person, will be allowed.
- Technical Service Providers must be certified conservation planners in order to prepare the Conservation Security Plan, now renamed the Conservation Stewardship Plan. NRCS retains authority to approve all plans, contracts, and payments.
- Renters can enroll land with a letter of support from their landlord. Lands not under control of the renter for the entire contract period will now not have to be maintained without payments.
- The definition of resource conserving crop rotations was added, with examples.
- To meet the entrance standard for soil quality on cropland, the Soil Conditioning Index must be positive. To meet the standard for water quality on cropland, the quality criteria must be met for nutrients, pesticides and salinity on surface and groundwater, as well as sediment for surface water. To meet the entrance standards for soil and water quality on pasture and rangeland, a grazing management plan must be followed
- Production-oriented practices and quality criteria in the field office technical guide will not be required for Tier 3 unless there is also a conservation benefit.

New Payment Limitation

Citing concerns with the potential distorting effects of CSP payments on land prices and rental values, NRCS created an entirely new “contract limitation” that is not in the law nor in the draft rule and has not been subject to public comment.

The sum of the stewardship payment, the existing practice maintenance payment, and all enhancement payments will be averaged out for each acre enrolled and capped at 15% of the adjusted rental rate for Tier 1, 25% for Tier 2, and 40% for Tier 3. New practice cost-share will be exempt from this computation.



There are strong concerns that this will drastically reduce the attractiveness of CSP, especially for those in areas with low rental rates such as pasture and rangeland. It will also severely limit the role of enhancement payments in the CSP, despite the NRCS assertion that enhancements should be a dominant component of payments. It will fall particularly hard on smaller farms which will have their enhancement payment drastically limited by their number of acres, despite the fact that net environmental outcome is not necessarily tied to acreage.

This policy addition is particularly puzzling since Congress already passed two limitations to address the concern about land prices. The stewardship payment is already capped at \$5000, \$10,500 and \$13,500 for Tiers 1, 2, and 3; and the total contract payment is capped at \$20,000, \$34,000 and \$45,000 for Tiers 1, 2, and 3. The addition of the new cap is sure to have unintended and undesirable effects.

Announcement of July 6-30 Sign-up

Later this month, NRCS will publish a sign-up announcement that will specify details for this first sign-up that are not reflected in the rules. Chief Knight announced that enrollment categories will be modified from the May 4 announcement to eliminate use of the Soil Tillage Intensity Rating, due to concerns about giving undue preference to no-till cropland.

Information that has never been released to the public yet will include the list of allowed new practices and cost-share rates; the list of enhancement practices and their payment rates; and the adjusted rental rates for each of the 18 selected watersheds. ■

Conservation Security Program Needs Diversity Index for Crop Rotations

By Tim Gieseke

Whether you view America's crop agriculture as part of its food culture or as an industrial production system, stability through diversity is a necessary ingredient.

Everyone remembers that stock portfolio mantra after the dot com boom—diversity, diversity, diversity—and for the same reason: stability. These concepts do not hold true just for a few business sectors that are at the verge or that have passed through some corrective collapse. All business structures demand it and only business sectors with extensive external subsidies can be maintained without a diverse portfolio.

But unlike dot com stock, or even energy commodities, agriculture is more personal—we eat the product and it becomes a part of each of us, literally. Because of this the USDA's food pyramid endorses diversity in each of our diets.

The reality that we all eat agricultural products is increasingly evading many people, including those that produce the limited commodity foodstuffs. It has often evaded USDA Farm Bill policy and that void continues with the proposed rules in the Conservation Security Program.

In CSP's long road to implementation, NRCS Chief Bruce Knight has touted the Conservation Security Program to be an agent of revolutionary change in agriculture conservation. This is correct on several fronts.

First, the CSP is designed to revolutionize the way NRCS employees and agricultural producers interact. Since its inception in 1935, NRCS employees have played the role of assessing resource concerns, designing solutions, providing construction oversight and developing operational and maintenance plans. With CSP's self-assessment tools and the private sector's technical service providers, ownership of conservation plans and implementation will reside with the landowner and operator.

Second, the CSP is designed to revolutionize the way a landowner and operator views their resource concern solutions. Structural practices have traditionally been used as solutions, whereas now there will be a stronger focus on management activities. Using effective "management intensities" can provide efficient resource utilization and energy conservation.

Third, the CSP is also designed to revolutionize the method by which environmental and economic benefits are measured. The agency will move away from enumerating the quantity of practices installed toward accounting for actual outcomes that are strived for, such as improved water quality and better fish habitat.

These changes are necessary and will increase the delivery efficiency of conservation in America. And they may also be considered revolutionary changes, especially if

one is standing at the doorstep of a USDA office looking in.

But no matter how progressive a program policy is hoped to be, it is ultimately determined by the eligibility criteria that motivates a producer into action. In the NRCS proposed Conservation Security Program, the Soil Conditioning Index dominates the eligibility criteria. This index and rating are focused on indicating the trend of carbon sequestration into the top four inches of the soil profile.

Gyles Randall, Soil Scientist, University of Minnesota said, "It scares me a little when a qualifying index that just focuses on soil organic matter is used. It will generally run true for the top inch or two of the soil, but not for overall soil health."

Dr. Randall spoke from his office in Waseca after fielding phone calls from producers that had just experienced several rainstorms during the third week of May. "Crop producers, some with strip tillage and zone tillage systems, have been asking me why they are experiencing the high level of erosion in their fields," said Randall. "The rainstorms that we've got in the last week have not been the three or four-inches, but in the inch to inch-and-a-half range."

Perennials in Rotation

"Don't get me wrong," Dr. Randall continued, "Increasing the

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level of residue in our fields does reduce the erosion, but what we have been trying to do, and what it appears CSP is attempting to further, is to protect our soils through adjusting our tillage systems. When, actually, it's not so much to do with tillage but with the continuation of annual row crops that expose our soils through the spring months before there is significant crop canopy and water uptake. Without perennials in our rotations that provide the evapotranspiration and the root structure, we will continue to see these results."

While subsidizing practices that promote higher soil organic matter is a positive conservation activity, it cannot be considered revolutionary. Seed varieties with emergence

vigor, herbicide-resistant crops, and increasing labor and energy costs have encouraged no-till and low-tillage technologies.

Adding additional monetary support and motivation to continue down this well-established path looks more like another income support program than a revolutionary conservation program. This program will continue to motivate agricultural producers to maintain farming operations that rely on a two-crop system that is highly vulnerable to market corrections, government subsidy needs, and pest and disease cycles.

A revolutionary CSP would provide motivation to develop crop production systems that improve overall soil quality and water quality, reduce erosion, diver-

sify the landscape, and, in the process, provide a diverse diet for the health and increasing demands of the American people.

If it is revolutionary it will use the working experience and knowledge foundation on how to grow and integrate a variety of crops needed for the agricultural community to succeed in the next 50 years. It will reestablish the soil, natural resource, social, and rural community benefits of a diverse, more stable agricultural and agribusiness community.

This can be done utilizing the SCI, but as a component, not as the foundation of CSP eligibility. The NRCS rule makers have more choices.

A more comprehensive approach would be to develop and utilize a crop rotation index that motivates producers to develop more diverse cropping systems that improve soil quality, interrupt pest and disease cycles, support broad-based cropping systems knowledge and encourage cost-effective management intensity activities.

Many hoped the 1996 Farm Bill policy would wean farmers off of government crop subsidies, but instead, it motivated them to increase production with greater reliance on subsidies. What are we hoping the Conservation Security Program will do for America and its farmers, and what should CSP be motivating America's farmers to do? ■

Tim Gieseke recently joined the Minnesota Project as an Agriculture and Environment Policy Specialist. Tim comes to the Minnesota Project from the Carver Soil and Water Conservation District.

Diversity Index for Crop Rotations

In 1989, Dr. Dwayne Beck, Manager at the Dakota Lake Research Farm at South Dakota State University, developed a Diversity Index for Crop Rotations in response to the need to compare and describe characteristics of no-till cropping rotation systems. The crop rotation principles in the index also apply to all types of crop tillage systems.

Briefly, the Diversity Index for Crop Rotations produces a higher score in relation to factors such as more years separating the same crop type, the presence of both grass and broadleaf crops, the presence of both spring and fall sown crops, and the presence of warm and cool season crops. Rotations with high Diversity Index Values will provide the most evenly distributed cropping system workload and present the least disease and weed risk.

It should be noted that Dr. Beck and Jason Miller, NRCS, both of whom worked on the project publication, have expressed concerns of using this Diversity Index for Crop Rotations as a regulatory tool.

Sponsors of the project publication include South Dakota State University, Cooperative Extension Service and Agricultural Experiment Station; USDA Natural Resources Conservation Service; South Dakota Department of Environment and Natural Resources; Hughes County Conservation District; South Dakota No-Till Association, and Ducks Unlimited, Inc.

To review more information on crop diversity index and intensity rating system go to www.dakotalakes.com and go to Publications and Information. ■

Testimony Calls for Revised CSP Rules

Senate Subcommittee hears unified voice against restricted CSP

On May 11, 2004, the Senate Subcommittee on Forestry, Conservation, and Rural Revitalization conducted hearings entitled: **Examining Conservation Programs of the 2002 Farm Bill**. Below are excerpts from testimony given on the Conservation Security Program at those hearings.

Al Christopherson, Farmer and President Minnesota Farm Bureau, on behalf of the American Farm Bureau Federation:

The current proposed rule has added eligibility restrictions never anticipated by the law. A new requirement to meet both soil and water quality criteria prior to participation in Tier I and Tier II adds new restrictions, which will severely limit eligibility by anyone other than those who have already achieved what the program sought to create. The CSP program should allow anyone to enter a Tier I contract, which requires only the adoption and maintenance of conservation practices that address at least one identified resource problem on part of the agricultural operation, or Tier II contract, which requires the adoption and maintenance of conservation practices that address at least one identified resource problem on all of the agricultural operation.

While we understand the initial reasoning for targeting watersheds, we contend that CSP should be available to all agricultural producers, rather than in only a few watersheds. Enactment of the 2004 Omnibus Appropriations bill removed funding limits previously imposed on this program; so we believe that

the final rule should reflect the mandatory status of the program and must include extensive revisions to the budget-driven application, implementation, and eligibility requirements in the proposed regulation.

Since the final rules have not been published, we would like to highlight several issues raised in the proposed rulemaking:

- Overall, the proposed rule is too complicated, restrictive and provides too little financial incentive for many farmers and ranchers to participate. We have encouraged Natural Resources Conservation Service (NRCS) to change this proposal before the regulation is finalized. We recommended that NRCS address the program's overall lack of clarity by finalizing a regulation that is easy to understand and fosters participation.
- Limiting eligibility to producers in "selected" watersheds will greatly reduce participation and deny conservation to broad areas of the nation's farmers and ranchers. CSP is not simply a watershed



Al Christopherson, Farmer and President Minnesota Farm Bureau

program, but a program meant to be open to all qualifying agricultural producers in all regions of the country.

Francis Thicke, Organic Dairy Farmer, Fairfield, Iowa, on behalf of the Sustainable Agriculture Coalition:

With all the promise CSP holds, it is confusing to me—and many farmers I have spoken with—why USDA appears to be unwilling to implement CSP as it was created by Congress. Why has USDA created an elaborate watershed selection and application ranking process that will severely restrict the number of farmers eligible to participation in CSP when the 2002 Farm Bill clearly intends for CSP to be an open-enrollment, continuous sign-up program? The USDA plan to limit farmer participation runs counter to the 2002 Farm Bill call for a nationwide program with all farmers practicing effective conservation and environmental protection eligible to participate.

Now I should hasten to add that before returning to farming, I worked for USDA in Washington, D.C. and helped write rules for USDA conservation programs. When I look at the proposed rules for CSP I do not recognize the spirit of the conservation-minded folks at the Natural Resources Conservation Service. Perhaps what we are seeing is the long shadow of the Office of Management and Budget (OMB) or perhaps political level decisions. Whatever the case may be, it is clear to me the assumption of a pre-ordained budget cap on the CSP is the one big domino that is knocking



Francis Thicke, Organic Dairy Farmer, Fairfield, Iowa

Thicke Testimony *Continued from page 6*

down all the other dominos that are collectively imploding CSP: watershed rotations, enrollment categories, greatly reduced payments for conservation practices, and all the other items in the proposed rule that serve to limit farmer interest and participation in CSP.

I have made a major commitment to conservation, converting a severely degraded conventional corn and soybean operation into a grass-based farm with an emphasis on plant diversity, soil health, and

wildlife restoration. I am very interested in enrolling in the CSP and look forward to the opportunities it affords not only to maintain and improve my conservation farming system, but also to participate in its on-farm demonstration and monitoring and evaluation components. Then the target watersheds are announced, and I am out of luck – my watershed is not chosen. Despite the law's clear requirement for an accessible nationwide program for top-notch conservation systems, I am left out. ■

Soil Conditioning Index

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The SCI is rated on a 1 to -1 scale, with zero indicating no loss or gain of soil organic matter, and a positive rating indicating a trend toward higher soil organic matter.

Achieving a SCI of greater than zero can be accomplished under a wide range of farming systems and parameters. For example, an increase in yield that generally provides more residue matter or inclusion of a cover crop will have positive results on the SCI. Other factors that can't be controlled which influence the index are soil types and climate regions.

The USDA Revised Universal Soil Loss Equation software, RUSLE2 is used to calculate the SCI. Information such as location, soil type and texture, crops in the rotation, typical yield for each crop, applications of organic matter (manure, straw, compost), removals of organic matter (baling straw), all field operations (tillage, fertilizer and manure applications and harvest), rates of erosion, erosion control, and sediment control practices are entered into the program. The SCI is an additive equation that uses the subfactors of organic matter, field operations and erosion rates, with each subfactor having an assigned multiplier.

Limitations

The SCI may produce misleading results when one of the components is near zero, so it is cautioned not to use the SCI as a sole assessment of soil quality or con-

servation planning. It is designed to help the producer plan and design conservation crop rotations and residue management practices when low organic matter, poor soil tilth, surface crusting, or erosion are identified as concerns. It is not a soil quality index. It assesses only one component of soil quality, soil organic matter, and it does not indicate what level of soil organic matter the soil should have.

Recent Changes Made by NRCS

Following the May 4, 2004 Federal Registry announcement defining the process to determine the priority watersheds and the details of enrollment categories that will be used in the FY2004 sign-up for the Conservation Security Program, the Minnesota Project and associated organizations discussed the use of the SCI and the STIR, the soil tillage intensity rating as Enrollment Category criteria.

In running farm systems models using the NRCS RUSLE2, it became apparent that farmers using no-till and low-tillage farming systems would attain a higher ranking over all other farming operations. This would have occurred because of using STIR as a major component of the category eligibility criteria.

After discussing this with NRCS soil scientists and agronomists, STIR was eliminated as a category eligibility component. Although STIR was removed, field operations and tillage still remain a component in the SCI formula. Extensive use of tillage, without using green manures or incorporating other organic material such as composts and manures will reduce the SCI score.

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Soil Conditioning Index

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Crop Systems Management	Soil detach. Tons/acre/yr	Sediment Del. Tons/acre/yr	SCI
#1 COMMM	1.9	0.98	0.8
#2 CCB (mulch)	4.7	2.6	0.2
#3 CB (NT)	2.2	1.4	0.4
#4 CB (Till)	6.3	3.6	-0.2
#5 CB (manure)	6.2	3.6	-0.1

Scenarios

To put the proposed SCI into perspective, the Minnesota Project ran several scenarios to determine the SCI outcome of different types of farming systems.

A southeast Minnesota dairy operation, Dairy Hills Farm, is situated in a productive trout stream watershed and is seen as a model for conservation. In addition to the sensitivity of the trout stream, the farmland is hilly, with slopes ranging from 5 to 15% of silt loam soils. Contour rotation cropping strips and a mid-slope water control diversion are also utilized in this example.

Scenario #1 represents the farming system of Dairy Hills Farm. The cropping scenarios #2- #5 are alternatives that will be compared for sediment detachment and delivery, and SCI score:

1. Corn-Oats-3Year Alfalfa (manure, fall mold-board after alfalfa, chisel, spring field cultivate after corn)
2. Corn-Corn-Soybean (anhydrous ammonia application for corn years, chisel and field cultivate before planting and no-till soybeans)
3. Corn and Soybeans Rotation (All No-till with anhydrous Ammonia application)
4. Corn-Soybean Rotation (fall chisel, and spring field cultivate for each crop; anhydrous ammonia for corn)
5. Corn-Soybean Rotation with liquid manure application, field cultivate and fall disc/chisel.

Summary

The models above indicate that the current farm system, which includes three years of perennial cover in the form of alfalfa in a diverse crop rotation, and produces the least erosion has the highest SCI. SCI scores are reduced as more tillage is used under a two-crop rotation such as corn and soybeans.

Notes

*For Category A - In addition to the SCI score the producer must also have had three Stewardship Practices in place for two or more years, have at least three Stewardship Activities in place for two or more years and agree to further improvements. The categories B-H have similar requirements and can be found in detail at www.nrcs.usda.gov/programs/csp.

**Scenarios #1-5 are management templates developed for RUSLE2 and applied specifically to the climate, soils and terrain of a field in southeast Minnesota. Soil detachment, sediment delivery, SCI are products of the RUSLE2. ■

Photo opposite page: Contour strips of alfalfa and corn interwoven with pasture and woodlands on a Midwest dairy. Whole farm planning systems that incorporate resource conserving crop rotations with legumes, hay, and pasture will score a higher Soil Conditioning Index and result in lower soil detachment and sediment delivery.

CSP Is Here...

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sign-ups for only selected watersheds, and enrollment categories that will appear like hurdles in the paths of farmers who have long anticipated the Conservation Security Program as the way all farmers can receive financial incentives for good stewardship.

This approach to implementation clearly moves the Conservation Security Program in a direction that appears contrary to the intent of the law passed in the 2002 farm bill. The USDA knows this—nearly 12,000 individuals and organizations across the full spectrum of agriculture and conservation told the NRCS this during the recent comment period.

Unfortunately, it now appears that the NRCS was planning to move forward on their controversial restrictive plan regardless of the comments they received. As early as March 17, only two weeks after the comment period closed, and while the NRCS in Washington was still denying public access to the comments while they were being processed and catalogued, in a speech to NRCS employees in Washington NRCS Chief Knight referred to a watershed-based implementation approach as if it were inevitable: “We need to have employees be more mobile—able to help producers in the watersheds where CSP is active.”

Therefore, it came as no surprise on May 4 when the NRCS published the process by which they would implement the Conservation Security Program using selected watersheds and enrollment categories. This

notice in the Federal Register describes the enrollment categories, prioritized in descending order from A to H, that will be used to determine eligibility for potential funding of contracts.

Enrollment Categories to Limit Applications

A key component in the enrollment categories for cropland will be the use of a Soil Conditioning Index (SCI). How a farmer scores using this model, in combination with the number of existing conservation practices and stewardship activities that are in place on the farm at the time the farmer completes a self-assessment benchmark inventory of the operation, will determine if the farm is eligible to complete a CSP application for the sign-up that is occurring in the watershed where the operation is located.

The May 4 notice also included a Soil Tillage Intensity Rating (STIR) that does not appear in the Interim Final Rule. Sustainable agriculture groups and soil scientists raised concerns that the use of the STIR would favor no-till cropping systems over other equally effective management systems. Chief Knight announced on June 9 that the STIR had been eliminated from the rules.

Chief Knight has also stated that the 15 percent limit on technical assistance that is mandated in the Conservation Security Program statute presents a challenge to the agency. Other conservation program technical assistance runs around 22 to 24 percent of

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Photo by Mike McGrath

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the total funding available each year. Thus, it will be important for producers to do much of their own assessments to determine if they are eligible.

To address this, the NRCS has developed a producer self-assessment process that shifts some of the burden of determining program eligibility away from the NRCS field staff, and on to the farmer. According to the Chief, this action will help reduce unnecessary field staff time spent on applications for which there is no funding. It will also help determine in which of eight enrollment categories a farmer would qualify.

Most advocates of the Conservation Security Program have long viewed this innovative legislation as the means by which all farmers will be eligible to receive financial incentives for implementing conservation plans that protect natural resources. All farmers would include conventional commodity crop producers, as well as ranchers, fruit and vegetable growers, and organic producers.

The Conservation Security Program was written into law to be the nation's first true "green payments program" that is WTO (World Trade Organization) friendly. In this green box category it is legitimate to provide financial incentives to farmers who provide public environmental benefits like clean water, clean air, and wildlife habitat.

Whose CSP Is It?

Last year, the NRCS asked for public input to 15 questions that basically were already answered in the law.

Nine months later the agency published its proposed rules, asking for a "robust comment period."

That comment period was very robust, generating the largest number of comments for a conservation program in the agency's history. Unfortunately, the Interim Final Rule has left the most controversial components of the proposed rules intact under the guise that no better way was suggested in the 12,000 comments to run the program.

It appears the Administration is missing a big opportunity with the Conservation Security Program. The nation's agriculture and natural resource conservation community stands ready to embrace a national conservation incentives program that makes natural resource protection and enhancement an integral and inherent part of all agriculture planning.

The Conservation Security Program was written and passed into law to be that national conservation incentive program. But the rules that are being presented by the NRCS make the Conservation Security Program, in the words of Chief Knight, "another conservation program for the tool box." These rules have been written to severely limit the scope of the program, and as written, will easily allow the program to be subjected to political gerrymandering.

As the fight for expanded funding plays out, there will be tremendous pressure to substantially revise a final rule to guide a future expanded CSP.

Look for our next edition of the Whole Farm Planner where we will profile farms that have enrolled in the first CSP sign-up. ■

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