



October 28, 2009

Gregory Johnson, Director
Financial Assistance Programs Division
U.S. Department of Agriculture
Natural Resources Conservation Service
1400 Independence Avenue, SW
Room 5237-S
Washington, DC 20250-2890

Submitted via rulemaking website at <http://www.regulations.gov>

RE: Conservation Stewardship Program Interim Final Rule.

Dear Sir or Madam:

The Izaak Walton League of America (the League) is a private, non-profit conservation organization that for more than 85 years has supported strong federal conservation policies on private lands, especially agricultural lands. Our nationwide membership lives, works and recreates in rural communities. We have a decades-long record of support for farm families and collaborative efforts to achieve conservation that sustains agricultural production, fish and wildlife habitat, and all natural resources.

IWLA comments:

Preamble to IFR "Discussion of Program"

The preamble to the Interim Final Rule provides a "Discussion of Program" section including specific topics for comments requested by NRCS.

“...NRCS requests public comment on ways to address program acreage and payment constraints, refine their payment approach, and make annual payments more consistent and predictable.”

The League encourages NRCS to address the constraints and consistency concerns at least partially through strict adherence to the payment limitations established for CSP in the IFR (section 1470.24), and through the addition of a minimum annual payment for operations with smaller acreages but large conservation commitments. The established payment ceiling provided by \$40,000 annual and \$200,000 total-contracts limitations provides an important device to help in the pursuit of program-wide predictability. However, this benefit is only realized through strict adherence to the limitations, which we strongly advocate. Variances from the limitations will certainly reduce predictability and have the opposite result to the stated desire for refining your payment approach. Similar to the payment ceiling, establishing a payment floor will provide additional assistance for payment predictability. As discussed below in our comments on section 1470.24, an established floor of \$1,500 minimum annual payment will more equitably deliver the program among different operations—balancing opportunity and incentive for rangeland or large acreage row crops, for instance, with that for the expanding sector of small-acreage (<50 acre) operations. The established minimum payment will further assist the consistency and predictability for both program participants and administrators.

“...NRCS seeks public comment on the proper distribution of CSP annual payment between payment for additional activities and payment for existing activities.”

The League strongly urges balancing additional activities and existing activities in the design and administration of CSP. Our long-standing and energetic support of the program model first established by the Conservation Security Program, and now embodied by the Conservation Stewardship Program, is directly rooted in the concept that CSP can serve as an alternative to and improvement upon traditional commodity support programs. From this perspective, rewarding existing (or perhaps better described as “continuous”) conservation activities is justified by both the environmental outcome received and the ongoing costs associated with effective activities. But furthermore, in comparison to Direct and Counter-cyclical payments for instance, CSP payments for existing activities provide a superior alternative—both in policy design and in producer incentives—to the DCP payments that are based on past activity (production) but provide and require no beneficial outcome. The League believes that where other NRCS conservation programs directly focus on the voluntary adoption of conservation activities, the role of CSP is to maintain, inspire, and expand conservation activities benefiting the public good. In so doing, CSP serves as a new model for federal support of U.S. agricultural production. And as market prices and input costs have become increasingly unpredictable and disconnected from the established commodity-support program paradigm, as represented by loan rates, the policy model of a balanced CSP is only becoming more important and deserving.

“NRCS seeks public comment on the contract renewal criteria in the interim final rule.”

As an added emphasis on our immediately preceding comments regarding the role and opportunity achieved with a balanced CSP, contract renewal is critical both for maintaining expanding conservation performance and for providing an alternative to perpetually renewable Farm Bill Title 1 programs. Renewal criteria must ensure the maintenance of ongoing conservation activities and the opportunity for additional activities, again thereby demonstrating positive public outcomes from public investment that is not similarly demonstrated with Title 1 payments.

“NRCS specifically requests through the comment process information on innovative enhancements NRCS should offer under CSP to improve participant’s conservation performance.”

The League strongly recommends that NRCS establishes and actively promotes enhancements for fish and wildlife habitat. As a resource concern, fish and wildlife habitat is virtually unique as an example of conservation activities that appeals to all levels of land stewards and that is available across all land uses, operation sizes and types, and production systems, including specialty crops and organic production. In a report on the Conservation Security Program’s benefits to fish and wildlife¹ (produced in partnership by the National Wildlife Federation, the Sustainable Agriculture Coalition, and the Izaak Walton League of America), it was clearly documented that CSP can provide extensive benefits when purposefully incorporating fish and wildlife goals. The opportunity for dramatic results exists, but special emphasis must be established for prioritizing opportunities for habitat enhancements. Coordinating with wildlife professionals at state and federal agencies, and utilizing the State Wildlife Action Plans² developed in each of the 50 states, are key elements for success.

§ 1470.3 Definitions.

The League supports the statutory establishment of supplemental payments for a *resource-conserving crop rotation*. However, the definition of a resource-conserving crop rotation 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. Further, rotations that include only Farm Bill Title 1 program-eligible commodity crops should not qualify as resource-conserving crop rotations.

§ 1470.24 Payments.

NRCS should establish a \$1,500 minimum annual payment to encourage small operations to participate in CSP. A minimum annual payment would further the IFR authors’ stated goal of increasing program appeal among all levels of land stewards and across all land uses, operation sizes and types, and production systems, including specialty crops and organic production. In particular, smaller acreage operations are a growth sector in U.S. agriculture and are often characteristically both strong conservationists and resource-

¹ *Hidden Treasures: the Conservation Security Program and Wildlife*, January, 2007, Washington, DC.

² http://wildlifeactionplans.org/about/action_plans_success.html

intensive producers. A minimum payment will assist in the effective delivery of CSP and improve the conservation results obtained by the program.

Conclusion:

The Izaak Walton League of America supports the IFR with the further changes and clarifications we have detailed above. We thank you for your consideration of these comments. Please direct any inquiries regarding this submission to Brad Redlin, IWLA Agricultural Program Director, bredlin@iwla.org, (651) 649-1446 ext. 13.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Redlin', with a long horizontal line extending to the right.

Brad Redlin
Izaak Walton League of America
Agricultural Program Director
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St. Paul, MN 55104