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USDA Announces Scaling Back Of Conservation Security Program

WASHINGTON, D.C. On May 4, the Bush Administration will announce its plan for implementing the landmark Conservation Security Program (CSP). The final plan will be published in tomorrow's Federal Register. The Administration is publishing the plan without seeking outside input, despite an earlier written commitment to first seek public comment.

The plan sets out a two-tiered approach to drastically limiting the number of farmers who will be eligible to participate in the CSP. Only farms in certain "priority watersheds" and only some "categories" of farmers within those limited number of watersheds who will be allowed to participate in the CSP. The plan runs counter to the 2002 Farm Bill call for a nationwide program with all farmers practicing effective conservation and environmental protection eligible to participate.

The Bush Administration intends for the restrictive approach to eligibility to be permanent, even though the tight \$41 million CSP budget cap for fiscal year 2004 comes off at the beginning of the new fiscal year in October and the program returns to its 2002 Farm Bill status as a conservation entitlement program. The notice being released on Tuesday clearly states that the same watershed and enrollment category restrictions will also appear in the final rule for the program when it is published later this spring, meaning the restrictions are intended to apply for 2005 and all future years.

"The Administration is now declaring its intent to deny the country's best conservation farmers the opportunity to participate in the CSP unless they are lucky enough to live in a selected watershed," said Ferd Hoefner, policy director for the Sustainable Agriculture Coalition. "Their exclusionary approach is at odds with the law and will effectively eliminate the CSP as the nationwide, comprehensive environmental program intended by Congress in the 2002 farm bill. The eligibility test for the CSP should be top-notch conservation and environmental performance, not where you happen to live."

"Over 14,000 farmers and other citizens wrote to USDA in response to the CSP proposed rule released at the beginning of the year, the most comments by far ever received by USDA for a conservation program. Nearly all of them rejected the restrictive watershed approach among several other key problems with the rule, including extraordinarily low payment rates," said Hoefner. "We urge the Administration to heed the overwhelming public input and reverse course in the upcoming rule to implement the CSP for 2005 and beyond."

The Coalition has studied an advance copy of tomorrow's publication. Our summary follows.

Watershed Selection Plan

In brief, USDA first will rank watersheds by the total amount of pesticides, fertilizers and manure applied to the land in the watershed, and then, from among those with the highest "input intensity," pick those with the most historically applied conservation practices. The ranking will then be weighted to give priority to those watersheds that are in the middle of the pack in terms of both input intensity and degree of conservation practice adoption. The final step in selecting the winning watersheds will be picking those that will have the lowest administrative costs, shifting the selections to places in the country where agency administrative capacity is already high.

"This complex set of selection criteria to find some magic middle ground between the most vulnerable watersheds and the most committed conservationists is overly complicated and in fact unnecessary after this fiscal year," said Hoefner. "Rather than fuss through an arbitrary watershed selection process, the Administration could ensure efficient delivery of the \$41 million available right now by allocating it to the states and allowing the state offices to enroll farmers on a pilot, lottery-type basis, without further delay. Then the Administration could focus all its efforts on preparing a plan for 2005 and beyond that is in accord with the requirements of the farm bill."

Ranking Categories of Farmers

Within the selected watersheds, USDA plans to enroll farmers in the program according to what "category" they fall into. Only the top ranked categories will be admitted. For cropland, the requirements for the highest ranking category is to have an existing conservation system that is adding carbon to the soil, using no-till or very minimum tillage practices, having in place at least 6 different conservation practices and activities from a prescribed list of eligible practices and activities, agreeing to adopt two new conservation practices or activities from the prescribed list, and agreeing to implement an on-farm conservation research and demonstration or on-farm conservation assessment and evaluation project. Each declining category below that has fewer or lower requirements.

"Congress specifically directed that no ranking system be used in implementing this program," noted Hoefner. "While the proposed requirements for the top categories may have some merit, we oppose the ranking system. The Administration should set a reasonably high environmental bar for participation and reward all farmers willing and able to respond to the challenge. Our farmers deserve good options for the days ahead when traditional farm commodity-oriented programs are no longer viable. The CSP not only provides farmers a trade rule-compliant option, but delivers an enormous public good in the form of environmental benefits. We will continue to urge the Administration to deliver a full-fledged program."

The Conservation Security Program is a comprehensive stewardship incentives program that provides financial and technical assistance to farmers and ranchers to reward them for investments of labor, management, and capital aimed at fostering healthy, productive, and non-eroding soils, clean air and water, energy savings, wildlife habitat, and prairie, wetland, and other ecosystem restorations. Unlike the US commodity programs which are under attack in the WTO, the CSP is a trade rule-compliant "green box" program aimed not at increasing production but rather at maximizing long-term environmental benefits. The sustainable agriculture community was a leading proponent of the initiative during the 2002 Farm Bill debate and continues to monitor implementation closely.

For more on watersheds and categories, [click here](#).

To view the CSP federal register notice, visit www.nrcs.usda.gov/programs/csp.