



SAC Responds to USDA Press Release

*Sustainable Agriculture Coalition Annotations and Comments on Secretary Veneman's Press Release
Re: Conservation Security Program*

USDA News Release: USDA Establishes Watershed Approach For Conservation Security Program

Notice Published on Process to Determine Priority Watersheds and Details of Enrollment Categories

WASHINGTON, May 4, 2004-Agriculture Secretary Ann M. Veneman today announced the watershed approach and details of the enrollment categories that will be used in the fiscal year 2004 Conservation Security Program (CSP) sign-up to be held this summer.

"Watersheds are nature's boundaries and are a good way to group together producers working on similar environmental issues," Veneman said. "With a rotation through the nation's watersheds, every farmer and rancher will have a chance to participate in the program and will provide the flexibility needed to expand the program as more funds become available."

In order to implement CSP this fiscal year, the Natural Resources Conservation Service will immediately begin to train employees on the selection process to determine priority watersheds and establish enrollment categories as described in the Federal Register notice published today.

SAC Comment: If "priority" watersheds are being selected, but every watershed in the country will be selected over the next 8 years, in what way are these "priority" watersheds. Is USDA's intent in years 5-8 to run a program focused on low priority or non-priority watersheds? What will that announcement look like? - "this year we are glad to announce that a major environmental initiative in low priority watersheds." Despite the complex and convoluted formula in today's notice for determining "priority" watersheds, this is not about determining water quality or any other priorities, nor is it science-based, but rather is ruse to deny farmers the opportunity to enroll in the program.

USDA will use watersheds as a basis to determine CSP participation. Economically, the \$41 million budget for CSP in fiscal year 2004 will permit NRCS to write 3,000 to 5,000 contracts. With 1.8 million potentially eligible producers, CSP funds must be focused.

SAC Comment: It is certainly not the case now, and sadly probably never will be, that 1.8 million farmers are eligible for the CSP. The CSP requires the highest environmental standards of any conservation program in the history of USDA. In order to participate a producer must reach or exceed all of the relevant NRCS conservation practice standards and quality criteria. For instance, participants would have to control erosion at or below the soil loss tolerance level, yet over 100 million acres of cropland currently erode at higher rates, representing hundreds of thousands of producers. In fact, if all 1.8 million producers were indeed eligible for CSP it would be a happy day - there would be few natural resource and environmental problems associated with agriculture, and NRCS could downsize to a skeletal operation.

Administratively, the law requires that NRCS not incur more than 15 percent technical assistance costs associated with CSP. Under this scenario, a nationwide program would not work; a watershed rotation offers a fair, science-based alternative.

SAC Comment: It is true that a full-scale nationwide program for 2004, while funds are limited to \$41 million, is not possible, and that the watershed approach is one option for dealing with this problem, though hardly the most logical or efficient. But this is due primarily to the funding cap, not to the 15 percent technical assistance cap. As the program grows, so do funds for technical assistance funds grow in absolute dollars, enabling the agency to keep up with the workload.

All CSP applications that meet the sign-up criteria will be placed in an enrollment category regardless of available funding. In addition to legal contract requirements, the categories will consider the applicants' current stewardship (soil condition, tillage intensity, existing practices and activities) and will sort producers based on these factors. Categories also will examine producers' willingness to perform additional conservation activities during their CSP contract.

CSP is a voluntary program that supports ongoing conservation stewardship of agricultural working lands and enhances the condition of America's natural resources. Additional information on CSP, including the Federal Register notice, public comments and frequently asked questions, is at www.nrcs.usda.gov/programs/csp.

SAC Comment: The CSP is an important part of the future profile of US farm programs, a future that will almost certainly require a downsizing of production promoting and environmentally harmful commodity programs. As the first US green payments program, the CSP needs to be available on a regular and ongoing basis to US farmers and ranchers, not on a hit and miss basis.