



SIERRA CLUB MARIN GROUP

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Financial Assistance Programs Division
Natural Resources Conservation Service
FarmBillRules@usda.gov, Subj: Attn: Conservation Security Program

RE Conservation Security Program: Comments on the Interim Final Rule:

The Sierra Club Marin Group supports sustainable agriculture in Marin County. We have reviewed the Interim Final Rule for the USDA Conservation Security Program (CSP) and consistent with the Club's position on this Rule, we wish to make the following comments specific to Marin County agriculture.

The CSP should be a nationwide program available to all types of producers in all regions of the country with all types of conservation objectives, as provided for in the 2002 Farm Bill. Marin County has an agricultural base of small and medium sized producers an increasing percentage of which are sustainable and organic. CSP was designed for growers like these, who never had the opportunity to participate in conservation programs or were never encouraged or rewarded for protecting natural resources.

The CSP should not have a cap on the base, existing practice, and enhancement payments that is based on the rental rate of the acreage enrolled in the CSP. The proposed "per acre" percentage cap would penalize farms in Marin which pay high land rents of the SF urban area yet whose conservation practices might well exceed the cap. Conservation benefit, not rental rate should be the payment determinant.

The CSP should provide enhancement payments to farmers and ranchers who establish and maintain complex management systems and practices that provide a high level of environmental and natural resource benefits. Marin producers are within a dense urban environment in micro-climates with limited water availability. The CSA should provide enhancement payments for farming in Marin that uses innovative practices for energy and water conservation, crop rotational systems, grazing rotational systems, conservation buffers, environmentally sound management of invasive species and predators, and protection for native grasses and pollinators. The CSP should continue the enhancement payments for on-farm/ranch research and demonstration activities, and for on-farm/ranch evaluation activities

The CSP should improve the cost-share payment for new practices by removing the 50% cost-share cap and restore the 15% bonus for beginning farmers and ranchers. Marin producers need more equitable cost share caps. The CSP 50% cost-share cap for new practices is much lower than cost-share payments established for conservation practices in many other farm conservation programs and may serve as a disincentive for farmers and ranchers to participate in the comprehensive approach to conservation provided in the CSP. Marin needs to attract and hold new farmers and ranchers, but the CSP's lack of a 15% cost-share bonus may be a disincentive for beginning farmers and ranchers.

The CSA should remove the requirement that farmers and ranchers must meet specific quality criteria for soil and water quality in order to be eligible to apply for the program and instead require that farmers and ranchers meet high soil and water quality criteria within a reasonable time after participating in the CSP. Many farmers and ranchers in Marin need help achieving the high environmental goals of the CSP. But, rather than preventing farmers and ranchers who do not meet high soil and water quality criteria at the time of applying for the CSP from participating in the program, CSP conservation plans and contracts should provide that the participant will meet these high soil and water quality criteria within a reasonable period.

Sincerely,

Gordon Bennett
Sierra Club Marin Group Vice Chair