



Montana
Native
Plant
Society

To observe - conserve - educate

P.O. Box 8783 Missoula, MT 59807

19 January 2004

Mr. David McKay
Conservation Operations Division
Natural Resources Conservation Service
P.O. Box 2890
Washington DC 20013

Dear Mr. McKay:

We are writing on behalf of nearly 500 members of the Montana Native Plant Society (MNPS). We are an organization dedicated to preserving, conserving and studying the flora of Montana and educating the public on the values of the native flora and its habitats. We are writing to comment on the proposed rule for implementing the Conservation Security Program (CSP).

We applaud CSP's goal of rewarding and motivating conservation in the private sector. Our concerns are simple; we want to be certain that encouraging progressive agricultural practices does not result in the loss of native prairie in Montana or elsewhere. Prairie is one of the most endangered ecosystems in North America; what remains should be preserved. MNPS believes that farmers and ranchers who sodbust should not be rewarded with public funds meant to promote conservation. Section 1470.5 of the proposed rule for CSP addresses the problem of sodbusting by requiring that enrolled land be devoted to crops for four of six years preceding enrollment. This requirement is good as far as it goes. However, we are concerned that a producer can still enroll cropland in CSP while sodbusting in other areas of his operation. We urge NRCS to include prairie conservation as a nationally significant resource concern. In this way a producer would not be eligible for Tier II or Tier III payments if he sodbusts on any part of his operation. Sodbusting is a serious conservation problem in Montana and other states on the Northern Great Plains. We hope that NRCS will recognize the problem and develop rules for CSP that educate producers on the value of native prairie and encourage its preservation. Thank you for considering our concerns.

Sincerely,

Elizabeth Kuropat
President

Peter Lesica
Conservation Chair