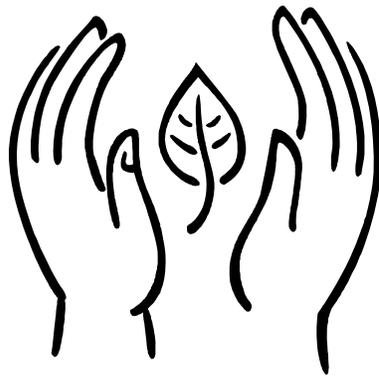

The Conservation Security Program: An Assessment of Farmers' Experience with Program Implementation



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September 2006

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Acknowledgements

The author wishes to acknowledge those who assisted in the production of this project. We particularly acknowledge those whose involvement made the interviews with farmers and ranchers possible, Jeanne Merrill with Michael Fields Agricultural Institute, Adam Warthesen with Land Stewardship Project and Practical Farmers of Iowa. We thank the participating farmers and ranchers for their time and contributions to the interviews.

We would like to acknowledge the Board of Directors of the Center for Rural Affairs, who made the hotline and preparation of this report a priority project of the organization.

Finally, we would like to thank those whose financial support made this report possible. Funding for the Conservation Hotline was made possible by the Joyce Foundation of Chicago, Illinois, and by the generous donations of supporters of the Center for Rural Affairs. We are grateful they trust us with their support to offer research and action that will benefit the communities and people of this region.

Introduction

The Conservation Security Program (CSP) is a voluntary stewardship incentives program designed to reward farmers and ranchers for adoption of advanced conservation systems that provide environmental services benefiting the country as a whole. This landmark “green payments” program, created by the 2002 Farm Bill and first implemented by the US Department of Agriculture (USDA) in 2004, pays farmers for clean water, better soil management, improved habitat, energy efficiency, and other natural resource benefits. The CSP provides farm support in a manner consistent with the public interest and world trade rules and obligations.

At its heart, the purpose of CSP is to vastly improve farmland conservation and environmental protection by rewarding farmers across the country for long-term and steadily-improving conservation practices on their land over a period of years, based on carefully developed and reviewed conservation plans. However, since the passage of the CSP, there have been several administrative policy decisions and congressionally-approved funding cuts that have limited the program severely to the detriment of many conservation minded farmers and ranchers.

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Through this paper we hope to address some of the many issues impacting the effectiveness of the CSP. We will examine these issues by taking a look at the program with the assistance of farmers’ perspective, provided through calls to the Center for Rural Affairs’ sponsored National Conservation Hotline and enhanced by follow-up interviews. This study explores the farmers/ranchers experience with the 2004, 2005 and 2006 CSP sign-ups. For this program to be successful in its mission of “rewards the best and motivating the rest,” it is critical that we listen to and learn from the farmers and ranchers that have explored and/or completed a CSP contract. Their perspective offers insights on CSP’s strengths, weaknesses and barriers that are delaying conservation on working land.

This paper will examine the challenges of the CSP; discuss what we have learned through the National Conservation Hotline and the interviews; and conclude with recommendations for the future years of the CSP. We also discuss CSP history and its impact on the resource stewards it was designed to serve.

The Founding and Historical Challenges of the Conservation Security Program

The birth of the CSP can be traced back to the farmers and ranchers it was designed to serve. Through the Sustainable Agriculture Coalition (SAC), conservation minded farmers and ranchers advocated for a program to benefit innovative farmers and ranchers utilizing sustainable agriculture and conservation systems. The Coalition stated, “With the CSP being designed as a conservation systems approach rather than a single practice approach, by requiring that real resource problems be solved to a sustainable use level, and by emphasizing cost-effective management practices, resource enhancement, and monitoring and assessment, it marks the most comprehensive and rigorous federal agricultural conservation incentive program to date.”¹

Since CSPs birth many barriers have been erected, impeding the ability of all conservation minded farmers and ranchers to participate. Though the farm bill provided CSP with full mandatory funding, through the Commodity Credit Corporation, it was quick to change.

There were three big cuts – first one for disaster offset in Fiscal Year (FY) 03 appropriations, which was then restored in FY04. Then they cut it again for disaster assistance in FY05, and that one hasn’t been restored. Then in budget reconciliation, they cut it even more. Those big cuts alone reduced the program by \$4 billion. Then each year in annual appropriations bill, the House proposes to clamp down on annual spending, while the Senate honors the farm bill and does not cap the program. But each year the House and Senate compromise, further reducing CSP spending amount by \$180 million, with the 2007 bill still pending.

Annual budget cuts have been much to the detriment of the program.

These cuts and a slow rulemaking process by USDA have impeded participation. The 2002 Farm Bill directed USDA to complete rules for the CSP by February of 2003. Instead USDA released that month an Advanced Notice of Proposed Rulemaking seeking comments on how to write the proposed rule. That was followed by a Proposed Rule almost a year later in January of 2004. Following this, USDA published an Interim Final Rule in June of 2004, which guided the initial CSP sign-up for FY2004. The most recent rule published for the CSP was the Amended Interim Final Rule, released on March 25, 2005 and it guided the FY2005 and FY2006 sign-up periods.

The scope of the program was further narrowed by USDA’s decision to restrict the amount of funding available through the farm bill for staffing and technical assistance to run the program. The statute allocated up to 15 percent of CSP funds for technical assistance, but USDA chose to interpret that restrictively as 15 percent of current year funding rather than of the total value of CSP contracts. That reduced staff for implementation, severely limiting the number of watersheds open to CSP each year.

The 2004 enrollment was available in only 18 watersheds across the country. In 2005 CSP was available in 202 new watersheds. In addition, farmers and ranchers in the initial 18 watersheds were given a second chance due to the short notice for the 2004 enrollment. The 2006 enrollment was scaled back from 110 watershed to 60 because of funding cuts. Consequently, enrollment has been limited to 20,000 farmers in 280 watersheds.

¹ Sustainable Agriculture Coalition, Comments to Proposed Rule, arch 2, 2004. This statement reflects the original intent of the CSP and what the conservation-based farmers envisioned when working towards the CSP. The desire to examine the CSP implementation process through the farmers’ perspective comes from our desire to preserve the original intent of the program, which as indicated above was driven by conservation-based farmers.

Methodology

We gathered information in two ways: first, through our National Conservation Hotline for farmers and ranchers seeking CSP information; and second, through interviews of farmers and ranchers regarding their experiences with the CSP sign-ups.

Both provided a clear view of CSP implementation from farmers and ranchers perspective. We did not set out to do a scientific study. Rather we sought insights from farmers and ranchers to inform CSP implementation and the upcoming farm bill debate.

The Center for Rural Affairs National Conservation Hotline is operated by Traci Bruckner, Assistant Director of the Rural Policy Program, and Kim Preston, Research Assistant for the Rural Research and Analysis Program. We fielded calls from across the country, including farmers and ranchers in the applicable watersheds as well as those that were not but nonetheless wanted to learn about CSP.

The interviews were conducted on the 2004, 2005 and 2006 sign-up periods, either via phone or face-to-face.

For the interviews we contacted farmers we knew had been in applicable watersheds to inquire about their experience with the CSP sign-up. We also interviewed farmers who had originally contacted the hotline. These farmers implement a range of different farming systems and practices, including highly diversified cropping systems to less diversified, no-till cropping systems.

We asked what their farms looked like and what types of conservation practices they had been implementing; whether CSP adequately compensated them for their conservation efforts; whether CSP motivated them to do more conservation; whether the program was fair to all types of operations; whether it was biased toward any specific practice; whether they agreed with watershed rotation; and their views on program strengths and weaknesses and suggestions for improvements.

What We Have Learned

We have found that CSP is a very promising conservation program. Farmers and ranchers are very excited about its potential. But cuts in program funding have prevented it from achieving its full potential. Moreover, it has been further impeded by administrative implementation problems.

The National Conservation Hotline and Farmer Interviews

The National Conservation Hotline and interviews enabled farmers and ranchers to share their concerns with CSP, which are significant. But they also shared their belief in the concept of rewarding sound conservation and overwhelmingly support such a policy direction.

One farmer stated, “We finally have a government program that pays for social and environmental benefits and it is a step in the right direction and has good bi-partisan support.”

Another farmer noted, “There are a lot of good points and strengths. In our circumstance on our farm it showed that you can still use tillage and don’t need to be no-till. I always tried to farm the way that I thought was conservation oriented and this is a way to have a third party verify our practices make sense. Basically, it gives credibility to our way of farming.”

The above statements demonstrate the strengths of the CSP and the difference it has made to farmers who have always farmed with conservation, rather than against it. In that spirit, this report looks at problems with the program and how they can be strengthened.

The hotline and the interviews highlighted some recurring themes. The most prominent program weaknesses in CSP implementation include: 1) Restricting enrollment to a small number of watersheds. 2) Deficiencies in the Soil Conditioning Index and RUSLE2 software on which it is based; 3) The need for on-farm research and demonstration; 4) Problems with payment rates; 5) Difficulties with measures used to narrow program participation; and 6) other concerns such as administrative complexity and the administratively fashioned per acre contract limit, used in the 2004 sign-up only, was biased against smaller farms.

Program Implementation Weaknesses

1) Restricting Enrollment to a Small Number of Watersheds and Lack of Full Funding

Despite the fact that the 2002 Farm Bill provided for nationwide CSP enrollment, USDA implemented the program in a limited number of watersheds each year. Its plan is to eventually reach every watershed in the country, on an ongoing “watershed rotation” basis, but at the current pace it will take an entire generation to just get through the first rotation.

Due to the limited geographic scope of the watershed rotation, many of the initial calls came from folks wondering whether they were in an eligible watershed. Those callers wanted to know when their area would be eligible and they wanted to learn as much as they could about the program.

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The farmers and ranchers interviewed disagreed with the watershed rotation. They expressed concern that CSP will not be open to all farmers and ranchers who deserve to participate. They indicated the program should be fully funded and available nationwide.

A few farmers understood the rationale of using the watershed rotation given the complexity of the program. One farmer said, “I understand the rationale. But once the learning curve is over CSP should be implemented as a fully funded program open nationwide.”

Following the 2006 sign-up, farmers contacted the hotline upon determination that their contracts were not approved due to the funding running out before it reached their applicable category. NRCS created a ranking system that limits CSP eligibility to particular, unspecified “categories” and “subcategories” of farmers and ranchers. This limitation is contradicted by the clear language of the statute. Eligible producers are clearly defined by the law. To participate in the CSP, eligible producers must meet the

statutory requirements of the program, including the minimum requirements for each tier determined and approved by the Secretary. The Secretary has the authority to set reasonable environmental requirements for the conservation plans required for participation in each tier but does not have the authority to make otherwise eligible producers ineligible based on selection categories unrelated to the tiers.

This is creating controversy amongst farmers. Those who did not get a contract believe it will result in additional competition for land because their neighbors that did receive a contract will have additional funds in which to accrue more acres. This certainly makes the case for fully funding the program. It was not designed to provide a competitive advantage to one type of producer over another or producers in one watershed of producers in another watershed, but rather to reward effective conservation systems. To the extent it provides a competitive advantage, it is intended to do so by providing the advantage to those who practice good stewardship.

2) The Soil Conditioning Index (SCI) and RUSLE2 Software.

The impact of the Soil Conditioning Index (SCI) on eligibility and payment rates is of great concern to farmers and ranchers. The SCI is a predictive model that estimates trends in organic matter, not the amount of organic matter. A higher score is indicative of “more confidence that a trend in soil organic matter will be significant.”² In other words, it is not a measure of actual soil quality but rather a measure of whether a management regime is likely to improve soil quality and by how much. The SCI score is also focused solely on soil carbon (organic matter) and not on any of the other important components of overall soil quality.

The score a farmer receives under the SCI is heavily influenced by the number of field operations that stimulate organic matter breakdown. Therefore, it appears that the SCI is weighted toward cropping systems that use very limited tillage or no tillage at all. Farmers and ranchers indicated they believe the program is biased and tilted towards no-till, mono-cropping agriculture systems.

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The SCI score appears to be impacted by soil type as well. A Minnesota farmer indicated that there are certain soil types that are difficult to ever build proper organic matter irregardless of the cropping and tillage systems being used. The SCI score that was low on those soils and was having a negative impact on the eligibility of this farmer’s entire farm as well as the payment rates he would receive through the CSP. This farmer indicated that some farmers were receiving high payment rates based on their SCI score, which was heavily influenced by the soil type of the farm not necessarily their farming practices.

The sole reliance on the SCI to determine CSP eligibility and payment rates for soil quality is unfortunate, especially in light of reviewing the Natural Resource Conservation Service’s own materials that caution against the use of SCI as the sole assessment of soil quality or conservation planning. The document states:

² Interpreting the Soil Conditioning Index: A Tool for Measuring Soil Organic Matter Trends. Soil Quality Institute—Agronomy Technical Note No. 16.

As with any model or assessment tool, the SCI should be used in combination with other observations and evaluations...In addition to the level of organic matter, other important aspects of soil quality are the quality of organic matter, compaction, crop diversity, salinity, sodicity, sedimentation, soil biota, nutrient management, contaminants, and the effects of irrigation management. These are related to the level of organic matter but are not directly reflected in the SCI. For example, crop diversity is not directly considered in the SCI estimates. Crop diversity has important impacts on organic matter quality and soil quality generally.³

This reflects the shortsighted nature of using only the SCI to determine eligibility for a comprehensive conservation program such as the CSP. Farmers we interviewed believe there should be a diversity index and a resource conserving crop rotation eligibility standard integrated into the CSP to fully address this concern. The diversity index would give credit for adopting resource conserving crop rotations, such as diverse rotations that include alfalfa, sod producing crops and other soil building crops.

Moreover, the SCI has an impact that goes beyond eligibility. The SCI is also being used in determining some enhancement payment rates. For example, under the enhancement category for soil, depending on where one falls with his/her SCI score, contracts can reap as little as \$1.16 per acre for an SCI of .1 or as much as \$29.00 per acre for an SCI of 2.5 or higher. When dealing with a program that has limited funds as is currently the case, it seems unreasonable to set such high payment rates based on a model that does not account for all the factors that build and improve soil quality.

A related issue is the RUSLE2 system, the software model being used to compute SCI scores. One farmer indicated that if it hadn't been for the local NRCS staff person that understood his farming system, he would have never been accepted into the program. This staff person had to manually override nearly all of the assumptions the software made. This particular farmer has an exemplary conservation-based farming system and in the end that was recognized when he was awarded a Tier III contract.

Another farmer from Iowa indicated she had both organic and conventional acres and only her conventional acres were accepted into the program. She indicated that her organic system was too comprehensive for the software and it could not handle all of that information. So those acres were not accepted. It appears the software has problems in computing highly diversified cropping systems and the information was too complex for this software model.

3) On-Farm Research and Demonstration

On-farm research and demonstration is one of the five factors for which CSP can provide enhancement payments. But USDA has chosen to implement it in a very few places and under very limited conditions. On-farm research and demonstration is very important to a majority of the farmers with whom we spoke and they would like CSP to recognize it.

One farmer indicated that he would never have adopted the practices that qualified him for the CSP without participating in research and demonstration project. He indicated that nitrogen rates and timing of application were the make or break point for him being accepted into the program. This farmer's nitrogen management plan, including modest application rates in the spring of the year, resulted from an on-farm research and demonstration project sponsored by Practical Farmers of Iowa. This project allowed him to see that lower application rates would work.

³ Interpreting the Soil Conditioning Index: A Tool for Measuring Soil Organic Matter Trends. Soil Quality Institute—Agronomy Technical Note No. 16.

Farmers see on-farm research and demonstration as an important part of their operations that should be an important part of the CSP. Most of these farmers have been doing such research and demonstration for more than a decade. Some of the areas that farmers would like to see emphasized through on-farm research and demonstration are: rotational grazing, pasture development and water distribution; organic methods for parasite control; prairie restoration; nitrogen availability from cropping system through organic matter on the farm; the affect of beneficial insects and flora; recycling manure in response to changed cattle wormers; and improvement of fescue pasture through introduction of other plant species.

Farmers and ranchers have many ideas to explore, ideas that can lead to better farming practices, better stewardship of the land and positive environmental outcomes. The CSP should support such enthusiasm and work with farmers and ranchers to promote their findings to others in an effort to foster even greater conservation.

4) Payment Rates

Farmers interviewed believed it was gratifying that they were finally being rewarded for their conservation efforts. And for the most part, all of them were satisfied with the level of compensation through the CSP. However, farmers do have some concerns regarding certain payments.

...declining enhancement payments may be antithetical to promoting conservation.

For example, those farmers that earned a contract in 2005 are disappointed with the nature of the declining enhancement payments and believe it is antithetical to promoting conservation. This provision simply limits the CSP enhancement payments for *existing* conservation systems to four years, paid out over seven yeas in declining amounts. In sharp contrast, USDA's approach to CSP provides ongoing, unlimited enhancement payments for *new* conservation practices and activities added during the five or ten year CSP contract period. With the bulk of the payments being earned through enhancement activities, this declining payment feature only serves to penalize the farmers and ranchers who have always practiced good stewardship. Such provisions do not reflect the "reward the best and motivate the rest" concept as it fails to adequately reward existing sound conservation.

The payment rates for cost-share incentives also fall short. The cost-share rates under CSP are not equal to those offered through other programs such as the Environmental Quality Incentives Program (EQIP). Most cost-share for the CSP is set at 50 percent or lower, much lower for some practices and in some areas. For example in the 2004 sign-up, Kansas was only offering 25percent cost share rate for practices. Farmers believed CSP cost-share rates should be the same as other programs. Many also expressed concern that while new practice cost share payments were advertised as being part of the program, they were not actually being offered during the enrollment process.

Farmers also issued concern regarding the payment rates that were being used for certain practices. For instance, a farmer from Minnesota informed us that the payment rate to delay mowing hay until after the nesting season was set at an extravagantly high \$320 per acre. This farmer was a recipient of this payment and believed it should have been reduced to enable the program to spread. After looking at the Minnesota CSP website it appears this payment level has since been lowered.

5) Measures Used to Narrow Program Participation and Tier Levels

Farmers were concerned about the very arbitrary disqualifying measures being used to narrow program participation. One is the soil testing requirement. Some organic farmers and some grass-based farmers, for example, said they do not typically test their soil because their farming systems do not involve synthetic inputs. The soil test requirement kept them out of the program, even though the actual conservation benefit was questionable and even if they were willing to soil test regularly in the future.

An organic farmer who was initially told he could not sign up because he did not have recent soil tests. He completed soil tests that spring but was told he could not qualify because they had not been completed the previous year, all despite the fact the soil test results were fantastic: his phosphorous was right on target, no excess nitrogen and his soil organic matter was very high. This demonstrates his conservation and stewardship history as a farmer. After making calls to the Iowa State Conservationist and to NRCS national headquarters, stating that the timing of soil test versus the soil test results is a poor eligibility test for this program, this farmer was granted a contract.

One farmer indicated that his Tier II contract was declined because he scored too low on the SCI to be placed in a funded category. USDA had taken the lowest score on his entire farm and used that to judge the entire contract thus placed him in a much lower category, one that the available funding did not reach down far enough to fund. The farmer could have indicated that he would like to scale back to a Tier I application that would have included only the higher scoring fields but the farmer was not armed with the information that would have allowed him to make that decision. This farmer won an appeal and was awarded a contract in the end.

That same farmer was also denied Tier III participation because the grass buffers along a stream were too narrow. This farmer indicated that had he had that information in good time he would have easily been able to make the change to satisfy that requirement. Moreover, he would have been willing to make the change immediately as part of his contractual agreement.

6) Other Concerns

The farmers interviewed regarding the 2004 sign-up felt the process was rushed and didn't enable them to really think in terms of long-term conservation planning. One farmer said, "I just did what was recommended rather than really looking at a conservation plan in the big picture sense." The premise of the CSP is to encourage conservation planning and we believe it should focus on whole farm planning. If the sign-ups are limited to short sign-up periods it will be very limited in that regard.

Farmers also indicated that the program is very complex in regards to the payment structure, paperwork requirements and farm practice requirements. Moreover, information regarding CSP requirements was not provided on a timely basis and they change from sign-up to sign-up. One example is the farmer described above who would have widened his grass buffer if he had known that was required for Tier III.

For the 2004 sign-up, the rule also contained a new payment limit called a contract limit that was biased against smaller farms. All farmers interviewed hit that limit before they hit the legislated payment limits. Fortunately, NRCS removed this provision under the Amended Interim Proposed Rule.

Recommendations and Conclusion

CSP is supported by farmers and ranchers. It is under high demand across the country. But there is certainly room for improvement in regards to funding and implementation. Therefore, the following recommendations are intended to provide some insight into how that can be accomplished.

To address the limited watershed selection process and for the CSP to function as intended, Congress must make the commitment to fully fund the program in the 2007 farm bill. And Congress must stand by that commitment rather than repeatedly cutting CSP to fund other initiatives, effectively treating it as a slush fund. Congress should mandate that all watersheds be open to enrollment every year, preferably on a continuous sign-up basis. The sign-up period must be predictable and farmers and ranchers should be provided with plenty of advance notice to facilitate proper and full understanding of program requirements.

The provision that limits participation through development of the category system as discussed above must be eliminated. The “category” and “subcategory” system USDA created is equal to establishing a ranking system and is explicitly prohibited within the statute. Moreover, USDA changes the categories criteria with each sign-up. That has led to mass confusion amongst farmers and ranchers, essentially making it very difficult to truly plan for the program. USDA must eliminate all category and subcategory systems they created to sort out applications.

The Soil Conditioning Index (SCI) should be complemented with the Soil Management Assessment Framework (SMAF). The SMAF is a comprehensive index measuring actual soil quality on the farm. This will level the playing field for farmers using diverse sustainable and organic farming systems. Because it measures actual soil quality, the SMAF should also be used in determining soil quality enhancement payments.

A crop diversity index should be added to CSP eligibility and enhancement payment criteria. The law mandates that special incentives be designed for resource-conserving crop rotations but there is not currently an index in use for the purposes of determining such eligibility or enhancement payment levels. Such an index would reward farmers and ranchers with diverse systems and provide benefits that stretch well beyond the farm or ranch.

In addition, Tier III participation should require adoption of resource-conservation crop rotations and cover cropping systems on all or most of annual cropland enrolled. A great deal of research suggests that the best way to keep nitrogen out of ground water is to include cover crops and sod-based perennials in crop rotations. CSP should be the program to promote and support such cropping systems.

The on-farm research and demonstration provision of the CSP should be fully implemented by USDA and offered with each annual sign-up.

CSP payment rates should be adjusted. The stewardship and maintenance payment currently being used is complex. To simplify the payment, we recommend converting it to a conservation planning payment for the first year and a conservation practice maintenance payment each additional year of the contract. This could be structured to be higher in higher tiers, for example, \$1,000, \$2,000, and \$3,000

for Tiers I, II and III respectively.

We strongly agree that the bulk of CSP payments should continue to come through the CSP enhancement provision. However, we believe USDA should eliminate the declining payment rate for the enhancement provision as described above. USDA should restore the full enhancement payment provision.

NRCS should eliminate the ceiling on CSP cost-share payments. The statute allows NRCS to provide up to 75% for most farmers and 90% for beginning farmers. NRCS has placed a cap of 50% and 65% (for beginners) on CSP cost share. In contrast the Environmental Quality Incentives Program (EQIP) is not capped in this manner and is allowed the statutory flexibility. All programs should be treated the same and given the same flexibility.

USDA must fix the glitches farmers and ranchers found in CSP that narrowed participation. For example, the current regulatory mechanism that requires farmers and ranchers to achieve one-hundred percent of all aspects of the eligibility bar before being allowed into the program is in conflict with the statute, which requires contractual agreements for these requirements. This requirement has kept some very good stewardship oriented farmers and ranchers out of the program. To fix this, USDA should allow the farmer or rancher to make the needed changes as part of his/her conservation plan and require they implement those practices within the contract period. There should be a time limit for when those practices must be completed, for example, within the first year or two of program participation, delaying enhancement payments until the conservation activities are implemented.

Finally, USDA needs to clearly and strictly follow the 2002 Act on CSP payment limits and direct attribution of all payments to real persons. This is critical both to the program's integrity, to controlling the program cost, and to providing clear information to farmers and ranchers throughout the program's implementation.

CSP should be retained in the next farm bill as the primary stewardship incentives program for working lands.

CSP should be retained in the next farm bill as the primary stewardship incentives program for working lands. Great progress has been made in launching the CSP, but post-farm bill funding cuts and misguided administrative implementation decisions have restricted enrollment opportunities to a limited number of stewardship-based farmers and ranchers. This is in direct contradiction to the intent of the 2002 Farm Bill that the program be available nationwide.

There are problems with the program's implementation. The program was not designed to provide a competitive advantage to one farmer or rancher over another, based on any factor other than environmental stewardship, or to farmers and ranchers in one watershed over those farming solely in another. These problems are a direct result of funding cuts and problematic regulations. We hope the recommendations in this report will be enacted and lead to a CSP that truly "rewards the best and motivates the rest."