



CENTER *for* RURAL AFFAIRS

CONSERVATION FOR RURAL COMMUNITIES: CENTER FOR RURAL AFFAIRS FARM BILL IMPLEMENTATION RECOMMENDATIONS

BY ANNA JOHNSON | NOVEMBER 2019

I. INTRODUCTION

The Center for Rural Affairs has been fighting for strong and healthy rural communities for several decades. Early in our history, we recognized that well-managed, diversified farming operations are key to rural community vitality. For example, diverse on-farm income streams offer economic resiliency. Crops and livestock managed together can cycle nutrients within the farm and build soil health and improve water quality. Healthy and profitable farms and ranches in turn help support rural businesses and communities.

Since 1973, the Center for Rural Affairs has advocated for conservation as a valuable tool for farmers and ranchers to establish and grow their operations. We have focused on working lands conservation programs that allow farmers and ranchers to maintain production on their land while implementing practices that benefit natural resources.

The U.S. Department of Agriculture (USDA) manages several conservation programs with valuable working lands opportunities. The 2018 farm bill created a variety of new provisions within these programs, requiring updates and creating opportunities to strengthen the programs. This paper outlines several of these opportunities to improve economic outcomes and stewardship opportunities for farmers, ranchers, and rural communities.

We describe working lands conservation and several key programs: the Conservation Stewardship Program, the Environmental Quality Incentives Program, and particular offerings under the Conservation Reserve Program. Next, we describe farm bill implementation, the process USDA follows to make farm bill-mandated changes to conservation programs. This is followed by key themes that guide our recommendations on how USDA can implement changes to working lands conservation programs to the greatest benefit for farmers, ranchers, and rural communities. Finally, we offer a robust slate of farm bill implementation recommendations, grouped by the identified themes.

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II. WORKING LANDS CONSERVATION PROGRAMS

The farm bill includes several major conservation programs; this paper focuses on those which address working lands conservation programs. These are programs that allow farmers and ranchers to make improvements to their operations' infrastructure and practices to realize healthier soil, cleaner water, healthier crops, and fuller pocketbooks. We support these programs for the following reasons:

- They allow farmers and ranchers to conserve natural resources on their land while simultaneously maintaining crop and livestock production.
- They are voluntary, meaning farmers and ranchers can choose to participate rather than being required to enter into them.

Our recommendations to USDA to strengthen its conservation offerings are directed toward the following programs.

A. CONSERVATION STEWARDSHIP PROGRAM (CSP)

This is USDA's flagship conservation program. CSP offers farmers and ranchers who are already practicing conservation an opportunity to create a plan to improve conservation on their entire operation. By working with their local Natural Resources Conservation Service (NRCS) office, farmers and ranchers consider their entire operation and select conservation practices that will address natural resource concerns that have been identified as priorities for their area.

Farmers and ranchers apply to participate, and once accepted, can enter into a five-year contract with NRCS to implement the identified practices, and receive payments to support the additional conservation activities. CSP is administered by USDA NRCS.

B. ENVIRONMENTAL QUALITY INCENTIVES PROGRAM (EQIP)

This is USDA's other major working lands conservation program. Similar to CSP, farmers and ranchers apply to participate at their local NRCS office, and EQIP offers them financial assistance payments to implement conservation practices on their operations. However, unlike CSP, EQIP

offers support for individual practices rather than a planned set of practices, and does not require that farmers and ranchers plan for the conservation impact on their entire operation. EQIP is also administered by NRCS.

C. CONSERVATION RESERVE PROGRAM (CRP)

This is USDA's oldest conservation program. CRP offers financial assistance payments for removing land from production and planting long-term cover such as trees or grasses. CRP offers a variety of enrollment options, two of which offer particularly helpful benefits to rural communities. The first is continuous CRP, a working lands portion that offers rental payments to producers to take their most marginal and environmentally sensitive lands out of production and plant them in covers such as buffers, wetlands, or filter strips. In addition, the CRP-Transition Incentives Program, or CRP-TIP, offers a pathway to land access for new farmers. Under CRP-TIP, landowners with expiring CRP contracts can receive additional rental payments if they sell or rent to a beginning, socially-disadvantaged, or veteran farmer or rancher who has a conservation plan in place for the land. CRP is administered by USDA's Farm Service Agency, while NRCS provides conservation planning support.

D. CROP INSURANCE PROVISIONS TO SUPPORT CONSERVATION

Crop insurance is an invaluable risk management tool for many farmers, offering a vital safety net to weather tough years and poor crop yields. Crop insurance also has an outsize impact on farmers' ability to implement conservation practices in a number of ways. Crop insurance is administered by USDA's Risk Management Agency.

III. WHAT IS FARM BILL IMPLEMENTATION?

Federal conservation programs are created by two major entities. The first is Congress, which writes and passes the legislation that creates, or "authorizes" conservation programs. These laws are referred to as farm bills. The second entity that shapes conservation programs is USDA, the department in the federal government's executive branch which interprets that legislation, creates

programs and program guidance from it, and employs and manages the national network of staff necessary to offer those programs to the public.

Congress generally passes farm bills on a five-year cycle, and the 2018 farm bill was signed into law on Dec. 20, 2018. Once a farm bill is passed, USDA has the immediate responsibility to begin interpreting the new provisions, identifying and determining program changes, and rolling out those changes to the public, their customers. This process is called “implementation.”

Depending on the specificity of the language in the legislation, USDA may have a fair amount of discretion in how it implements a farm bill.

IV. FARM BILL RECOMMENDATIONS

Most of these recommendations to USDA in implementing changes to CSP, EQIP, CRP, and crop insurance are in response to specific provisions in the 2018 farm bill, but a limited few are within USDA’s existing authority. The section of the 2018 farm bill that requires program changes is given where relevant. While the recommendations are grouped below according to the themes, Appendix A groups these recommendations by program.

A. FOSTER RURAL ECONOMIC OPPORTUNITY AND RESILIENCY

Working lands conservation programs have a key role to play in fostering rural economic opportunity and resiliency. Conservation management practices that build soil health, for example, can help crops thrive through times of both little and excess water, and are therefore good for risk management. However, investment in future conservation benefits costs money for producers, and in tight financial times, justifying the cost can be difficult.

Conservation programs which help farmers and ranchers install and begin practices that build soil health, improve water quality, and achieve other conservation benefits are beneficial for building long-term resiliency for farms, ranches, and rural communities. The following recommendations would improve farmers’ and ranchers’ access to conservation practices and programs

that are particularly powerful for building long-term economic and environmental resiliency.

Other recommendations address removing barriers within farm programs so individuals can better access economic opportunity through conservation.

1. HIGHER CSP PAYMENTS FOR ADVANCED CONSERVATION (SECTION 2308)

The new farm bill requires USDA to offer higher payments for a few conservation practices that are particularly positive. These include cover crops, advanced grazing management, resource-conserving crop rotations, and comprehensive conservation planning. Each of these offers key benefits: cover crops aid with reducing erosion and help build soil health; and advanced grazing management also helps build soil health, drought resilience, and other benefits. Resource-conserving crop rotations offer similar benefits in addition to interrupting pest cycles. Finally, comprehensive conservation planning is a time and resource-intensive exercise to identify the suite of practices that can allow a farmer or rancher to address every major conservation resource concern on their operation. Farmers and ranchers will benefit from being able to receive higher payments for all four of these practices. While increased payments were available in 2019 for both cover crops and resource-conserving crop rotations, we urge USDA to roll out increased payments for advanced grazing management and comprehensive conservation planning as soon as possible.

2. PROVIDE STRONG INSTITUTIONAL SUPPORT FOR GRAZING MANAGEMENT PRACTICES UNDER EQIP (SECTION 2304)

A certain portion of EQIP funds is set aside for livestock practices. The 2018 farm bill changed this set aside from 60 percent to 50 percent of EQIP funding, and it also required that grazing practices be included under the livestock practices. This change offers an important opportunity for NRCS to increase support for livestock management practices which improve forage quality, manure distribution and nutrient cycling, and water quality.

In addition, diversified farming systems such as with crops and livestock can offer several benefits

to producers: multiple income streams, improved impacts on soil and water resources, and reduced fertilizer need from nutrient cycling.¹ However, the cost of constructing the needed infrastructure to support livestock—fencing, water—is a significant barrier for producers considering reintegrating livestock with crops. This change in the emphasis of EQIP livestock funds has the potential to help producers more permanently reintegrate livestock into row crop operations, offering both economic and natural resource benefits.

There are a number of ways NRCS could implement this provision and support reintegration of livestock on cropland. First, we urge NRCS to publicly promote the new emphasis on grazing practices within EQIP, and clearly communicate the benefits of reintegrating livestock onto cropland.

In addition, states can prioritize EQIP applications for particular purposes—specifically, for an environmental concern, a geographic region, or a type of agricultural operation. The number of these targeted funding pools can vary widely by state: in 2016, Mississippi had 571 funding pools and Ohio had 42.² To ensure EQIP supports grazing management practices under the new provision, we ask NRCS to release a requirement that when a state creates an EQIP funding pool for concentrated animal feeding operations, the state must also offer an equivalent funding pool for grazing management practices.

Finally, in sharing statewide information about EQIP sign-ups, we ask NRCS to share publicly each year the breakout of EQIP funds that support grazing management practices and the funds that support other livestock practices.

1 “Integrated Crop-Livestock Systems.” University of Nebraska-Lincoln, agronomy.unl.edu/range-pasture-forages/integrated-crop-livestock-systems. Accessed September 2019.

2 “Agricultural Conservation: USDA’s Environmental Quality Incentives Program Could Be Improved to Optimize Benefits.” U.S. Government Accountability Office, April 13, 2017, [gao.gov/assets/690/684073.pdf](https://www.gao.gov/assets/690/684073.pdf). Accessed September 2019.

3. ALL CONSERVATION PRACTICES INCLUDED UNDER GOOD FARMING PRACTICES

Strong risk management options are essential to the economic health of farms and ranches. Crop insurance is a central risk management tool for many operations. However, conservation practices that build soil health and increase farm resilience against both dry and wet years are another way to manage risk. Sometimes these two tools conflict: certain crop insurance provisions currently prevent many farmers from using beneficial conservation practices.

Specifically, crop insurance coverage is contingent upon farmers following certain “Good Farming Practices,” which are set by agricultural experts and the Risk Management Agency. But, NRCS-approved conservation practices are not automatically included under the Risk Management Agency’s Good Farming Practices.

The exception is cover crops: Section 11107 of the 2018 farm bill provides that cover crops are now included under Good Farming Practices. We are glad to see that NRCS has announced guidelines for treating cover crops as a Good Farming Practice will be in place for the 2020 insurance year.

USDA can still strengthen farmers’ access to the risk management tools of both crop insurance and conservation by releasing guidance that all NRCS-approved conservation practices are considered Good Farming Practices. Providing farmers with this certainty that their conservation practices will not impact their crop insurance coverage will do a great deal to assist farmers in increasing conservation practices on their land, and will help open up economic opportunities such as planting more complex crop rotations and accessing additional markets.

4. INCREASE SERVICE TO ORGANIC PRODUCERS (SECTIONS 2208, 2304, 2308)

Organic certification is a valuable way that operations can diversify and market their crops and livestock for a higher organic price premium. However, not all USDA programs are currently set up to offer comparable service to conventional and certified organic operations, which in turn helps discourage some producers from considering organic certification. We are glad certain

changes in the 2018 farm bill offer USDA the opportunity to improve conservation offerings for certified organic operations.

We are pleased the farm bill included provisions to make CSP and EQIP more accessible to certified organic farmers and ranchers, and ask USDA to speedily implement these changes. For example, we are glad the farm bill requires NRCS to develop a formula for CSP that allocates funding by state for certified organic operations based on the number of certified organic operations and acres. We also support NRCS headquarters allocating these funds automatically to the states rather than requiring that states request them.

In addition, other positive changes in the farm bill remove various barriers to farmers and ranchers who are certified organic or wish to transition and also seek to enroll in conservation programs. One of these changes is the increase in the cap of the aggregate size of EQIP payments allowed to certified organic operations: the 2018 farm bill increased this cap to \$140,000, from \$20,000 per year or \$80,000 over six years. People with expiring CRP contracts can also now begin the organic certification process on their land in CRP during the last three years of their CRP contract, without violating that contract.

For these changes to have a positive impact, farmers and ranchers need to be aware of these opportunities. We urge and encourage USDA to both quickly implement these changes and conduct robust outreach to all farmers and ranchers.

5. FUNDING FOR CONTINUOUS CRP SIGN-UPS (SECTION 2201)

Continuous CRP is available to enroll environmentally sensitive land in certain conservation practices. The farm bill requires 8.6 million acres be enrolled in continuous CRP acres, and of that, 40 percent should be for such practices as a grass sod waterway, a contour grass sod strip, a prairie strip, a filter strip, a riparian buffer, a wetland or a wetland buffer, a saturated buffer, a bioreactor, or other similar practice.

We are grateful USDA opened a continuous CRP sign-up period in 2019 to end on Aug. 23, 2019, and ask USDA to continue regularly promoting continuous CRP sign-up opportunities.

B. BETTER RESULTS FOR SOIL AND WATER IN RURAL COMMUNITIES

Environmental stewardship is a central value of the Center for Rural Affairs, and several conservation provisions in the 2018 farm bill are directed toward improving farmers' and ranchers' abilities to strengthen their environmental stewardship. Many of these go hand in hand with the previous recommendations to strengthen economic resiliency.

In addition, we believe NRCS has an obligation in its administration of conservation programs to steward these taxpayer dollars to benefit both farmers and ranchers and the public. The conservation practices NRCS funds and supports should result in cleaner water, healthier soil, diverse habitat for wildlife, and other positive changes.

1. LIMIT THE USE OF EQIP FUNDS SUPPORTING CONSTRUCTION OF NEW AND EXPANSION OF EXISTING CONCENTRATED ANIMAL FEEDING OPERATIONS IN ENVIRONMENTALLY SENSITIVE AREAS

The 2002 farm bill made two major changes to EQIP: it significantly raised the cap on the payment size available to applicants, and it removed restrictions on providing support to concentrated animal feeding operations to construct animal waste management infrastructure. Since then, a significant portion of EQIP funds supports these practices: more than \$100 million in 2015,³ and more than \$113 million in 2016.⁴

Both USDA's Office of Inspector General and the U.S. Government Accountability Office have found that NRCS does not give environmental considerations enough weight in the process they

3 "CAFOS and Cover Crops: A Closer Look at 2015 EQIP Dollars." National Sustainable Agriculture Coalition, Nov. 20, 2015, sustainableagriculture.net/blog/fy15-general-eqip-update/. Accessed September 2019.

4 "Cover Crops and CAFOs: An Analysis of 2016 EQIP Spending." National Sustainable Agriculture Coalition, Jan. 12, 2017, sustainableagriculture.net/blog/eqip-fy2016-analysis/. Accessed September 2019.

use to rank and fund EQIP applications.^{5,6} Siting and construction of waste management facilities for concentrated animal feeding operations is of particular concern. Currently, NRCS allows for construction of new animal waste facilities using EQIP funds, and has weak restrictions on siting and expansion of these facilities in environmentally sensitive areas, such as impaired watersheds or floodplains.

As NRCS updates its administration of EQIP, we believe NRCS should establish best practices for approving applications for construction of waste management facilities. Criteria for approval should include consideration of the environmental impact of the operation in these sensitive areas as well as the impact of the additional manure load on the surrounding area.

2. MANAGE CSP FOR SOIL HEALTH (SECTION 2308)

We are very glad the 2018 farm bill identified soil health planning as an activity that can be supported under a CSP contract. Previously, only two areas of conservation activities were identified: structural, vegetative and land management measures, including agricultural drainage management systems; and planning needed to address a priority resource concern. Along with soil health planning, there are now two other new conservation activities: development of a comprehensive conservation plan, and activities that will assist a producer to adapt to, or mitigate against, increasing weather volatility.

Building soil health supports farm resiliency and improves water quality. We urge NRCS to develop strong guidance for farmers and ranchers about how to use CSP to build soil health, including updating practice bundles as needed. We also urge NRCS to conduct outreach to farmers and ranchers about the new emphases within CSP.

5 “Environmental Quality Incentives Program.” U.S. Department of Agriculture Office of Inspector General, July 2014, [usda.gov/oig/webdocs/10601-0001-31.pdf](https://www.usda.gov/oig/webdocs/10601-0001-31.pdf). Accessed September 2019.

6 “Agricultural Conservation: USDA’s Environmental Quality Incentives Program Could Be Improved to Optimize Benefits.” U.S. Government Accountability Office, April 13, 2017, [gao.gov/products/GAO-17-225](https://www.gao.gov/products/GAO-17-225). Accessed September 2019.

3. REPORT ON TILLAGE OF NATIVE SOD (SECTION 1706)

The 2018 farm bill requires USDA to release, for the first time, robust information about the tillage of native sod. We are pleased the 2018 farm bill requires USDA to submit a report to Congress detailing how much native sod has been tilled; how many acres of cropland lost their crop insurance privileges because native sod was tilled; and to do so by state and county. We ask USDA to release this report to the public as well as submitting it to Congress. This information will help the public understand the rate that native sod is tilled and the amount of native sod that remains.

4. CONSERVATION DATA INITIATIVE (SECTION 12618)

USDA has an obligation to protect individual program participants’ identities, and takes various steps to ensure that, in releasing data publicly about their programs, various identifiers are removed. While this has done a great deal to protect farmer and rancher privacy, it has held back needed investigation into the relationship between conservation and risk management.

For example, if cover crops build soil health, and improved soil health increases resilience against both drought and heavy rains, risk management tools such as crop insurance should reward farmers for practices that mitigate risk and build soil health. However, while USDA data exist that would allow analysis of the relationship between conservation practices and weather resilience, analysis has not moved forward, in part, because of restrictions on the information.

The 2018 farm bill includes an important requirement that USDA identify internal data sets that pertain to conservation practices and the effect of such practices on profitability and risk. USDA is required to share with Congress a report on these data sets and the needed steps to make them available to university researchers while protecting individuals’ privacy.

We encourage USDA in developing this report to make every effort to lay a clear path for this long overdue research, while also protecting the privacy of farmers and ranchers.

C. LEVEL THE PLAYING FIELD

“Genuine opportunity for all” and “fairness” are two values central to the work of the Center for Rural Affairs. We believe farm programs should serve all farmers and ranchers, no matter their size, crop, or business model. When farm programs effectively favor the largest farms over small and mid-size family farms, the government is picking winners and losers.

New programs and authorities offer important opportunities for USDA to ensure program changes foster a level playing field for all farmers and ranchers. The 2018 farm bill offers a few such new or shifted authorities for conservation programs including the new incentive payments under EQIP and the new authority for local municipalities to be eligible for EQIP where it will be necessary to ensure all farmers and ranchers are able to access programs via a level playing field.

1. ENSURE NEW EQIP INCENTIVE CONTRACTS OFFER A PATHWAY TO MOVE INTO CSP (SECTION 2304, OTHERS)

The 2018 farm bill creates a new opportunity titled “incentive contract” under EQIP. These incentive contracts allow EQIP funds to be used to address resource concerns in a more targeted way: the State Technical Committee selects three primary resource concerns for a state, and an EQIP incentive contract application must address at least one of them. In addition, these contracts are to be between 5 and 10 years long, while standard EQIP contracts can be between 1 year and 10 years long.

This new authority has the potential to offer greater conservation benefits than standard EQIP, and potentially NRCS can use it to support farmers and ranchers in graduating to CSP. The new EQIP incentive contracts should provide an on-ramp to help farmers and ranchers become eligible for CSP, including allowing EQIP incentive contracts to end early once a farmer or rancher meets the stewardship threshold for two resource concerns on their operation.

2. NRCS SHOULD NOT FAVOR LOCAL MUNICIPALITIES FOR EQIP FUNDING UNDER NEW WATER CONSERVATION AND IRRIGATION AUTHORITY (SECTION 2304)

The 2018 farm bill allows additional entities—such as a state, irrigation district, or groundwater management district—to be eligible for EQIP funds for water conservation and irrigation related practices. This new authority means there will now be increased competition for EQIP funds. The 2018 farm bill also requires that, in making EQIP available for these entities, USDA not change how it allocates EQIP funds among states. We encourage USDA to not allow states to request funds specifically for this new authority, and to take care so farmers and ranchers are not excluded from accessing EQIP funds.

D. OPEN THE DOOR

Rural community vitality depends on robust economic opportunity, which is greatly impacted by the ability for newcomers and beginners to start and build businesses. The Center for Rural Affairs strives to support economic opportunity in agriculture. Several provisions in the 2018 farm bill seek to strengthen and increase opportunity for beginning, socially-disadvantaged, and veteran farmers.

These provisions that address access to conservation programs are particularly important. Operations where farmers and ranchers are still building infrastructure, markets, and capital can greatly benefit from conservation programs. Many are less likely to be able to prioritize conservation without additional support. Supporting conservation measures on expanding operations may help these producers continue conservation practices in the future.

1. CLARIFY AND PROMOTE ADVANCE EQIP PAYMENT OPTION (SECTION 2304)

EQIP is a financial assistance program, and typically under an EQIP contract, NRCS reimburses costs for conservation practices after the money has been spent. While the benefits of assisting producers to implement additional conservation practices are clear, the timeline of financial assistance payments can create cash flow challenges for many operations. Beginning, socially-disadvantaged, and others who do not have

capital reserves to rely on might be excluded from conservation programs. However, the 2014 farm bill created an option where beginning, socially-disadvantaged, and veteran producers can receive advance payments of up to 50 percent of the conservation practice cost under EQIP. Because participation was low, the 2018 farm bill strengthened these provisions and now requires that NRCS notify eligible farmers and ranchers when they apply about the available option of advance payments, and document whether or not they accept.

NRCS can take several actions to increase the positive impact for farmers and ranchers with these advance payments. We encourage NRCS to develop and release outreach materials explaining this option, including clearly describing the requirement that funds be expended within 90 days once received. We also urge NRCS to work with USDA's National and State Beginning Farmer and Rancher Coordinators, the Office of Partnerships and Public Engagement, and other relevant USDA staff to conduct outreach to eligible populations and encourage them to apply. We encourage NRCS to release training for staff in local offices to ensure they are up-to-date on the new requirements for offering the advance payment option to producers and documenting their response. Finally, we ask NRCS to release data each year by state on the number and size of EQIP contracts that relied on the advance payment option.

2. INCREASE OUTREACH AND PROMOTION OF TARGETED CONSERVATION FUNDING FOR BEGINNING AND SOCIALLY-DISADVANTAGED PRODUCERS (SECTION 2501)

The 2018 farm bill extended through 2023 the requirement that 5 percent of both CSP and EQIP funds be used to assist beginning farmers and ranchers, and an additional 5 percent of each be used to assist socially-disadvantaged farmers and ranchers.

We are glad these set-asides are maintained in the 2018 farm bill as they offer an important opportunity for socially-disadvantaged and beginning farmers and ranchers to access conservation support. Similar to our recommendations for the advance payment option, we encourage NRCS to collaborate with other expert USDA staff to conduct targeted outreach about the availability of this opportunity and these funds.

We also ask that NRCS release annual information by state regarding participation in CSP and EQIP by these targeted groups.

3. STRENGTHEN OPPORTUNITIES UNDER THE CONSERVATION RESERVE PROGRAM-TRANSITION INCENTIVES PROGRAM (CRP-TIP) (SECTION 2208, 2501)

CRP-TIP allows landowners with expiring CRP contracts to receive payments for two additional years if they sell or lease the land to a beginning, socially-disadvantaged, or veteran farmer ("covered farmer or rancher"), provided that the covered farmer or rancher also establishes a conservation plan.

We support changes made to CRP-TIP in the 2018 farm bill. One is changing landowner eligibility from "retired or retiring" to any contract holder. Another is extending the amount of time that modifications can be made to the land at the close of a CRP contract to support organic transition or conservation practices: from one to two years. We also support the increased funding for CRP-TIP from \$35 million over five years to \$50 million over five years, and reserving \$5 million for outreach activities, as well as offering priority for land leaving CRP to be enrolled in EQIP, CSP, or the Agricultural Conservation Easement Program.

The Center for Rural Affairs analyzed CRP-TIP enrollment and usage in our report, "Pathways to Land Access," and submitted a set of recommendations to USDA to improve program participation in July 2017.⁷ Our recommendations for implementation of the new changes to CRP-TIP under the 2018 farm bill are based on these.

First, we recommend USDA conduct robust outreach to all current CRP contract holders with notification of their new eligibility for CRP-TIP. This should include outreach to third parties who manage land or contracts for landowners. We also recommend USDA conduct outreach to CRP contract holders about CRP-TIP throughout the duration of a CRP contract, because it takes time for a landowner and covered farmer or

⁷ Johnson, Anna. "Conservation Reserve Program - Transition Incentive Program recommendations." Center for Rural Affairs, July 9, 2017, cra.org/news/170709/conservation-reserve-program-transition-incentive-program-recommendations. Accessed September 2019.

rancher to build the business relationship that is the foundation for CRP-TIP contracts. Finally, we encourage USDA to include in these outreach materials information for landowners to opt into being publicly listed as interested in enrolling in CRP-TIP.

To increase awareness of CRP-TIP among covered farmers and ranchers, we ask that USDA identify organizations that work with covered farmers and ranchers in every state. We ask USDA to work with them to conduct outreach to covered farmers and ranchers about the CRP-TIP program, and provide the necessary support for these activities such as through cooperative agreements. We ask that state and national Beginning Farmer and Rancher Coordinators support this work as well.

To support state and county staff in implementing this program, we recommend USDA provide training materials to staff about changes to CRP-TIP, and provide regular updates to state and county staff regarding the level of enrollment and funds availability, so staff do not hold back in promoting the program for fear of over-subscription. We also recommend USDA standardize its reporting procedures to track CRP-TIP enrollment. Another administrative action that would support CRP-TIP enrollment is to develop a method whereby Farm Service Agency local staff can share with each other successful techniques for promoting CRP-TIP.

Finally, we recommend that USDA annually release data on CRP-TIP enrollment by state and county. This analysis should include information about the CRP practice codes that are most commonly used on land enrolled in CRP-TIP, to inform future outreach about the program.

E. STREAMLINED CUSTOMER EXPERIENCE

Successful administration of conservation programs is dependent on the high quality customer experience for farmers and ranchers. Below are our recommendations for ensuring conservation program enrollment is clear and easy for farmers and ranchers to understand while also providing for responsible stewardship of taxpayer dollars.

1. HOLD CONSERVATION PROGRAM SIGN-UPS EARLY IN THE FISCAL YEAR AND BEFORE PLANTING SEASON AND WIDELY ADVERTISE

Sign-ups for these conservation programs—CSP, EQIP, continuous CRP, CRP-TIP, and others—all happen at different points in the year. While staggering sign-up dates can be helpful for NRCS staff to balance workloads, clear communication and outreach regarding sign-up dates is key for robust program enrollment.

Our first recommendation is that USDA endeavor to standardize conservation program deadlines across states and from year to year. Crop insurance deadlines are reliably set for the 15th of January, February, and March; conservation programs deserve similar treatment.

In particular, we urge USDA to standardize EQIP sign-up dates across states. Many of the media outlets that support outreach on conservation programs work across state lines, and farmers and ranchers have businesses and relationships that cross state lines. Standardizing sign-up dates by state and by year would vastly help with outreach.

With CSP, we strongly urge USDA to make every effort to ensure the sign-up deadline every year falls before March.

2. STREAMLINE ENROLLMENT IN CSP AND EQIP WHILE MAINTAINING THEIR SEPARATE FUNCTIONS (SECTION 2308)

The 2018 farm bill requires NRCS to streamline enrollment in both EQIP and CSP. This new requirement has the potential to make it easier for farmers and ranchers to access greater levels of conservation by streamlining the application, contracting, and other administrative procedures of the two programs.

First, we ask in conducting outreach about the benefits of the programs that NRCS develop clear messaging about the differences between the two programs. EQIP supports targeted conservation and individual practices, while CSP offers the opportunity to evaluate a whole operation and identify the opportunities for conservation that will have the greatest impact.

We also ask that NRCS coordinate between the programs where logical, such as with ranking tools, applications forms, and sign-up deadlines where possible.

Finally, NRCS may consider changes to streamline enrollment in CSP. We look forward to working with NRCS on the rollout of new applications systems, and ask that NRCS continue to emphasize transparent and customer-friendly application systems.

V. CONCLUSION

Conservation plays a vital role for farmers, ranchers, and rural communities in building economic opportunity and resiliency and in achieving valuable benefits for natural resources. The 2018 farm bill offers a number of opportunities to strengthen USDA conservation programming and delivery that can help strengthen rural communities, improve conservation outcomes, level the playing field for farmers and ranchers, open the door for newcomers in agriculture, and streamline program delivery. Farmers and ranchers need strong conservation programs now more than ever, and we urge USDA to take these recommendations into consideration as they roll out programmatic changes following the 2018 farm bill.

ABOUT THE CENTER FOR RURAL AFFAIRS

Established in 1973, the Center for Rural Affairs is a private, nonprofit organization with a mission to establish strong rural communities, social and economic justice, environmental stewardship, and genuine opportunity for all while engaging people in decisions that affect the quality of their lives and the future of their communities. This institution is an equal opportunity provider and employer.

Appendix: Recommendations by program

EQIP recommendations

- Provide strong institutional support for grazing management practices under EQIP.
- Increase service to organic producers.
- Limit the use of EQIP funds supporting construction of new and expansion of existing concentrated animal feeding operations in environmentally sensitive areas.
- Ensure the new EQIP incentive contracts offer a pathway to move into CSP.
- NRCS should not favor local municipalities for EQIP funding under new water conservation and irrigation authority.
- Clarify and promote advance EQIP payment option for beginning and socially-disadvantaged producers.
- Increase outreach and promotion of targeted conservation funding for beginning and socially-disadvantaged producers.
- Hold conservation program sign-ups early in the fiscal year and before planting season and widely advertise.
- Streamline enrollment in CSP and EQIP while maintaining their separate functions.

CSP recommendations

- Higher CSP payments for advanced conservation.
- Increase service to organic producers.
- Manage CSP for soil health.
- Higher CSP payments for targeted practices.
- Targeted conservation funding for beginning and socially-disadvantaged farmers and ranchers.
- Hold conservation program sign-ups early in the fiscal year and before planting season and widely advertise.
- Streamline enrollment in CSP and EQIP while maintaining their separate functions.

CRP recommendations

- Funding for continuous CRP sign-ups.
- Increase service to organic producers.
- Strengthen opportunities under CRP-TIP.
- Hold conservation program sign-ups early in the fiscal year and before planting season and widely advertise.

Crop insurance recommendations

- Good Farming Practices.
- Hold conservation program sign-ups early in the fiscal year and before planting season and widely advertise.

Other

- Report on tillage of native sod.
- Conservation data initiative.

