



**Oral Comments for USDA Listening Session – February 26, 2018**  
**National Sustainable Agriculture Coalition – Conservation Comments**

Good afternoon. My name is Alyssa Charney, Senior Policy Specialist at the National Sustainable Agriculture Coalition. Earlier today my colleagues provided comments on crop insurance, credit, and farm loan programs, and we thank you for the opportunity to comment on implementation of the 2018 Farm Bill. I will provide recommendations on a few of our conservation priorities today, and will also be submitting more detailed implementation recommendations later this week.

Let me start with the question posed by NRCS on coordination between EQIP and CSP, the two major working lands conservation programs. We are pleased that the farm bill retains both as standalone conservation programs, recognizing the unique benefits that each program provides. The farm bill directs NRCS to provide streamlined and coordinated procedures for EQIP and CSP. We support this coordination, while also point out the significant differences between the two programs. CSP offers comprehensive conservation across an entire operation, whereas EQIP provides cost share for individual conservation practices. CSP payments reflect the existing level of stewardship at the time of operation, plus payments for additional conservation activities, whereas EQIP payments only support new conservation activities. Additionally, CSP eligibility is based on meeting the stewardship threshold for two resource concerns at the time of application, whereas EQIP does not have a stewardship eligibility requirement. We urge NRCS to retain and promote these key differences, while equally promoting and supporting both key programs.

Even with the addition of incentive contracts in EQIP, the differences between the two programs still apply, and thus EQIP incentive contracts are not a duplication of the comprehensive conservation support that is provided through CSP. We do however welcome the addition of incentive contracts as an opportunity to provide longer term, management focused conservation support within EQIP. We urge NRCS to utilize incentive contracts a tool participants can utilize to eventually qualify for CSP through a seamless graduation process. If incentive contract holders meet the stewardship threshold for two resource concerns across the entire operation before the end of an incentive contract and wish to move to comprehensive conservation in CSP, we urge NRCS to allow them make this transition and end their incentive contract early, without any penalty for doing so.

In terms of implementation of CSP as a standalone program, our most immediate concern is the timing and process of the FY19 sign-up. We urge NRCS to move forward with the FY19 process as quickly as possible so as to ensure farmers have time to work with NRCS through the evaluation tools and application process. We understand that there are delays to a national funding announcement as a result of the new Grassland Conservation Initiative and extending expiring contracts. However, as producers *are* able to go into their local NRCS offices now and begin the process of applying for CSP in FY19, it is essential that NRCS release and publicize a national announcement regarding this opportunity to provide clarity as soon as possible. This announcement can be made in conjunction with information regarding contract extensions. Waiting until later this

spring to formally announce FY19 is too late – farmers will be well into the growing season, and it is essential to put out an national announcement that clarifies producers can now begin the process of applying for CSP. Additionally, as you move forward with the FY19 sign up, we urge you to incorporate the straight forward changes that the farm bill made for increased payments for cover crops and resource conserving crop rotations, prior to the release of an interim rule for FY20.

Next, to respond to the question regarding the added authority for new entities for water conservation or irrigation efficiency practices under EQIP, we urge NRCS to strictly enforce the statutory requirement that the state funding allocations cannot be adjusted as a result of the new provision. We also urge NRCS to ensure a competitive application process for these entities as is the case within EQIP, and to ensure that this new authority prioritizes projects that reduce water consumption and does not disadvantage other producers who individually apply for EQIP funding. Our detailed comments will expand on this provision and also include several additional EQIP recommendations related to the advanced payment provision and grazing management practices.

In terms of the changes made to the Regional Conservation Partnership Program, we urge NRCS to ensure that there is a fully developed rule in place before moving forward with a sign-up under the restructured programs, which no longer utilizes the underlying covered programs. As NRCS modifies the program to provide increased flexibility, we urge you to ensure public accountability, increased support for partner coordination and outreach, and conservation outcomes.

Finally, I will speak briefly to the implementation of changes made to the Conservation Reserve Program. We urge FSA to quickly move forward with a CRP sign-up this fiscal year, including opening up the continuous enrollment option, including the Conservation Reserve Enhancement Program and the newly authorized Clean Lakes and Estuaries (CLEAR) initiative. We urge FSA to do additional outreach to promote the CRP grassland initiative, and CRP TIP, both of which received increased acres or funding in the new bill.

Thank you for the opportunity to comment on these provisions. We will be submitting more detailed recommendations in our written statement.