

March 22, 2016

The Honorable Thomas J. Vilsack
U.S. Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Dear Secretary Vilsack:

The undersigned 71 national and regional organizations thank you and your team at USDA for your work to improve the Conservation Stewardship Program (CSP) for the 2017 sign-up period and beyond. The forthcoming CSP “refresh” presents a terrific opportunity to make the program more flexible, transparent, and accessible for farmers and NRCS staff, while enhancing the program’s unique performance-based character and natural resource and environmental outcomes.

Since 2009, farmers and ranchers have enrolled over 75 million acres in CSP. During this period, CSP has addressed critical resource concerns through targeted conservation efforts, while simultaneously providing opportunities for beginning and socially disadvantaged farmers to increase their stewardship levels. The 2017 updates present a critical opportunity to build upon these successes and expand CSP’s reach and impact across the country, thereby leaving a lasting legacy for natural resource and environmental improvement.

CSP is unique among conservation programs due to its explicit performance-based and stewardship identity. CSP offers technical and financial assistance to farmers for adopting and maintaining high standards of resource conservation and environmental stewardship on eligible lands. Eligibility is based on meeting or exceeding stewardship thresholds set by USDA for priority resource concerns in a particular state or watershed. Assistance is geared toward both the active management of existing conservation systems and the implementation of new conservation activities on land in agricultural production. CSP rewards advanced conservation across an entire farming operation and supports the continual improvement of such conservation systems, including through the contract renewal process. Payments reflect projected conservation and environmental benefits. No other current or previous farm conservation program has operated in this fashion.

In light of that uniqueness, we urge you to not only retain, but also to strengthen these basic CSP principles moving forward. We therefore urge you to consider the following recommendations for the CSP refresh.

Resource Concerns and Environmental Benefits

CSP contract holders are leaders in resource stewardship. They have adopted more than 139,000 water quality and water conservation enhancements, representing more than 35 percent of all enhancements chosen between 2009 and 2015. CSP farmers are also increasing biodiversity -- more than 20 percent of enhancements selected during the same period support wildlife, pollinator, and beneficial insect habitat. Additionally, CSP supports cropping and livestock systems that provide significant soil health and climate change mitigation benefits. Resource-Conserving Crop Rotations (RCCRs), in particular, improve soil health, and since 2009, this option was used on nearly 800,000 acres nationwide, with a new *RCCR improvement* option applied to an additional 1,700 acres in 2015.

Livestock producers also improve soil health through CSP, as more than 1,000 producers applied management intensive rotational grazing to nearly 700,000 acres between 2009 and 2015. Moving forward, we believe at least four changes are needed to expand upon CSP's ability to address critical resource concerns:

- USDA should ensure that the major program overhaul builds upon participants' successes, and properly rewards conservation benefits and environmental outcomes, regardless of when a conservation activity was first adopted. In the new CSP ranking and payment structure, differences in ranking and payments should reflect nothing other than actual or expected differences in environmental benefits, financial costs, and forgone income to the farmer, without any artificial discounts or bonuses. USDA should also introduce regular evaluation and reporting to assess program performance and outcomes and closely track how resource concerns are being addressed through ongoing and additional conservation efforts.
- We appreciate that the refresh aims to make CSP more flexible and accessible, and as enhancements are refined through this process, NRCS should consider offering flexible enhancement bundles for each of the primary resource concerns – water quality, water conservation, soil quality, soil conservation, wildlife habitat, and energy conservation. Allowing and encouraging program participants to choose bundles of enhancements, rather than just individual enhancements, might be a good way to encourage additional conservation through a suite of practices chosen from the wider set of enhancements for the particular resource concern. By incentivizing priority resource concern bundles, but leaving flexibility for the individual farmer to choose those that best fit the circumstances, the program will better maximize bang for the buck.
- USDA should use the refresh as an opportunity to widely promote CSP as the program for farmers looking to adopt cover crops, diversify production, and improve soil health by increasing the supplemental payment for Resource-Conserving Crop Rotations, as well as ensuring that rotational grazing benefits are appropriately rewarded. The ranking and payment credited for actively managing ongoing cover cropping, RCCRs, and managed rotational grazing should also be increased simultaneously.
- NRCS should ensure that participants have the option of doing comprehensive, total resource conservation planning as part of CSP enrollment. This too will maximize bang for the buck, while also serving as a roadmap to the producer's stewardship improvement path to greater sustainability, as recommended by the 2014 Farm Bill Statement of the Managers. The supplemental payment should be set on a sliding scale between \$1,000 and \$3,000, and payments should be determined by the number of resource concerns addressed as well as the complexity of the farming operation.

Support for Organic Systems

Farmers transitioning to organic production, as well as those maintaining their organic certification status, have already benefited from CSP through key conservation activities. Since 2009, farmers and ranchers selected over 740 enhancements specific to organic production – including transitioning to organic, pest management for organic crop and livestock production, and adding no-till practices to their organic operations. Organic systems seek to maintain biodiversity on the farm

and use methods that support the conservation of natural resources, ensuring that CSP continues to work for organic producers should be a key priority of the 2017 refresh.

- We therefore urge you to maintain and expand upon the resources currently available to organic producers as a part of next year's revisions, including retention of the current enhancements and the addition of new organic transition bundles for both crop and livestock production.

Opportunities for Beginning Farmers and Ranchers

Under the 2015 CSP sign-up period, 10 percent of all acres, 13 percent of all dollars, and 20 percent of all contracts went to beginning farmers and ranchers. This conservation support is critical as beginning farmers look to maintain and expand their conservation efforts and get started off on a lifetime of good stewardship. The statutory five percent acreage set aside is a good first step in ensuring access to the program. Additionally, we applaud USDA for increasing the minimum annual payment for all successful applicants to \$1,500 for FY16, ensuring that CSP provides sufficient incentive for beginning and smaller acreage producers, and we urge USDA to maintain this minimum limit in future years.

- However, given that beginning farmers currently make up over 17 percent of farms and 25 percent of farmers, we urge USDA to increase the 5 percent set-aside (which is a minimum, not a maximum) by setting an agency goal of at least 15 percent of CSP acres to be enrolled by beginning farmers.

Renewal Process for Expiring Contracts

The option to renew all CSP contracts every five years provides not only for the preservation and ongoing management of advanced conservation on the ground, but a critical opportunity to practice adaptive management and commit to continual improvement. We applaud USDA for actively promoting this option, reflected in the fact that three quarters of all expiring acres were reenrolled in 2014 and again in 2015. This amounts to more than 24.4 million acres of conservation benefits that will be maintained and expanded for an additional five years.

While 75 percent of all acres were enrolled, only half of expiring contracts were renewed each year, illustrating that smaller acreage producers are not selecting the renewal option, likely due to a lack of sufficient incentive through the payment structure. It is vitally important that two things change, therefore, as part of the refresh:

- Not only does the program refresh need to equalize ranking and payment credit for the ongoing management and maintenance of ongoing advanced conservation work, but payments during successive renewals need to account for any and all ongoing commitments to managing the enhancements adopted in the previous contracts. This does not happen now, and is one key reason why small and mid-scale farms have a much lower renewal rate.
- In addition, the new \$1,500 payment minimum for some unknown reason does not apply to renewals, and we urge USDA to ensure that the upcoming changes include contract renewals within this payment option.

We thank you for your leadership on CSP. The program's major accomplishments to target resource concerns, support organic and sustainable production, create opportunities for beginning farmers, and extend long term conservation benefits deserve to be celebrated. They lay the groundwork for USDA's major overhaul of the program next year, and we thank you for carefully considering our recommendations to build upon and expand these successes as part of the 2017 overhaul.

Sincerely,

Audubon

American Rivers

Catholic Rural Life

Center for Food Safety

Earthjustice

Friends of the Earth

Izaak Walton League of America

National Center for Appropriate Technology

National Farmers Union

National Hmong American Farmers

National Organic Coalition

National Sustainable Agriculture Coalition

National Wildlife Federation

National Young Farmers Coalition

Pesticide Action Network

Pollinator Partnership

Slow Food USA

Soil and Water Conservation Society

Union of Concerned Scientists

Water Environment Federation

Wild Farm Alliance

Women, Food and Agriculture Network

Alternative Energy Resources Organization

Angelic Organics Learning Center

Bluestem Communications

California Certified Organic Farmers
Carolina Farm Stewardship Association
Center for Rural Affairs
Central Appalachian Network
Certified Naturally Grown
CROPP Cooperative – Organic Valley
Dairy Grazing Apprenticeship
Delta Land & Community
Endangered Habitats League
Friends of Family Farmers
Georgia Organics
Gulf Restoration Network
Illinois Stewardship Alliance
Institute for Agriculture and Trade Policy
Iowa Environmental Council
Iowa Farmers Union
Iowa Natural Heritage Foundation
John Hopkins Center for a Livable Future
Kansas Rural Center
Kentucky Waterways Alliance
Kentucky Resources Council, Inc.
Land Stewardship Project
Lower Mississippi River Foundation
Maine Farmland Trust
Michael Fields Agricultural Institute
Midwest Organic and Sustainable Education Service
Milwaukee Riverkeeper
Mississippi Sustainable Agriculture Network
Missouri Coalition for the Environment
Nebraska Sustainable Agriculture Society
Nebraska Wildlife Federation
New England Farmers Union
Northeast Organic Dairy Producers Alliance

Northeast Sustainable Agriculture Working Group
Northwest Center for Alternatives to Pesticides
Ohio Ecological Food and Farm Association
Practical Farmers of Iowa
Prairie Rivers Network
Rural Advancement Foundation International
Slow Food Nebraska
Socially Responsible Agricultural Project
Tennessee Clean Water Network
The Wetlands Initiative
Virginia Association for Biological Farming
Washington Sustainable Food & Farming Network
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