GENERAL FARM BILL REQUESTS

No Further Cuts to Conservation Title Funding in the Farm Bill

The Conservation Title (Title II) took a 10 percent funding cut in the 2014 Farm Bill, and continues to be cut annually during the appropriations process. Every dollar cut from mandatory conservation programs leads directly to less conservation on the ground and only increases the natural resources concerns and the probability of regulatory hassles. **NACD believes, at a minimum, no further cuts should occur in the next farm bill to the Conservation Title, and we hope to see Congress increase its funding.**

Technical Assistance & Conservation Planning are the Bedrock of Conservation Delivery

Technical assistance and conservation planning are critical tools and the first steps in evaluating producers' resource needs. NRCS, along with conservation districts, help agricultural producers plan and apply conservation practices on the land. They develop conservation plans; plan, design, lay out, and install conservation practices; and inspect completed practices for certification. **Congress should include language in the next Farm Bill that emphasizes the importance of technical assistance provided through the Conservation Technical Assistance (CTA) program.**

Repeal SAM/DUNS Requirements

NACD supports completely doing away with the System for Award Management and Dun and Bradstreet Data Universal Numbering System (DUNS/SAM) registration system for participants in NRCS cost-share programs. These requirements are unnecessary and add additional regulatory burdens on farmers and ranchers who are attempting to do the right thing by working with NRCS to install conservation practices. **Congress should include in the next Farm Bill bipartisan legislation introduced in the 115th Congress (S. 364/H.R. 1163) to remove this unnecessary regulation.**

Continue Current Conservation Compliance Policy

In the 2014 Farm Bill NACD supported including crop insurance subsidies under Sodbuster and Swampbuster compliance requirements that have long been placed on Title I payments. This ensures that farmers of highly erodible land are farming using the proper conservation practices and that wetlands are not drained. **NACD supports the continuation of the existing policy of conservation compliance as included in the 2014 Farm Bill.**

Crop Insurance Should Continue Working in Tandem with Conservation

Farmers should have no fear of potentially losing their crop insurance policy if they are implementing conservation practices that improve soil health and water quality. Unfortunately, based on some past

instances, some farmers continue to be concerned that implementing positive practices such as cover crops may jeopardize their policies. This is despite official Risk Management Agency (RMA) policy which approves of cover cropping and other conservation practices. **The next Farm Bill should direct USDA to be proactive in its messaging that conservation practices such as cover cropping are allowed. RMA should work closely with NRCS to ensure that Approved Insurance Providers (AIPs) and local crop insurance agents are fully aware of federal policy.**

PROGRAM SPECIFIC REQUESTS

Environmental Quality Incentives Program

- EQIP is the critical workhorse program of the conservation title, often serving as the gateway to voluntary conservation for producers. It assists farmers and ranchers who may not already implement conservation to address their operation's resource concerns**. Because of its crucial role, EQIP baseline funding should be increased, or at the very least maintained, in the next Farm Bill.** In addition to the many conservation benefits this funding will provide, this will continue helping producers comply with or altogether avoid the need for regulation by voluntarily protecting natural resource concerns.
- Acequias are centuries old irrigation systems that are managed by local units of governments. In many cases they serve small acreage, low income, minority and other underserved farmers. The 2014 Farm Bill allowed Acequias to be eligible for RCPP. Since then, Acequia projects have improved surface water conservation and water quality on agricultural lands and have provided for riparian habitats benefiting wildlife and plant species. **NACD supports expanding Acequias eligibility to the full EQIP program to ensure these unique irrigation systems can continue to provide conservation benefits and economic stability to low income, minority and underserved farmers.**

Regional Conservation Partnership Program

- Conservation districts lead Local Workings Groups (LWG) that identify priority resource concerns that guide NRCS funding decisions. RCPP projects that do not target these identified resource concerns divert tax payer investments from that area's most pressing needs. There have been several examples where RCPP projects were funded that did not address a highly ranked resource concern or did not have a realistic plan to engage landowners. **NACD supports language encouraging local engagement of conservation districts by project sponsors.** Some state conservationists have

encouraged this during the application process, but explicit language would increase coordination with conservation districts that have firsthand knowledge of local conditions.

- RCPP is partially funded through funds taken from the other conservation programs. If applicants in a state cannot procure matching funds and ultimately be awarded a grant, that state loses out on the funding taken from the donor program. Program equity around the nation is a priority for NACD and **funding for RCPP should only be increased from donor programs if a similar increase in the underlying program occurs.**

Small Watershed Dam Rehab Program

Small watershed dams help meet water quality and erosion control resource concerns across the country and over the decades, conservation districts have stepped up to sponsor these projects. There are over 11,800 flood control structures nationwide. These often require significant continued technical assistance and financial resources on the part of the sponsoring conservation district. **NACD fully supports robust funding for the Small Watershed Dam Rehab Program to help meet today's needs for these structures.**

Conservation Reserve Program

NACD supports CRP as a program that addresses natural resource concerns such as erosion, soil health and its effect on water quality on our nation's most sensitive working lands by resting/idling them from production agriculture.

- **Acreage Cap – A balanced approach**
  - **NACD supports an increase in the Conservation Reserve Program (CRP) acreage cap but not at the expense of other programs (EQIP, CSP, etc.) within the Conservation Title.** NACD prefers a balanced approach to funding conservation programs and we do not want to see any one conservation program eliminated or suffer significant cuts to fund large increases in another.
- **CRP Technical Assistance – Apportioned at the discretion of the Secretary of Agriculture**
  - In the 2014 Farm Bill, the Secretary of Agriculture, rather than the Office of Management and Budget (OMB), was given the responsibility to determine the portion of funding for NRCS cost-share programs that goes to technical assistance. However, this change excluded CRP. With NRCS and FSA now under the same mission area, decisions on the amount of technical assistance provided to NRCS should also be made solely by the Secretary of Agriculture.
- **Grazing – An ecologically responsible management practice**
  - **NACD supports allowing more grazing in CRP as NACD believes grazing activities can be done in an environmentally sound way and can actually improve the health of the land.** NACD believes Congress should look at ways to remove impediments to grazing when

appropriate such as allowing grazing as a mid-contract management (MCM) practice without a reduction in rental payment when the grazing produces the same or better results than other cost-shared MCM practices and is approved within the conservation plan.

- **Transitioning out of CRP – Ensuring the continuation of environmental benefits**
  - **NACD strongly believes land transitioning out of CRP back into crop production should have an updated conservation plan.** Since most land enrolled into CRP is sensitive in nature and since taxpayers have made a significant investment in this land, NACD believes this policy makes sense both for the environmental benefit and for the taxpayer. Producers should begin the process of working with NRCS to develop these plans well before the end of the contract in order to ensure completion before cropping begins post-contract. Further, NACD believes that EQIP and CSP should be available to contract holders in the last year of a contract as it is for those participating in CRP-TIP.
- **SAFE Acres separate under the County Cap**
  - **NACD supports a continuation of the 2014 Farm Bill policy of allowing continuous CRP acres and State Acres for Wildlife Enhancement (SAFE) acres to be counted separately from the 25% cap imposed on General CRP lands in a county.**
- **Increase CRP Payment Limit**
  - **NACD encourages Congress to increase the CRP payment limit per person or legal entity from $50,000 per year to $100,000 per year.** The current maximum payment limit for CRP annual rental payments and incentive payments per person or legal entity has remained the same since 2002. There are fewer farmland owners that own more cropland acres and CRP soil rental rates have increased substantially. Current payment limits may inhibit landowners from enrolling sensitive lands or lands identified in priority areas into CRP.
- **Natural Disasters Substituting for Mid-Contract Management**
  - In some instances when a natural disaster occurs, such as a fire, flood, or hailstorm, the requirement to still conduct a practice during the contract could be duplicative. In other instances, this requirement would be detrimental to the vegetation if the landowner is still required to mow or disk/till the vegetation. **Congress should allow FSA/NRCS to assess the ecological outcome of the natural disaster.** If the agencies determine the ecological goals of the MCM have occurred, or if they determine that requiring the management would actually further harm the vegetation on the CRP acres, the requirement to conduct MCM may be removed.

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