



National Association of Conservation Districts

August 7, 2020

The Honorable Bill Beam
Deputy Administrator for Farm Programs
Farm Service Agency
1400 Independence Ave. SW
Washington, DC 20250

Deputy Administrator Beam,

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies and private sector interest groups to provide technical, financial and other assistance to help landowners and operators apply conservation to the landscape.

NACD appreciates the opportunity to submit comments on the Environmental Benefits Index (EBI) calculations used to rank Conservation Reserve Program (CRP) offers. CRP is an important component of the farm bill conservation programs. NACD advocated throughout the farm bill process to increase the acreage cap, expand conservation-minded grazing opportunities, and ensure the conservation benefits of CRP. Although the total acreage was increased in the 2018 Farm Bill, demand is sure to continue outweighing available acres, and therefore it is vitally important that the Farm Service Agency (FSA) ensure that the offers ultimately accepted provide the most conservation benefit.

NACD believes that soil erosion should be the primary natural resource concern addressed in any CRP general enrollment period. CRP was created with a focus on removing highly erodible lands from production, and although much progress has been made, soil erosion continues to be a priority resource concern in many parts of the country. Excess soil erosion leads to decreased soil health, lost topsoil and greater water quality concerns.

Out of the total approximately 400 points available through the EBI calculations, we are pleased to see that 245 points can be achieved from erosion-related calculations. However, we believe that more attention should be given to lands offered that have the highest erodibility indexes (EI). FSA should encourage additional acreage offers by giving more weight to land with higher EIs. Highly Erodible Land (HEL) is defined for the purposes of Farm Bill Conservation Compliance as anything with an EI above 8. These lands must be farmed according to an approved conservation plan to be eligible for most USDA programs.

Unfortunately, while other erosion concerns help make up the 245 points, only 100 points can be awarded no matter how erodible the offer's land is. Currently, all offers with an EI of 8 or higher, which is the threshold for HEL, receive 11 points out of 100 available. The point value placed on EI, especially for EI values of 15 to 21 and higher, should receive an even greater proportion of the total overall EBI points that can be achieved. At NACD, we know that not all HEL acres are the same, and that HEL is a major resource concern that must be aggressively addressed. Land with an EI of over 8 should be awarded more than the current 11 points within the EBI. As EI increases above 8, more points should be also awarded on top of what is currently assigned to ensure increased point totals from higher EI offers.



National Association of Conservation Districts

The highest points available from the EI metric may need to be higher than 100 to properly prioritize erosion concerns. FSA should be doing what it can to encourage and ultimately accept offers of even higher EI lands by increasing the points assigned those values versus other EBI factors.

FSA should also provide more flexibility in payment rates so those offers which are accepted and have high EI values receive a bonus on top of the underlying rental rate where statutory flexibility exists. Having land that is highly erodible does not necessarily mean that the land is marginal crop land, and therefore FSA should be encouraging additional offers of high EI lands in CRP general signups. Providing a bonus on top of the underlying rental rate for high EI offers would encourage producers who have erodible, but very productive, farmland to offer their land during general sign-ups for retirement. FSA should accept these offers and provide a rental payment that would help offset lost income from that productive farmland.

Finally, while at the national level FSA should be prioritizing erosion concerns in accepting CRP offers, the agency should look into ways to provide more local control in the EBI calculation. Farm bill conservation programs were not designed to be 'one-size-fits-all,' and State Technical Committees should retain flexibility that will allow them to choose the criteria that awards a high EBI based upon the predominant natural resource concerns that exist in that state. For instance, if soil productivity and soil erosion are major concerns, the EBI should be structured to account for a mix of on-site as well as offsite soil erosion benefits. Alternatively, where wind erosion is a higher concern, an offer which maximizes cover to address wind erosion would receive a higher EBI. Conservation programs like CRP perform at their best when producers have greater buy-in by knowing that their local community's needs are truly being served by the program. Conservation districts are an integral part of the locally-led conservation delivery structure that has existed for over 80 years and, through Local Working Groups, help identify for State Technical Committees the priority resource concerns that should be addressed by USDA programs.

Thank you for the opportunity to submit comments on future changes to the EBI calculation and for your commitment to voluntary, locally-led conservation.

Sincerely,

A handwritten signature in black ink that reads "Tim Palmer". The signature is written in a cursive, flowing style.

Tim Palmer

President, NACD