United States Department of Agriculture

Regulatory Impact Analysis for the Conservation Stewardship Program

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Natural Resources Conservation Service

Helping People Help the Land

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Executive Summary

Compared to the Conservation Stewardship Program (CSP) as authorized under the 2014 Farm Bill, Congress significantly reduced the program's size in the 2018 Farm Bill—from \$9 billion[1] to \$3.975 billion over 5 years--but left much of CSP's underlying structure intact. With fewer dollars available, fewer contracts will be funded under the 2018 Farm Bill. However, the program will continue to fund high-ranking applications across all States, with the aim of improving cost effectiveness based on dollars per additional unit of conservation effect.

The 2018 Farm Bill eliminated the 10-million-acre cap on enrollment and the annual \$18 per acre cap on program costs, moving to an annual funding level for new contracts similar to the Environmental Quality Incentives Program (EQIP). NRCS will now obligate funds for all activities conducted under a new or renewed CSP contract up front. NRCS will also allocate a portion of the annually available funds for contract renewals.

Regarding changes beyond funding and the elimination of the acreage cap, only the revised contract renewal conditions are expected to generate impacts that are moderately different from the 2014 Farm Bill. CSP contracts continue to run for 5 years and include the potential for participants to compete for a renewal contract for an additional 5 years. Under the 2014 Farm Bill, renewals were non-competitive and as long as the participant met eligibility and program requirements, NRCS would approve a renewal contract for one additional 5-year period. Under the 2018 Farm Bill, NRCS ranks contract renewals against other contract renewals and funds the highest ranked renewal applications. NRCS provides funding for renewals using approximately 40% of the total funds allocated for CSP in a given fiscal year, not including the funds set aside for the CSP Grassland Conservation Initiative. NRCS uses the remaining 60% of the allocation to fund the highest ranked new applications. The overall decrease in program funding will reduce the funding available for both renewal and new contracts reducing the total number of acres treated and the amount of conservation achieved through the program. Cost-effectiveness of the overall program may increase as lower ranked applications will not be funded.

The 2018 Farm Bill also mandates the establishment of the CSP Grassland Conservation Initiative for eligible producers with base acres where the entire farm was planted to grass or pasture, or was idle or fallow, from January 1, 2009 to December 31, 2017. Beginning in FY 2019, the Secretary started providing signups for producers to make a one-time election to enroll eligible land in the initiative. NRCS will continue to provide signups until all eligible producers are enrolled or the authority for the program expires, which is currently in FY 2023. Enrollment

[1] Includes funding for renewing contracts for an additional five years.

is for a 5-year non-renewable term. Participants must meet CSP eligibility conditions, but do not go through the ranking process.
Participating producers must agree to meet or exceed the stewardship threshold for not less than one priority resource concern by the date on which the contract expires. The annual payment is limited to $18 per acre, and enrolled acreage cannot exceed the number of base acres on a farm.

An estimated 2.4 million acres meet the 2009-17 criterion noted above and are eligible for the Grassland Conservation Initiative. Although these eligible acres are concentrated in Texas, Oklahoma and Kansas, there is eligible acreage throughout most of the country. The Grassland Conservation Initiative is expected to cost $214.9 million over 5 years, representing 5.5-percent of total authorized CSP funding under the 2018 Farm Bill. Through March 2020, a total of 1.2 million acres had been enrolled with obligated funds totaling $106.8 million. Cost-effectiveness may be affected marginally as fewer funds will be available.

In the 2008 Farm Bill, Congress established a $200,000 CSP payment limit per person or legal entity which carried over into the 2014 and 2018 Farm Bills. To address concerns related to potentially large contracts with joint operations, NRCS initially set a contract limit of $200,000 for all contracts but increased the contract limit to $400,000 for joint operations in the 2010 CSP final rule. NRCS indicated in the 2019 CSP interim rule that the higher contract limit for joint operations would continue for the duration of the 2018 Farm Bill (2019-23). In response, NRCS received comments on contract limits, most of which recommended keeping the contract limit at $200,000 regardless of the participant type. To evaluate these comments, NRCS considered the impact of eliminating the higher contract limit on potential program participants and the demand for program funds. Analysis of data found that reducing the contract limit to $200,000 for all contracts would increase funding available for additional contracts on average by $43.7 million per signup. The maximum increase in acres that could be treated with this additional funding—about 658,000 acres—represents 9.1 percent of the 7.2 million acres enrolled on average per signup since 2014. Reduced participation by joint operations and other factors, however, could lead to substantially fewer additional acres being treated than expected. Joint operations enrolled in the program with contract costs exceeding the $200,000 limit are on average three times as large, in terms of acres, as operations enrolled in the program with contract costs below the contract limit. However, the average per acre costs of the joint operations with contract costs exceeding the contract limit are only 1.34 times larger than the average per acre costs of operations enrolled in the program that have contract costs below the contract limit. Based on these findings, NRCS is making no change to the existing $400,000 contract limit.

Conservation activities funded through CSP contribute to improvements in soil health and reductions in water and wind erosion on cropland, pasture, forest and rangeland; reduce nutrient losses to streams, rivers, lakes and estuaries; increase wildlife habitat, including providing habitat for pollinators; and provide other environmental benefits. Environmental benefits resulting from CSP's conservation activities are difficult to quantify at this time. Partial estimates made by NRCS (see Benefits section) indicate the positive benefits of the program.

Beginning in FY2020, NRCS began using a new software tool, the Conservation Assessment and Ranking Tool (CART), to assess and rank all program applications. Per the statutory requirements outlined in Section 2308C(1) of the 2018 Farm Bill, CART allows NRCS to rank CSP applications based on (i) the natural resource conservation and environmental benefits that result from the conservation treatment on all applicable priority resource concerns at the time of submission of the application; (ii) the degree to which the proposed conservation activities increase natural resource conservation and environmental benefits; and (iii) other consistent criteria, as determined by the Secretary. Additionally, CART creates the framework to better facilitate, and integrate, the potential costs with environmental benefits (outcomes). Through data collected in CART, NRCS will be better prepared to conduct future analysis of the environmental benefits achieved through the program.

NRCS estimates the total cost of accessing the program over 5-years is $2.5 million. NRCS also estimates total transfers over 5-years to be $3.795 billion. Given a 3 percent discount rate, this translates into projected annualized transfers (NRCS funds) of $759 million in constant 2019 dollars. In addition, participants incur $500,000 in access costs in nominal terms.

Table 1. Annual Estimated Costs, Benefits and Transfers[a]

Category	Annual Estimate
Costs[b]	$500,000
Benefits	Qualitative
Transfers	$759,000,000

[a] All estimates are discounted at 3 percent to 2019 $ except for the participant access cost, which is nominal.
[b]Imputed cost of applicant time to gain access to the program

In implementing the 2018 Farm Bill, USDA is following legislative intent to maximize conservation impacts, address natural resource concerns, establish an open participatory process, and provide flexible assistance to producers who apply appropriate conservation measures to comply with Federal, State, and Tribal environmental requirements. Participation in CSP is voluntary. Hence, CSP participation is not expected to negatively impact program participants and nonparticipants.

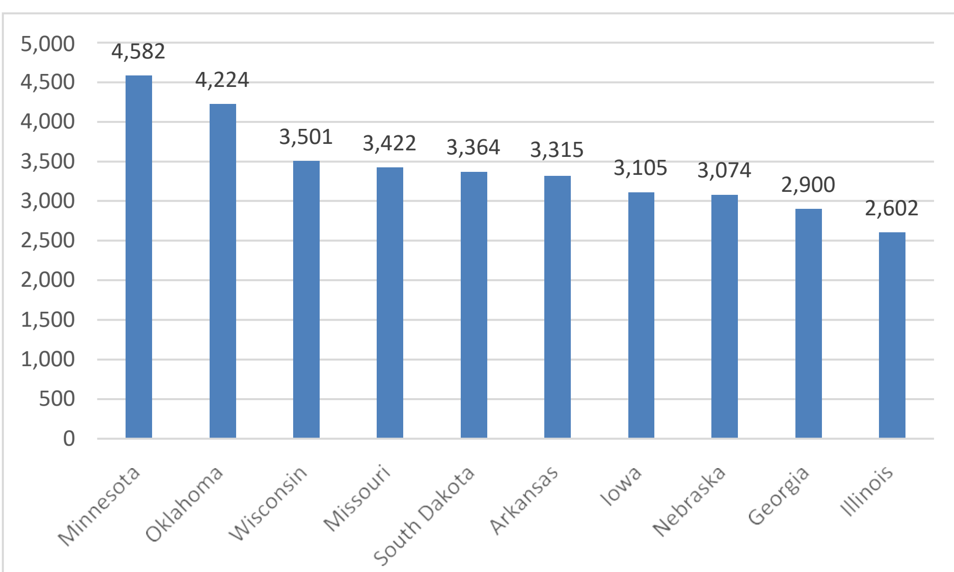
Regulatory Impact Analysis for the Conservation Stewardship Program

Background

The Conservation Stewardship Program (CSP) is the largest working lands conservation program in the United States. Since its inception as the CSP in the 2008 Farm Bill, the program has enrolled more than 138.9 million acres with 75.9 million acres currently active. The 2014 Farm Bill authorized NRCS to spend $9 billion to enroll 50 million acres in the program for up to ten years. The program consists of transfers (payments) from the Federal government to producers. These transfers create incentives for program participants to change the way they use their resources and can help correct for market failures. CSP-eligible conservation activities can mitigate negative externalities (such as soil erosion and degradation in water quality), generate positive externalities (increased wildlife and pollinator habitat), or both.

CSP payments provide a financial incentive to spur agricultural producers to adopt additional conservation activities and to continue to maintain their existing level of stewardship. Such efforts also support NRCS strategic objectives of delivering high-quality science and technology for private lands conservation, promoting productive working lands and healthy waters, promoting and enhancing productive agricultural landscapes, and supporting healthy watersheds (Natural Resources Conservation Service, 2016).

Figure 1. Conservation Stewardship Program: Top Ten States with Respect to Number of Contracts, 2014-2018

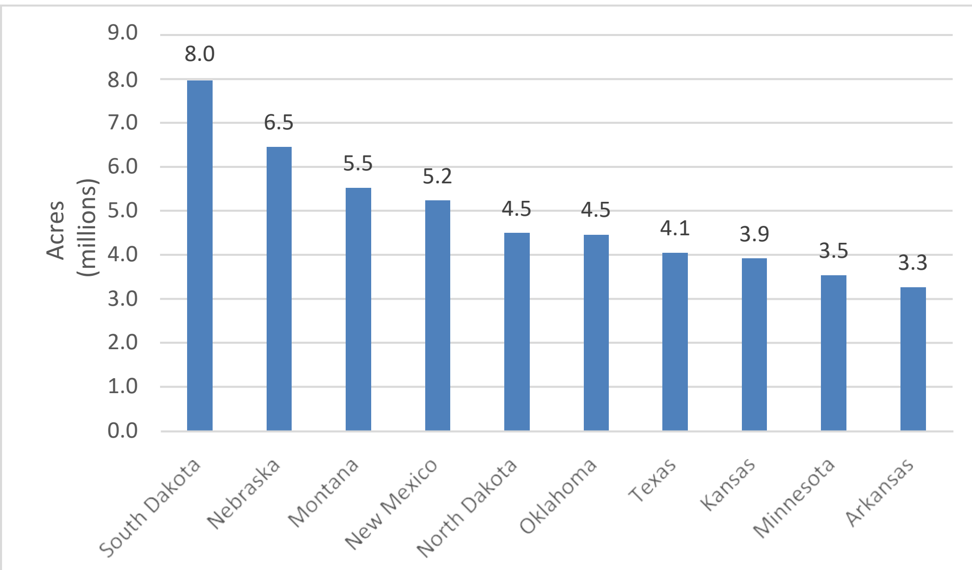


Source: NRCS RCA Interactive Viewer, Program Reports. April 2019.
https://www.nrcs.usda.gov/wps/portal/nrcs/rca/national/technical/nra/rca/ida/

Program Description and Features

CSP is available to all eligible agricultural and forestry applicants—individuals, legal entities, joint operations, Indian Tribes, and Alaska Native corporations—in all States and U.S. territories. Participation in CSP is voluntary. Applications for CSP are accepted on a continuous basis, with at least one signup occurring in the first quarter of the fiscal year, to the extent practicable. States with the largest number of contracts enrolled include Minnesota, Oklahoma and Wisconsin (Figure 1); those with the largest acreage enrollment are South Dakota, Nebraska, and Montana (Figure 2).

Figure 2. Conservation Stewardship Program: Top Ten States with Respect to Acres Enrolled, 2014-2018



Source: NRCS RCA Interactive Viewer, Program Reports. April 2019.
https://www.nrcs.usda.gov/wps/portal/nrcs/rca/national/technical/nra/rca/ida/

CSP offers technical and financial assistance to farmers adopting and maintaining high standards of resource conservation and environmental stewardship on eligible lands, totaling $3.975 billion under the 2018 Farm Bill (Table 2). Assistance is aimed at both the active management of existing conservation systems and the implementation of new conservation activities on land in production. It provides equitable access to program funds for eligible applicants regardless of crops produced, size of operation, or geographic location.

Table 2. CSP Authorized Funding FY 2014-FY 2018 and FY 2019-2023[a]

	2014 Farm Bill			2018 Farm Bill	
Fiscal Year	5-Years of Contract Payments	Contract Renewal Payments[b]	Total Payments	Fiscal Year	5-Years of Contract Payments
FY 2014	$900,000,000	$900,000,000	$1,800,000,000	FY 2019	$700,000,000
FY 2015	$900,000,000	$900,000,000	$1,800,000,000	FY 2020	$725,000,000
FY 2016	$900,000,000	$900,000,000	$1,800,000,000	FY 2021	$750,000,000
FY 2017	$900,000,000	$900,000,000	$1,800,000,000	FY 2022	$800,000,000
FY 2018	$900,000,000	$900,000,000	$1,800,000,000	FY 2023	$1,000,000,000
Totals:	$4,500,000,000	$4,500,000,000	$9,000,000,000		$3,975,000,000

[a] Assumes $18/acre weighted average payment rate.
[b] Assumes 100 percent of contracts renew for an additional 5 years (Automatic renewals and associated funding for 2014 Farm Bill contracts were eliminated under the 2018 Farm Bill).

NRCS offers every CSP applicant selected for enrollment a yearly payment (Table 3) based on land type, number of resource concerns meeting stewardship levels at the time of enrollment, and the cost of implementing additional conservation activities. Each State selects eight priority resource concerns for each ranking pool from the seventeen nationally identified resource concern categories. In determining their priorities, States seek input from the State Technical Committee, which includes input from local working groups, in order to target funding to address these priorities. The actual payment received by a given producer varies widely depending on the type of land enrolled, the existing level of conservation, and the number and type of new enhancements and practices to be adopted.

Table 3. CSP Annual Obligations All Signups by Fiscal Year, Top Ten States in FY 2018[a]

Division[b]	2014	2015	2016	2017	2018
	--- thousand $ ----				
South Dakota	66,134	75,751	93,175	95,384	94,632
Arkansas	72,949	77,861	81,211	84,449	83,576
Minnesota	81,575	85,018	84,083	82,001	80,327
North Dakota	71,382	75,144	77,089	74,743	75,246
Mississippi	28,643	33,276	36,605	44,969	66,477
Nebraska	61,972	60,449	63,937	61,594	64,372
Oklahoma	57,850	61,222	61,187	61,340	58,802
Georgia	38,955	43,331	43,986	48,257	52,831
Kansas	53,311	50,195	47,715	48,449	46,140
Montana	41,872	42,406	46,460	43,109	44,566
Total All States	1,030,871	1,095,879	1,129,295	1,134,534	1,197,294

[a]Represents funds obligated in FY from all contracts regardless of the FY in which the contract was initiated. Does not represent total funds committed under the 2014 Farm Bill in that fiscal year. [b]See Table 16 in the Appendix for listing of all states.
Source: NRCS RCA Interactive Viewer, Program Reports. April 2019.
https://www.nrcs.usda.gov/wps/portal/nrcs/rca/national/technical/nra/rca/ida/

CSP contracts include the entire agricultural operation. As a result, the entire operation needs to meet CSP eligibility criteria with respect to number of resource concerns met in order to qualify. In return, the participant receives a payment based on the extent of their operation. This is different than EQIP, where only the area to be treated is evaluated and payment is only for the conservation practices being implemented on the area being treated.

Eligible lands include cropland, grassland, prairie land, pastureland, rangeland, nonindustrial private forestlands, and agricultural land under tribal jurisdiction. Cropped woodlands, marshes, land being used for livestock production, and other private lands on which resource concerns can be addressed are also eligible.

CSP participants agree to improve, maintain, and manage existing conservation activities and undertake additional conservation activities to address resource concerns. Eligible additional activities include enhancements[2] and conservation practices such as alley cropping, brush management, conservation crop rotation, forest stand improvement, and woody residue treatment.

Annual payments for maintaining existing stewardship levels on the operation include $300 for each resource concern being met and a per acre payment rate based on land use. The per acre payment rates are based on estimated costs of existing conservation practices per acre on each land use. Cropland generally has received the highest payment rate, with range and forestland at the lower end and pasture in the middle (Table 4). In addition, the adoption or improvement of resource conserving crop rotations and advanced grazing management may qualify for supplemental payments. The minimum annual payment is $1,500 per operation. Total payments per contract in the 2018 sign-up ranged from a low of $7,500 ($8.60/acre/year) to a high of $485,774 ($22.58/acre/year).

Table 4. Payment Rates per Acre by Land Use

Land Use	Payment rate
Crop, Pastured Cropland, and Farmstead	$7.00
Pasture	$3.00
Range	$1.00
Forest and Associated Agricultural Land	$0.50

Source: NRCS Programs Financial Assistance Conservation Stewardship Program CSP Payments (https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/programs/financial/csp/?cid=nrcseprd1297344)

The management intensity applied via a CSP enhancement is designed to exceed the minimum treatment requirements of the corresponding NRCS practice standard. The total number of enhancements available for any signup period varies over time. NRCS pays 100-percent of the established payment rate for implementing an enhancement. Under the 2018 Farm Bill, participants will receive 125-percent of the payment rate for installing cover crops and 150-percent of the payment rate for installing resource conserving crop rotations or implementing advanced grazing management.

A few examples help provide context for enhancements. For example, E328J – *Improved crop rotation to provide benefits to pollinators* – is available across several CSP land uses and promotes the planting of nectar and pollen-producing plants in non-cropped areas such as field borders, grassed waterways, and riparian forests. Enhancement bundles such as B000CPL16 – *Non-Irrigated Cropland with Water*

[2] CSP Enhancements are listed and described in the section "FY2018 Activity List for Participants" at (https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/financial/csp/).

Bodies (MRBI) – encourage producers to apply several enhancements at the same time for a higher percentage payment rate. An important enhancement used extensively on pasture, range, and forest lands is E528E – *Grazing management for improving quantity and quality of plant structure and composition for wildlife*, which encourages producers to regularly move their livestock to reduce localized degraded areas and improve the plant community that is available for wildlife.

A contract renewal option allows participants an option to renew their contract for another 5 years if they fully complied with their existing contract and agree to satisfy additional conditions specified by NRCS. Under the 2014 Farm Bill, an additional 5-year term was at the producer's discretion with no competition; under the 2018 Farm Bill, renewals must be ranked with other contracts up for renewal (see below for discussion and analysis).

In 2017, the payment basis for enhancement and existing land use acres changed from a "performance" basis to a "cost of installation" basis. This change made payments more transparent to recipients and better aligned payments with the cost of installing enhancements. It also helps field staff keep payments more consistent with EQIP. Since these changes were made, 52 percent of payments have gone toward maintaining existing stewardship levels and 48 percent of payments have gone toward additional conservation enhancing activities.

Benefits

Even though CSP is a transfer program (meaning that payments are made from taxpayers to eligible farmers), CSP payments provide the needed financial incentives to spur participants to undertake activities that benefit society. Conservation activities supported by CSP can mitigate negative externalities, such as sediment and nutrient runoff into streams from cropland operations; generate positive externalities, such as carbon stored by forestry and rangeland operations; or both.

Environmental benefits resulting from CSP's conservation activities are difficult to measure, but NRCS models developed through the Conservation Effects Assessment Project (CEAP) have been used to estimate the impacts of fiscal year 2018 expenditures on conservation activities (Table 5). CSP enhancements installed on cropland in FY 2018 are estimated to annually prevent 2.4 million tons of sediment from leaving fields, 20.7 million pounds of nitrogen from leaving fields, and 4.3 million pounds of phosphorus from leaving fields. Installed enhancements are also estimated to retain, on an annual basis, 76.3 million pounds of soil carbon. These estimated changes represent a fraction of the benefits from CSP because current modeling does not capture reductions in pesticide use or integrated pest management enhancements, range and pasture management enhancements, or improvements in wildlife or pollinator habitat. These estimates also do not measure the benefits from keeping preexisting conservation practices in place.

Table 5. CSP Performance—Benefits to the Environment, FY 2018	2018
Performance Indicator	
Sediment prevented from leaving cropland[a] (thousand tons)	2,380.5
Nitrogen prevented from leaving from cropland (thousand lbs.)	20,718.3
Phosphorus prevented from leaving cropland (thousand lbs.)	4,333.9
Soil carbon retained on cropland (thousand lbs.)	76,278.0

[a] Includes sediment loss from water and wind erosion
Source: Internal NRCS analysis, 2018

Program Funding

Congress authorized the enrollment of 12.769 million acres for each fiscal year (FY) covered by the 2008 Farm Bill. Under the 2014 Farm Bill, Congress authorized the enrollment of 10.0 million acres for each fiscal year during the period February 7, 2014, through September 30, 2018 (Table 6). With the 2018 Farm Bill, Congress eliminated the acreage authorization and authorized annual funding beginning in FY 2019 through FY2023 totaling $3.975 billion, down from $9 billion in the 2014 Farm Bill Congress also removed the 7 percent contribution to the Regional Conservation Partnership Program in the 2018 Farm Bill and authorized NRCS to use this freed-up funding to supply the technical assistance needed to run the program and assist farmers with the installation of their conservation activities. Technical assistance averaged 15 percent of the obligation amount from FY 2015-2018.

Table 6. CSP Authorized Funding FY 2014-FY 2018

Fiscal Year	Authorized Acreage	5-Years of Contract Payments[a]	Contract Renewal Payments[b]	Total Payments
FY 2014	10,000,000	$900,000,000	$900,000,000	$1,800,000,000
FY 2015	10,000,000	$900,000,000	$900,000,000	$1,800,000,000
FY 2016	10,000,000	$900,000,000	$900,000,000	$1,800,000,000
FY 2017	10,000,000	$900,000,000	$900,000,000	$1,800,000,000
FY 2018	10,000,000	$900,000,000	$900,000,000	$1,800,000,000
Totals:	50,000,000	$4,500,000,000	$4,500,000,000	$9,000,000,000

[a] Assumes $18/acre weighted average payment rate.

[b] Assumes 100 percent of contracts renew for an additional 5 years.

Total government program obligations for CSP under the 2018 Farm Bill are shown in Table 7. Obligations include costs to the government between FY 2019 and FY 2023 and total, in nominal dollars, $3.975 billion. Given a 3 percent discount rate, projected cumulative program obligations equal $3.477 billion in constant 2019 dollars. At a 7 percent discount rate, maximum program obligations equal $3.097 billion in constant 2019 dollars. Average annualized obligations at the 3 percent and 7 percent discount rates equal $759 million and $755 million, respectively.

Table 7. Total Projected Program Obligations for CSP, 2019 through FY 2023

Fiscal Year	Obligation (million $)	GDP Price Deflator[a] (2019=100)	Obligation Constant Dollars (million $)	Discount Factors for 3%	Present Value of Obligation - 3% (million $)	Discount Factors for 7%	Present Value of Obligation - 7% (million $)
FY19	700	100.0000	700	0.9709	680	0.9346	654
FY20	725	102.0000	711	0.9426	670	0.8735	621
FY21	750	104.0400	721	0.9151	660	0.8164	588
FY22	800	106.1208	754	0.8885	670	0.7629	575
FY23	1,000	108.2432	924	0.8626	797	0.7130	659
Total	3,975		3,810		3,477		3,097
Annualized Obligations					759		755

[a]the GDP adjustment is 2.00 percent (OMB Economic Assumptions and Overview and OMB Circular A-94)

The government costs represented in Table 7 do not represent the only costs of this program. Even though the program is voluntary, participants incur costs with respect to the time they spend to apply to the program and receive payments. While these costs are not explicit they represent a cost borne by participants to gain access to the program. NRCS has estimated that these costs, based on average number of applications and contracts per year to be about $0.5 million annually or about $2.5 million from FY 2019 through FY 2023. Over this period NRCS estimates that it will receive 165 thousand applications (33 thousand per year) of which it will enter into 30 thousand contracts (6,000 per year). NRCS estimates this will involve a total time of 26,679 hours on the part of applicants and participants combined (4.4 hours per fully completed contract). NRCS estimates the average value of applicants and participants time to be $19.40 per hour.

CSP and the Agriculture Improvement Act of 2018: Mandated Changes, Proposed Discretionary Changes, and Projected Program Impacts

In reauthorizing CSP, Congress reduced the program's size in terms of overall funding. Congress also mandated changes that affect eligibility, ranking, contract renewals, eligible conservation activities, payments for cover crops, resource conserving crop rotations, and advanced grazing management, and allowed the Secretary of Agriculture more discretion, especially concerning the program's emphasis regarding a science-based foundation for environmental improvement and resource concerns (see Table 8). Statutory requirements, discretionary actions, and likely program impacts of the sets of changes are discussed below and summarized at the end of this section in Table 15.

Table 8. CSP Statutory Changes Under the 2014 and 2018 Farm Bills

Program Elements	Primary Statutory Requirements of Interest: 2014 Farm Bill	2018 Farm Bill
<u>CSP Funding</u>		
Acreage enrollment limitation	10,000,000 acres	Not Applicable
National average program rate[a]	$18/acre	Not Applicable
Number of ranking factors	Original five ranking factors remain with a focus on priority resource concerns; one additional factor dealing with former CRP land transitioning into agricultural use.	Requires the Secretary to rank applications based on the natural resource conservation and environmental benefits that result from the conservation treatment on all applicable priority resource concerns at the time of submission of the application; the degree to which the proposed conservation activities increase natural resource conservation and environmental benefits; and other consistent criteria, as determined by the Secretary.
Conditions for contract renewal	Agrees to adopt and continue to integrate conservation activities across the entire agricultural operation and agrees, at a minimum, to meet the stewardship threshold for at least **two priority resource concerns** by the end of the renewed contract period, **<u>or</u>** to exceed the stewardship threshold of at least **two existing priority resource concerns.**	Agrees to adopt and continue to integrate **new or improved** conservation activities across the entire agricultural operation, **demonstrating continued improvement during the additional 5-year period** and agrees, at a minimum, to meet the stewardship threshold for at least two priority resource concerns by the end of the renewed contract period, or **to adopt or improve conservation activities, as determined by the Secretary, to achieve higher levels of performance with respect to not less** than two existing priority resource concerns**.**
Measurement of environmental improvement	Establishes need to develop and use science-based thresholds for priority resource concerns.	Expands how NRCS determines stewardship threshold, including through the use of quality criteria under a resource management system; predictive analytics tools or models developed or approved by NRCS; data from past and current enrollment in the program; and other methods that measure conservation and improvement in priority resource concerns, as determined by the Secretary.
Factors to consider in determining payment levels	Based on: costs incurred; forgone income; expected environmental benefits; and three conditions related to benchmark and additional activities to meet priority resource conditions plus one additional factor to be determined by the Secretary.	In addition to 2014 Farm Bill criteria it increases payments for cover crop activities to not less than 125-percent of annual payment and it increases the supplemental payment for resource conserving crop rotations and advance grazing management to not less than 150-percent of annual payment
Grassland Conservation Initiative	Not applicable	Establishes Grassland Conservation Initiative Creates special eligibility and other program provisions, i.e. grassland conservation initiative, for cropland for which base acres have been maintained by the Secretary under section 1112(d)(3) of the Agricultural Act of 2014 (7 U.S.C. 9012(d)(3)).

[a]**Includes all** financial assistance **and** technical assistance **associated with enrollment and participation in the program.**

Changes to the CSP Funding Structure and Contract Renewals

The most important change to CSP in the 2018 Farm Bill involves the funding structure. Under the 2014 Farm Bill, NRCS was authorized to enroll a certain number of acres in CSP and could determine different payment rates for each acre as long as the national weighted average payment rate was $18. Under the 2018 Farm Bill, the mandatory acreage requirement was eliminated and a fixed annual authorization on spending was provided—increasing from $700 million in 2019 to $1 billion in 2023 (refer back to Table 7).

In making this change, Congress eliminated not only the acreage requirement, but also the average $18 per acre payment restriction. The funds for the full contract are now obligated at the time of signing rather than annually as occurred previously. In addition, funds for contract renewal will come from the authorized funds available in the year the contract renewals occur. No additional funding for contract renewals is provided, which means that renewals must compete with new contracts for available funds. Conservation benefits achieved during the original contract period will be considered when a contract is evaluated for renewal. Current participants that are eligible for renewal during the first year of implementation of the 2018 Farm Bill are eligible for a one-year extension of their current contract and payments.

In previous farm bills, contract renewals did not compete. Renewal was automatic as long as participants were willing to renew and as long as they agreed to adopt additional conservation as part of the next contract. Further, the availability of funds for renewals was guaranteed at the time the initial contract was signed. That meant, for example, that the funds used to renew the 2009 and 2010 contracts in the 2015 signup did not reduce the funds available to enroll new contracts. That is, the funding needed to renew the 24 million acres enrolled by the 2009 and 2010 signups did not affect the amount of funds that could be used to enroll 10 million new acres authorized for the 2015 signup.

Under the 2018 Farm Bill, Congress reduced CSP commitments from $1.8 billion a year under the 2014 Farm Bill to $0.795 billion a year. This reduction, assuming average outlays remain near $18/acre, will lead to a significant decline in acres enrolled in the program even though funding increases each year.

The effect of the reduction in the funding commitment between the two Farm Bills on the acres enrolled is analyzed here in two steps: 1) the impact on renewals assuming FY 2014 authority levels but taking into account only the shift in timing of renewal obligations; and then 2) the impact of taking into account the change in funding amounts in the 2018 Farm Bill. First analyzing the renewal impact, consider that, under the 2014 Farm Bill, contracts signed in 2011 became eligible for renewal in 2016. The 2011 signup had enrolled a little over 12 million acres. Of this amount, roughly 8.9 million acres were re-enrolled in 2016 (Table 9). In 2016, there were also 8 million acres enrolled by new participants, bringing the total number of acres enrolled under 2016 signups to 16.9 million acres (8 million + 8.9 million).

Table 9. CSP Signup Information

New			Renewals			Renewal Percentage	
Signup	Contracts (No.)	Enrolled Acres (million)	Signup[a]	Contracts (No.)	Enrolled Acres (million)	Contracts	Enrolled Acres
CSP-2010[b]	19,401	23.627	CSP-2015-R	10,918	16.151	56%	68%
CSP-2011	9,140	12.033	CSP-2016-R	5,159	8.935	56%	74%
CSP-2012	8,508	11.109	CSP-2017-R	5,032	8.602	59%	77%
CSP-2013	6,629	8.857	CSP-2018-R[c]	2,631	4.406	40%	50%
CSP-2014	7,335	8.863					
CSP-2015	5,556	6.743					
CSP-2016	6,876	7.999					
CSP-2017	7,173	7.441					
CSP-2018	7,965	7.534					

[a]-R in signup number stands for renewal. [b]Contains two major signups: 2009 and 2010. [c]First year of contract renewals under the cost of installation basis.

Under the restrictions imposed by the 2018 Farm Bill, however, only 9.3 million acres[3] total could have been enrolled in 2016.[4] This is because renewals are not obligated "up front" now, but in the year of renewal. As a result, the number of acres enrolled in 2016 would have declined by 7.6 million acres (16.9 million – 9.3 million).[5]

In the second step, the overall impact of the funding restriction for overall active acres in CSP over time is shown in Table 10. Under the 2014 Farm Bill rules, and assuming a 68-percent renewal rate, the number of active acres peaks in 2019 at 84.5 million acres and declines to 63.7 million acres in 2022 and then begins to increase again in 2023 to 66.6 million acres as CSP funding increases each year to $1 billion in 2023. Under the 2018 Farm Bill rules, however, the number of active acres declines steadily to 44.2 million acres as the number of acres available for renewals and new contracts is restricted by funding authorized in each year of the 2018 Farm Bill. At the end of the 2018 Farm Bill, the number of active acres enrolled in the program declines by 22.4 million (66.6 million – 44.2 million).

Table 10. CSP Active Acres, 2018-2023[a]

Program rules	2018	2019	2020	2021	2022	2023
			--- million acres ---			
2014 Farm Bill	76.7	84.5	71.4	68.2	63.7	66.6
2018 Farm Bill	76.7	84.5	60.8	52.2	45.0	44.2
Change	0.0	0.0	-10.6	-10.0	-18.7	-22.4

Source: NRCS ProTract Database, FY2018

[a]Assumes average spent per acre enrolled is $18 and that 68-percent of acres in expiring contracts are renewed under 2014 Farm Bill provisions for 2018-2023. The 68-percent renewal rate is the average renewal rate for 2010-2013 Signups (see Table 9).

[3] The 0.7 million acres "donated" to the Regional Conservation Partnership Program (RCPP) reduced available acres for new enrollments from the 10 million acres authorized by the 2014 Farm Bill to 9.3 million.

[4] This assumes that the acres authorized for the signup of new applications remain at the FY 2014 level and that the average cost of contracts remains at $18/acre.

[5] This assumes that no significant funds are carried over from 2014 Farm Bill signups to fund new and renewed contracts under the new 2018 Farm Bill rules.

Creation of the CSP Grassland Conservation Initiative

Congress mandated creation of the CSP Grassland Conservation Initiative for producers with base acres where the entire farm was planted to grass or pasture (including cropland that was idle or fallow) from January 1, 2009 to December 31, 2017. Producers whose farms are planted entirely to grass or pasture are not eligible for an Agriculture Risk Coverage/Price Loss Coverage (ARC/PLC) payment for the 2019-2023 crop years but may enroll in the CSP Grassland Conservation Initiative and receive a payment of no more than $18 per base acre. The acres on which payments are made may not exceed the number of base acres on the farm.

Participants must meet eligibility conditions for CSP but need not go through the ranking process. Producers enrolling in the Initiative must develop a grassland conservation plan and agree to meet or exceed the stewardship threshold for one or more priority resource concerns by the date on which the contract expires. As such, the Initiative assists producers in protecting grazing uses and conserving and improving soil, water, and wildlife resources.

Grassland conservation contracts are for a 5-year term and are not renewable. Beginning in FY 2019, the Secretary started providing signups for producers' one-time election to enroll eligible land in the initiative. NRCS has provided three signups to date and will continue to provide signups until all eligible producers are enrolled or the authority for the program expires in FY 2023. A Grassland Conservation Initiative contract may be terminated at any time and the producer may retain payments already received under the contract.

The Farm Service Agency estimates that there were 2.4 million base acres where the entire farm was planted to grass or pasture (including cropland that was idle or fallow) from January 1, 2009 to December 31, 2017. These base acres are eligible for the Grassland Conservation Initiative. These eligible acres are concentrated in Texas, Oklahoma and Kansas (Table 11). Based on this estimate, the total cost of the Grassland Conservation Initiative would be $214.9 million over 5 years, representing 5.5-percent of authorized CSP funding under the 2018 Farm Bill. Through March 2020, a total of 1.2 million acres have been enrolled with obligated funds totaling $106.8 million.

Table 11. Eligible Base Acres Enrolled in the Grassland Conservation Initiative (GCI) [a]

State Name	Acres enrolled in GCI, FY 2019-2020	Estimated Uncropped Base Acres	Percentage enrolled
Texas	467,806	743,744	62.9
Oklahoma	219,535	410,770	53.4
Kansas	72,377	170,776	42.4
Missouri	39,701	96,852	41.0
Louisiana	51,886	96,436	53.8
Montana	37,263	83,400	44.7
Nebraska	24,983	65,560	38.1
Georgia	21,324	64,196	33.2
California	24,876	62,321	39.9
Subtotal	**959,751**	**1,794,055**	**53.5**
Other States	233,188	593,683	39.3
U.S. Total	**1,192,938**	**2,387,738**	**50.0**

[a] Base acres no longer eligible for ARC and PLC payments.
Source: Internal FSA analysis, 2018 and NRCS ProTracts Database, FY2020

Ranking Factors

Under the 2014 Farm Bill, applications were ranked using 5 statutory ranking criteria to determine how well the current and future conservation management system would address national, state, and local natural resource priorities. These criteria include:

- Level of conservation treatment on all targeted resource concerns at the time of application.
- Degree to which the proposed conservation activities effectively increase conservation performance.
- Number of targeted resource concerns proposed to be treated to meet or exceed the stewardship threshold by the end of the contract.
- Extent to which non-targeted resource concerns will be addressed to meet or exceed the stewardship threshold by the end of the contract period.
- Extent to which resource concerns will be addressed when transitioning from the Conservation Reserve Program (CRP) to agricultural production.

Under the 2018 Farm Bill, these 5 criteria are replaced with the broader criteria below, which provide USDA greater flexibility in ranking applications:

- The natural resource conservation and environmental benefits that result from the conservation treatment on all applicable priority resource concerns at the time of submission of the application;
- The degree to which the proposed conservation activities increase natural resource conservation and environmental benefits;
- Other consistent criteria, as determined by the Secretary.

NRCS intends to continue evaluating applications based on the level of expected environmental benefit achieved through adoption of additional conservation activities. Currently, NRCS provides higher points to applicants who agree to adopt more conservation activities in order to meet or exceed the stewardship threshold of a higher number of resource concerns, agree to adopt the additional conservation activities over a greater percentage of their operation, adopt bundles, and adopt conservation activities that target wildlife habitat improvement and soil health. NRCS also uses an efficiency score component in the ranking which considers the environmental benefit associated with an applicant's planned additional conservation activities and the costs associated with implementing these activities. In this way, NRCS prioritizes applications that will provide higher levels of conservation and environmental benefits across the agricultural or forestry operation.

The 2018 Farm Bill also indicates that, if applications receive the same ranking based on the criteria established by USDA, consideration should be given to the extent to which actual and anticipated conservation benefits are provided at the lowest cost relative to other contracts.

The broadening of the ranking factor conditions, the greater flexibility provided USDA, and the addition of cost/benefit analysis in situations where applications are ranked the same, should allow for greater environmental benefit per dollar expended. NRCS will assess the results of its application rankings to evaluate the improvements made over time.

Measurement of Environmental Improvement

The Secretary has considerable discretion in developing and using science-based thresholds. The 2018 Farm Bill expands how NRCS determines stewardship thresholds, including using quality criteria under a resource management system; predictive analytics tools or models developed or approved by NRCS; data from past and current enrollment in the program; and other methods that measure conservation and improvement in priority resource concerns, as determined by the Secretary. The increased flexibility provided by the 2018 Farm Bill should have a negligible impact on program cost-effectiveness and the number of activities undertaken.

Factors to Consider in Determining Payment Levels

The complex mix of factors considered in determining contract obligations consider enhancement and practice costs, income foregone, expected conservation impacts of existing activities and new enhancements and practices, and treated areas of the operation. The 2018 Farm Bill now requires increasing the payment for cover crop activities to at least 125-percent of the annual payment amount determined by the Secretary and increasing the supplemental payment rate for resource conserving crop rotations and advanced grazing management activities to not less than 150-percent.

Table 12. Cost of Enhancements Targeted for Payment Over 100 Percent of Payment Rate, FY 2018 contracts[a]

Enhancements	Base Payment[b] (million $)	Share of Total Obligations (%)	Adjusted Payment[c] (million $)	Share of Total Obligations (%)
Cover crop systems (125%)	22.1	2.6%	27.6	3.2%
Resource conserving rotations (150%)	3.4	0.4%	5.1	0.6%
Prescribed grazing systems[d] (150%)	32.7	3.8%	49.1	5.7%
Total	58.2	6.8%	81.8	9.5%

[a]Includes both new applications and renewals
[b]Annual payment amount as determined by the Secretary (equal to estimated cost of implementing the enhancement)
[c]Payment made to participant after increasing annual payment by the mandated percentage
[d] Prescribed grazing systems are used as a proxy for potential demand advanced grazing management

These increases will, on the face, reduce the amount of CSP funding available to pay for other enhancements and increase the number of contracts that include cover crop enhancements, resource conserving crop rotations, and advanced grazing management. The actual impact will likely not be that great as funds committed to these enhancements in FY 2018 represent 6.8-percent of total obligations (Table 12). The increased payments specified in the 2018 Farm Bill represent 9.5-percent of funds available in FY 2018, which would likely reduce the total number of contracts funded slightly. However, because the least beneficial contracts are ranked lower, the increase in payments for these systems would likely lead to an increase in cost-effectiveness even while reducing the overall benefits because of fewer enrolled acres.

Contract limits

Congress established a payment limit per person or legal entity of $200,000 in the 2008 Farm Bill. To address concerns related to large contracts with joint operations, NRCS also set a contract limit of $200,000 at the beginning of the program to correspond with the $200,000 payment limit. NRCS expanded the contract limit to $400,000 for joint operations in 2010 to reflect the two-participant structure of these operations; this limit was maintained through the 2014 Farm Bill.

NRCS indicated in the interim rule that the higher contract limit for joint operations would continue for the duration of the 2018 Farm Bill (2019-23), and, in turn, received several comments. Most of these comments recommended removing the higher contract limit for joint operations and one comment suggested the contract limitation itself is a violation of statute. Several comments suggested that allowing the higher contract limit for joint operations reduces the availability of funds for individuals and small farms. To evaluate these comments, NRCS considered the impact of eliminating the contract limit on funds available for new contracts and potential program participants, as described below.

Analysis of NRCS program data reveals that a small number of contracts would be affected by eliminating the $400,000 limit (Table 13), as joint operations with estimated costs that exceed $200,000 represent a relatively small share of all CSP contracts. The highest number of contracts in this category occurred in the 2011 signup, with 619 contracts (6.8 percent), and ranged from 3.7-6.4 percent in all other years prior to the 2017 signup. Since the 2017 signup, the percent of active contracts with estimated costs exceeding $200,000 have dropped markedly from 5.3 percent in 2016 to 2.9 percent in 2019.[2]

Table 13. Number of Joint Operation Contracts by estimated size of contract

	Contract Type								
	All	Joint operations							
		Total		>=200K[a]		>=400K[b]			
Signup			% all		% all	Total	% all	No. Participants >2[c]	% all
2009	9,921	859	8.7	364	3.7	141	1.4	45	0.5
2010	9,431	1,010	10.7	502	5.3	236	2.5	54	0.6
2011	9,084	1,099	12.1	619	6.8	333	3.7	90	1.0
2012	8,458	1,000	11.8	540	6.4	223	2.6	48	0.6
2013	6,615	744	11.2	382	5.8	155	2.3	21	0.3
2014	7,242	871	12.0	440	6.1	184	2.5	21	0.3
2015	5,514	542	9.8	242	4.4	82	1.5	15	0.3
2016	6,789	687	10.1	358	5.3	149	2.2	6	0.1
2017	7,084	726	10.2	296	4.2	45	0.6	2	0.0
2018	7,926	683	8.6	277	3.5	19	0.2	0	0.0
2019	5,692	370	6.5	164	2.9	24	0.4	0	0.0
Average	7,614	781	10.2	380	4.9	145	1.8	27	0.3

[a]Joint operation contracts with estimated costs greater than or equal to $200,000. [b]Joint operation contracts with estimated costs greater than or equal to $400,000. [c]Contracts with more than 2 participants

The drop in the number of joint-operation contracts exceeding $200,000 since FY 2017 may be due to two interrelated factors. First, NRCS moved to paying on costs of enhancements and land uses rather than on performance points in FY 2017. As a result, determining the overall cost of the contract became easier to estimate and applications may have been submitted that fit under the limit. In addition, the estimated costs of contracts were lower under the new cost basis payment structure than when based on performance points, and consequently, more contracts likely fell below the $200,000 limit.

[2] Note that the percent of joint ownership contracts exceeding $200,000 did not drop by as much.

CSP contract information from the 11 signups under the life of CSP were reviewed to determine the impact of reducing the contract limit for joint operations on the availability of funds. The analysis uses only active and completed contracts for the main CSP signups. It does not include renewals of original contracts. Federally recognized Indian tribes and Alaskan native corporations are exempt from payment limits by statute and therefore their contracts are unaffected by proposed changes in contract limits.

Table 14. Estimated reduction in obligated funds from reducing the contract limit for joint operations to $200,000

	Contracts		Acres	Total estimated contract obligations			
Signup	Operation Type			Current Policy[a]	$200,000 limit[b]		
	All	Joint		Level	Level	Change	% Change
		>$200K	million	million $	million $	million $	
2009	9,921	364	11.9	726.4	683.8	-42.6	-5.9
2010	9,431	502	11.7	827.6	776.8	-50.8	-6.1
2011	9,084	619	12.0	899.4	833.1	-66.4	-7.4
2012	8,458	540	11.1	778.0	720.7	-57.2	-7.4
2013	6,615	382	8.8	579.5	537.3	-42.3	-7.3
2014	7,242	440	8.7	688.5	640.4	-48.1	-7.0
2015	5,514	242	6.7	443.4	413.4	-29.9	-6.8
2016	6,789	358	7.8	554.1	505.4	-48.6	-8.8
2017	7,084	296	7.3	548.8	514.2	-38.2	-7.0
2018	7,926	277	7.5	592.2	557.5	-35.0	-5.9
2019	5,692	164	5.5	384.3	363.2	-21.0	-5.5
Total	83,756	4,184	99	7,022.2	6,545.9	-480.2	
Average	7,614	380	9	638.4	595.1	-43.7	-6.8

[a] Current policy maintains a contract limit of $200,000 for individual operations and $400,000 for joint operations. No contract limit on contracts with Indian tribes or entities.
[b] $The 200,000 limit is imposed on all operations, except Indian tribes.

Analysis of data (Table 14) found that reducing the contract limit to $200,000 for all contracts would increase funding available for additional contracts on average by $43.7 million per signup, while reducing the average amount received per joint operation by $115,000. (This is a $43.7 million average reduction per signup divided by 380 joint operation contracts exceeding $200,000.) This would translate, based on an estimate of an average cost per contract of $78,000, to an additional 560 contracts ($43.7 million divided by a $78,000 cost per contract) and 658,000 additional acres (560 additional contracts times 1,174 acres per contract). The potential increase in acres treated represents 9.1 percent of the 7.2 million acres enrolled on average per signup since 2014.

This analysis assumes that reducing the contract limit to $200,000 would not reduce the willingness of joint operations to participate in the program. However, if this is not the case then the potential increase in acres treated could be significantly smaller. For example, the number of joint operation contracts exceeding $200,000 has declined significantly since 2017. Joint operation contracts with estimated costs over $200,000 may be unwilling to scale back their proposed treatment plans and decide not to participate. The number of acres treated under large joint operation contracts (2,215 acres/contract) are more than twice as large as acres treated under individual operation contracts (952 acres/contract). If large joint operations are less interested in participating, reducing the contract limit for joint operations to $200,000 could lead to a reduction in acres treated by the program rather than an increase (as some commenters assumed). Based on these findings, NRCS is making no change to the existing $400,000 contract limit.

Table 15. Program Impacts of 2018 Farm Bill Statutory Requirements and Discretionary Actions

Statutory	Authorized Program Funds	Impacts on Conservation Activities	Cost-effectiveness
Funding changes (from acre and payment per acre with automatic renewal basis to annual funding)	- $5.025 billion	Significant decrease	Improvement
Conditions for Contract Renewal (Compete for funding with other renewals and new contracts)	Not Applicable	Decrease	Improvement
Grassland Conservation Initiative	$18/acre	Marginal decrease	Marginal decrease
Ranking factors	No Impact	No Impact	Slight Improvement
Measurement of environmental improvement	No Impact	Negligible	Negligible
Factors to consider in determining payment levels	No Impact	Increase[a] Slight Decrease[b]	Slight Improvement

[a] Targeted enhancement—cover crops, resource conserving crop rotations, and advanced grazing management
[b] Other enhancements

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Appendix

Table 16. Conservation Stewardship Program Annual Obligations, FY 2014-2018, All Signups.					
Division	**2014**	**2015**	**2016**	**2017**	**2018**
	thousand $				
Total	1,030,871	1,095,879	1,129,295	1,134,534	1,197,294
South Dakota	66,134	75,751	93,175	95,384	94,632
Arkansas	72,949	77,861	81,211	84,449	83,576
Minnesota	81,575	85,018	84,083	82,001	80,327
North Dakota	71,382	75,144	77,089	74,743	75,246
Other	29,435	55,200	57,701	61,654	72,733
Mississippi	28,643	33,276	36,605	44,969	66,477
Nebraska	61,972	60,449	63,937	61,594	64,372
Oklahoma	57,850	61,222	61,187	61,340	58,802
Georgia	38,955	43,331	43,986	48,257	52,831
Kansas	53,311	50,195	47,715	48,449	46,140
Montana	41,872	42,406	46,460	43,109	44,566
Illinois	31,479	35,742	39,542	40,424	41,232
Iowa	48,412	43,328	37,051	36,281	38,598
Louisiana	29,570	34,828	35,713	36,960	37,956
Missouri	34,181	34,740	28,473	29,328	35,836
Texas	37,269	35,635	40,605	35,361	34,414
Oregon	20,512	22,676	26,272	27,742	29,227
Wisconsin	20,797	23,782	21,155	22,693	28,654
Colorado	27,921	26,165	26,703	25,303	27,158
Washington	19,897	21,785	23,259	23,139	23,129
New Mexico	27,135	28,290	27,954	26,032	22,199
Indiana	9,557	9,350	12,940	11,031	12,486
South Carolina	6,111	7,127	7,397	7,619	9,458
Alabama	7,204	7,601	7,393	7,456	8,669
Pennsylvania	7,528	7,743	7,522	7,797	8,655
Ohio	6,942	6,802	6,576	7,654	8,418
Tennessee	6,441	7,360	7,171	7,439	8,323
Virginia	7,086	7,538	6,878	6,834	7,695
Idaho	8,057	6,994	7,197	7,607	7,546
Michigan	9,265	8,424	7,029	6,833	7,539
Kentucky	3,829	5,087	4,971	5,650	7,395
Utah	5,595	5,800	7,678	6,447	7,177
New York	6,503	6,436	6,189	6,760	6,977
Wyoming	9,645	8,175	9,840	7,151	6,723
California	9,069	7,504	6,356	6,614	6,079
Florida	3,573	3,749	3,696	3,577	4,112
West Virginia	2,996	3,851	2,278	2,495	4,007
North Carolina	3,732	4,123	3,259	2,955	3,862
Arizona	7,667	5,357	5,688	3,529	3,425
Delaware	1,323	1,511	1,769	1,982	1,866
Maryland	1,309	1,387	1,004	1,234	1,484

Table 16. Conservation Stewardship Program Annual Obligations, FY 2014-2018, All Signups. (*cont.*)					
Division	**2014**	**2015**	**2016**	**2017**	**2018**
	-- thousand $ --				
Alaska	2,086	1,466	1,609	1,272	1,317
Maine	932	916	750	750	851
Hawaii/Pacific	325	706	567	496	795
Nevada	1,115	1,312	1,271	936	712
New Hampshire	287	399	496	688	677
New Jersey	404	592	485	603	620
Caribbean	109	231	175	332	517
Connecticut	301	507	414	483	513
Vermont	189	324	289	404	451
Massachusetts	253	463	302	381	433
Rhode Island	189	223	235	315	410

Source: NRCS RCA Interactive Viewer, Program Reports. April 2019.
(https://www.nrcs.usda.gov/wps/portal/nrcs/rca/national/technical/nra/rca/ida/)