Conservation Planning Activity

Conservation Plan Supporting Organic Transition

CPA 138

Definition

A site specific conservation plan that contains planned conservation treatment activities for resource concerns resulting from the transition of conventional to organic production systems.

Applicable Land Uses

This conservation planning activity applies to farmstead (production area), as well as cropland, pastureland, rangeland, and grazed forest land.

REQUIREMENTS General Requirements

This Conservation Planning Activity (CPA) involves a Technical Service Provider (TSP), hired by a Farm Bill Program participant, providing a conservation plan to document participant objectives, benchmark (current) conditions, resource concerns, alternative actions, the evaluation of alternative actions, and the participant's preferred alternative with the intent to achieve specific ecological, economic and management objectives.

This activity will meet the Natural Resource Conservation Service (NRCS) planning criteria for one or more of the plant, animal, water, air, and soil resource concerns. The overall conservation plan must accomplish one or more purposes as described in the criteria and considerations for each conservation practice, as described in the Conservation planning process as outlined in the NRCS National Planning Procedures Handbook (NPPH), steps 1-7. A summary of those seven steps is provided in Appendix A, *Conservation Planning Activity, General Requirements*, at the end of this document. Do not overlook the General Requirements – they are important for this CPA's development.

State-specific conservation planning reference information and technology is provided in the NRCS Field Office Technical Guide (FOTG). The FOTG home page hyperlink is: https://efotg.sc.egov.usda.gov/#/

Technical Requirements

CPA 138 must be developed by a TSP who meets NRCS Conservation Plan Supporting Organic Transition certification requirements (see NRCS Registry).

The TSP must:

1) Arrange a pre-work meeting between participant, TSP and NRCS field office in order to establish collaboration and address any questions among the parties.
2) Maintains a written and date-ordered record of discussions with the participant that are related to this planning activity.

3) Conducts an on-site inventory of participant's planning area to inventory the current land uses and land management systems in the operation.

4) Uses NRCS-approved technology tools and protocols to assess resource concerns, as indicated in the state's FOTG, Section 3, including: a) Water Erosion

   RUSLE2 simulation (all fields) reports for the benchmark and the agreed upon conservation practice changes are included as part of the Organic Transition-DIA document.

   b) Wind Erosion
   Complete the Wind Erosion Prediction System (WEPS) on all fields to document reduction of wind erosion loss after installation of conservation practices. Include the WEPS simulation report.

   c) Nitrogen Leaching and Off-site Movement
   Completed State approved environmental risk assessment tool designed to assess the potential for nitrogen movement out of agricultural lands via leaching, surface offsite transport and atmospheric loss. The Leaching Index functionality within RUSLE2 may be used when a State N assessment is not available. Report will document the effect of installed conservation practices.

   d) Phosphorus Assessment/Index
   Completed State approved risk assessment showing the installed conservation practice effect on risk of P movement. If using MMP and MMP includes a valid State risk assessment, include the custom report document.

   e) Pesticide Screening Tool/Hazard Assessment
   Complete the Windows Pesticide Screening Tool (WIN-PST) on all NOP approved pesticides used to document any hazards for pesticide losses. Include reports.

5) Develops a minimum of one conservation alternative to meet the resource needs, participant's objective(s), and adequately addresses the NRCS-recognized Resource Concern(s) that participant chooses to address. The list of Resource Concerns appears in the state's FOTG, Section 3. Contrast this alternative with the no-action alternative (what is predicted to happen if no action is taken).

6) Include an evaluation of the alternative's effects on the participant's land use, capital, labor, management, risk, profitability, and public health and safety.

7) Present and explain technically feasible conservation alternatives to the participant and obtain the participant's decision about what conservation practices to use, the practice location(s), and the schedule to guide sequential installation of conservation practices.

8) Produces conservation plan products (plan schedule, maps, and other useful supporting material) based on decisions reached in the previous item and in the Deliverables section of this document.

9) Must be developed to assist participants in taking voluntary actions to meet the National Organic Program (NOP) regulations for organic certification related to addressing natural resource concerns for soil, water, wetlands, woodlands and wildlife. Here is a link to the NOP regulations: https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=3f34f4c22f9aa8e6d9864cc2683cea02&tpl=/ecfrbrowse/Title07/7cfr205_main_02.tpl

10) Include considerations to avoid or mitigate any adverse effects on unique resources and other soil, water, air, plants, animals (including livestock, fish, and wildlife), energy, or human

concerns, as well as on special environmental considerations.

11) Collect and evaluate data on special environmental concerns, such as wetlands, endangered species, or cultural/historic sites on and near the planning area. NRCS needs this information to understand the effects implementing the conservation practices will have on the environment; and will use this information to complete an environmental evaluation (CPA-52).

12) In most situations, a combination of conservation practices and management activities will be required to meet the production needs of the owner/operator and the resource concerns associated with the farmstead and land treatment areas. The Field Office Technical Guide (FOTG) Section III and National Planning Procedures Handbook (NPPH) contain additional information and guidance.

Farmstead (Production Area)

1) Review/Develop plan map(s) showing existing and planned structures (See NPPH Title 180, part 600.31 subpart A for map requirements), and soils map(s) for all fields indicating map units. Note: Provide a brief description of any limitations of the soil for desired use. Appropriate conservation practices, existing or planned, will address the limitations.

2) For livestock operations, record or update the Animal Inventory Information (both existing and proposed) to include such information as type, number and average weight.

3) For livestock operations, record Manure Storage Information including type of manure storage, existing storage volumes/sizes (when applicable) and maximum length of storage available. When applicable, document planned imports, exports, and on-farm transfers of manure and other NOP allowed substances.

4) Record Pesticide Handling and Storage Facilities.

Crop and Pasture (Land Treatment Areas)

1) Review/develop plan map(s) showing fields, soils, sensitive areas, setbacks, existing and planned crop and pasture practices. Note: Provide a brief description of any limitations of the soil for desired use. Appropriate conservation practices, existing or planned, will address the limitations.

2) Review and update:

   a) Any existing results of approved risk assessment tools for soil erosion, nitrogen, phosphorus and pesticides.

   b) Identify sensitive area setback distances required for application of organic or inorganic nutrients or pesticides to protect water quality.

   c) Soil test result data. New or updated soil tests shall be scheduled if analysis exceeds testing recommendations.

   d) Test result data for all nutrient sources to include manure water, compost, organic byproduct, and plant tissue sample analyses applicable to the plan. Schedule any new sampling according to LGU recommendations.

   e) Confirm or update the current and/or planned crop rotation including realistic yield goals for the crops. Highlight any crop rotation changes such as adding cover crops, multi-year perennials, non-harvested crops to build soil health.

   f) Include operational changes to tillage and residue management, use of compost and/or biochar, and other management changes to meet NOP criteria.

g) Listing and quantification of all nutrient sources, fertilizer recommendations, planned nutrient applications and form.

h) Outdoor access plan for livestock and poultry. Consider Grazing Management Plan (CPA 110) and Grazing Management Design and Implementation Activity (DIA 159) if needed.

Wetlands, Woodlands and Wildlife (Resource improvement Areas)

1) Review/develop plan map(s) showing wetlands, woodlands and wildlife habitat.

2) Review current state of inventory and how resources will be maintained or improved for:

   a) Wetlands protection from resource degradation by sediment, nutrients and pathogens. Confirm that a Highly Erodible Land and Wetland Conservation determination for each field has been completed. Refer participant to Farm Service Agency if not able to confirm. Consider incorporating Grazing Management Plan (CPA 110) and Grazing Management Design and Implementation Activity (DIA 159). The grazing management plan will define the timing, duration and intensity of grazing if applicable.

   b) Woodlands - Consider incorporating Grazing Management Plan (CPA 110) and Grazing Management Design and Implementation Activity (DIA 159). Grazed forest grazing management plans will define the timing, duration and intensity/defoliation for all livestock.

   c) Wildlife - Livestock watering tanks must include exit ramps for birds or small animals.

DELIVERABLES

The TSP must provide documentation showing all the tasks indicated in the **General Requirements** section, the **Technical Requirements** section, and the following sections:

Cover Page

The cover page must include the following:

1) CPA name and number.

2) Participant information: Name, farm bill program name, contract number (TSP obtains contract number from participant), land identification (e.g., state, county, farm, and tract number).

3) TSP name, TSP number, TSP expiration date, mailing address, phone number, email address.

4) A statement by the TSP that services meet the CPA requirements, such as:

   I certify the work completed and delivered for this CPA:

   - *Complies with all applicable Federal, State, Tribal, and local laws and regulations.*
   - *Meets the General and Technical Requirements for this CPA.*
   - *The planned practices are based on NRCS Conservation Practice Standards (CPSs) in the state Field Office Technical Guide where the practices are to be implemented.*
   - *Is consistent with and meets the conservation goals and objectives for which the program contract was entered into by the participant.*
   - *Incorporates alternatives that are both cost effective and appropriate to address the resource issue(s) and participant's objective(s).*

   TSP Signature _____ *Date* _____

5) Participant's acceptance statement indicating:

I accept the completed CPA deliverables as thorough and satisfying my objectives. Participant Signature _____ Date _____

6) A designated space for an NRCS reviewer to certify the agency's acceptance of the completed CPA.

NRCS administrative review completion by:

Signature _____ Title _____ Date _____

Resource Inventory and Assessment Documentation

Results from NRCS-approved resource assessment technology tools that are appropriate for the resource conservation needs and participant objectives to compare the benchmark condition with the planned alternative condition, including as applicable:

1) Any additional assessments, maps, and sketches resulting from the planning process used in preparation and arriving at the alternative selected.
2) Any photographs or documentation used to support the determination documented.
3) Document the effects of each Alternative on other resources concerns.
4) Considerations to avoid or mitigate any adverse effects on unique resources and other soil, water, air, plants, animals (including livestock, fish, and wildlife), energy, or human concerns, as well as on special environmental considerations.
5) An evaluation of the alternative's effects on the participant's land use, capital, labor, management, risk, profitability, and public health and safety.
6) Descriptions of current crops and rotation, farming practices (tillage, nutrient application methods, timing, source, and rate), soils, and equipment and technology utilized.
7) Calculations from current erosion prediction technology used to estimate benchmark annual sheet and rill erosion and wind erosion in tons/acre. Include printout of any software utilized
8) Organic System Plan documentation
    a) Description of Organic Production, Application Information, and Land Requirements.
    b) Crop Production, Seed and Planting Stock, Soil Management and Crop Rotation, Pest, Disease and Weed Management & Monitoring, Irrigation Water, Equipment and Containers, Treated Wood, Materials List, Greenhouse Crop Production, Compost and/or Manure Use and/or Production, Facility Pest Management, and Wild Crop Harvest.

Notes and Correspondence

1) Provide notes, in date-order that:
    a) Document each interaction with the participant, results of that interaction, and the date of the interaction.
    b) Document the participant's objectives.
    c) Document each site visit, those present, the activity completed in the field, and results of each site visit.
    d) Provide initials of the note-maker, if more than one person provides the assistance.

2) Information provided to support the participant's understanding of the planned conservation practices such as applicable "Conservation Practice Overview" sheets from the FOTG, or other prepared material.

3) Provide copies of correspondence between the TSP and the participant relating to decisionmaking and completion of this CPA. For example, description of alternatives presented for evaluation and decision-making.

Maps

Maps for this CPA must include, but are not limited to:

1) General location map of the planning area showing access roads to the location.

2) A CPA map (this may consist of several maps to account for the entire planning area). This map will specifically include:

   a) Boundary lines for the Planning Land Units (PLUs) with labels (name, number, or both). A PLU is a unique geographic area, defined by a polygon, which has common land use and is owned, operated, or managed by the same participant or participants. The PLU is the minimum unit for planning.

   b) Land-use designation and any applicable land-use modifiers such as irrigation for each PLU, as appropriate. The NRCS-recognized land use names and land use modifiers are listed in the National Planing Procedures Handbook, Definitions section. (Handbook 180, Part 600.2) Here is a link to the National Planning Procedures Handbook: https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=44407

   c) Acreage for each PLU.

   d) Location of sensitive resources and setbacks, if applicable.

   e) Locations of planned and applied conservation practices.

   f) If the planning area includes nonprivate lands, such as Federal or Tribal lands, a land status map must be included to display land ownership categories (Private, State Trust, BLM, Tribal, and Territorial, etc.).

3) Soil interpretative map(s) and other natural resource maps used to support the planning activity.

4) All maps developed for the CPA will include:

   a) Map title.

   b) Participant's name.

   c) Assisted By [TSP planner's name].

   d) Name of applicable conservation district, county, and State.

   e) Date prepared.

   f) Map scale.

   g) Information needed to locate the planning area, such as geographic coordinates, public land survey coordinates, etc.

   h) North arrow.

   i) Appropriate map symbols and a map symbol legend on the map or as an attachment.

Practice Schedule

A record of the participant's decision, which includes:

1) A table, titled "Practice Schedule" indicating all of the following:
   a) Tract Number to have practice(s) installed.
   b) PLU (Field) number to have practice(s) installed.
   c) Practice Code and Practice Name (Codes and Names are used for conservation practices, conservation activities, enhancements, and bundles) to be implemented,
   d) Estimated Amount of each practice to be implemented, and the practice's measurement units.
   e) Dates (month and year) the conservation activities are intended to be installed, or were previously installed.

   The Practice Schedule is used in conjunction with a conservation plan map to document the participant's decision and vision for conservation implementation. Table 1 provides an example Practice Schedule.

Table 1. Example Practice Schedule

Tract Number	PLU (Field) #	Practice Code	Practice Name	Planned Amt	Practice Units	Planned Date
1000	3, 5, 7	340	Cover Crop	75	Ac.	September 2022
1000	9, 11	600	Terrace	3,000	Ft.	May 2023
1000	9, 11	638	Water and Sediment Control Basin	2	No.	May 2023

2) Brief descriptions of the planned conservation practices to explain their use in the context of this plan. For example, "Cover Crop - Plant grasses, legumes, or forbs for seasonal vegetative cover to protect or improve natural resources."
3) As needed, applicable "Conservation Practice Overview" sheets or other prepared material.
4) Available maps, sketches, and designs resulting from the planning process that will be useful to the participant in implementing the Practice Schedule.

Deliver Completed Work

The TSP must:

1) Prepare and provide their participant two sets of the items listed in Deliverables.
   a) One set is for the participant to keep.
   b) The other set is for sharing with the local NRCS Office.
   c) The TSP may transmit a set of the Deliverables to the local NRCS Office, if their participant has authorized it. It is recommended to provide NRCS field office an opportunity to review the CPA deliverables, prior to asking for its acceptance.
2) Upload electronic copies of all the items listed under the **Deliverables** heading on NRCS Registry.

REFERENCES

USDA Natural Resources Conservation Service. Cultural Resources Handbook. https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=42752

USDA Natural Resources Conservation Service. Field Office Technical Guide.

https://efotg.sc.egov.usda.gov/#/

USDA Natural Resources Conservation Service. National Environmental Compliance Handbook. https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=39467

USDA Natural Resources Conservation Service. National Planning Procedures Handbook.https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=44407 USDA

Natural Resources Conservation Service: National Range and Pasture Handbook

USDA Natural Resources Conservation Service. National TSP Resources. https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/programs/technical/tsp/?cid=nrcseprd1417414

USDA Natural Resources Conservation Service. National TSP Website. https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/technical/tsp/

Appendix A - Conservation Planning Activity, General Requirements Overview

The Technical Service Provider (TSP) hired by a participant to complete this Conservation Planning Activity (CPA) is expected to complete conservation planning steps 1 through portions of 7 of the Natural Resource Conservation Service (NRCS) 9 step conservation planning process, as outlined in the NRCS National Planning Procedures Handbook (NPPH). Those steps are described below. The NPPH may be consulted for more detailed descriptions of the steps. NPPH is located at the following link: https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=44407.

Identify Problems and Opportunities (Step 1)

Visit with the participant to identify and document existing, potential, and perceived natural resource problems, opportunities, and concerns in the planning area. The identified problems and opportunities as well as the participant objectives guide the remainder of the planning process and are the basis for the purpose and need for action that are documented in NRCS Environmental Evaluation. This will include items such as soils, ecological sites or forage suitability groups, where applicable, and discuss opportunities to maintain and/or enhance resource conditions.

Determine Objectives (Step 2)

Determine the participant's planning objectives by developing an understanding with the participant of the desired future condition for the planning area, as compared to the existing conditions. This is the purpose for the participant to take action. It includes the desired resource uses, resource problem reductions, onsite and offsite ecological protection, and production concerns. As resources are inventoried, their interactions are analyzed, and alternatives formulated, objectives may need to be reviewed and modified.

Inventory Resources (Step 3)

The resource inventory documents benchmark (current) conditions of natural resources in the CPA planning area. The inventory documentation requirements and resource concerns to be evaluated specifically for each CPA are provided in the CPA's **TECHNICAL REQUIREMENTS** section. Use NRCS Field Office Technical Guide (FOTG) Sections 1 and 2, plus Web Soil Survey (WSS) and other helpful resources to support the inventory. In addition, each CPA requires the following inventory documentation as applicable: 1) General description of the enterprise/operation,

2) Document any previously installed or implemented conservation practice(s) and indicate whether the existing practice(s) is currently accomplishing the conservation practice purpose indicated in the NRCS conservation practice standard in the state's FOTG, Section 4,
3) Equipment, technology and management activities currently being used by the participant,
4) Soils, climate, topography,
5) Environmentally sensitive areas in and around the planing area- for example riparian areas, cultural resources and historic properties, habitat for rare or protected species, and wetlands,
6) The need for Highly Erodible Land or Wetland compliance determinations associated to the planning land unit,

7) Pertinent Federal, State, Tribal, and local laws, regulations, policies and their associate permit requirements.

8) Identification of existing conditions through a resource inventory.
9) After the prior steps, identity if/what you have learned about other relevant soil, water, air, plant and animal resource concerns.
10) Provide a landscape setting description explaining how surrounding management affects the property as well as how the participant's actions impact their neighbors. Consider aesthetic quality, privacy, wildlife movement and habitat, noxious weeds, urban encroachment, wildland fire interface, if applicable.

Analyze Resource Data (Step 4)

Run applicable resource assessment tools and compare the current (benchmark) conditions with the desired future conditions to identify resource concerns that need to be addressed. Analyses and documentation requirements are provided in the **Technical Requirements** and **Deliverables** sections.

Analyses documentation will include at a minimum:

1) Benchmark conditions,
2) Results of assessment tools (as applicable), and
3) The need for conservation actions, in terms of a desired future condition, 4) NRCS resource concerns identified.

Formulate Alternatives (Step 5)

Develop a minimum of two alternatives. The first is a ***no-action alternative*** in which current management activities are assumed to continue. The second is an ***action alternative*** identifying a conservation practice or a system of conservation practices and management activities to address the identified resource concern(s). Additional action alternatives may be developed to identify different ways of achieving participant objectives. Each action alternative must meet the participant's objectives and comply with Federal, State, Tribal, and local laws, regulations, and policies.

Evaluate Alternatives (Step 6)

Evaluate the alternatives and describe the natural resource, environmental and socio-economic effects associated with each alternative. Review with NRCS and the participant the analysis of the resource inventory and the evaluation of alternatives. This information will provide the participant with information needed to select their preferred alternative.

When evaluating the no-action alternative, provide information to the participant about what will occur if current management activities continue, and no new practices are implemented.

When evaluating conservation practice effects, the short and long-term effect on natural resources and the applicability and effect on special environmental concerns identified in Step-3 (Resource

Inventory) must be documented. Include recommendations that will avoid or mitigate any adverse effects on soil, water, air, plants, animals (including livestock, fish, and wildlife), energy, or socioeconomic concerns, as well as on special environmental concerns.

Prepare the following documentation, at a minimum:

1) Documentation of alternatives discussed and site level resource inventory and assessment data, and analysis used to formulate management alternatives.

2) Considerations to avoid or mitigate any adverse effects on those unique resources and other soil, water, air, plants, animals (including livestock, fish, and wildlife), energy, or human concerns, as well as on special environmental considerations, and
3) An evaluation of the alternative's effects on the participant's land use, capital, labor, management, risk, profitability, and public health and safety.

Make Decisions (Step 7)

Document the participant's preferred alternative as a decision via a Conservation Plan Map and Practice Schedule.