

## **Testimony for the Record**

## by the Environmental Working Group

# Submitted to the Subcommittee on Conservation and Forestry of the House Agriculture Committee

## "A 2022 Review of Farm Bill Conservation Programs"

### February 2, 2022

To avoid the worst effects of climate change, we must swiftly reduce greenhouse gas emissions from agriculture. But a small fraction of Department of Agriculture conservation spending flows to practices that reduce greenhouse gas emissions, and the reforms included in the 2018 Farm Bill have done little to make these practices a priority.

To address the climate crisis, Congress must quickly enact the Build Back Better Act, which includes \$27 billion for conservation practices that reduce greenhouse gas emissions, and must fundamentally reform the Environmental Quality Incentives Program (EQIP), Conservation Stewardship Program (CSP), Conservation Reserve Program (CRP), and other voluntary conservation programs to make the reduction of emissions as well as long-term and permanent storage of carbon the focus of these programs.

Structural practices designed to boost farm income – such as irrigation pipelines, manure lagoons, roofs and roads – should not be financed through conservation programs.

Agriculture is not only one of the biggest sources of water pollution in the United States, <u>impairing</u> <u>drinking water</u> for millions of Americans and contributing to toxic algae blooms and hypoxic dead zones. Agriculture is also a significant and growing <u>source</u> of greenhouse gas emissions that, if left unaddressed, will jeopardize our efforts to avoid a climate crisis. In particular, <u>nitrous oxide</u> emissions from fertilizing crops and animal feed, and the <u>methane</u> emissions from livestock and their manure, are growing sources of greenhouse gas emissions. Carbon dioxide from tilling fields is also important to agriculture's emissions footprint. Unless we reduce nitrous oxide, carbon dioxide and methane emissions from agriculture, we will fail to make the greenhouse gas reductions <u>needed</u> to avoid the worst impacts of climate change.

Voluntary conservation programs administered by the USDA could play a significant role in reducing the impacts of farm pollution, reducing greenhouse gas emissions, and mitigating the effects of climate change.

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But many farmers are <u>turned away by USDA</u> when they apply to participate in voluntary conservation programs, because the department lacks the resources to accommodate them. Last year, more than 100,000 farmers were <u>turned away</u> by USDA from participating in its two flagship working lands conservation programs. What's more, most conservation funding flows to practices that fail to reduce emissions and actually increase emissions, in some cases.

Congress must provide more resources for USDA's voluntary conservation programs and must ensure that conservation funds get directed toward the conservation practices that will reduce greenhouse gas emissions. The same practices that reduce nitrous oxide and methane emissions also improve air and water quality and make our farms better able to withstand the extreme weather caused by climate change.

To address the climate crisis, the Committee should:

1) Make climate change the primary focus of conservation practices. Congress must significantly increase USDA resources targeted at reducing agricultural greenhouse gas emissions and increasing climate resiliency. The historic investments proposed in the Build Back Better Act would provide a once-in-a-generation opportunity to increase funding and target conservation investments in practices that reduce greenhouse gas emissions. Congress should look to the policy reforms in the Climate Stewardship Act introduced by Sen. Cory Booker (D-N.J.) and Rep. Abigail Spanberger (D-Va.) for additional guidance on climate investments and reform ideas.

In the past year, USDA has taken steps to incorporate climate goals in its conservation programs, including, among other things, establishing a <u>pilot program</u> within EQIP for "climate smart" agriculture and forestry practices in FY 2021I; announcing a <u>new initiative</u> to finance the deployment of climate-smart agriculture and forestry practices; <u>creating</u> a new Climate-Smart Practice Incentive for general and continuous signups within CRP; and most recently <u>releasing</u> an updated list of climate-smart agriculture and forestry practices for CSP and EQIP for FY 2022 enrollment.

Although that is an important first step, much more must be done to ensure that existing conservation programs focus on climate goals and do not fund practices that exacerbate the climate crisis.

For example:

Many of the practices identified as "priority practices" by states to be eligible for higher 90 percent cost share under EQIP don't reduce greenhouse gas emissions, or they actually increase emissions. (e.g., Agrichemical Handling Facility, Livestock Pipeline and Well Decommissioning; see Appendix).

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- Several practices eligible for enrollment in EQIP's Conservation Incentive Contracts (CIC)<sup>[i]</sup> either do not address greenhouse emissions or actually increase emissions, as is the case with Surface Roughening and Emergency Animal Mortality Management (*see Appendix*).<sup>[ii]</sup>
- The list of climate-smart agriculture and forestry practices identified within CSP fails to include bundles of enhancements (e.g., Buffer Bundle, Crop Bundle #1 – Precision Ag-No Till), which consistently rank among the most effective conservation activities eligible for CSP payments.
- Agricultural land easements do not require that producers adopt any of the climate-smart agriculture and forestry identified within EQIP or CSP as a condition of enrollment.

**2)** End or reduce support for practices that do not reduce pollution. USDA should fund only practices that provide clear public health benefits or are highly effective at addressing the most pressing resource concerns, such as reducing agricultural greenhouse gas emissions and protecting sources of drinking water from farm runoff.

A number of conservation practices (e.g., Land Clearing and Deep Tillage) financed through EQIP actually contribute to the climate crisis, according to the government's own data (*see Table 9 in Appendix*).<sup>[iii]</sup> Meanwhile, other practices financed through EQIP and CSP provide little to no benefit to the environment or public health.

Many capital-intensive infrastructure improvements currently funded by conservation programs should instead be financed through an expanded conservation loan program. According to <u>EWG</u> <u>analysis</u>, historically, payments for high-cost structures, equipment or facilities appeared in 38 percent of contracts but received 62 percent of EQIP payments.

Congress sought to incentivize the adoption of highly effective conservation practices through EQIP and CSP in 2018 Farm Bill. Although the Natural Resources Conservation Service (NRCS) has improved its implementation in the past year, EWG analysis finds that the practices eligible for higher cost-sharing or priority under EQIP often do not align with congressional intent.

In 2021, few states chose to include the highest ranking EQIP practices when choosing which 10 practices would be eligible for higher 90 percent cost sharing. NRCS must provide clearer guidance or limits on the types of conservation practices that states can elect as being high priority practices for purposes of higher cost sharing (*see Appendix*).

**3)** Focus investments on long-term and permanent benefits. USDA must swiftly prioritize and expand the number of acres enrolled in long-term CRP contracts and permanent easements to reduce nitrous oxide emissions from fertilizer applications, protect drinking water supplies and ensure long-term storage of carbon in soils and biomass while reducing support for short-term land retirement contracts where benefits are fleeting.

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The 2018 Farm Bill included a number of reforms<sup>[iv]</sup> to prioritize long-term contracts within CRP, but much more needs to be done to prioritize longer-term contracts or permanent easements for environmentally sensitive lands and end the enrollment of prime farmland in short-term contracts. For instance, EWG <u>analysis</u> has found that millions of acres of land enrolled through 10-year general CRP contracts go back into production when the contracts expire or crop prices rise. When contracts expire and land is returned to farming, soil carbon is released into the atmosphere.

Although USDA has increased incentive payments for continuous CRP and water quality practices, the number of acres enrolled through high priority categories like Conservation Reserve Enhancement Program (CREP) <u>stand</u> roughly 500,000 acres less than they were a <u>decade ago</u>, and CLEAR 30 enrollment accounts for less than one percent of total acres enrolled in Clean Lakes, Estuaries and Rivers (CLEAR). It is critical that we shift priorities within CRP from short-term contracts to temporarily restore farmland in favor of long-term or permanent restoration projects that will produce long-lasting benefits.

Finally, long-term contracts for working lands practices must focus on highly effective conservation activities with broad resource benefits. When Congress established EQIP CIC in the last farm bill, it anticipated that USDA would focus this longer-term, five-to-10-year contract period on incentive practices with "broad resource benefits." However, EWG analysis finds that too many practices eligible for incentive payments are one-time practices that do not deserve long-term contracts (e.g., Emergency Animal Mortality Management) or are more akin to on-farm projects a farmer would presumably fund themselves (e.g., Surface Roughening; *see Appendix*). Focusing on highly effective management and vegetative practices would be the most cost-effective way for NRCS to focus limited resources and meet congressional expectations.

EWG thanks the Subcommittee on Conservation and Forestry of the House Agriculture Committee for holding today's hearing reviewing the conservation programs authorized by the farm bill.

Respectfully submitted on behalf of the Environmental Working Group,

Colin O'Neil Legislative Director

Anne Schechinger Midwest Director



## **APPENDIX**

Table 1. 20 Most Common HPP Offered by States in FY2021

		No. of States Offering	Total CPPE Score (98	CPPE Rank (1 = best,	Address Emissions
	Practice	Particular	highest, -22	166 =	of GHGs
Practice	Code	НРР	lowest)	worst)	(CPPE)
Riparian Forest Buffer	391	21	98	1	3
Residue and Tillage Management, No Till	329	19	57	17	4
Cover Crop	340	19	61	14	3
Nutrient Management	590	16	57	18	4
Filter Strip	393	14	62	12	1
Riparian Herbaceous Cover	390	13	75	9	2
Field Border	386	12	46	24	1
Prescribed Grazing	528	12	78	7	2
Waste Storage Facility	313	10	14	107	-1
Conservation Crop Rotation	328	10	54	20	1
Residue and Tillage Management, Reduced Till	345	9	46	22	3
Conservation Cover	327	9	79	6	4
Upland Wildlife Habitat Management	645	8	39	30	2
Pasture and Hay Planting	512	8	41	28	4
Irrigation Water Management	449	8	46	23	1
Forest Stand Improvement	666	8	58	16	3
Tree/Shrub Establishment	612	8	97	2	4
Wildlife Habitat Planting	420	7	24	63	3
Streambank and Shoreline Protection	580	7	32	43	1
Prescribed Burning	338	7	38	33	2



Table 2. 20 Lowest Overall Ranked HPP Offered by	states m	FIZUZIAC	corung to		
	Practice	No. of States Offering Particular	Total CPPE Score (98 highest, -22	CPPE Rank (1 = best, 166 =	Address Emissions of GHGs
Practice	Code	НРР	lowest)	worst)	(CPPE)
Groundwater Testing	355	1	0	160	0
Denitrifying Bioreactor	605	5	2	157	-1
Firebreak	394	3	2	156	1
Agrichemical Handling Facility	309	5	3	155	0
Saturated Buffer	604	5	3	152	0
Structures for Wildlife	649	2	7	145	0
Tree/Shrub Site Preparation	490	1	8	142	0
Livestock Pipeline	516	2	9	137	0
Stream Crossing	578	4	9	134	0
Aquatic Organism Passage	396	5	10	133	0
Salinity and Sodic Soil Management	610	1	10	128	1
Water and Sediment Control Basin	638	3	10	127	0
Well Decommissioning	351	5	10	126	0
Animal Mortality Facility	316	6	11	125	1
Energy Efficient Agricultural Operation	374	2	11	124	2
Waste Facility Closure	360	1	11	122	1
Open Channel	582	1	12	120	0
Short Term Storage of Animal Waste and Byproducts	318	1	12	119	-1
Underground Outlet	620	4	13	115	0
Fence	382	6	14	112	1

Table 2. 20 Lowest Overall Ranked HPP Offered by States in FY2021 According to the CPPE
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		No. of			
		States	Total CPPE	CPPE Rank	Address
		Offering	Score (98	(1 = best,	Emissions
	Practice	Particular	highest, -22	166 =	of GHGs
Practice	Code	НРР	lowest)	worst)	(CPPE)
Riparian Forest Buffer	391	21	98	1	3
Tree/Shrub Establishment	612	8	97	2	4
Windbreak/Shelterbelt Establishment and Renovation	380	2	87	4	4
Range Planting	550	3	80	5	3
Conservation Cover	327	9	79	6	4
Prescribed Grazing	528	12	78	7	2
Silvopasture	381	2	77	8	2
Riparian Herbaceous Cover	390	13	75	9	2
Access Control	472	4	72	10	1
Filter Strip	393	14	62	12	1
Critical Area Planting	342	7	62	13	1
Cover Crop	340	19	61	14	3
Forest Stand Improvement	666	8	58	16	3
Residue and Tillage Management, No Till	329	19	57	17	4
Nutrient Management	590	16	57	18	4
Conservation Crop Rotation	328	10	54	20	1
Residue and Tillage Management, Reduced Till	345	9	46	22	3
Irrigation Water Management	449	8	46	23	1
Field Border	386	12	46	24	1
Pest Management Conservation System	595	5	45	25	0

Table 3. 20 Highest Overall Ranked HPP Offered by States in FY2021 According to the CPPE



### Table 4. EQIP Conservation Incentive Contracts List of Eligible Practices for FY2022

FY 2022 EQIP Practice	Practice Code	EQIP CIC Practice	Total CPPE Score	CPPE Rank (1-166)	Emissions of Greenhouse Gasses - GHGs
Amending Soil Properties with Gypsum Products	333	Yes	9	141	0
Amendments for Treatment of Agricultural Waste	591	Yes	33	42	1
Anionic Polyacrylamide (PAM) Erosion Control	450	Yes	22	82	0
Bivalve Aquaculture Gear and Biofouling Control	400	Yes	7	146	0
Carbon Sequestration and Greenhouse Gas Mitigation Assessment	218	Yes (NEW)			
Conservation Crop Rotation	328	Yes	54	20	1
Cover Crop	340	Yes	61	14	3
Drainage Water Management	554	Yes	23	79	1
Dust Control on Unpaved Roads and Surfaces	373	Yes	4	151	0
Early Successional Habitat Development/Mgt.	647	Yes	16	101	0
Emergency Animal Mortality Management	368	Yes	10	130	1
Feed Management	592	Yes	30	47	4
Field Operations Emissions Reduction	376	Yes	16	100	1
Fishpond Management	399	Yes	19	91	1
Forage Harvest Management	511	Yes	23	78	0
Grazing Land Mechanical Treatment	548	Yes	24	71	2
Irrigation Water Management	449	Yes	46	23	1
Mulching	484	Yes	28	55	0
Nutrient Management	590	Yes	57	18	4
On-Farm Recharge	817	Yes (NEW)			
Pest Management Conservation System (IPM)	595	Yes	45	25	0
Prescribed Burning	338	Yes	38	33	2
Prescribed Grazing	528	Yes	78	7	2
Residue and Tillage Management, No Till	329	Yes	57	17	4
Residue and Tillage Management, Reduced Till	345	Yes	46	22	3
Salinity and Sodic Soil Management	610	Yes	10	128	1
Site Assessment for Soil Testing for Contaminants Activity	207	Yes (NEW)			
Soil Carbon Amendment	808	Yes (NEW)			
Soil Health Testing	216	Yes (NEW)			
Surface Roughening	609	Yes	-3	164	-1
Upland Wildlife Habitat Management	645	Yes	39	30	2
Waste Recycling	633	Yes	23	73	1
Wetland Wildlife Habitat Management	644	Yes	25	61	1



#### Table 5. EQIP CIC Practices for FY2022 Ranked Lowest to Highest According to the CPPE

FY 2022 EQIP Practice	Practice Code	EQIP CIC Practice	Total CPPE Score	CPPE Rank (1-166)	Emissions of Greenhouse Gasses - GHGs
Surface Roughening	609	Yes	-3	164	-1
Dust Control on Unpaved Roads and Surfaces	373	Yes	4	151	0
Bivalve Aquaculture Gear and Biofouling Control	400	Yes	7	146	0
Amending Soil Properties with Gypsum Products	333	Yes	9	141	0
Emergency Animal Mortality Management	368	Yes	10	130	1
Salinity and Sodic Soil Management	610	Yes	10	128	1
Early Successional Habitat Development/Mgt.	647	Yes	16	101	0
Field Operations Emissions Reduction	376	Yes	16	100	1
Fishpond Management	399	Yes	19	91	1
Anionic Polyacrylamide (PAM) Erosion Control	450	Yes	22	82	0
Drainage Water Management	554	Yes	23	79	1
Forage Harvest Management	511	Yes	23	78	0
Waste Recycling	633	Yes	23	73	1
Grazing Land Mechanical Treatment	548	Yes	24	71	2
Wetland Wildlife Habitat Management	644	Yes	25	61	1
Mulching	484	Yes	28	55	0
Feed Management	592	Yes	30	47	4
Amendments for Treatment of Agricultural Waste	591	Yes	33	42	1
Prescribed Burning	338	Yes	38	33	2
Upland Wildlife Habitat Management	645	Yes	39	30	2
Pest Management Conservation System (IPM)	595	Yes	45	25	0
Irrigation Water Management	449	Yes	46	23	1
Residue and Tillage Management, Reduced Till	345	Yes	46	22	3
Conservation Crop Rotation	328	Yes	54	20	1
Nutrient Management	590	Yes	57	18	4
Residue and Tillage Management, No Till	329	Yes	57	17	4
Cover Crop	340	Yes	61	14	3
Prescribed Grazing	528	Yes	78	7	2
Carbon Sequestration and Greenhouse Gas Mitigation Assessment	218	Yes (NEW)			
On-Farm Recharge	817	Yes (NEW)			
Site Assessment for Soil Testing for Contaminants Activity	207	Yes (NEW)			
Soil Carbon Amendment	808	Yes (NEW)			
Soil Health Testing	216	Yes (NEW)			

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FY 2022 EQIP Practice	Practice Code	EQIP CIC Practice	Total CPPE Score	CPPE Rank (1-166)	Emissions of Greenhouse Gasses - GHGs

Table 6. EQIP CIC Practices	for EV2022 in Order o	f Most to Least Effective	for Addressing	CHC Emissions in CDDE
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Feed Management	592	Yes	30	47	4
Nutrient Management	590	Yes	57	18	4
Residue and Tillage Management, No Till	329	Yes	57	17	4
Residue and Tillage Management, Reduced Till	345	Yes	46	22	3
Cover Crop	340	Yes	61	14	3
Grazing Land Mechanical Treatment	548	Yes	24	71	2
Prescribed Burning	338	Yes	38	33	2
Upland Wildlife Habitat Management	645	Yes	39	30	2
Prescribed Grazing	528	Yes	78	7	2
Emergency Animal Mortality Management	368	Yes	10	130	1
Salinity and Sodic Soil Management	610	Yes	10	128	1
Field Operations Emissions Reduction	376	Yes	16	100	1
Fishpond Management	399	Yes	19	91	1
Drainage Water Management	554	Yes	23	79	1
Waste Recycling	633	Yes	23	73	1
Wetland Wildlife Habitat Management	644	Yes	25	61	1
Amendments for Treatment of Agricultural Waste	591	Yes	33	42	1
Irrigation Water Management	449	Yes	46	23	1
Conservation Crop Rotation	328	Yes	54	20	1
Dust Control on Unpaved Roads and Surfaces	373	Yes	4	151	0
Bivalve Aquaculture Gear and Biofouling Control	400	Yes	7	146	0
Amending Soil Properties with Gypsum Products	333	Yes	9	141	0
Early Successional Habitat Development/Mgt.	647	Yes	16	101	0
Anionic Polyacrylamide (PAM) Erosion Control	450	Yes	22	82	0
Forage Harvest Management	511	Yes	23	78	0
Mulching	484	Yes	28	55	0
Pest Management Conservation System (IPM)	595	Yes	45	25	0
Surface Roughening	609	Yes	-3	164	-1
Carbon Sequestration and Greenhouse Gas Mitigation Assessment	218	Yes (NEW)			
On-Farm Recharge	817	Yes (NEW)			
Site Assessment for Soil Testing for Contaminants Activity	207	Yes (NEW)			
Soil Carbon Amendment	808	Yes (NEW)			
Soil Health Testing	216	Yes (NEW)			



FY 2022 EQIP Practice	Practice Code	USDA Climate Smart Ag & Forestry Practice	Total CPPE Score	CPPE Rank (1-166)	Emissions of Greenhouse Gasses - GHGs
Anaerobic Digester	366	Yes	13	118	4
Conservation Cover	327	Yes	79	6	4
Nutrient Management	590	Yes	57	18	4
Residue and Tillage Management, No Till	329	Yes	57	17	4
Tree/Shrub Establishment	612	Yes	97	2	4
Windbreak/Shelterbelt Establishment and Renovation	380	Yes	87	4	4
Cover Crop	340	Yes	61	14	3
Range Planting	550	Yes	80	5	3
Residue and Tillage Management, Reduced Till	345	Yes	46	22	3
Riparian Forest Buffer	391	Yes	98	1	3
Alley Cropping	311	Yes	94	3	2
Herbaceous Wind Barriers	603	Yes	29	52	2
Prescribed Grazing	528	Yes	78	7	2
Riparian Herbaceous Cover	390	Yes	75	9	2
Silvopasture	381	Yes	77	8	2
Upland Wildlife Habitat Management	645	Yes	39	30	2
Conservation Crop Rotation	328	Yes	54	20	1
Contour Buffer Strips	332	Yes	20	86	1
Field Border	386	Yes	46	24	1
Filter Strip	393	Yes	62	12	1
Grassed Waterway	412	Yes	44	26	1
Hedgerow Planting	422	Yes	31	45	1
Irrigation Water Management	449	Yes	46	23	1
Land Reclamation, Abandoned Mined Land	543	Yes	54	19	1
Land Reclamation, Currently Mined Land	544	Yes	53	21	1
Multi-Story Cropping	379	Yes	64	11	1
Waste Separation Facility (no)	632	Yes	28	54	1
Land Reclamation, Landslide Treatment	453	Yes	36	35	0
Mulching	484	Yes	28	55	0
Stripcropping	585	Yes	25	62	0

<u>Table 7. EQIP Climate-Smart Agriculture and Forestry Practices for FY2022 in Order of Most Effective to Least Effective</u> <u>for Addressing GHG Emissions According to the CPPE</u>

#### Table 8. EQIP Practices with Negative Scores for Addressing GHG Emissions According to the CPPE

FY 2022 EQIP Practice	Practice Code	USDA Climate Smart Ag & Forestry Practice	EQIP CIC Practice	High Priority Practices (Top 10)	EWG CSAF Proposed List	Total CPPE Score	CPPE Rank (1-166)	Emissions of Greenhouse Gasses - GHGs
Waste Treatment Lagoon	359					19	87	-3
Land Clearing	460					-21	166	-1
Surface Roughening	609		Yes			-3	164	-1
Denitrifying Bioreactor	605			Yes		2	157	-1
Deep Tillage	324					8	143	-1
Recreation Land Improvement and Protection	566					9	136	-1
Short Term Storage of Animal Waste and Byproducts	318			Yes		12	119	-1
Waste Storage Facility	313			Yes		14	107	-1
Precision Land Forming and Smoothing	462					29	51	-1



Table 9. 10 Overall Lowest Ranked EQIP Practices According to the CPPE
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FY 2022 EQIP Practice	Practice Code	USDA Climate Smart Ag & Forestry Practice	EQIP CIC Practice	High Priority Practices (Top 10)	EWG CSAF Proposed List	Total CPPE Score	CPPE Rank (1-166)	Emissions of Greenhouse Gasses - GHGs
Land Clearing	460					-21	166	-1
Fuel Break	383					-3	165	1
Surface Roughening	609		Yes			-3	164	-1
High Tunnel System	325					-2	163	0
Aquaculture Ponds	397					-1	162	0
Vertical Drain	630					-1	161	0
Groundwater Testing	355			Yes		0	160	0
Irrigation Canal or Lateral	320					0	159	0
Monitoring Well	353					0	158	0

<sup>[1]</sup> The Conservation Incentive Contracts subprogram of EQIP was established by the 2018 Farm Bill. It provides NRCS with unique tools to address the most pressing resource challenges across the country, including addressing climate change through reducing agricultural greenhouse gas emissions and increasing carbon sequestration efforts. However, EWG analysis finds that in its current form, EQIP CIC does not meet the clear intent of Congress. When Congress passed the 2018 Farm Bill, the managers included clear guidance about how such a program should be implemented. Report language states that the managers anticipate incentive practices with "broad resource benefits (including, but not limited to, cover crops, transition to resource-conserving crop rotations, and incorporation of precision agriculture technologies into agriculture operations) will be available to producers within the program."

<sup>(ii)</sup> Section 2304(b)(2) of the Agriculture Improvement Act of 2018 allows states to identify 10 highly effective conservation practices to be eligible for higher 90 percent cost-share payments through EQIP. Under current law, states are only allowed to offer higher 90 percent cost-sharing for new and beginning, veteran or socially disadvantaged farmers. All other producers are eligible for only up to 75 percent cost-sharing. Among other things, the 2018 Farm Bill Conference Report notes that the managers intend for the increased incentives to promote further adoption of these highly beneficial practices by producers in high priority watersheds.

<sup>(iii)</sup> To assess the environmental benefits of EQIP practices, EWG used the <u>Conservation Practice Physical Effects</u> (CPPE) matrix – a tool NRCS uses in combination with other proprietary software to evaluate and rank the effectiveness of conservation activities in addressing specific causes of impairment (e.g., nutrients in surface water) within resource concerns (e.g., water quality). The CPPE scores how effective a practice is for addressing an impairment with -5 meaning it makes it demonstrably worse, and +5 meaning it's highly effective. EWG added the scores each practice received across all 47 specific causes of impairment and created a total score. The highest EQIP practice, riparian forest buffer, received a 98. The lowest practice, land clearing, received a -22. EWG then gave each practice a rank from 1 to 166 for how well each practice scored.

<sup>[w]</sup> The 2018 Farm Bill established for the first time a minimum number of acres to be enrolled through the continuous categories of CRP, like CREP and new CLEAR Initiative. It also established a CLEAR 30 Pilot Program where producers could enroll eligible land for 30-year contracts. Unlike general CRP contracts, which pay farmers to convert large tracts of land to grass for 10 years and then return them to production, CLEAR 30 will result in longer-lasting climate, environmental and public health benefits in watersheds that are significantly impacted by farm pollution, like the Western Lake Erie Basin and Chesapeake Bay.