

Iowa Bulletin: 440-25-4

Date: March 18, 2025

**Subject:** PGM – Fiscal Year (FY) 2025 Conservation Stewardship Program (CSP) Implementation Guidance

Action Required By:

November 22, 2024 – CSP Classic Application Batching Date Deadline December 13, 2024 – Renewal CSP Obligation Deadline

# August 1, 2025 - CSP Classic and IRA Obligation Deadline

**Purpose.** To provide updated FY 2025 Conservation Stewardship Program (CSP) implementation guidance and deadlines. IA440-25-4 will supersede IA440-25-1. Please refer to this guidance for most up to date deadline information.

Expiration Date. September 30, 2025

**Background.** Annually Iowa provides guidance and direction for implementing the CSP. The guidance provides deadlines, eligibility, planning, Inflation Reduction Act (IRA), ACT Now, and documentation requirements.

**Explanation.** Iowa will use the information contained in this bulletin and policy contained in 440-Conservation Program Manual (CPM), Part 530 to evaluate and obligate FY2025 CSP applications. Enhancement guide sheets with Iowa supplements will be posted in the <u>FOTG section 3, Conservation</u> <u>Programs</u>.

Additional information is available on the <u>Iowa SharePoint</u> and <u>National CSP website</u> for documents needed for the FY2025 CSP Classic, IRA, and Renewal sign-ups. Follow <u>440 CPM 530</u> policy, reference subpart M, "Inflation Reduction Act– Funded Contracts," for additional guidance on IRA-funded contract obligations.

Follow this timeline for implementation of the Conservation Stewardship Program in FY2025:

# 1. FY2025 CSP Annual Payments

Deadline	Activity
November 29, 2024	Complete eligible contract item number certifications
December 13, 2024	Approve payment requests in calendar year 2024
February 21, 2025	Approve payment requests in calendar year 2025

# 2. FY2025 - Renewal CSP Timeline

Deadline	Activity
May 3, 2024	For reference: FY2025-Renewal CSP, application <b>batching</b> cut-off date
November 15, 2024	FY2025-Renewal CSP complete assessment and <b>ranking</b> in the Conservation Assessment Ranking Tool (CART). Application selection will occur within one week after the ranking deadline. Unranked, pending, and/or applications with no uploaded cost estimate will not be

	considered.
December 13, 2024	FY2025-Renewal CSP <b>obligation</b> deadline.

**Note:** The FY2026 Renewal sign-up will be announced by the national office in the 2<sup>nd</sup> quarter of FY2025.

#### 3. FY2025 CSP and IRA Classic Timeline

Deadline	Activity
November 22, 2024	FY2025-1 CSP Classic and IRA, application <b>batching</b> cut-off date. To be eligible applications must be entered in ProTracts by deadline.
March 14, 2025	FY2025-1 CSP Classic and IRA, complete assessment and <b>ranking</b> in the Conservation Assessment Ranking Tool (CART). Application selection will occur within one week after the ranking deadline. Unranked, pending, and/or applications with no uploaded costs or estimates will not be considered.
May 9, 2025	FY2025-1 CSP Classic and IRA first round selections <b>obligation</b> deadline.
May 9, 2025	FY2025-2 CSP Classic and IRA application <b>batching</b> start date. All pools and remaining funds will be selected through Act Now process. The ranking threshold will be score of 15 in all pools.
August 1, 2025	FY2025 CSP Classic and IRA <b>obligation</b> deadline.

### 4. CSP Eligibility Documentation

When a program application Form CPA-1200 is received, the field office will date stamp it, enter it into ProTracts with the date signed by applicant, and review it for completeness.

**For Crop and Pasture:** Iowa NRCS acquires the Farm Service Agency (FSA) Producer Farm Data Report from FSA Farm Records System, to determine the applicant's agricultural operation. Tenant/sharecropper consent must be received if excluding a producer from a contract. Form 156EZ from FSA Farm Records System may be used to provide additional supporting documentation of the applicant's agricultural operation.

For crop history, crop production is required four (4) of the six (6) years prior to December 20, 2018. When available, use FSA records or other documentation such as historical aerial photography, producer records, etc., to verify compliance with crop history requirement. Recommend using historical aerial photography from years 2013, 2014, or 2015.

Use acres from common land unit (CLU) layer in Conservation Desktop (CD) as eligible acres for contract. Program acres will be attributed to the hundredth of an acre in CD for planning. For any planning already completed to the tenth of the acres, planners are not expected to go back and update to the hundredth of the acre. Total eligible crop acres for each tract should match effective Direct and Counter-Cyclical Program (DCP) acres. If they do not, document the discrepancy on the Producer Farm Data Report. Document the eligible acres and control of land on the Producer Farm Data Report for each tract.

**Note:** Due to rounding that will occur in ProTracts, contract acres may be more than eligible FSA acres listed on the Producer Farm Data Report. Staff must document in the Form CPA-6 notes why there is a discrepancy and proceed with planning. Field offices have the flexibility to make changes to the acres, so contract acres match the Producer Farm Data Report, if they so choose.

Eligibility required designations on Producer Farm Data Report are:

- COL = Applicant has control of land for the life of the contract.
- No COL = Applicant does not have control of land for the life of the contract.
- NE-CRP = Not eligible because acres are enrolled in CRP. Use only when the CRP acres are included in the effective DCP acres.
- NE-NA = Not eligible because the land is newly acquired, and the applicant has not demonstrated their management system yet.
- NE-SB = Not eligible because acres were sod busted after December 20, 2018.
- NE-CSP18 = Not eligible because land is in another CSP18 CSP contract.

**For Forestry and Associated Ag Land:** When available, use FSA records such as the Form FSA-578 or Producer Farm Data Report. If FSA records are not available, a lease, deed, tax parcel data or written notice of control from a landowner may be used.

Associated Agricultural Land (AAL) must be included in the agricultural operation and evaluated if controlled by the applicant. AAL must be associated with an agricultural or nonindustrial private forest land (NIPF) operation and cannot be enrolled on its own.

**For Farmstead**: Farmsteads can be enrolled on its own, if it is the only land use in the operation.

# 5. Conservation Assessment Ranking Tool (CART) Instructions

Planners evaluate resource conditions to determine if they meet minimum acceptable condition levels established by the National Resource Concern List and Planning Criteria. Conservation Assessment Ranking Tool (CART) is the business tool used to document the resource concern assessment. Iowa CART Assessment Resource Tool (ICART) provides Iowa guidance for resource concern assessment on selected land uses and land use modifiers. Conservation planners must follow the guidance in the FY2025 ICART to evaluate resource conditions for consistency. FY2025 ICART will be posted to the Ecological Sciences SharePoint. Additional CART resources can be found on the <u>National CART</u> <u>SharePoint</u> site.

The following must be completed before ranking applications:

- Evaluate all Special Environmental Concerns (Form CPA-52 Sections G and J) for existing conditions, no action impacts, and preferred alternative impacts.
- Cultural resources process, except consultation (if required).
- All applicable Threatened and Endangered Species Assessments. Consultation, if required, will be initiated.
- If permits are required but not obtained, the permits must have a high likelihood of approval. List all required permits on the Environmental Evaluation (Form CPA-52 Section K) (e.g., U.S. Army Corps of Engineers 404 permit, Iowa Department of Natural Resources floodplain permit, county floodplain permit, etc.). Document on the Environmental Evaluation the permits must be approved before construction starts.

The following must be completed before obligating applications:

- Entire cultural resources review procedures (including consultation, if required).
- Consultation for Threatened and Endangered species.
- Environmental Evaluation (Form CPA-52) completed and signed.

### 6. IRA Applications

CSP applications using IRA funds must include one or more core conservation practices or enhancements identified in the <u>FY2025 Climate-Smart Agriculture and Forestry (CSAF) Mitigation</u> <u>Activities</u> list for Renewals and Classic applications for each land use. IRA ranking pools will only list the eligible activities and narratives available for IRA funding. A non-IRA activity can be planned if it is linked as supporting practice to the core IRA activity in CART. Activities not part of an IRA system and not on the CSAF Mitigation Activities list cannot be included in an IRA funded contract. If the IRA requirements are not met, the application will be considered under CSP Classic funding.

IRA funds cannot be combined with any other USDA program funds within a contract. IRA payments will count toward program-specific payment limitations as described in 440 CPM 530, subpart M.

Applications selected for IRA funding must have the IRA radio button on the ProTracts application page set to "Yes" before the application is promoted to preapproved status in ProTracts. The IRA selection may be changed while in pending, eligible, or preapproved status. Users may not change IRA selection for approved applications or obligated contracts.

Program:	CSP 2018
Application FY:	2023
Signup Date:	3/29/2022
Signup Number:	CSP-2023-1
IRA:	🔍 Yes 🔘 No
Contract Renewal:	🔾 Yes 🖲 No

In addition to the appendix to Form CPA-1202, NRCS must use exhibit 530.129A, "IRA Addendum to Appendix to Form CPA-1202." The addendum supplements the general terms and conditions established in the appendix to Form CPA-1202. Participants with an IRA-funded contract must sign both the contract appendix and IRA addendum at the time of obligation. The program-specific preobligation checklists with an IRA section must be used.

#### 7. Act Now

Iowa NRCS will be utilizing ACT Now to obligate applications to deliver a conservation product quickly. ACT Now, Title 440 CPM, Part 530, Section 530.37, allows NRCS to immediately approve and obligate a ranked application in a designated ranking pool when an eligible application meets or exceeds a determined threshold ranking score.

The field office will follow the same ranking and obligation processes used with classic CSP. The ranking threshold for CSP ranking pools is set at a score of 15. After May 9, 2025, all applications will be eligible for Act Now process. Selections will be made on a daily basis. After preapproval status is selected in the select application tool (SAT), field offices have 35 days to move a preapproved application to an obligated contract.

### 8. Waiver To Start Prior To Obligation

The process for requesting and approving Early Start Waivers will follow the process in Title 440 – CPM 530.23 B. The State Conservationist has granted permission for the Assistant State Conservationists for Field Operations (ASTC-FOs) to approve waivers for the applicant to start activities prior to contract obligation.

The Early Start Waiver is used in situations where activities are scheduled in year one of the application and the contract will not be obligated by the time the activities need to be applied. A copy of the approved waiver must be kept in the case file.

The following items are required when requesting an Early Start Waiver:

- Written request for waiver from the applicant and must be dated (email is acceptable).
- Name of program the waiver is being requested for.
- List of activities the applicant is requesting to start early.
- Reason the waiver is being requested.
- Signed Form CPA-1200 application form.

- Completed Environmental Evaluation (Form CPA-52).
- Application must be assessed in CART with a Record of Decision and Plan Map attached.
- Conversation with applicant that an Early Start Waiver is not a guarantee of funding, documented on Form CPA-6-Notes.

**NOTE:** CSP Renewal applications are not eligible for an Early Start Waiver.

### 9. Special Documentation Requirements for Contracting

The following documentation is required:

- Participant signatures on forms must be consistent (example: if applicant signs as an individual on the Form CPA-1200 the contract must also be with the individual).
- CART Summary Reports used for eligibility determinations (including CART revisions during contract modifications) are kept in the contract folder.
- Field verification findings are to be documented on Conservation Assistance Notes (Form CPA-6).
- Form CPA-1155, "Conservation Plan or Schedule of Operations" and Form CPA-1156, "Revision of Plan/Schedule of Operations or Modification of a Contract" requires electronic district conservationist's signature certifying technical adequacy prior to participant signatures.
- The approving official's electronic signature must be printed and placed in the contract file for Forms CPA-1202, CPA-1155, and all CPA-1156s forms.
- A Conservation Assistance Notes (Form CPA-6) entry is required to document participant received obligated contract documents and job sheets.

**Contact.** If you have questions, please contact Rubyana Neely, CSP coordinator, at (515) 323-2224 or at <u>rubyana.neely@usda.gov</u>.

I look forward to another great year of assisting our customers with timely implementation of the Conservation Stewardship Program (CSP).

Jon Hubbert Iowa State Conservationist