Advancing Markets for Producers (AMP)

Environmental Evaluations 08-28-2025 Partner Call FAQs

[VERSION: 09162025]

NRCS partnership agreements that are formerly known as the Partnership for Climate Smart Commodities have been relaunched as the Advancing Markets for Producers (AMP) Initiative. We recognize the incredible work you've already begun through these agreements. Our goal is to help you continue that momentum—with realigned support that meets the new Farmer's First guidelines and maintains the heart of your original mission. The NRCS staff is committed to working with you through an agreement review and resubmission process that successfully meets these AMP initiative goals and agency environmental evaluation requirements.

Overview of Changes

No New or Updated CPA-52 Required:

- Environmental letter received, exempted practices were implemented prior to August 28, 2025
- Signed CPA-52, practices (documented on the CPA-52) have been implemented
- Signed CPA-52, practices (documented on the CPA-52) not yet implemented

CPA-52 Required:

- Environmental letter received, and no signed CPA-52, exempted practices not implemented prior to August 28, 2025
- Environmental letter received and signed CPA-52, exempted practices not yet implemented and not documented on CPA-52
- No signed CPA-52
- Any activity <u>that impacts soil or existing vegetation</u> that does not follow an NRCS practice

Acronym Key:

AMP - Advancing Markets for Producers

CPA - Conservation Practice Assessment

EA - Environmental Assessment

EE - Environmental Evaluation

FONSI - Finding of No Significant Impact

NEPA - National Environmental Policy Act

NHPA – National Historical Preservation Act

POC - Point of Contact

PPA - Prototype Partnership Agreements

RFO - Responsible Federal Official

TSP - Technical Service Provider

Environmental Evaluation/CPA-52 Questions

Q: Why did the Environmental Evaluation (EE) requirement change for the AMP Partnership Agreements?

A: The USDA's Advancing Markets for Producers (AMP) program helps farmers and ranchers access new market opportunities while implementing sound conservation practices. To ensure these projects meet federal environmental standards, NRCS requires an environmental evaluation before any conservation practices can begin.

Why is this required? Federal law requires NRCS to evaluate how conservation activities may affect natural resources, wildlife, cultural sites, and community health. NRCS is required to conduct an Environmental Evaluation (EE) for all technical planning and financial assistance. This ensures that AMP projects are:

- Environmentally responsible safeguarding soil, water, air, and wildlife.
- Legally compliant meeting requirements under the National Environmental Policy Act (NEPA) and related laws.
- Transparent and accountable showing communities and stakeholders that conservation work is well-planned and defensible.

Q: How does this EE update affect producers already enrolled in an AMP project?

A: Every new practice requires an Environmental Evaluation. Before installing a new AMP-funded practice, NRCS staff will complete a CPA-52 Environmental Evaluation form. The EE process ensures compliance with required laws, Executive Orders and policy. The results of an EE are documented on NRCS Form CPA-52, "Environmental Evaluation Worksheet" and it is also used to document the applicability of a Programmatic Environmental Assessment (EA).

- Expansions trigger new reviews. If you add acres or introduce new practices, NRCS will reassess potential impacts.
- Work cannot begin until it is approved. While contracts can be signed earlier, no onthe-ground implementation should occur until NRCS has completed the evaluation.
- NRCS leads Environmental Evaluation consultation, which may require coordination
 with agencies such as the U.S. Fish and Wildlife Service or State Historic
 Preservation Office, NRCS will handle those communications on behalf of the AMP
 Agreement Holder.

Q: If a producer has an EE approved (signed CPA-52), and they do not change practices year-to-year, will they have to do another EE each year, given that we have one-year contracts in our program?

A: No. If there are no changes in the approved practices, an additional EE is not needed.

Q: If a producer does change practices year to year, will they have to do a new EE each year to account for the new practices?

A: Yes, or cover multiple practices on a single EE, if future practices are known. The EE should include all practices planned on the farm that will be included in AMP, and any that may be planned in future years.

Q: Is a producer allowed to drop or add acres after an EE is completed and approved?

A: Yes, they can drop acres with no effect to the CPA-52. Additional acres cannot be added without revisiting the EE for compliance review because new areas may lead to new Endangered Species Act/Cultural Resource concerns).

Q: If a producer lists NRCS practice $No\text{-}Till\ (329)$ on their EE, but needs to switch to NRCS practice $Reduced\ Till\ (345)$ due to weather or other unforeseen circumstances, will they need to complete another EE due to the change in practice code that they will implement?

A: If the primary practice is intended to be No-Till (329) with Reduced Till (345) as "alternative", this can be documented on the CPA-52 and both practices will be evaluated. It is good practice to include alternative practices or practices over multiple years (when applicable), such as maybe the case with no till / reduced till, cover crop / crop rotation, chemical/mechanical termination methods. Including the possibility of these additional practices helps account for weather, market changes, etc. that may dictate changes to management activities.

Q: Will the grantees be the ones responsible for documenting resource concerns at each tract/field listed on the CPA-52 document and monitoring each area where practices are implemented for benefits or unintended consequences?

A: Yes, AMP Grantees/Awardees are responsible for the CPA-52 through Section O, including documentation of any environmental concerns. There is not a monitoring requirement for the EE process, unless that is a requirement of the specific AMP project. There will be a quality assurance plan developed by the AMP team to ensure accurate and thorough completion of the EE documentation.

Q: Once the CPA-52 is signed, how long Is the Environmental Evaluation valid?

A: Once the EE is signed, it is valid for the duration of the contract/grant.

Q: Is our technical forestry staff (non-TSPs) still able to complete these visits and forms for submission or only NRCS staff?

A: Your teams perform the environmental evaluation process (they do not need to be TSPs or meet any specific certifications or requirements), complete the CPA-52 through Section O, and submit the CPA-52. Only an NRCS staff member can sign the CPA-52 and perform inherently government requirements - such as consultations with Fish and Wildlife Service, State Historic Preservation Officers, and Tribal Nations.

Q: Does every producer/farm now require a CPA-52 worksheet on each practice, and for all land uses?

A: If they are implementing a conservation practice, yes, an EE and documentation on the CPA-52 is required.

Q: How do you define "operation" since a CPA-52 is required for every operation. Is a CPA-52 required on a farm, tract or field level? One farm can comprise of 10+/-different fields? Does that mean one for each property over the life of the contract term or one each time there is an event that qualifies as an operation (i.e. enrollment, harvest, other treatments, etc.)?

A: One for each producer (may include several properties) over the life of the contract term. An operation is considered all the property managed by a producer.

Q: Who is completing other Special Environmental Concerns (such as Clean Air Act, Invasive Species, Essential Fish Habitat etc.) on the CPA-52? and why are Cultural Resources and Endangered Species handled differently?

A: The primary AMP Agreement Holder has the responsibility of completing the may effect/no-effect determination. Additionally, NHPA is its own process that runs concurrently with NEPA and many states have state level agreements that prescribe what that process is in that state.

Q: What if the multi-year practice does not require an activity such as harvest, but a landowner can choose to do one in the future. We don't know when or where that will happen at the time of signing and payment. How will we complete a CPA-52 at that time?

A: It is recommended that the CPA-52 include all conservation practices that may be implemented as part of the project, even if not planned in the immediate future, to accommodate for unforeseen circumstances.

Q: If field on-site surveys for cultural resources undertakings are required during consultation, who is responsible for that?

A: It is the responsibility of the NRCS state office to ensure compliance with NHPA/Sec106. How individual NRCS state offices choose to direct their staff work is up to that state's leadership.

Q: Who can complete a CPA-52? Can practitioners like foresters complete the CPA-52 reviews for awardees to review and submit to NRCS, or do awardees need to complete the reviews?

A: Your teams perform the environmental evaluation process (they do not need to be TSPs or meet any specific certifications or requirements), complete the CPA-52 through Section O, and submit the CPA-52. Only an NRCS staff member can sign the CPA-52 and perform inherently government requirements - such as consultations with Fish and Wildlife Service, State Historic Preservation Officers, and Tribal Nations.

Q: Are engineering plans required in the CPA-52?

A: No, engineering designs are not a part of the CPA-52, however the practice(s) being implemented (footprint, depth, etc.) are considered as a part of the EE.

Q: What is the difference between "project specific review" and "site-specific review" as it relates to CPA-52?

A: Project specific review is a general term that was used to make a very general review of the practices across all states and does not meet the NRCS environmental evaluation process requirements. A site specific EE is completed on a specific field / farm / operation considering the individual site conditions.

Q: Will previous Finding of No Significant Information (FONSI) practices require CPA-52s under AMP?

A: AMP EA and FONSI does not bypass the EE requirements. Site-specific CPA-52s are still needed on all practices, all land uses, for all landowners.

Q: Are there letters that exclude some practices from the need for the CPA-52? Are there parameters for size of farm that may exclude need for CPA-52?

A: No practices are excluded. Please see the AMP Partner notification letter dated August 28, 2025. There are no parameters for size for any practices to be excluded. Any practice triggers an environmental evaluation, regardless of the size.

Q: How do we handle practices that will not trigger a National Environmental Policy Act (NEPA) compliance issue? Do we still fill out CPA-52 saying no effect will occur for all items? Both on endangered species and cultural?

A: All practices have to be evaluated. It is not known if there is a NEPA issue until a CPA-52 is completed. The "No Effect" determination on the CPA-52 is finalized only after evaluation is performed by the Responsible Federal Official (RFO) with NRCS.

Q: If the farmer is receiving a grant, but not being asked to perform any specific practice, do we have to do a CPA-52?

A: No, if no practices are being installed, there is no practice to be considered in the EE.

Q: For multi-state projects, variations in state level conservation practice standard requirements make implementation complex. Will there be a streamlined process to seek differences in state-to-state-level practice standard requirements?

A: For multiple states, partners must use the **state-specific** conservation standards respective to the state where the operation exists. The <u>NRCS Field Office Technical Guide</u> (FOTG) contains technical information about conservation of soil, water, air, and related plant and animal resources. Section 4 of the FOTG contains <u>Practice Standards</u> establish the minimum level of acceptable quality for planning, designing, installing, operating, and maintaining conservation practices to address one or more of the NRCS resource concerns.

Q: Is a farm visit required for completing a CPA- 52?

A: Yes. Site-specific, technical assistance is the AMP Agreement Holder's responsibility.

Q: Our producers enroll land from up to 20 different FSA farm IDs; sometimes these are contiguous operations, sometimes they are in different parts of the management/systems. How many CPA-52s do we need to complete for these operations?

A: Multiple farm IDs are allowed per CPA-52. Typically, CPA-52s are completed at the operational level. If operations are miles apart with different management/systems such as operation A is livestock-based pasture, and operation B is a pine plantation, then you should consider separating those for EE purposes.

Q: We enroll producers with one-year contracts. Can we submit a CPA-52 proposing to implement practices across the entire operation, even if we know that the practice will only be implemented in specific fields this year so that we do not have to submit another CPA-52 in future years if the producer re-enrolls in future years for different fields?

A: Yes, it is encouraged that the CPA-52 include all the potential practices that the might implement over the life of the program. The details on the CPA-52 should include the planned practices for all fields within the operation.

Q: If an AMP project is developing comprehensive nutrient management plans (CNMP) for livestock operations, does the CPA-52 have to include <u>all practices in the CNMP or only those that will be implemented and funded through the AMP project?</u>

A: Only practices funded through an AMP project that the producer plans to implement over the life of the AMP initiative should be included in the CPA-52. For example, a CNMP may include nutrient management (590), feed management (592), cover crop (340), critical area planting (342), and a waste storage facility (313). If the AMP project and farmer agree the only practices to be implemented are 590 and 592, only those two practices are included in the CPA-52. If later the farmer will implement additional practices funded by AMP or another federally funded program, an additional CPA-52 would be required for those practices.

Policy, Eligibility & Program Changes

Q: Will practices done earlier this year (i.e., reduced till or no till, nutrient management plans) be able to be grandfathered into the program this year, or will they be ineligible because an EE was not done for those practices prior to their implementation?

A: The changes are effective 08/28/2025; the date the Notification of Change is issued. If practices were already installed and there are not additional practices to be implemented on the farm through AMP at a later date, they are not required to do additional documentation after the fact.

Q: How long are the EE's good for once they are approved?

A: EEs are valid if the practice and location don't change. It is a good idea to include alternative practices or practices over multiple years (when applicable), such as may be

the case with no till/reduced till, cover crop/crop rotation, chemical/mechanical termination methods. This can help account for weather, markets, and other variables that may dictate changes to management activities.

Q: If a one-year contract was signed under the old letter (with no CPA-52) and the contract is renewed (same field, same practice), does a CPA-52 need to be done before the new contract is signed?

A: The changes (requiring the EE) are effective on the date the Notification of Change is issued, August 28, 2025. If practices were already installed and there are no additional practices to be implemented on the farm through AMP at a later date, they are not required to do additional documentation after the fact. If it is a new contract (renewed contract is a new contract), then yes, the EE needs to be completed.

Q: What qualifies as an "agricultural producer" according to USDA?

A: AMP producer requirements are in the agreement Statement of Work (SOW). These award terms which are in addition to the USDA Farm Production and Conservation (FPAC) General Terms and Conditions for Grants and Agreements for a producer are:

- 1. Establish Farm Records with the Farm Service Agency (FSA) (have farm, tract, and field numbers in place);
- 2. Complete an AD-2047 (Customer Data Worksheet to facilitate the collection of customer data for Business Partner Record);
- 3. Certify highly erodible land conservation (HEL) and wetland conservation (WC) compliance via Form AD-1026, Highly Erodible Land Conservation (HELC) and Wetland Conservation (WC) Certification; and
- 4. Certify that they are not a foreign person or entity.

Additionally, producers are not bound by payment limitations or the adjusted gross income (AGI) limitations.

Q: What about producers who already received payments for multi-year practice implementation under CSC who were not required to have a CPA-52? Do we need to pay those back?

A: If the practice has already been implemented and paid under the previous process; you do not need to go back and do anything additional.

Q: Do previous/current enrolled producers enrolled in a multi-year practice need to have a CPA-52 to receive future payments for implementation?

A: No - if fulfilling an already obligated contract/agreement with no changes implemented beyond what has already been approved, then you can proceed.

Q: For parts of our project that pay for modeling and NOT for practice implementation, does this review apply?

A: No, this is only for the implementation of conservation practices.

Q: We have had the experience that state and county level USDA offices are not always well-equipped to support AMP/CPA-52 compliance from external partners. What support can the national office provide in ensuring that they are? What remedies are available to us when we cannot get what we need at the county/state level?

A: The National AMP team and National Science and Technology team are providing support to State AMP POCS and Partners to aid with AMP. The National AMP team has office hours planned and a <u>website with AMP Environmental Evaluation resources</u>, including CPA-52 information, forms, trainings and more.

Q: Will AMP partners be able to consult with their local NRCS offices for advice in completing the CPA-52, since they have so much experience working through this process?

A: State AMP POCs should be your first POC - NOT local NRCS offices. This is to manage workload and streamline the work at the state level.

Q: What practices are eligible under AMP?

A: All conservation practices that are available through NRCS are an option. The specific practices may vary with AMP Agreement Holder's contract terms. If they are implementing a conservation practice, then yes, an EE and documentation on the CPA-52 is required. https://www.nrcs.usda.gov/resources/guidesand-instructions/conservation-practice-standards.

Q: When will the CPA-52s be required for projects that previously had an environmental letter to waive the CPA-52?

A: As of August 28, 2025, when the notification of AMP program changes letter was sent to all agreement holders.

Q: Will the CPA-52s that had been passed from The Clark Group to the state, but were pending approval at the time of termination, be automatically considered under AMP? Or will they have to be resubmitted?

Any submission that was in pending status and not signed will have to be resubmitted, reviewed and signed. When The Clark Group went offline, anything that was in pending status was made unavailable and no longer accessible by NRCS and Partners.

Q: Are engineering plans required?

A: This is a state level, project and site-specific practice question for the NRCS State POC for your agreement.

Q: Are we going to get a new Environmental Letter like we did at the beginning of Climate Smart for practices that may be exempt from CPA-52s?

A: No, there are no exempted practices.

Q: In light of the 3rd AMP principle (reducing paperwork), has any consideration been given to reinstating the list of practices that are categorically exempt, or even expanding that list?

A: No, there are no exempted practices.

Q: For a producer implementing practices now, while our AMP approval is still pending, what is the process? Assuming that the practice requires a CPA-52.

A: During the AMP approval process, we cannot support amendments going through a CPA-52. Once approved, agreement holders will receive the link and the instructions from their NRCA AMP Program Manager to complete the process.

Q: CPA-52s are required now for ALL practices? Are the exclusions established in the Programmatic Environmental Assessment (EA) no longer in effect?

A: Yes, all practices must be included in the CPA-52. The Programmatic EA requires completion of the NRCS EE process.

Q: For projects where technical service providers are working with farmers to plan practices, would they be responsible for developing the requirements of the cultural resources (1:24,000 scale map, narrative, time constraints, etc.)? Or would that be handled by the main partner?

A: It is the responsibility of the partner that is the primary Agreement Holder to uphold the requirements. The CPA-52 and any supplemental/supporting information is provided by the

10AMP CHANGES FAQ - Version 091625

partner. A future office hours discussion will be provided with guidance on how to generate those materials.

Q: Does the CPA-52 have to be approved before we can proceed with contracting a producer?

A: Yes. Before a practice is implemented and any potential site disturbance occurs, an Environmental Evaluation needs to occur to ensure no Special Environmental Concerns (SECs) are impacted.

Q: Does a private forester working with producers for projects need to be an NRCS Technical Service Providers (TSPs)?

A: No, the people completing the EE for partners do not have to be TSPs.

Q: Is there a timeline for additional Programmatic Agreements with State Historic *Preservation Officers (SHPOs)? We work in three states where there is no agreement.*

A: No, some are actively in process and others have not started. If a state does not currently have a programmatic agreement in place for cultural resources and Section 106, then the standard Section 106 process will apply. Your state POC can provide you with additional guidance on state-specific requirements. https://www.nrcs.usda.gov/our-agency/cultural-resources

Q: So someone currently going through enrollment right now, planting cover crops tomorrow, won't be eligible all of a sudden?

A: Correct. Not until the EE has been signed and approved by NRCS.

Q: Does the letter NRCS sent to partners on August 28, 2025 mean that Findings of No Significant Impact (FONSI) practices approved under PCSC are still valid under AMP?

A: The existing project level FONSI documents (AKA "Environmental Letters") were rescinded 08/28/2025. The FONSI document itself is still valid. Per the Environmental Letter, all project specific environmental evaluation instructions and requirements for the Partnership for Climate-Smart Commodities are rescinded as of 08/28/2025. ALL conservation practices now require a CPA-52.

Q: Our project's CPA-52's were under review by the Clark Group. We were awaiting these completions prior to contracting with our producers. We were informed that projects must have at least one signed contract prior to Sept 31. Please advise if there will be an extension to that Sept 31 deadline.

A: Deadline has been extended to Nov. 15, 2025.

Q: Does NRCS have a process for completing environmental evaluations for a noaction practice?

A: No, if no practices are being installed there is no practice to be considered in the EE so a CPA-52 is not needed.

Q: For clarification, farmers who have completed practices in our last three years do not need CPA-52? What is the process for existing producer contracts implementing practices now (today, next week, etc.)? Are we going to be able to grandfather them in?

A: The changes (requiring the EE) are effective on the date the notification of change is issued (August 28, 2025). If practices were already installed and there are no additional practices to be implemented on the farm through AMP at a later date, they are not required to do additional documentation after the fact. If it is a new contract (note: a renewed contract is a new contract), yes the EE needs to be completed.

Q: If a farmer has performed these practices in a particular field in the past, but were not part of our project, now wants to join the project and implement that practice in the same field, do we need to do a CPA-52 for that farm?

A: As of 08/28/2025, yes - new farmer, new practices, new field - requires CPA-52.

Q: The majority of our incentives are in the form of grants to farmers to purchase equipment or get marketing assistance. Do we or do we not need to do a CPA-52 for that?

A: Since there is not a conservation practice involved with the purchase of equipment and marketing assistance, then no CPA-52s are required for these activities.

Q: After we received the instructions for the Box intake portal and if we receive an error message "Application Access Denied," what should we do to gain access?

A: That error could be what folks get when external customers try to log in through typing "nrcs.box.com." Please try typing "box.com" directly into your browser and logging in and then you should see the folder. This is the actual link: https://nrcs.app.box.com/f/ad875a8b12a4448288f21d176c93b608

Q: We have 1 – 2 staff members in each of our project states who are meeting directly with producers to complete CPA-52s. Is there a limit to how many partner users can have access to the folders you are creating in Box?

A: To access copies of EE submissions and approved CPA-52s, please submit the name(s) of the staff in your project that will serve as the point of contact (POC) for this process. We need at least one, but no more than three, names and emails of staff to invite to your project folder in Box. These POCs will have access to PII from all the EEs, so they should be staff with the appropriate level of clearance and controls. Some projects have different state or subaward partners that are responsible for developing subsets of CPA-52s within the project. You can share the portal link with those partners – they can submit the environmental evaluation files and serve as points of contacts for individual submissions. However, the contacts who are invited to access the Box folder with copies of the final files should be limited to key staff who can then disseminate the files to the appropriate partners. Submit the EE POC name(s) and email(s) to your AMP program officer(s) with a cc: to Matthew Denton (matthew.denton@usda.gov) and Allison Costa (allison.costa@usda.gov).

Q: We have heard that a CPA-52 will be required for each producer that is implementing a practice. Is this accurate? Are there any limits? For example, can it cover multiple operations, even if they are not adjacent to each other? What if they are in different counties? States? What if they grow different crops and implement different practices?

A: A1: In general, yes, a CPA-52 will be completed for each producer. If a producer has multiple farms that are in close proximity (similar site complexity) and are managed the same (land use, crops rotation, and practices), they can be included in one CPA-52 that includes the details and maps for all of the farms and practices. A2: If they are in different /neighboring counties and have a similar site complexity, they may be included in the same CPA-52. A3: If the farms are in different states, a separate CPA-52 should be completed for each state.

Q: Can we include all of the possible practices that could be implemented on an operation within the next five years, even if we are only planning to incentivize some of those practices this year?

A: Yes, CPA-52 can and should be utilized for multiyear projects for all practices that are potentially viable. You should include alternatives that can be used if there are delays in the weather, crop failures, unforeseen variables, etc. Having them already evaluated could expedite implementation and save time.

Q: Specifically, at what point in the process is the approved CPA-52 required? Do we need it prior to signing a contract with the producer, prior to paying an enrollment

incentive, prior to paying a practice-based incentive, or prior to final payment after the practice has been verified?

A: Producers cannot implement practice before an Environmental Evaluation is performed. Specifics vary among Agreement Holder's contracts regarding timing and types of payment, implementation and stages of practice implementation, etc. Each Agreement Holder should work with their NRCS AMP Program Manager for specific questions.

Q: Do producers receiving incentives paid by match dollars require CPA-52s?

A: Match (non-federal) funds are treated the same as federal funds, and all practices require a CPA-52.

Q: For our projects that are implementing a crop warranty, some of them will use federal funding for the producer incentive if a warranty is triggered; since no federal funding is being used to implement the practice and it's a payout based on yield, do those projects need to do CPA-52s for the farmers/ fields? PEPC

A: If the producer incentive is not tied directly to a conservation practice, then a CPA-52 is not required.

Transitioning Agreements

Q: Our project's CPA-52's were under review by the Clark Group. We were awaiting these completions prior to contracting with our producers. We were informed that projects must have at least one signed contract prior to Sept 31. However, this appears to delay our ability to get a CAP-52 approved and a contract signed before the deadline--as we await our Amendment approval. Please advise.

A: The CPA-52s and supporting material that had not been submitted but not signed will need to be re-submitted. The new deadline for submission is November 15, 2025.

Q: With regard to the information lost in the Clark Group Portal transition, can you speak to whether the information that was submitted is secure or is producer information at risk?

A: The Clark Group Portal went offline. The information was not lost, just no longer available. The Clark Group had an agreement with NRCS that required them to maintain PII integrity, so this information was not shared outside the Agreement.

Q: The CPA-52 needs to be reviewed and signed off on for future practices but prior practices completed, such as reduced tillage done in the spring this year, would be enrolled per the previous agreement – correct?

A: The changes (requiring the EE) are effective on the date the notification of change is issued (August 28, 2025). If practices were already installed and there are not additional practices to be implemented on the farm through AMP at a later date, they are not required to do additional documentation after the fact. If it is a new contract (renewed contract is a new contract), then yes, the EE needs to be completed.

Q: With the changes that are being made, will we (the project lead) be responsible for any of the tasks that were previously completed by the Clark Group/NRCS? Will we need to provide any additional information beyond what we have in the past?

A: Yes, the responsibility for submitting CPA-52s and ensuring all agreement requirements are met is the Agreement Holder's responsibility. NRCS is utilizing the same process as before for handling all CPA-52s. Communication is the responsibility of both NRCS and partner Agreement Holder.

Q: We have a three-year agreement with our producers. When they sign up, they select a three-year enrollment, and we display a three-year payment schedule. I assume adding no-till, which we hadn't yet paid for, would require a CPA-52. But for those producers who have received cover crop payments, but may have may receive a modified contract, can they be grandfathered in without a CPA-52?

A: No. Any unreviewed practices require evaluation through a CPA-52. All practices in this case 329 (no-till) and 340 (cover crop) would need to be evaluated as a conservation system moving forward. Both practices would need to be included in the CPA-52.

Q: From our understanding, going forward all NRCS CPS practices will require CPA-52 approval without exception, is that correct? In this context, we are wondering how to handle previously enrolled producers. For example, if a producer has already been implementing cover crops under CSGSC, and continues to implement the same practice (previously included in the environmental letter) on the same fields under AMPSC, would a CPA-52 be required for those acres? Or would it only apply to new practices or fields that were not included the prior program?

A: Yes, all practices implemented after August 28, 2025 would require EE through the CPA-52. The changes (requiring the EE) are effective on the date the notification of change is issued, August 28. If practices were already installed and there are no additional practices to be implemented on the farm through AMP at a later date, they are not required to do

additional documentation for practices implemented prior to August 28, 2025. If a practice is implemented after August 28, 2025, then the EE would need to be completed.

Resources, Trainings and Communication

Q: Our state has not been very enthusiastic about supporting this. How can we make sure they will help support these programs?

A: AMP Team and National Office are working with the STCs and State AMP POCs to provide support and streamlining opportunities to meet this workload. The AMP agreements have been made a priority by our Chief. which has been communicated throughout the agency. It is important to be in communication with your NRCS AMP agreement team member if you have any questions or issues.

Q: Will each partner be given a state NRCS POC to coordinate CPA-52 processing?

A: The list of State NRCS AMP POCs will be provided to Agreement Holders in the near future.

Q: Please clarify if the communication with State POCs during development of the CPA-52 draft should be completed only through the submission portal (box portal) or may we connect by phone or email external to the Portal

A: The State NRCS AMP POCs will be your first line for questions related to the CPA-52 or EE. AMP Agreement POCs should be your first line for all other questions.

Q: Can we have a list of which states don't have Prototype Partnership Agreements (PPAs) in place?

A: The NRCS States without PPAs are: Oklahoma, Georgia, Wisconsin, North and South Carolina, and Indiana. In many of these states, CRS staff are working diligently in developing their agreement.

Q: How do we access Box for submissions of CPA-52?

A: The AMP Environmental Evaluation (EE) Portal, aka "Box" (CLICK HERE FOR LINK) is available for submissions and you may begin uploading files for review as soon as you have finalized the required documents.

To access copies of these submissions and approved CPA-52s, please submit the name(s) of the staff in your project that will serve as the point of contact (POC) for this process. We need at least one, but no more than three, names and emails of staff to invite to your

project folder. These POCs will have access to PII from all the EEs, so they should be staff with the appropriate level of clearance and controls.

Some projects have different state or subaward partners that are responsible for developing subsets of CPA-52s within the project. You can share the portal link with those partners – they can submit the environmental evaluation files and serve as points of contacts for individual submissions. However, the contacts who are invited to access the Box folder with copies of the final files should be limited to key staff who can then disseminate the files to the appropriate partners.

Q: What will the estimated EE evaluation and approval timeline be for new submissions once received by state level NRCS?

A: We do not have a timeframe on turnaround time. Each environmental evaluation is state-dependent. Projects will be addressed in the timeliest manner possible - all depending on volume of workload, available staff, complexity of projects, and other possible factors.

Q: Can you share the link to the website? It has not been very clear where to go?

A: Yes. Our Environmental Evaluation Webpage has resources for partners: https://www.nrcs.usda.gov/resources/guides-and-instructions/nrcs-environmental-evaluation-cpa-52-worksheet-tools-and-training

Q: Can you repeat who to contact to have additional team members added to Box submission notification?

AMP Program Manager with a courtesy copy to matthew.denton@usda.gov and allison.costa@usda.gov

Q: Is the August 28, 2025 AMP Partner webinar recording available?

A: Yes. It can be found online in the Advancing Markets for Producers section of the <u>NRCS</u> Environmental Evaluation CPA-52 Worksheet, Tools and Training website, or <u>CLICK HERE</u> for the direct link to the recording.

Q: Can a batch upload option be made available in the box platform for CPA-52 submission?

A: The <u>intake portal linking to Box</u> can only accept one submission per CPA-52 per entry. Each CPA-52 will have its own folder created with supporting (uploaded) materials associated with it.

Q: Are previous environmental letters still valid?

A: No. A letter was sent out to all AMP agreement holders on 08/28/2025 rescinding those letters to reflect the new current requirements.

Q: Which practices will now require a CPA-52?

A: All practices must be included in the CPA-52

Q: Is there a general AMP website available or being developed?

A: A dedicated AMP page is in development and will be shared as soon as it is available.

NOTE: All AMP Agreement Holders are encouraged to maintain frequent communication with their NRCS AMP Program Manager. NRCS will post this FAQ document and other AMP related resources online in the Advancing Markets for Producers section of the NRCS Environmental Evaluation CPA-52 Worksheet, Tools and Training website. As the Agreements progress and new questions arise or answers are further clarified, we will update this FAQ document on the website. Please make note of the Version Number in the lower left-hand corner to ensure you have the most current version.