Conservation Planning

CPA-52 Documentation - Guidance

June 14, 2016
Madison, WI

Introduction
The Natural Resource Conservation Service (NRCS) uses one conservation planning process outlined in the agency's National Planning Procedures Handbook (NPPH). During the conservation planning process, NRCS provides technical assistance to clients to help them solve natural resource problems or improve their resource management. An Environmental Evaluation (EE) is conducted concurrent with the planning process, helping to ensure both the client and NRCS remain in compliance with applicable laws and regulations. Documentation of the EE also aids NRCS compliance with the National Environmental Policy Act (NEPA) (NPPH 180, Part 600.0 K (11)).

Purpose
An NRCS "Conservation Plan" represents, and records, final decisions made during the conservation planning process, and can serve as a basis for conservation program contracting; however, Conservation Plans are not documentation of the planning process itself. The purpose of this guidance document is to help NRCS-Wisconsin employees, agency partners, and Technical Service Providers (TSPs) understand the role of the EE and how to complete National Form (CPA-52) as a means of documenting our conservation planning process and ensuring NRCS compliance with NEPA and other applicable requirements.

Selected Policy References

1. GM 180, Part 409.1 B - Purpose of Conservation Planning is to ensure sound management of Soil, Water, Air, Plant, Animal, Energy and Human (SWAPAE+H) Resources. That is to address eligible resource concerns! NRCS has 9-broad categories of natural resource concerns that are eligible for program funding:
    a. Soil Erosion
    b. Soil Quality
    c. Excess Water
    d. Insufficient Water
    e. Water Quality
    f. Air Quality
    g. Plant Degradation
    h. Inadequate Habitat Fish/Wildlife
    i. Livestock Production limitation
2. GM 190, Part 410.5 A - NRCS will **document the planning process** on the CPA-52.
3. GM 190, Part 410.25 H (ii) - Each State Conservationist (STC) is the Responsible Federal Official (RFO) in all NRCS-assisted programs administered within the State. The STC will assign a staff person who has basic knowledge of landforms, soils, water, and related plant and animal ecosystems to provide technical oversight to ensure that assistance to land users and project sponsors on the wise use, conservation, and preservation of flood plains is compatible with national policy…..
4. GM 190, Part 410.4 K - …. NRCS STCs or their designee (in Wisconsin this has been delegated to District Conservationists) are RFO for compliance with the provisions of NEPA….
5. GM 190, Part 410.25 H (III) - The district conservationist is delegated the responsibility for providing technical assistance and approving financial assistance to land users in non-project actions, where applicable, and for deciding what constitutes an adverse effect….

6. GM 190, Part 410.25 H (i) – The NRCS Chief, STCs, and district conservationist are the RFOs in NRCS for implementing the policies expressed in these rules.
7. GM 190, Part 410.26 F (2) – NRCS will complete an EE according to GM-190, Part 410, Section 410.5 and 7 C.F.R. Section 650.5. The client is responsible for obtaining all required Federal, State, Tribal, or local permits.
8. GM 190, Part 410.30 B (xvii) - …Actions include the circumstance where the RFOs fail to act and that failure to act is reviewable by courts or administrative tribunals under the Administrative Procedure Act or other applicable law as agency action.
9. NECH, Part 600.17 A (2) – Baseline data (Benchmark Conditions) "are to be documented…"
10. NECH, Part 600.17 A (6) – Alternatives "are to be inventoried and estimated…"
11. NPPH, Part 600.12 3 (iii) - All NRCS planning activities will be conducted in compliance with NEPA and other applicable requirements for the protection of the environment.
12. NPPH, Part 600.23 C (10) – "Resource Inventories will" obtain information needed to comply with NEPA.
13. NPPH, Part 600.31 C (15) – The NRCS case file contain environmental documentation CPA-52, Environmental Evaluation Worksheet, and any other documents needed to meet the requirements of NEPA…
14. NPPH, Part 600.41 A - NEPA requirements <u>will be incorporated into all steps and actives of the planning process</u> and will not be considered as a separate process or requirement. Planners will identify the level of NEPA documentation required for each planning activity as early in the planning process as possible, and incorporate activities into each planning step to ensure that information required for NEPA documentation is developed simultaneously with the plan document.
15. NPPH, Part 600.41 C (1) – NRCS is required to conduct an EE for all planning an financial assistance, including development of individual conservation plans (as well as component plans, such as Nutrient Management Plans and Comprehensive Nutrient Management Plans).
16. NPPH, Part 600.51 A (1) - ….The identified problems and opportunities and the decision-maker and stakeholder objectives guide the remainder of the planning process and are the basis for the purpose and need for action that are documented on Form CPA-52…

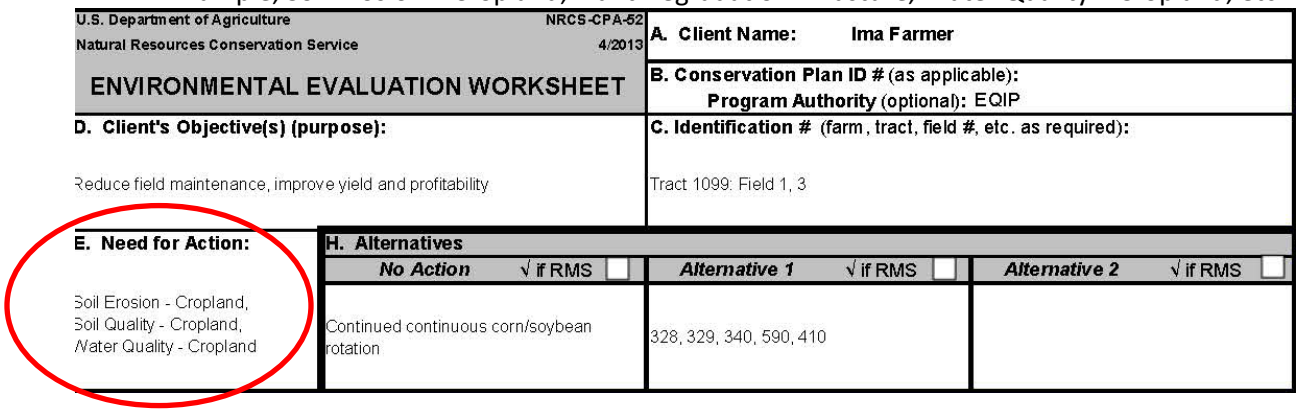
NRCS Planning Process	Corresponding CPA-52 Sections
Step-1 – Problem Identification	Section-E – Need for Action
Step-2 – Determine Objectives	Section-D – Objectives
Step-3 – Inventory Resources	Section-F – Resource Concerns/Benchmark Cond.
Step 3 – Inventory Resources	Section G - Special Environmental Concerns
Step-4 – Analyze Resource Data	Section-F – Resource Concerns/Benchmark Cond.
Step-4 – Analyze Resource Data	Section G - Special Environmental Concerns
Step-5 – Formulate Alternative	Section-H – Alternatives
Step 6 – Evaluate Alternatives	Section I – Effects of Alternatives – No Action
Step-6 – Evaluate Alternatives	Section-I – Effects of Alternatives – Alternative-1+
Step 6 – Evaluate Alternatives	Section J – Special Concerns – No Action
Step 6 – Evaluate Alternatives	Section J – Special Concerns – Alternative 1+
Step-7 – Make Decision	Section-K – Other Agencies and Public Concerns
Step-7 – Make Decision	Section-M – Findings – Preferred Alternative
Step-7 – Make Decision	Additional Notes – Job Approval Authority
Step-7 – Make Decision	Additional Notes

NPPH 180, Part 600.2 (13) defines Benchmark Condition as "The present condition of identified resource concerns and special environmental concerns that is used as a point of reference to measure changes in resource conditions resulting from conservation treatment." This information is generally obtained in Steps 3 and 4 of the conservation planning process. By comparison Planning Criteria is defined as "A quantitative or qualitative statement of a treatment level required to achieve a minimum level of treatment for a given resource concern for a particular land area." (NPPH 180, Part 600.2 (101)). Planning Criteria can be found in Section III of the electronic Field Office Technical Guide (eFOTG). Inventory methods and evaluation of alternatives generally require conservation tools (e.g., RUSLE2) to be utilized in establishing a Benchmark Condition and a planned treatment to meet Planning Criteria. That is, the results of two runs of each tool should be documented on the CPA-52, with supporting attached and/or referenced to provide documentation of results.

General Guidance

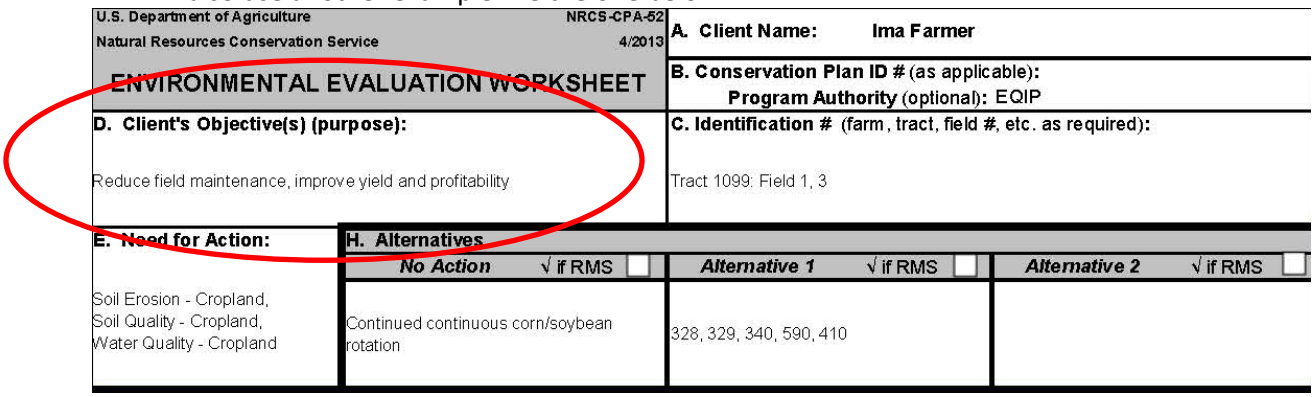
The general guidance below provides some example statements that may be used in the pertinent sections of the CPA-52:

1. Step-1 – Problem Identification and Section-E – Need for Action – Record Eligible Resource Concerns (only to the level of the 9-broad resource concerns category), and Landuse. For Example, Soil Erosion – Cropland, Plant Degradation – Pasture, Water Quality – Cropland, etc.



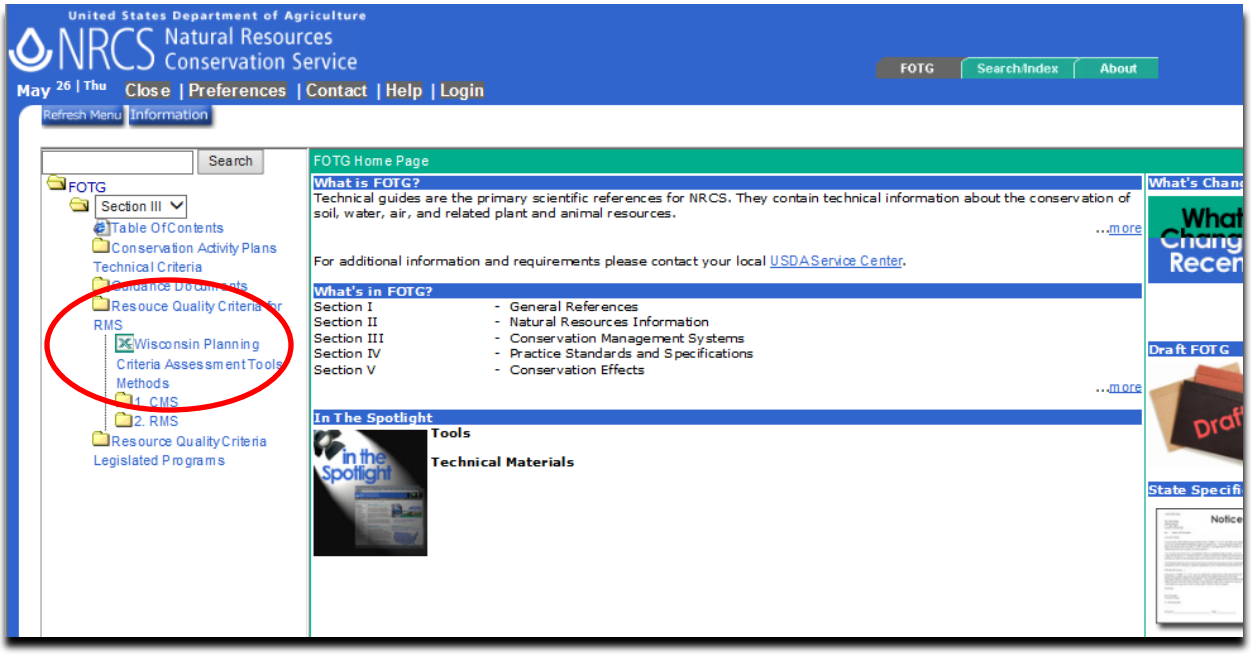
U.S. Department of Agriculture / Natural Resources Conservation Service	NRCS-CPA-52 4/2013	A. Client Name: Ima Farmer	
ENVIRONMENTAL EVALUATION WORKSHEET		B. Conservation Plan ID # (as applicable): Program Authority (optional): EQIP	
D. Client's Objective(s) (purpose):		C. Identification # (farm, tract, field #, etc. as required):	
Reduce field maintenance, improve yield and profitability		Tract 1099: Field 1, 3	
E. Need for Action:	H. Alternatives		
	No Action √ if RMS ☐	*Alternative 1* √ if RMS ☐	*Alternative 2* √ if RMS ☐
Soil Erosion - Cropland, Soil Quality - Cropland, Water Quality - Cropland	Continued continuous corn/soybean rotation	328, 329, 340, 590, 410	

2. Step-2 – Determine Objectives and Section-D – Objectives – Record very brief summations of the client's objectives. Some examples might include, but not be limited to reduce soil erosion, improve water quality, increase wildlife habitat, improve forest management, etc. One might also use another example like the one below:



U.S. Department of Agriculture / Natural Resources Conservation Service	NRCS-CPA-52 4/2013	A. Client Name: Ima Farmer	
ENVIRONMENTAL EVALUATION WORKSHEET		B. Conservation Plan ID # (as applicable): Program Authority (optional): EQIP	
D. Client's Objective(s) (purpose):		C. Identification # (farm, tract, field #, etc. as required):	
Reduce field maintenance, improve yield and profitability		Tract 1099: Field 1, 3	
E. Need for Action:	H. Alternatives		
	No Action √ if RMS ☐	*Alternative 1* √ if RMS ☐	*Alternative 2* √ if RMS ☐
Soil Erosion - Cropland, Soil Quality - Cropland, Water Quality - Cropland	Continued continuous corn/soybean rotation	328, 329, 340, 590, 410	

3. Step-3 Inventory Resources and Step-4 Analyze Resource Data and Section-F – Resource Concerns and Existing/Benchmark Conditions – Record Benchmark Condition developed with the appropriate Inventory Method/Assessment Tool as found in Wisconsin eFOTG – Section III.



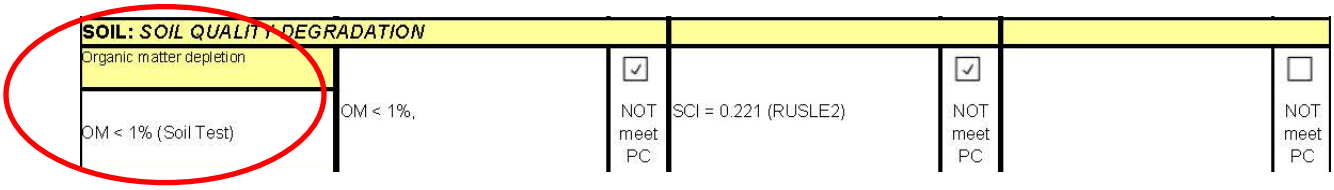
Record the tool used to assess the benchmark conditions and the results.

Using Soil Erosion – Cropland – Sheet, Rill, & Wind Erosion as an example, RUSLE2 will be the primary tool to calculate erosion rates. Results of the RUSLE2 calculation - based on field conditions, soils, cropping patterns, etc. - should be recorded in this section of the CPA-52. Therefore, Section F might look like: Fields 1 & 3 = 9.0 TAY (This will help the planner/reviewer know RUSLE2 has been run to make such a calculation, and such documentation should be located adjacent to the CPA-52 to support the recorded results).

Resource Concerns						
In Section "F" below, analyze, record, and address concerns identified through the Resources Inventory process. (See FOTG Section III - Resource Planning Criteria for guidance).						
F. Resource Concerns and Existing/ Benchmark Conditions (Analyze and record the existing/benchmark conditions for each identified concern)	**I. Effects of Alternatives**					
	No Action		***Alternative 1***		***Alternative 2***	
	Amount, Status, Description *(Document both short and long term impacts)*	**√ if does NOT meet PC**	**Amount, Status, Description** *(Document both short and long term impacts)*	**√ if does NOT meet PC**	**Amount, Status, Description** *(Document both short and long term impacts)*	**√ if does NOT meet PC**
SOIL: *EROSION*						
Sheet, Rill & Wind Erosion		☑		☐		☐
Field 1&3 - 9 TAY (RUSLE2)	9+ TAY	NOT meet PC	4 TAY (RUSLE2)	NOT meet PC		NOT meet PC
Concentrated flow						

Another example for Soil Quality – Cropland – Organic Matter Depletion might look like: OM =1% (This will help the planner/reviewer know a soil test has been conducted and the soil test

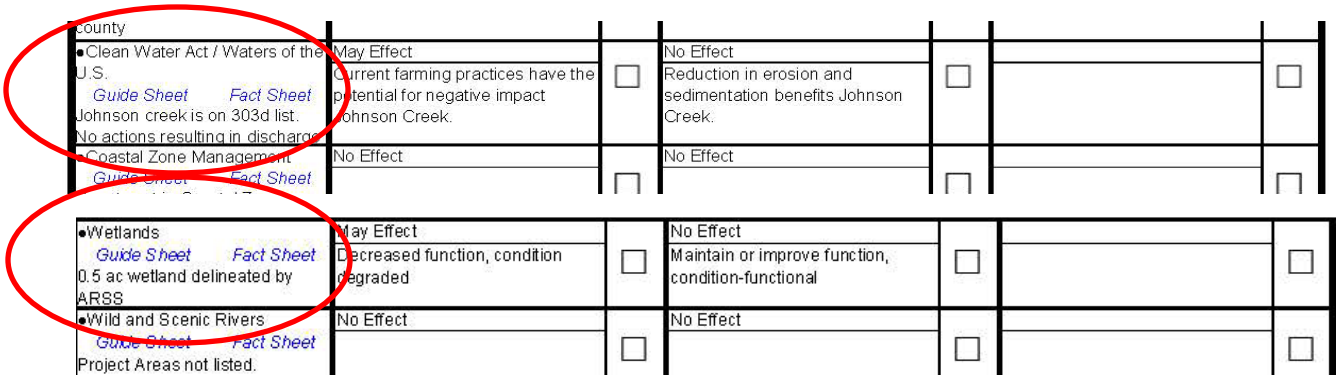
results should be included in the file as documentation to support results recorded on the CPA-52).



SOIL: SOIL QUALITY DEGRADATION						
Organic matter depletion						
OM < 1% (Soil Test)	OM < 1%,	☑ NOT meet PC	SCI = 0.221 (RUSLE2)	☑ NOT meet PC		☐ NOT meet PC

A summary of all current conservation planning tools is located in Appendix A

4. <u>Step-3 Inventory Resources and Step-4 Analyze Resource Data and Section-G – Special Environmental Concerns – Document Existing/Benchmark Conditions</u> – NRCS must consider Special Environmental Concerns during the planning process. Steps 3 and 4 represent the planner's opportunity to determine if some of these Special Environmental Concerns are present in the planning area. The Special Environmental Concerns include:
    - Clean Air Act
    - Clean Water Act
    - Coastal Zone Management
    - Coral Reefs
    - Cultural Resources
    - Endangered and Threatened Species
    - Environmental Justice
    - Essential Fish Habitat
    - Floodplain Management
    - Invasive Species
    - Migratory Birds/Bald and Golden Eagle Protection Act
    - Natural Areas
    - Prime and Unique Farmlands
    - Riparian Areas
    - Scenic Beauty
    - Wetlands
    - Wilde and Scenic Rivers

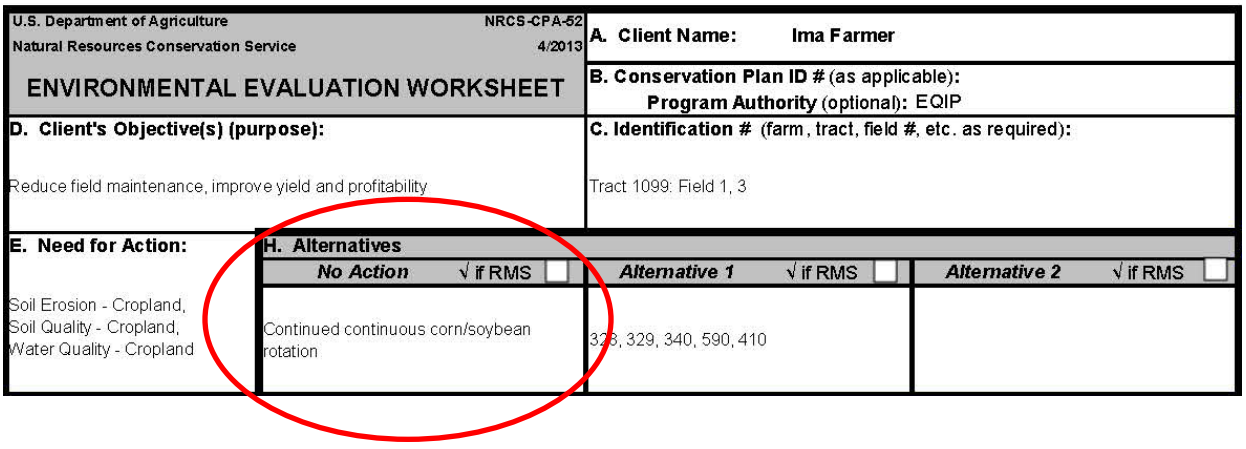


county						
•Clean Water Act / Waters of the U.S. Guide Sheet Fact Sheet Johnson creek is on 303d list. No actions resulting in discharge	May Effect Current farming practices have the potential for negative impact Johnson Creek.	☐	No Effect Reduction in erosion and sedimentation benefits Johnson Creek.	☐		☐
•Coastal Zone Management Guide Sheet Fact Sheet	No Effect	☐	No Effect	☐		☐
•Wetlands Guide Sheet Fact Sheet 0.5 ac wetland delineated by ARSS	May Effect Decreased function, condition degraded	☐	No Effect Maintain or improve function, condition-functional	☐		☐
•Wild and Scenic Rivers Guide Sheet Fact Sheet Project Areas not listed.	No Effect	☐	No Effect	☐		☐

When conducting inventories and analyzing resource data, record the presence of any found in this documenting existing/benchmark conditions section of Section G on the CPA-52:

A complete sample CPA-52 can be found in Attachment B

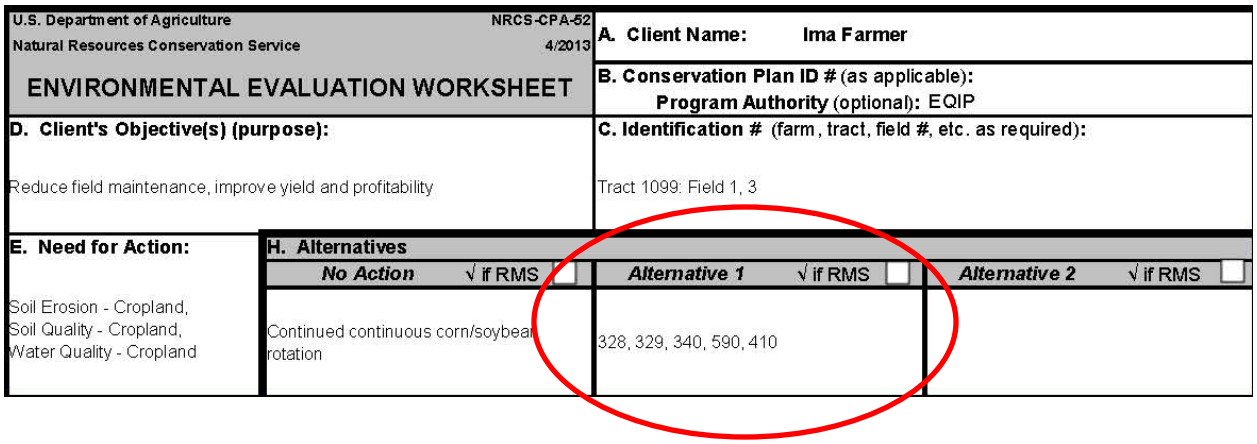
5. Step 5 – Develop Alternatives and Section-H – Alternatives – No Action – Provide very brief description of existing operation. For example, continued continuous corn/soybean rotation.



U.S. Department of Agriculture Natural Resources Conservation Service **ENVIRONMENTAL EVALUATION WORKSHEET**	NRCS-CPA-52 4/2013	**A. Client Name:** Ima Farmer **B. Conservation Plan ID #** (as applicable): **Program Authority** (optional): EQIP
D. Client's Objective(s) (purpose): Reduce field maintenance, improve yield and profitability		**C. Identification #** (farm, tract, field #, etc. as required): Tract 1099: Field 1, 3

E. Need for Action:	**H. Alternatives**		
	No Action √ if RMS ☐	***Alternative 1*** √ if RMS ☐	***Alternative 2*** √ if RMS ☐
Soil Erosion - Cropland, Soil Quality - Cropland, Water Quality - Cropland	Continued continuous corn/soybean rotation	328, 329, 340, 590, 410	

6. Step 5 – Develop Alternatives and Section-H – Alternatives – Alternative-1 – Record the planned practice code(s) only. A list of NRCS practice codes can be found in the Wisconsin eFOTG – Section IV – Table of Contents. An example record might be 328, 329, 340, 410. (repeat for additional alternatives)



U.S. Department of Agriculture Natural Resources Conservation Service **ENVIRONMENTAL EVALUATION WORKSHEET**	NRCS-CPA-52 4/2013	**A. Client Name:** Ima Farmer **B. Conservation Plan ID #** (as applicable): **Program Authority** (optional): EQIP
D. Client's Objective(s) (purpose): Reduce field maintenance, improve yield and profitability		**C. Identification #** (farm, tract, field #, etc. as required): Tract 1099: Field 1, 3

E. Need for Action:	**H. Alternatives**		
	No Action √ if RMS ☐	***Alternative 1*** √ if RMS ☐	***Alternative 2*** √ if RMS ☐
Soil Erosion - Cropland, Soil Quality - Cropland, Water Quality - Cropland	Continued continuous corn/soybean rotation	328, 329, 340, 590, 410	

7. Step 6 – Evaluate Alternatives and Section-I – Effects of Alternatives – No Action – Restate Benchmark Condition, or show deterioration of resource concern as appropriate. If the Benchmark Condition and No Action Alternative will not meet Planning Criteria (PC) as outlined in Wisconsin's eFOTG - Section III, make sure to select the NOT meet PC box.

Resource Concerns						
In Section "F" below, analyze, record, and address concerns identified through the Resources Inventory process. (See FOTG Section III - Resource Planning Criteria for guidance).						
F. Resource Concerns and Existing/ Benchmark Conditions (Analyze and record the existing/benchmark conditions for each identified concern)	**I. Effects of Alternatives**					
	No Action		***Alternative 1***		***Alternative 2***	
	Amount, Status, Description *(Document both short and long term impacts)*	**√ if does NOT meet PC**	**Amount, Status, Description** *(Document both short and long term impacts)*	**√ if does NOT meet PC**	**Amount, Status, Description** *(Document both short and long term impacts)*	**√ if does NOT meet PC**
SOIL: *EROSION*						
Sheet, Rill & Wind Erosion		☑		☐		☐
Field 1&3 - 9 TAY (RUSLE2)	9+ TAY	NOT meet PC	4 TAY (RUSLE2)	NOT meet PC		NOT meet PC

8. Step 6 – Evaluate Alternatives and Section-J – Special Environmental Concerns – No Action – Record potential impacts to Special Environmental Concerns in a brief statement. For example, potential negative impact to Johnson Creek, Reduced Habitat for Golden Winged Warbler, No Impact on Floodplain, Coral Reefs Not Present, etc. Be sure statements are consistent with inventory methods used, and benchmark conditions established, and can be defensible (i.e., supported by information in the case file or sources cited on the CPA-52).

Special Environmental Concerns: Environmental Laws, Executive Orders, policies, etc.						
In Section "G" complete and attach Environmental Procedures Guide Sheets for documentation as applicable. Items with a "•" may require a federal permit or consultation/coordination between the lead agency and another government agency. In these cases, effects may need to be determined in consultation with another agency. Planning and practice implementation may proceed for practices not involved in consultation.						
G. Special Environmental Concerns (Document existing/ benchmark conditions)	**J. Impacts to Special Environmental Concerns**					
	No Action		***Alternative 1***		***Alternative 2***	
	Document all impacts (Attach Guide Sheets as applicable)	√ if needs further action	Document all impacts (Attach Guide Sheets as applicable)	√ if needs further action	Document all impacts (Attach Guide Sheets as applicable)	√ if needs further action
•Clean Air Act *Guide Sheet FS1 FS-2* No non attainment areas in county	No Effect	☐	No Effect	☐		☐
•Clean Water Act / Waters of the U.S. *Guide Sheet Fact Sheet* Johnson creek is on 303d list. No actions resulting in discharge	May Effect Current farming practices have the potential for negative impact Johnson Creek.	☐	No Effect Reduction in erosion and sedimentation benefits Johnson Creek.	☐		☐

9. Step 6 – Evaluate Alternatives and Section-I – Effects of Alternatives – Alternative-1- Record quantitative or qualitative results of planned practices using the outcomes from proper assessment methods (i.e. RUSLE2, BERT, PCS, SVAP, BEPI, WHSI, etc). NOTE: This is a separate calculation from Benchmark Conditions to document planned practices will meet Planning Criteria. Using our earlier example of Soil Erosion – Sheet, Rill, & Wind; the estimated erosion rate with installed conservation practices will need to be recorded. Again, the documentation to support the estimated effect of conservation practices should accompany the CPA-52.

Resource Concerns						
In Section "F" below, analyze, record, and address concerns identified through the Resources Inventory process. (See FOTG Section III - Resource Planning Criteria for guidance).						
F. Resource Concerns and Existing/ Benchmark Conditions (Analyze and record the existing/benchmark conditions for each identified concern)	**I. Effects of Alternatives**					
	No Action		***Alternative 1***		***Alternative 2***	
	Amount, Status, Description *(Document both short and long term impacts)*	**√ if does NOT meet PC**	**Amount, Status, Description** *(Document both short and long term impacts)*	**√ if does NOT meet PC**	**Amount, Status, Description** *(Document both short and long term impacts)*	**√ if does NOT meet PC**
SOIL: *EROSION*						
Sheet, Rill & Wind Erosion Field 1&3 - 9 TAY (RUSLE2)	9+ TAY	☑ NOT meet PC	4 TAY (RUSLE2)	☐ NOT meet PC		☐ NOT meet PC

Some quantification of Effects of Alternatives might require a separate calculation from the method used to quantify our Benchmark Conditions. Using the Soil Quality Degradation – Organic Matter Depletion example earlier. The Soil Test was needed to determine existing Organic Matter (OM) for comparison to the historic OM of the soil(s) within the planning area. To determine/document our planned practices will have a positive impact on the degraded resource, in this case, a separate tool is used to determine/document improvements (e.g. the Soil Conditioning Index (SCI) from RUSLE2).

SOIL: *SOIL QUALITY DEGRADATION*						
Organic matter depletion OM < 1% (Soil Test)	OM < 1%,	☑ NOT meet PC	SCI = 0.221 (RUSLE2)	☑ NOT meet PC		☐ NOT meet PC

NOTE: the NOT meet PC box is checked in this case because it takes much time to build OM and the assessment method to improve the resource base does not directly correlate to Planning Criteria. It will take Step 9 (Evaluate the Plan), or future Resource Inventor and Analysis (Steps 3 and 4) to determine if the resource concern continues using this example.

10. Step 6 – Evaluate Alternatives and Section-J – Special Environmental Concerns – Alternative-1 - Record potential impacts to Special Environmental Concerns in a brief statement. For example, potential positive impact to Little River, or Increased Habitat for Golden Winged Warbler, Coral Reefs Not Present, No impact to Floodplain, etc. Be sure statements are consistent with inventory methods used, and benchmark conditions established. (repeat for additional alternatives). For example, Cultural Resources/Historic Properties might look like: Review completed by Lori VanHulle indicating non present.

•Cultural Resources / Historic Properties *Guide Sheet* *Fact Sheet* 410 requires CR Review	No Effect See documentation.	☐	No Effect Review completed by L. VanHulle indicated not present.	☐		☐
•Migratory Birds/Bald and Golden Eagle Protection Act *Guide Sheet* *Fact Sheet* NHI indicates an EO for Bald Eagle	No Effect No impact, no active nest present in or near project area	☐	No Effect No impact, no active nest present in or near project area	☐		☐

11. Step-7 – Make Decisions and Section-K – Other Agencies and Broad Public Concerns – Identify any permits need for Conservation Plan Implementation.

K. Other Agencies and Broad Public Concerns	***No Action***	***Alternative 1***	***Alternative 2***
Easements, Permissions, Public Review, or Permits Required and Agencies Consulted.		ITP permit required through DNR-BNHC Wetland and Waterways Permit Needed from DNR	

12. Step-7 – Make Decisions and Section-M – Preferred Alternative – Record the preferred alternative of the client by checking the appropriate box

M Preferred Alternative	√ preferred alternative	☐	☑	☐
	Supporting reason		Addresses all resource concerns identified and is economically feasible for the client	

13. Step-7 – Make Decision and Additional Notes Section – Record Practice Job Approval Authority in the planning process to document practices planned by those with proper job approval authority, and any actions taken to day related to permitting.

Additional notes
EJAA-3 for Grassed Waterway, planned by Civil Engineering Technician with EJAA04 Landowner has submitted paperwork for an ITP from DNR-BNHC regarding the N. Long Eared Bat.

    a. GM 450, Part 405.1 D (2) (i) - Inform the landowner or operator in writing or verbally that it is his or her responsibility to comply with applicable laws and regulations

b. GM 450, Part 405.1 D (2) (iii) - Furnish the landowner or operator, on request, any available information needed to obtain rights, permits, or approvals necessary to construct, operate, and maintain the practice.
c. GM 450, Part 405.1 D (2) (iv) - Provide further technical assistance only after the landowner or operator obtains required rights, permits, and approvals necessary to construct, operate, maintain, and apply practices. (High Priority Applicants, or Medium if they have finished designs and permits by Contract Deadline)
d. GM 450, Part 405.1 E - NRCS employees are not to procure permits, rights, or approvals or enforce laws and regulations.

Attachment A

Conservation Planning Tools

Wisconsin eFOTG – Section III

Conservation Planning Tools

May 26, 2016

----------Establishing Benchmark Conditions----------

SWAPA+HE	RESOURCE CONCERN	CROPLAND	PASTURE	FARMSTEAD	OTHER AG LAND	FOREST	PLANNING CRITERIA
SOIL	Soil Erosion - Concentrated Flow	Field Measurements	Field Measurements	Field Measurements	Field Measurements	Field Measurements	TY ≤ 4
SOIL	Soil Erosion - Excessive Bank Erosion	BEPI	BEPI	BEPI	BEPI	BEPI	BEPI ≤ 15
SOIL	Soil Erosion - Excessive Bank Erosion	EI	EI	EI	EI	EI	TY ≤ 4
SOIL	Soil Erosion - Sheet, Rill, & Wind	RUSLE2, WEPS	RUSLE2, WEPS	RUSLE2, WEPS	RUSLE2, WEPS	Screening/Photos	"T" based on soil
SOIL	Soil Quality - Compaction - Non-Pasture	BDT	---	BDT	BDT	BDT	BDT - 10% > Base Texture
SOIL	Soil Quality - Compaction - Non-Pasture	Dial Penetrometer	---	Dial Penetrometer	Dial Penetrometer	Dial Penetrometer	10% > Benchmark Cond.
SOIL	Soil Quality - Compaction - Pasture	---	PCS	---	---	---	PCS ≥ 4
SOIL	Soil Quality - Organic Matter Depletion	Soil Test	PCS	---	---	Soil Test	PCS ≥ 4, SCI > 0
SOIL	Soil Quality - Organic Matter Depletion	RUSLE2, WEPS	RUSLE2, WEPS, PCS	---	RUSLE2, WEPS	RUSLE2, WEPS	SCI > 0, PCS ≥ 4
SOIL	Soil Quality - Subsidence	SCI	SCI	SCI	SCI	SCI	SCI > 0
SOIL	Soil Quality - Subsidence	STIR	STIR	STIR	STIR	STIR	STIR < 15
WATER	Excess Water - Ponding, Flooding	Field Measurements	Field Measurements	Field Measurements	Field Measurements	Field Measurements	Soil Parameter
WATER	Insufficient Water - Inefficient use of Irrigation	FIRI, CU	FIRI, CU	---	FIRI, CU	---	FIRI > 85%, CU > 85%
WATER	Insufficient Water - Inefficient use of Irrigation	PWLW	PWLW	---	PWLW	---	PWLW ≤ 2 Ac-In
WATER	Water Quality - Excess Nutrients (Surface/Ground) - Crop	SNAP+ (PI), NI	---	---	---	---	PI ≤ 6, or PI < 2, NI < 14 or < 10
WATER	Water Quality - Excess Nutrients (Surface/Ground) - Past.	---	RUSLE2, PCS, SNAP+	---	---	---	RUSLE <0.2 TY, PCS ≤ 4, PI < 6/2
WATER	Water Quality - Excess Nutrients (Surface/Ground) - Past.	---	BERT, PCS-L	---	---	---	BERT < 6, PCS-L > 4
WATER	Water Quality - Excess Nutrients (Surface/Ground) - Farm.	---	---	NR-812, Table A	---	---	Site/Date Dependent
WATER	Water Quality - Excess Nutrients (Surface/Ground) - Farm.	---	---	Waste Mgt. Wrkshts	---	---	Worksheet Dependent
WATER	Water Quality - Excess Pathogens and Chemicals	---	---	NR-812, Table A	---	---	Size/Date Dependent
WATER	Water Quality - Excess Pathogens and Chemicals	---	---	Waste Mgt. Wrkshts	---	---	Worksheet Dependent
WATER	Water Quality - Excess Sediment (Surface)	SVAP, RUSLE2, WEPs	SVAP, RUSLE2, WEPs	---	SVAP, RUSLE2, WEPs	FOTG III Needs Chng.	SVAP ≥ 5, "T", Delivery 0.2 TY
WATER	Water Quality - Pesticides Transported	Win-PST, IPM Wrksht.	Win-PST, IPM Wrksht.	NR-812, Table A	Win-PST, IPM Wrksht.	Win-PST, IPM Wrksht.	FOTG III Needs to Identify
WATER	Water Quality - Petroleum, Heavy Metals	---	---	Soil Test, NR-812	---	---	FOTG III Needs to Identify
WATER	Water Quality - Water Temperature	Water Sample	Water Sample	Water Sample	Water Sample	Water Sample	SVAP ≥ 5, SVAP-Canopy ≥ 6
AIR	Air Quality Impacts - Greenhouse Gas Emissions	COMET, NASQAT	COMET, NASQAT	COMET, NASQAT	COMET, NASQAT	COMET, NASQAT	GHG ≥ 50% Effective
AIR	Air Quality Impacts - Objectionable Odors	NASQAT	NASQAT	NASQAT	NASQAT	---	Odor ≥ 50% Effective
AIR	Air Quality Impacts - Ozone Precursers	NASQAT	NASQAT	NASQAT	NASQAT	NASQAT	VOC ≥ 50% Effective
AIR	Air Quality Impacts - Particulate Emissions	Air Sample, NAQSAT	Air Sample, NAQSAT	Air Sample, NAQSAT	Air Sample, NAQSAT	Air Sample, NAQSAT	PM ≥ 50% Effective
PLANT	Plant Degradation - Excessive Plan Pressure						
PLANT	Plant Degradation - Inadequate Structure/Composition	Photo Documentation	PCS	---	Photo Documentation	Photo Documentation	PCS ≥ 4, TBD
PLANT	Plant Degradation - Undesireable Productivity	Crop Yield (CY)	---	---	---	---	CY ≥ 75% High Management
PLANT	Plant Degradation - Undesireable Productivity	---	PCS	---	---	Need Populating	PCS ≥ 4, TBD
PLANT	Plant Degradation - Wildfire Hazard, Excess Biomass	Field Measurements	Field Measurements	---	Field Measurements	Field Measurements	Meet 386 Standard
ANIMAL	Inadequate Habitat for Fish/Wildlife - Habitat Degradation	SVAP, WHSI	SVAP, WHSI	SVAP, WHSI	SVAP, WHSI	SVAP, WHSI	SVAP > 7, WHSI > 0.5
ANIMAL	Livestock Production Limitation - Inadequate Shelter	Field Measurements	Field Measurements	Field Measurements	Field Measurements	Field Measurements	TBD
ANIMAL	Livestock Production Limitation - Inadequate Water	---	GRAS, PCS	---	---	---	TBD
ENERGY	Inefficient Energy Use - Equipment/Facilities	AgEMP, ASABE 612	AgEMP, ASABE 612	AgEMP, ASABE 612	AgEMP, ASABE 612	---	Level 2 Audit Results
ENERGY	Inefficient Energy Use - Framing Practices/Field Operations	AgEMP, ASABE 612	AgEMP, ASABE 612	AgEMP, ASABE 612	AgEMP, ASABE 612	---	Level 2 Audit Results

Attachment B

Sample CPA-52

U.S. Department of Agriculture / Natural Resources Conservation Service	NRCS-CPA-52 4/2013	A. Client Name: Ima Farmer	
ENVIRONMENTAL EVALUATION WORKSHEET		B. Conservation Plan ID # (as applicable): Program Authority (optional): EQIP	
D. Client's Objective(s) (purpose): Reduce field maintenance, improve yield and profitability		C. Identification # (farm, tract, field #, etc. as required): Tract 1099: Field 1, 3	

E. Need for Action:	H. Alternatives		
	No Action √ if RMS ☐	*Alternative 1* √ if RMS ☐	*Alternative 2* √ if RMS ☐
Soil Erosion - Cropland, Soil Quality - Cropland, Water Quality - Cropland	Continued continuous corn/soybean rotation	328, 329, 340, 590, 410	

Resource Concerns

In Section "F" below, analyze, record, and address concerns identified through the Resources Inventory process. (See FOTG Section III - Resource Planning Criteria for guidance).

F. Resource Concerns and Existing/ Benchmark Conditions (Analyze and record the existing/benchmark conditions for each identified concern)	I. Effects of Alternatives					
	No Action		*Alternative 1*		*Alternative 2*	
	Amount, Status, Description *(Document both short and long term impacts)*	√ if does NOT meet PC	**Amount, Status, Description** *(Document both short and long term impacts)*	√ if does NOT meet PC	**Amount, Status, Description** *(Document both short and long term impacts)*	√ if does NOT meet PC
SOIL: *EROSION*						
Sheet, Rill & Wind Erosion Field 1&3 - 9 TAY (RUSLE2)	9+ TAY	☑ NOT meet PC	4 TAY (RUSLE2)	☐ NOT meet PC		☐ NOT meet PC
Concentrated flow Field 1&3 - 43 TY	43+ TY	☑ NOT meet PC	0 TY	☐ NOT meet PC		☐ NOT meet PC
SOIL: *SOIL QUALITY DEGRADATION*						
Organic matter depletion OM < 1% (Soil Test)	OM < 1%,	☑ NOT meet PC	SCI = 0.221 (RUSLE2)	☑ NOT meet PC		☐ NOT meet PC
		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
WATER: *EXCESS / INSUFFICIENT WATER*						
No resource concern identified		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
WATER: *WATER QUALITY DEGRADATION*						
Excess nutrients in surface and ground waters Field 1&3 - P> 30 PPM (Soil Test)	P > 30 PPM	☑ NOT meet PC	PI = 4 (SNAP+)	☐ NOT meet PC		☐ NOT meet PC
Excess nutrients in surface and ground waters Field 1&3 - PI = 12 (SNAP+)	PI > 12	☑ NOT meet PC	PI = 5 (SNAP+)	☐ NOT meet PC		☐ NOT meet PC

F. Resource Concerns and Existing/ Benchmark Conditions (Analyze and record the existing/benchmark conditions for each identified concern)	I. (continued)					
	No Action		*Alternative 1*		*Alternative 2*	
	Amount, Status, Description *(Document both short and long term impacts)*	√ if does NOT meet PC	**Amount, Status, Description** *(Document both short and long term impacts)*	√ if does NOT meet PC	**Amount, Status, Description** *(Document both short and long term impacts)*	√ if does NOT meet PC
AIR: *AIR QUALITY IMPACTS*						
No resource concern identified		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
PLANTS: *DEGRADED PLANT CONDITION*						
No resource concern identified		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
ANIMALS: *INADEQUATE HABITAT FOR FISH AND WILDLIFE*						
No resource concern identified		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
ANIMALS: *LIVESTOCK PRODUCTION LIMITATION*						
No resource concern identified		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
ENERGY: *INEFFICIENT ENERGY USE*						
No resource concern identified		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
		☐ NOT meet PC		☐ NOT meet PC		☐ NOT meet PC
HUMAN: *ECONOMIC AND SOCIAL CONSIDERATIONS*						

Special Environmental Concerns: Environmental Laws, Executive Orders, policies, etc.

In Section "G" complete and attach Environmental Procedures Guide Sheets for documentation as applicable. Items with a "•" may require a federal permit or consultation/coordination between the lead agency and another government agency. In these cases, effects may need to be determined in consultation with another agency. Planning and practice implementation may proceed for practices not involved in consultation.

G. Special Environmental Concerns (Document existing/ benchmark conditions)	J. Impacts to Special Environmental Concerns					
	No Action		*Alternative 1*		*Alternative 2*	
	Document all impacts (Attach Guide Sheets as applicable)	√ if needs further action	Document all impacts (Attach Guide Sheets as applicable)	√ if needs further action	Document all impacts (Attach Guide Sheets as applicable)	√ if needs further action
•Clean Air Act *Guide Sheet* *FS1* *FS-2* No non attainment areas in county	No Effect	☐	No Effect	☐		☐
•Clean Water Act / Waters of the U.S. *Guide Sheet* *Fact Sheet* Johnson creek is on 303d list. No actions resulting in discharge	May Effect Current farming practices have the potential for negative impact Johnson Creek.	☐	No Effect Reduction in erosion and sedimentation benefits Johnson Creek.	☐		☐
•Coastal Zone Management *Guide Sheet* *Fact Sheet* County not in Coastal Zone	No Effect	☐	No Effect	☐		☐
Coral Reefs *Guide Sheet* *Fact Sheet* None in WI	No Effect	☐	No Effect	☐		☐
•Cultural Resources / Historic Properties *Guide Sheet* *Fact Sheet* 410 requires CR Review	No Effect See documentation.	☐	No Effect Review completed by L. VanHulle indicated not present.	☐		☐
•Endangered and Threatened Species *Guide Sheet* *Fact Sheet* NHI indicates an EO for N. Long Eared Bat.	No Effect No potential roost trees will be disturbed. No hibernacula in project area.	☐	May Effect 1) ER Review indicates no impact OR 2) Avoidance and minimization activities on ER Review/ITP will be implemented	☐		☐
Environmental Justice *Guide Sheet* *Fact Sheet* No landuse change or adverse effects to environment/health.	No Effect	☐	No Effect	☐		☐
•Essential Fish Habitat *Guide Sheet* *Fact Sheet* None in WI	No Effect	☐	No Effect	☐		☐
Floodplain Management *Guide Sheet* *Fact Sheet* 64 acres in 100 yr floodplain	No Effect No measurable effects in 100 yr.	☐	No measurable effects in 100 yr. Decrease in peak discharge of 25 year frequency.	☐		☐
Invasive Species *Guide Sheet* *Fact Sheet* Field Inventory indicated none present	No Effect	☐	No Effect	☐		☐
•Migratory Birds/Bald and Golden Eagle Protection Act *Guide Sheet* *Fact Sheet* NHI indicates an EO for Bald Eagle	No Effect No impact, no active nest present in or near project area	☐	No Effect No impact, no active nest present in or near project area	☐		☐
Natural Areas *Guide Sheet* *Fact Sheet* No landuse change.	No Effect	☐	No Effect	☐		☐
Prime and Unique Farmlands *Guide Sheet* *Fact Sheet* 60% of field 1, however there is no landuse conversion	No Effect	☐	No Effect	☐		☐
Riparian Area *Guide Sheet* *Fact Sheet* No riparian areas present in project area	No Effect	☐	No Effect	☐		☐
Scenic Beauty *Guide Sheet* *Fact Sheet* No change to landscape	No Effect	☐	No Effect	☐		☐

•Wetlands *Guide Sheet* *Fact Sheet* 0.5 ac wetland delineated by ARSS	May Effect Decreased function, condition degraded	☐	No Effect Maintain or improve function, condition-functional	☐		☐
•Wild and Scenic Rivers *Guide Sheet* *Fact Sheet* Project Areas not listed.	No Effect	☐	No Effect	☐		☐

K. Other Agencies and Broad Public Concerns		***No Action***	***Alternative 1***	***Alternative 2***
Easements, Permissions, Public Review, or Permits Required and Agencies Consulted.			ITP permit required through DNR-BNHC Wetland and Waterways Permit Needed from DNR	
Cumulative Effects Narrative (Describe the cumulative impacts considered, including past, present and known future actions regardless of who performed the actions)				
L. Mitigation (Record actions to avoid, minimize, and compensate)			No cutting of snag or dying trees from June 01 - Aug. 15	
M. Preferred Alternative	√ preferred alternative	☐	☑	☐
	Supporting reason		Addresses all resource concerns identified and is economically feasible for the client	

N. Context (Record context of alternatives analysis)	local	local	

The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality.

O. Determination of Significance or Extraordinary Circumstances

Intensity: Refers to the severity of impact. Impacts may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

If you answer ANY of the below questions "yes" then contact the State Environmental Liaison as there may be extraordinary circumstances and significance issues to consider and a site specific NEPA analysis may be required.

Yes	No	
☐	☑	• Is the preferred alternative expected to cause significant effects on public health or safety?
☐	☑	• Is the preferred alternative expected to significantly affect unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas?
☐	☑	• Are the effects of the preferred alternative on the quality of the human environment likely to be highly controversial?
☐	☑	• Does the preferred alternative have highly uncertain effects or involve unique or unknown risks on the human environment?
☐	☑	• Does the preferred alternative establish a precedent for future actions with significant impacts or represent a decision in principle about a future consideration?
☐	☑	• Is the preferred alternative known or reasonably expected to have potentially significant environment impacts to the quality of the human environment either individually or cumulatively over time?
☐	☑	• Will the preferred alternative likely have a significant adverse effect on ANY of the special environmental concerns? Use the Evaluation Procedure Guide Sheets to assist in this determination. This includes, but is not limited to, concerns such as cultural or historical resources, endangered and threatened species, environmental justice, wetlands, floodplains, coastal zones, coral reefs, essential fish habitat, wild and scenic rivers, clean air, riparian areas, natural areas, and invasive species.
☐	☑	• Will the preferred alternative threaten a violation of Federal, State, or local law or requirements for the protection of the environment?

P. To the best of my knowledge, the data shown on this form is accurate and complete:

In the case where a non-NRCS person (e.g. a TSP) assists with planning they are to sign the first signature block and then NRCS is to sign the second block to verify the information's accuracy.

Signature (TSP if applicable)	**Title**	**Date**
Conservation Planner	**Soil Conservationist**	**5/14/2016**
Signature (NRCS)	**Title**	**Date**

If preferred alternative is not a federal action where NRCS has control or responsibility and this NRCS-CPA-52 is shared with someone other than the client then indicate to whom this is being provided.

The following sections are to be completed by the Responsible Federal Official (RFO)

NRCS is the RFO if the action is subject to NRCS control and responsibility (e.g., actions financed, funded, assisted, conducted, regulated, or approved by NRCS). These actions do not include situations in which NRCS is only providing technical assistance because NRCS cannot control what the client ultimately does with that assistance and situations where NRCS is making a technical determination (such as Farm Bill HEL or wetland determinations) not associated with the planning process.

Q. NEPA Compliance Finding (check one)

The preferred alternative:		Action required
☐	1) is **not a federal action** where the agency has control or responsibility.	Document in "R.1" below. No additional analysis is required
☑	2) is a federal action **ALL** of which is **categorically excluded** from further environmental analysis **AND** there are **no extraordinary circumstances as identified in Section "O".**	Document in "R.2" below. No additional analysis is required
☐	3) is a federal action that has been **sufficiently analyzed** in an existing Agency state, regional, or national NEPA document **and** there are no predicted significant adverse environmental effects or extraordinary circumstances.	Document in "R.1" below. No additional analysis is required.
☐	4) is a federal action that has been sufficiently analyzed in another Federal agency's NEPA document (EA or EIS) that addresses the proposed NRCS action and its' effects **and has been formally adopted by NRCS**. NRCS is required to prepare and publish its own Finding of No Significant Impact for an EA or Record of Decision for an EIS when adopting another agency's EA or EIS document. (**Note: This box is not applicable to FSA)**	Contact the State Environmental Liaison for list of NEPA documents formally adopted and available for tiering. Document in "R.1" below. No additional analysis is required
☐	5) is a federal action that has **NOT** been sufficiently analyzed or may involve predicted significant adverse environmental effects or extraordinary circumstances and may require an EA or EIS.	Contact the State Environmental Liaison. Further NEPA analysis required.

R. Rationale Supporting the Finding

R.1 Findings Documentation	
R.2 Applicable Categorical Exclusion(s) **(more than one may apply)** 7 CFR Part 650 *Compliance With NEPA*, subpart 650.6 *Categorical Exclusions* states prior to determining that a proposed action is categorically excluded under paragraph (d) of this section, the proposed action must meet six sideboard criteria. See NECH 610.116.	(20) Implementing soil control measures on existing agricultural lands, such as grade stabilization structures (pipe drops), sediment basins, terraces, grassed waterways, filter strips, riparian forest buffer, and critical area planting;

I have considered the effects of the alternatives on the Resource Concerns, Economic and Social Considerations, Special Environmental Concerns, and Extraordinary Circumstances as defined by Agency regulation and policy and based on that made the finding indicated above.

S. Signature of Responsible Federal Official:

Responsible Federal Official	RFO	5/15/2016
Signature	**Title**	**Date**

Additional notes

EJAA-3 for Grassed Waterway, planned by Civil Engineering Technician with EJAA04
Landowner has submitted paperwork for an ITP from DNR-BNHC regarding the N. Long Eared Bat.