



CONSERVATION PLANNING ACTIVITY

Conservation Plan Supporting Organic Transition

DEFINITION

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

CRITERIA

General Requirements

The Conservation Planning Activity (CPA) documents client objectives, benchmark (current) conditions, resource concerns, alternative actions, the evaluation of alternative actions, and the client's preferred alternative.

Applicable land uses for this CPA are provided in the **DELIVERABLES** section.

The TSP will complete conservation planning steps 1 through portions of 7 of the NRCS 9 step conservation planning process as outlined in the NRCS National Planning Procedures Handbook (NPPH). The steps include identify problems and opportunities (step 1), determine objectives (step 2), inventory and analyze resources (steps 3 and 4), formulate and evaluate alternatives (steps 5 and 6) and document client's preferred alternative(s) (step 7).

The TSP will maintain an ongoing record of CPA related discussions with the client. The TSP will document on a conservation assistance notes form (CPA-6) or other format that includes all components of the CPA-6 (client objectives, dates of assistance, all parties present, notes of significant assistance provided, alternatives considered, and decisions reached). Any correspondence between the TSP and the client related to the development of the CPA will be included in the record.

1. IDENTIFY PROBLEMS AND OPPORTUNITIES (Step 1)

Visit with the client to identify and document existing, potential, and perceived natural resource problems, opportunities, and concerns in the planning area. The identified problems and opportunities as well as the client objectives guide the remainder of the planning process and are the basis for the purpose and need for action that are documented in NRCS Environmental Evaluation.

2. DETERMINE OBJECTIVES (Step 2)

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

3. INVENTORY RESOURCES (Step 3)

The resource inventory documents benchmark (current) conditions of natural resources in the CPA planning area. The specific inventory documentation requirements and resource concerns to be evaluated are provided in the **DELIVERABLES** section. Inventory documentation required may include such items as:

- Current agricultural or forestry practices and management activities,
- Environmentally sensitive areas (e.g., wetlands, sinkholes, wellheads, gullies, ditches, etc.),
- Soils, climate, topography,
- Equipment and technology currently being used by the landowner,
- Highly erodible land or wetland compliance determinations associated to the planning land unit,
- Pertinent Federal, State, Tribal, and local laws, regulations and policy, and
- Special Environmental Concerns that may be applicable on, or in the vicinity of the planning area. The special environmental concerns to be inventoried include, at a minimum, the following:
 - Clean Air Act
 - Clean Water Act / Waters of the U.S.
 - Coastal Zone Management
 - Coral Reefs
 - Cultural Resources / Historic Properties
 - 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 Area
 - Scenic Beauty
 - Wetlands
 - Wild and Scenic Rivers

NRCS state offices may identify additional state, tribal, or local laws, regulations or ordinances that must routinely be evaluated.

Use NRCS data available in the Field Office Technical Guide (FOTG) Sections 1 and 2, plus Web Soil Survey (WSS) and other helpful resources to support the inventory.

Document any previously installed or implemented conservation practice(s) and indicate whether the existing practice(s) is currently accomplishing the conservation practice purpose indicated in the NRCS conservation practice standard in the state's FOTG, Section 4.

4. ANALYZE RESOURCE DATA (Step 4)

Analysis of a resource inventory will document benchmark (current) conditions of natural resources in the CPA planning area. A comparison between benchmark (current) conditions and planning criteria/quality criteria (desired future conditions) will help identify resource concerns. Analysis and documentation requirements are provided in the **DELIVERABLES** section.

Analysis documentation will include at a minimum:

- NRCS resource concerns identified,
- Benchmark conditions,
- (as applicable) Results of assessment tools, and
- A description of the need for conservation actions.

5. FORMULATE ALTERNATIVES (Step 5)

At a minimum two alternatives will be developed. The first will be a no-action alternative in which current management activities are assumed to continue. The second will be an action alternative identifying a conservation practice or a system of conservation practices and management activities to address CPA identified resource concern(s). Additional action alternatives may be developed to identify different ways of achieving client objectives. Alternatives may include an appropriate mix of structural conservation practices, such as terraces, dams, and waterways; nonstructural conservation practices, such as crop residue management, or livestock exclusion. Each action alternative must meet the client's objectives and comply with Federal, State, Tribal, and local laws, regulations, and policies.

When providing technical assistance to existing organic operations, ensure recommended conservation practices and management activities are consistent with the client's Organic System Plan (OSP) and the National Organic Program (NOP) regulations. If client's objective is to transition to organic production, use CPA 138 – Conservation Plan Supporting Organic Transition.

6. EVALUATE ALTERNATIVES (Step 6)

The TSP will evaluate the alternatives and describe the environmental effects associated with each alternative. The analysis will be reviewed with the client. The analysis should provide the client with the information needed to select their preferred alternative.

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

When evaluating conservation practice effects, the short and long-term effects on natural resources and the applicability and effect on special environmental concerns identified in Step-3 (Resource Inventory) must be documented. Include recommendations that will avoid or mitigate any adverse effects on soil, water, air, plants, animals (including livestock, fish, and wildlife), energy, or human concerns, as well as on special environmental concerns.

After analyzing the proposed alternatives, prepare the following documentation, at a minimum:

- Documentation of alternatives discussed (CPA-6, correspondence), (as applicable)
- Results of assessment tools,
- Considerations to avoid or mitigate any adverse effects on those unique resources and other soil, water, air, plants, animals (including livestock, fish, and wildlife), energy, or human concerns, as well as on special environmental considerations, and
- An evaluation of the alternative's effects on the client's land use, capital, labor, management, risk, profitability, and public health and safety.

7. CLIENT'S PREFERRED ALTERNATIVES (Step 7)

The TSP will present all alternatives to the client and document the client's preferred alternative.

Technical Requirements

The CPA 138 must be developed by a TSP who meets NRCS Conservation Plan Supporting Organic Transition certification requirements, see TechReg/NRCS Registry.

Minimum technical criteria to be addressed in the development of the CPA 138:

1. Must comply with Federal, Tribal, State, and local laws, regulations, and permit requirements and meet the producer's objectives.
2. Must be developed to assist owners/operators in taking voluntary actions to meet the National Organic Program (NOP) regulations for organic certification related to addressing natural resource concerns for soil, water, wetlands, woodlands and wildlife. https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=3f34f4c22f9aa8e6d9864cc2683cea02&tpl=/ecfrbrowse/Title07/7cfr205_main_02.tpl
3. Must utilize applicable NRCS approved resource assessment tools to address and recommend planned conservation practices.
 - a. Water Erosion
RUSLE2 simulation (all fields) reports for the benchmark and the agreed upon conservation practice changes are included as part of the Organic Transition-DIA document.
 - b. Wind Erosion
Complete the Wind Erosion Prediction System (WEPS) on all fields to document reduction of wind erosion loss after installation of conservation practices. Include the WEPS simulation report.
 - c. Nitrogen Leaching and Off-site Movement
Completed State approved environmental risk assessment tool designed to assess the potential for nitrogen movement out of agricultural lands via leaching, surface offsite transport and atmospheric loss. The Leaching Index functionality within RUSLE2 may be used when a State N assessment is not available. Report will document the effect of installed conservation practices.
 - d. Phosphorus Assessment/Index
Completed State approved risk assessment showing the installed conservation practice effect on risk of P movement. If using MMP and MMP includes a valid State risk assessment, include the custom report document.
 - e. Pesticide Screening Tool/Hazard Assessment
Complete the Windows Pesticide Screening Tool (WIN-PST) on all NOP approved pesticides used to document any hazards for pesticide losses. Include reports.
4. Must document landowner(s) decisions.
5. Requires evaluation and documentation of compliance with the National Environmental Policy Act, the Endangered Species Act, the National Historic Preservation Act, and other effects on the environment. This evaluation and

documentation process WILL BE COMPLETED BY NRCS. TSP will document findings that impact any of the special environmental concerns not already discussed in the alternative evaluation.

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

Farmstead (Production Area)

1. Review/Develop plan map(s) showing existing and planned structures (See NPPH Title 180, part 600.31 subpart A for map requirements), and soils map(s) for all fields indicating map units. Note: Provide a brief description of any limitations of the soil for desired use. Appropriate conservation practices, existing or planned, will address the limitations.
2. For livestock operations, record or update the Animal Inventory Information (both existing and proposed) to include such information as type, number and average weight.
3. For livestock operations, record Manure Storage Information including type of manure storage, existing storage volumes/sizes (when applicable) and maximum length of storage available. When applicable, document planned imports, exports, and on-farm transfers of manure and other NOP allowed substances.
4. Record Pesticide Handling and Storage Facilities.

Crop and Pasture (Land Treatment Areas)

1. Review/develop plan map(s) showing fields, soils, sensitive areas, setbacks, existing and planned crop and pasture practices. Note: Provide a brief description of any limitations of the soil for desired use. Appropriate conservation practices, existing or planned, will address the limitations.
2. Review and update:
 - a. Any existing results of approved risk assessment tools for soil erosion, nitrogen, phosphorus and pesticides.
 - b. Identify sensitive area setback distances required for application of organic or inorganic nutrients or pesticides to protect water quality.
 - c. Soil test result data. New or updated soil tests shall be scheduled if analysis exceeds testing recommendations.
 - d. Test result data for all nutrient sources to include manure water, compost, organic by-product, and plant tissue sample analyses applicable to the plan. Schedule any new sampling according to LGU recommendations.
 - e. Confirm or update the current and/or planned crop rotation including realistic yield goals for the crops. Highlight any crop rotation changes such as adding cover crops, multi-year perennials, non-harvested crops to build soil health.

- f. Include operational changes to tillage and residue management, use of compost and/or biochar, and other management changes to meet NOP criteria.
- g. Listing and quantification of all nutrient sources, fertilizer recommendations, planned nutrient applications and form.
- h. Outdoor access plan for livestock and poultry. A Grazing Management Plan may be designed consistent with Prescribed Grazing code 528.

Wetlands, Woodlands and Wildlife (Resource improvement Areas)

1. Review/develop plan map(s) showing wetlands, woodlands and wildlife habitat.
2. Review current state of inventory and how resources will be maintained or improved for:
 - a. Wetlands protection from resource degradation by sediment, nutrients and pathogens. Confirm that a Highly Erodible Land and Wetland Conservation determination for each field has been completed. Refer client to Farm Service Agency if not able to confirm. The grazing management plan defines the timing, duration and intensity of grazing if applicable.
 - b. Woodlands- grazed forest grazing management plans define the timing, duration and intensity/defoliation for all livestock.
 - c. Wildlife- Livestock watering tanks must include exit ramps for birds or small animals.

DELIVERABLES

Two copies (hardcopy or electronic) of the plan must be developed—one for the client and one for the NRCS field office. At the client's request, Technical Service Provider (TSP) can deliver NRCS's copy to the NRCS Field Office. The client's copy must include the maps and preferred alternative, unless the client requests other documents from this section. The NRCS copy must include all items identified herein. An additional electronic copy of the plan should also be uploaded on NRCS Registry.

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

The plan must meet the Natural Resource Conservation Service (NRCS) planning criteria for applicable resource concerns.

1. Cover Page

Cover page reporting the technical services provided by the TSP. Cover page(s) must include the following:

- a. Client information: Name, farm bill program, contract number, and contract item number.
- b. TSP information: name, address, phone number, email, TSP number, TSP expiration date; and county of service.
- c. CPA information: CPA name, land use(s), units, and amount.
- d. Statement by TSP that services provided:

- i. Comply with all applicable Federal, State, Tribal, and local laws and requirements.
- ii. Meet applicable program requirements and recommended planned practices are based on NRCS conservation practice standards and specifications.
- iii. Are consistent with and meet the conservation program goals and objectives for which the program contract was entered into by the client.
- iv. Incorporate alternatives that are both cost effective and appropriate to address the resource issues.
- e. TSP certification statement: signature and date.
- f. Client confirmation: signature and date.
- g. Block for NRCS reviewer acceptance (to be completed by NRCS): signature and date

2. Conservation Assistance Notes and Correspondence

- a. Conservation Assistance Notes (NRCS-CPA-6) or other format that includes all components of the CPA-6.
 - i. Document the client's objectives.
 - ii. Document each interaction with the client, include notes and results of that interaction, date, and initials of the TSP.
 - iii. Document each site visit, activity in the field, results of each site visit, all parties present, date, and initials of the TSP.
- b. Any correspondence between the TSP and the client relating to the development of the CPA.

3. Maps

- a. Maps to include, but not be limited to:
 - i. General location map of the planning area showing access roads to the location.
 - ii. CPA map (this may consist of several maps to account for the entire planning area). This map will specifically include:
 - Boundary lines for the Planning Land Units (PLUs) with labels (name, number, or both). A PLU is a unique geographic area, defined by a polygon, which has common land use and is owned, operated, or managed by the same client or clients. The PLU is the minimum unit for planning.
 - Land-use designation and any applicable modifiers such as wildlife for each PLU as appropriate.
 - Acreage for each PLU.
 - Location of sensitive resources and setbacks, if applicable.
 - Location of planned and applied conservation practices.
 - If the planning area includes nonprivate lands, such as Federal or Tribal lands, a land status map must be included to display land ownership categories (Private, State Trust, BLM, Tribal, and Territorial, etc.)
 - i. Resource maps of the PLU
 - Soils maps, and other resource maps as applicable.
 - An existing Wetland delineation map, if any.
- b. At a minimum, all maps developed for the CPA will include:
 - i. Title block showing:

- Map title.
 - Client's name (individual or business).
 - Prepared with assistance from USDA – Natural Resources Conservation Service.
 - Assisted By [TSP planner's name].
 - Name of applicable conservation district, county, and State.
 - Date prepared.
- ii. Map scale.
 - iii. Information needed to locate the planning area, such as geographic coordinates, public land survey coordinates, etc.
 - iv. North arrow.
 - v. Appropriate map symbols and a map symbol legend on the map or as an attachment.

4. Conservation Plan

A record of the client's preferred alternative, which includes:

- a. For all land uses
 - i. PLU label (name, number, or both).
 - ii. NRCS conservation practice name and code for applied and planned practices required for the system.
 - iii. Estimated amount planned or applied.
 - iv. Brief description of the planned conservation practices (practice narratives).
 - v. Dates the planned practices are scheduled to be implemented.
 - vi. Date any applied practices were completed.
 - vii. As needed, applicable "Conservation Practice Overview" sheets or other prepared material.
 - viii. Operation and maintenance agreements and procedures
 - ix. Available maps, sketches, and designs resulting from the planning process that will be useful to the client in implementing the plan.

5. Resource Inventory and Assessment Documentation

- a. Descriptions of current crops and rotation, farming practices (tillage, nutrient application methods, timing, source, and rate), soils, and equipment and technology utilized.
- b. Calculations from current erosion prediction technology used to estimate benchmark annual sheet and rill erosion and wind erosion in tons/acre. Include printout of any software utilized
- c. Results from NRCS-approved resource assessment technology tools, that are appropriate for the resource conservation needs and client objectives, to compare the benchmark condition with the planned alternative condition.
- d. Organic System Plan documentation
 - i. Description of Organic Production, Application Information, and Land Requirements.
 - ii. Crop Production, Seed and Planting Stock, Soil Management and Crop Rotation, Pest, Disease and Weed Management & Monitoring, Irrigation Water, Equipment and Containers, Treated Wood, Materials List, Greenhouse Crop Production,

Compost and/or Manure Use and/or Production, Facility Pest Management, and Wild Crop Harvest.

- e. Any additional assessments, maps, and sketches resulting from the planning process used in preparation and arriving at the alternative selected in Part 4.
- f. Any photographs or documentation used to support the determination documented.
- g. Document the effects of each Alternative on other resources concerns.
- h. Considerations to avoid or mitigate any adverse effects on those unique resources and other soil, water, air, plants, animals (including livestock, fish, and wildlife), energy, or human concerns, as well as on special environmental considerations.
- i. An evaluation of the alternative's effects on the client's land use, capital, labor, management, risk, profitability, and public health and safety. (e.g., practice cost estimates, no action alternative, alternative impact described, Financial assistance programs available.)

References

USDA Natural Resources Conservation Service. National Planning Procedures Handbook.

<https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=44407>

USDA Natural Resources Conservation Service. Field Office Technical Guide.

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

USDA Natural Resources Conservation Service: National Range and Pasture Handbook

USDA Natural Resources Conservation Service. National Environmental Compliance Handbook.

<https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=39467>

USDA Natural Resources Conservation Service. Cultural Resources Handbook.

<https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=42752>

USDA Natural Resources Conservation Service. National TSP Website.

<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/technical/tsp/>

USDA Natural Resources Conservation Service. National TSP Resources.

<https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/programs/technical/tsp/?cid=nrcseprd1417414>