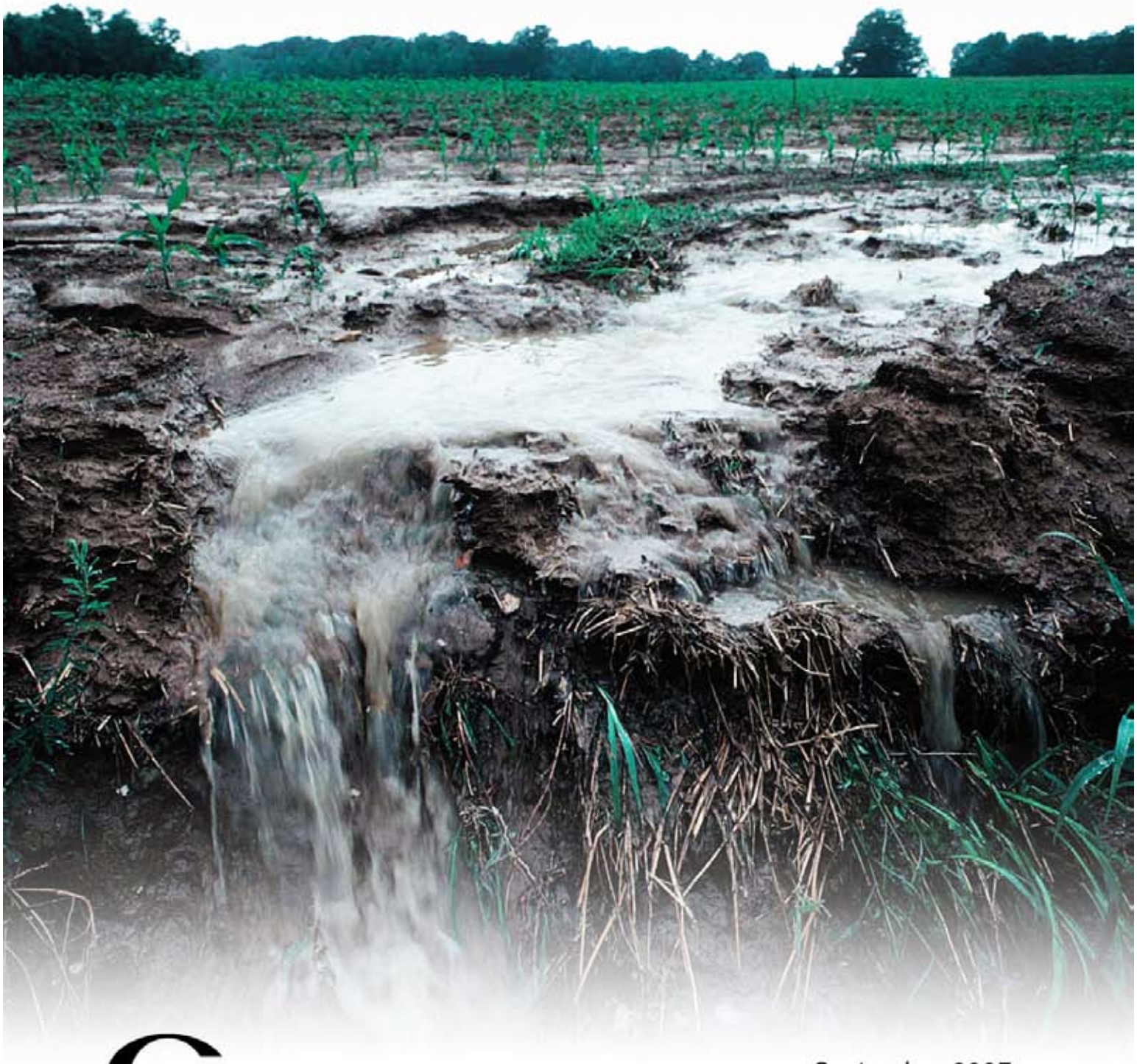
TROUBLE DOWNSTREAM

Upgrading Conservation Compliance



ENVIRONMENTAL WORKING GROUP

September 2007

Executive Summary

KEY FINDINGS

1. Due to lax standards and implementation problems, the conservation compliance program is missing cost-effective opportunities to make further, substantial reductions in soil erosion on U.S. cropland.

2. Without corrections to policy design constraints and adequate staff funding to implement the program effectively, conservation compliance will not reduce soil erosion on the majority of U.S. cropland to rates considered "sustainable."

3. Since geographic areas heavily associated with crop subsidies are linked with high levels of agricultural nutrient pollution, current conservation compliance policy misses an opportunity to prevent or reduce pollution that may be inadvertently subsidized by farm programs.

4. Conservation compliance is a valid eligibility requirement for farmers receiving commodity subsidies since the current voluntary, financial assistance approach to solving agricultural environmental problems leaves 70 percent of farmer applications unfunded.

5. Conservation compliance should be expanded and strengthened to help reduce the additional soil erosion and nutrient pollution associated with the increase in agricultural biofuels production.

BACKGROUND

In the 1985 Farm Bill, Congress decided that as a quid pro quo for federal farm assistance, farmers receiving taxpayer support should control soil erosion on highly erodible lands used to grow subsidized crops. The policy principle was straightforward and widely embraced in conservation and agriculture policy circles: taxpayer support for agriculture should not inadvertently subsidize degradation of natural resources or the environment. Parallel policies were authorized in the 1985 law to prevent subsidies from encouraging conversion of fragile lands and wetlands to crop production.

In order to maintain their eligibility for federal farm benefits such as commodity crop subsidies and disaster payments, farmers were required to develop and implement a government-approved soil conservation plan specifying soil conservation practices. Common erosion reduction practices include: rotating crops, minimizing tillage, leaving soil covered with crop residue after harvest, and installing grassed buffers, etc. This program was called the Highly Erodible Land Conservation (HELC) Compliance provision or "conservation compliance," for short.

Farmers were given 10 years (until 1995) to fully implement the soil conservation plans. The U.S. Department of Agriculture (USDA) attributes the HELC planning and compliance process with widespread adoption of conservation systems, which made unprecedented progress in reducing erosion over these 10 years (Claassen et al, 2004). HELC compliance, coupled with the Conservation Reserve Program (CRP), reduced erosion by about 40 percent (1.2 billion tons) from 3.07 billion tons in 1982 to 1.9 billion tons in 1997 (national soil survey years which encompass the 1985 to 1995 time period). USDA attributes about 25 percent of that reduction to HELC compliance requirements. HELC compliance is also credited with a "technology-forcing" effect that helped reduce erosion on cropland not subject to HELC plans.

However, since full implementation of HELC compliance plans in 1995, there has been little additional progress in reducing erosion. According to the National Resources Inventory (NRI) survey, approximately 100 million acres of cropland in the U.S.—nearly one-third of the 368 million acres of cropland nationwide —continue to erode at rates deemed "unsustainable." As of 2003, when the latest NRI survey occurred, 1.76 billion tons of soil is still being lost each year. Sediment from cropland causes a variety of serious problems as it pollutes drinking water sources, clogs downstream reservoirs that include hydroelectric facilities, smothers aquatic life, and forces farmers to use more fertilizer to make up for

reduced soil fertility. Moreover, since 1985, mounting scientific evidence has identified fertilizer run-off and animal manure from cropland as a major source of water nutrient pollution (Howarth et al, 2002). Nutrient run-off was not a consideration in the development or implementation of HELC policy or plans.

Another, even more dramatic development since the passage of the 1985 Farm Bill and the HELC policy is the ethanol boom. While experts are still trying to determine what the net impact of expanding corn acreage and production will be on natural resources and the environment, it is clear that ethanol production is already leading to significant changes in cropping patterns, and to growing demand for corn. Both of which could have adverse impacts on water quality and soil erosion, increased fertilizer and pesticide application, and land use change. Current HELC policy and soil conservation plans may be inadequate to deal with potential emerging environmental impacts of the ethanol boom.

This report highlights the successes and shortcomings of the conservation compliance policy and sheds light on the nationwide problem of agricultural soil erosion and nutrient pollution. To provide a state-level perspective and to highlight one of the nation's largest agricultural-environmental problems—the Mississippi River-Gulf of Mexico "Dead Zone"—this report focuses on the 10 states that border the Mississippi River: Arkansas, Illinois, Iowa, Kentucky, Louisiana, Minnesota, Mississippi, Missouri, Tennessee, and Wisconsin.

The Mississippi River Basin (MRB) watershed includes 17 major tributaries that drain 31 states and 41 percent of the continental United States (U.S. Department of Interior). The Mississippi River also encompasses the majority of the country's subsidized production of corn, wheat, soybeans, cotton, and rice, and much of the nation's beef, dairy, hog, and poultry industries. According to the USDA, cropland in the Mississippi River Basin not only receives the highest federal commodity subsidies but also has the highest nitrogen runoff potential.

KEY FINDINGS, EXPLAINED

Finding #1: Due to lax standards and implementation problems, the conservation compliance program is missing cost-effective opportunities to make further, substantial reductions in soil erosion on U.S. cropland.

The conservation compliance program is not working as well as it could to reduce soil erosion because: a) the soil conservation plans in many cases require only modest reductions in erosion and; b) because implementation and enforcement of the program has diminished over time.

In enacting the HELC policy, Congress did not set a specific standard for the amount of erosion producers should be expected to achieve, stating only that a "substantial reduction" in erosion was required in order for affected producers to comply. Initially, the USDA's Natural Resources Conservation Service (NRCS)—the agency responsible for the technical aspects of compliance—proposed to use the soil loss tolerance level (symbolized as "T") as the standard for achieving a substantial reduction in erosion. T is intended to represent a rate of erosion, in tons of soil lost per acre per year, which can be sustained with no long-term loss in soil productivity.

In response to claims from some farm organizations that achieving T would create economic hardship for some producers, NRCS instead developed standards for two types of conservation compliance plans. A "basic plan" would reduce erosion to "T" when the plan could be implemented without creating economic hardship; an "alternative system" that did not reduce erosion to T was used in all other cases. The erosion reductions required by alternative systems varied between regions and states depending on soil characteristics. To some degree, the Conservation Reserve Program, which was also established by the 1985 Farm Bill, was intended to provide a paid, long-term retirement option for land that had erosion hazards so severe that conversion to grass or tree cover was the most cost-effective conservation practice.

Currently, two standards for "substantial reduction in erosion" are used to make a "compliance determination" during a status review. Conservation plans developed prior to July 3, 1996—whether a basic plan or an alternative system was required—are automatically considered to be meeting the substantial reduction standard provided the plan or the system is maintained. If the plan or system was developed after July 3, 1996, then a substantial reduction is defined as a 75 percent reduction in

potential erodibility. On these latter tracts of eligible cropland, NRCS field staff should review crop residue levels and use water and wind erosion prediction equations to check if a 75 percent reduction in potential erodibility is being met.

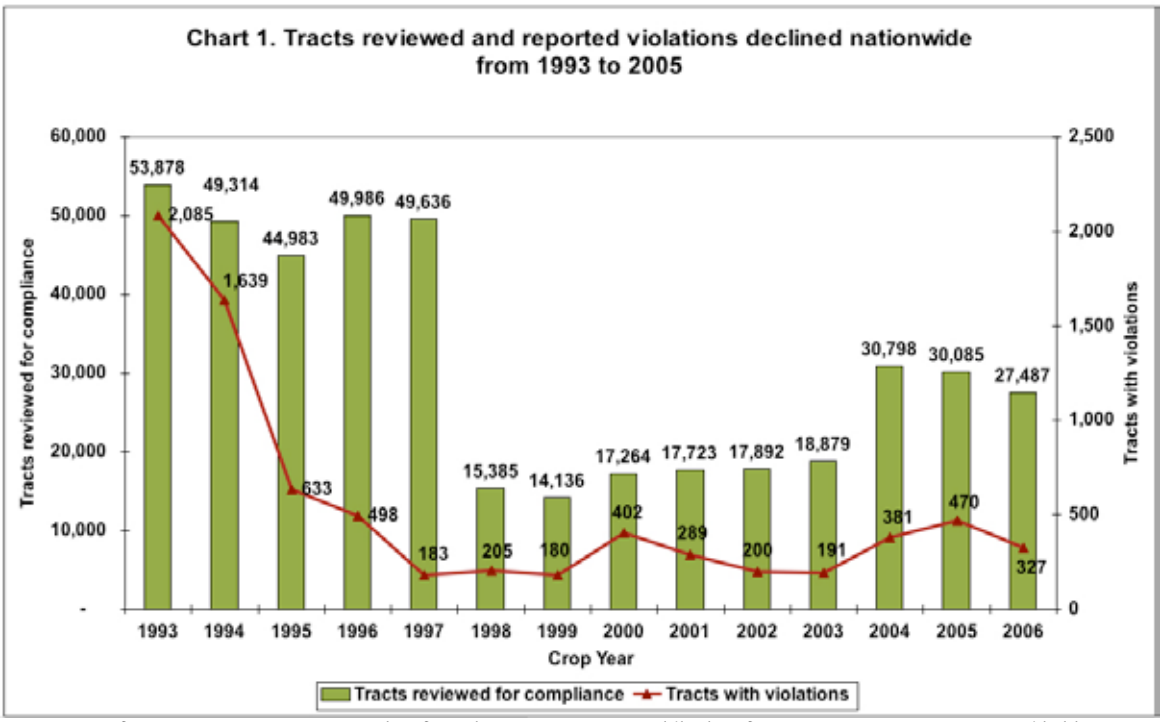
Unfortunately, because NRCS does not systematically collect or maintain several types of data, the agency is unable to fully evaluate how effectively conservation compliance is working. As of 2007, there were 4.5 million tracts of subsidized cropland subject to HELC compliance. However, of these 4.5 million tracts, NRCS does not differentiate what proportions are covered by a "basic" plan or an "alternative" system. In addition, NRCS does not track the proportion of plans approved before or after July 3, 1996, and thus cannot determine which plans or systems meet the pre-1996 standard or the post-1996 "75 percent reduction standard." Finally, because NRCS and FSA maintain two separate databases for conservation compliance information, compliance staffs at both agencies concede that tract violation information is irreconcilable between the two databases.

The Government Accountability Office (GAO) in 2003 questioned the NRCS claim that 98 percent of tracts reviewed were in compliance since:

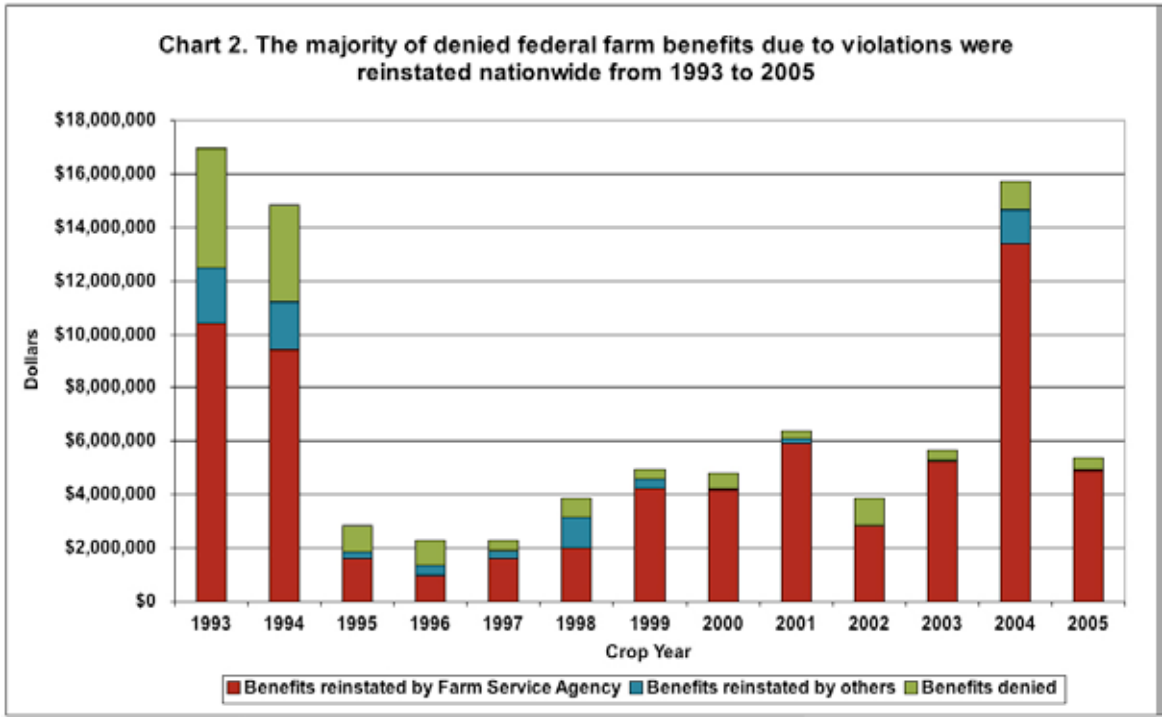
(1) NRCS selected about 20 percent of the tracts annually with little or no potential for noncompliance (such as permanent rangelands),
(2) NRCS does not have an automated system to send the list to the field offices for compliance reviews to be conducted during the critical erosion periods,
(3) NRCS does not consistently collect and analyze the results of the field offices' compliance reviews to identify unusual enforcement patterns across regions and states and over time, and the
(4) USDA Office of Inspector General noted that improvements in NRCS' implementation of the program, including, avoiding issuing waivers that are not warranted, are needed to strengthen the agency's ability to provide accurate and reliable assessments of farmer compliance.

EWG compiled and analyzed available data to provide the following snap shots of the implementation of the conservation compliance provisions over time:

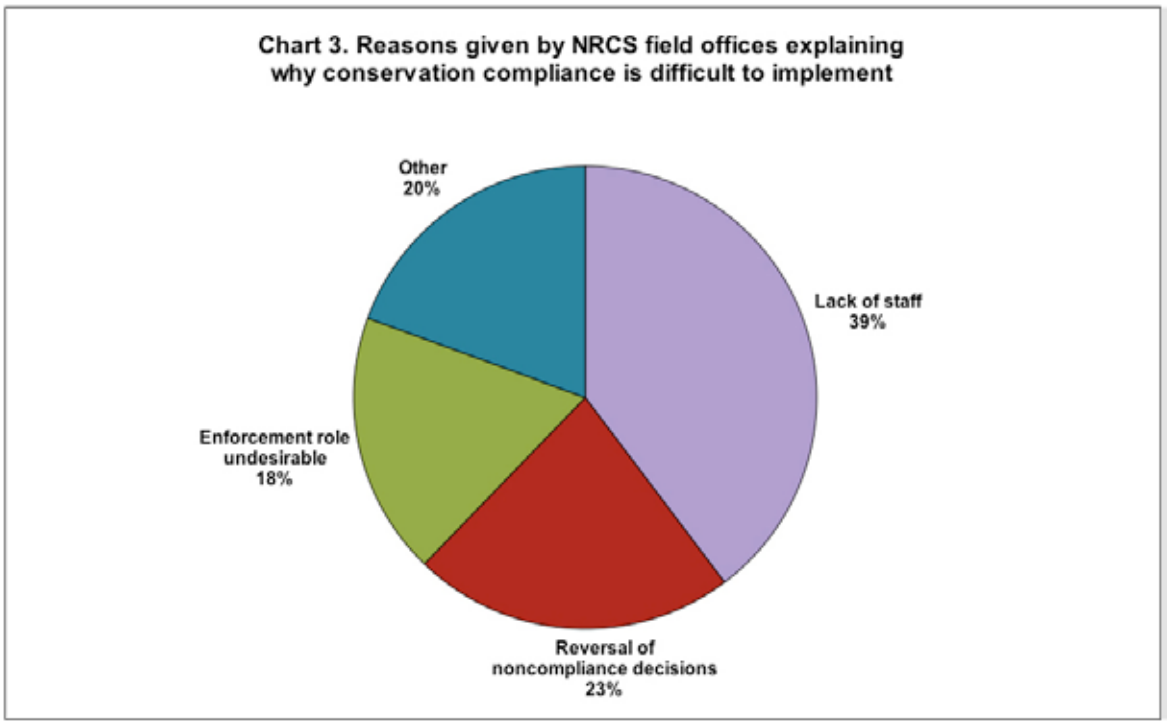
(1) NRCS significantly reduced the annual compliance status reviews conducted over time (See Chart 1);
(2) NRCS and FSA consistently overturned violation rulings using multiple waivers, exemptions, and variances, while consistently reinstating federal farm benefits (See Chart 2), and
(3) NRCS field staff gave a variety of reasons to explain the difficulty in implementing the provisions (See Chart 3).



Source: Data for years 1993 to 1999 were taken from the 2003 GAO report while data for years 2000 to 2006 were provided by NRCS.
Note: Data for tracts reviewed and data for tracts with violations includes both HELC and WC violations.



Source: GAO (2003, 2006).

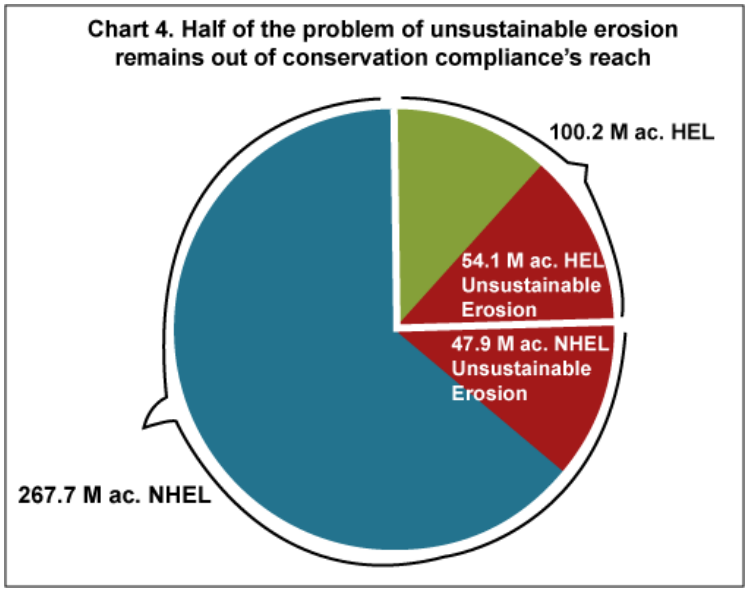


Source: GAO, 2003.

Finding #2: Without corrections to policy design constraints and adequate staff funding to effectively implement the program, conservation compliance will not reduce soil erosion on the majority of U.S. cropland to rates considered "sustainable."

Soil conservation compliance plans are only required on cropland receiving federal farm subsidies and designated highly erodible land (HEL). But a great deal of unsustainable, excessive erosion occurs on cropland that is not technically classified highly erodible. According to the National Resources Inventory,

of the 102 million acres of cropland nationwide eroding at unsustainable rates, nearly half (48 million acres) are classified as non-highly erodible (NHEL) and thus do not have conservation compliance requirements (See Chart 4).

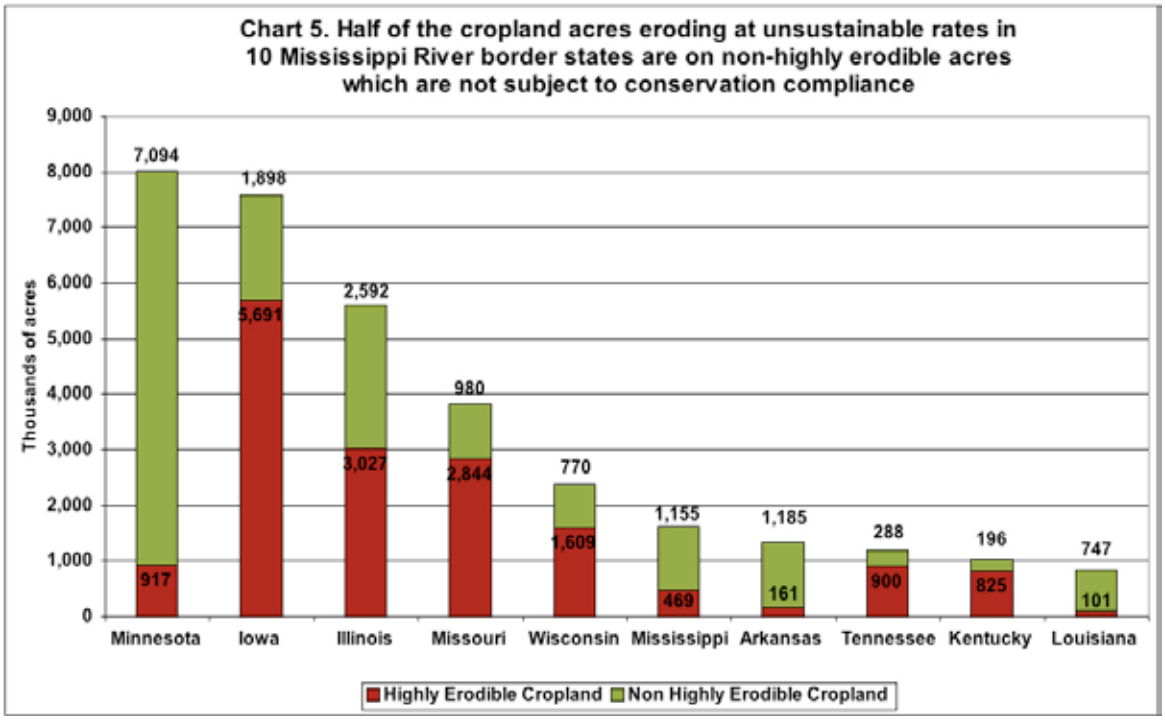


Source: Data calculated from USDA's National Resources Inventory, 2003.

In the 10 states that border the Mississippi River, 33 million of the 123-million cropland acres are eroding unsustainably. Half of those 33 million acres (16.4 million) are non-highly erodible lands and thus not subject to conservation compliance.

When looking at the problem of unsustainable erosion at the state level, four of the 10 states that border the Mississippi River have more of their unsustainable erosion problem occurring on non-highly erodible land than on highly erodible land: Minnesota, Mississippi, Arkansas, and Louisiana. Thus, conservation compliance does not address this significant problem on the 10.2 million acres in these four states where most of the 10 state's 16.9 million acres of NHEL-unsustainable erosion is occurring (See Chart 5).

With yearly budget cuts hampering the ability of NRCS field offices to conduct conservation compliance status reviews, it is increasingly difficult for agency staff to adequately monitor the environmental impacts of agricultural activities. Expanding conservation compliance to address unsustainable erosion problems and increasing funding to support NRCS staff or certified technical service providers, are critical components to improving the conservation compliance policy.



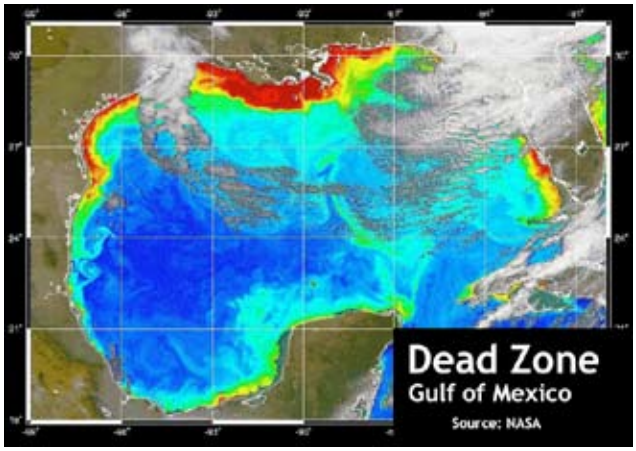
Source: Data calculated from USDA's National Resources Inventory, 2003.

Finding #3: Since geographic areas heavily associated with crop subsidies are linked with high levels of agricultural nutrient pollution, current conservation compliance policy misses an opportunity to prevent or reduce pollution that may be inadvertently subsidized by farm programs.

Source: University System of Maryland. Photo credit: J. Burkholder.

By design, conservation compliance does not explicitly address one of today's most pressing agricultural-environmental problems: nutrient pollution. Excess runoff of commercial fertilizer and animal manure applied on cropland causes algae outbreaks in rivers and lakes (USDA ARS, 2003). The algae clog water intake pipes at industrial plants and municipal drinking water facilities. Algae blooms can lead to "dead zones" which suffocate bottom-dwelling creatures like crabs and oysters, as well as fish unable to escape the resulting oxygen-deprived waters (See photo of fish kill). Nutrient pollution has also been linked to toxic microbes that cause lesions on fish and on humans, as well as short-term memory loss in humans who are exposed to the polluted water (CDC, 2004).

Dead zones occur throughout the world and are caused primarily from excess fertilizer and animal manure run-off, as well as, emissions from sewage treatment plants, urban and suburban run-off, and air emissions from vehicles. Examples of dead zones in the U.S. are in the Long Island Sound, Chesapeake Bay, Corpus Christi Bay, Los Angeles River, and Puget Sound (WRI Earthtrends).



The largest dead zone in the country occurs at the mouth of the Mississippi River in the Gulf of Mexico each spring. In past years, the dead zone (pictured in the satellite image as the red coastal areas around Texas, Louisiana, Mississippi, Alabama, and Florida) has encompassed some 5,000 square miles, an area roughly the size of Connecticut. Predictions for 2007 indicate that the dead zone will be the third largest on record, about 7,900 square miles or nearly the size of New Jersey (LUMCON, 2007).

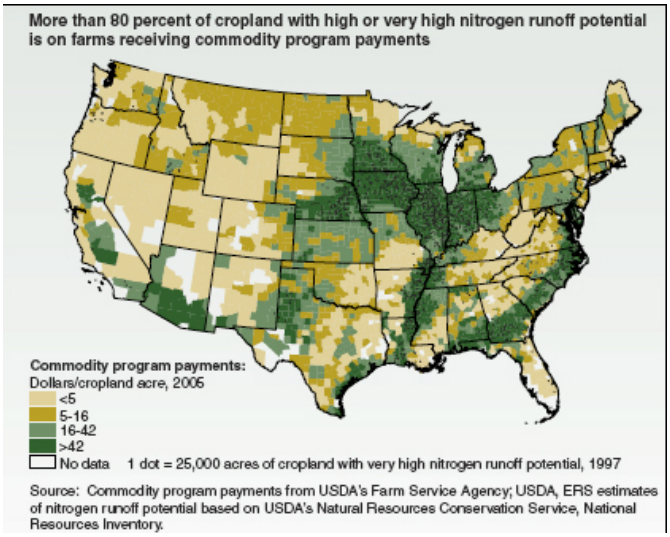
While the soil erosion reduction efforts in conservation compliance plans indirectly reduce phosphorus nutrient pollution, as some phosphorus is bound to soil particles, plans focused on soil erosion do not directly address the problem of dissolved phosphorus nutrient pollution or nitrogen nutrient pollution, which do not adhere to soil particles.

Every year, over the last five-year Farm Bill, taxpayers provided between $8 and $17 billion in commodity crop subsidies and between $1 and $3 billion in disaster relief to farmers (Chite, 2007 and EWG Farm Subsidies Database). While subsidies are projected lower in the next five years because of the price-enhancing effect of ethanol production and other factors, commodity program expenditures alone are still projected to be about $7 billion annually (Chite, 2007). In addition, taxpayers spend, on average, $3 billion per year subsidizing crop insurance for farmers and crop insurance companies.

Since these federal farm income support programs enable farmers to till cropland and apply fertilizers, they share responsibility for the agricultural soil erosion and nutrient pollution problems in our nation's

waters. More than 80 percent of the nation's cropland with high or very high nitrogen runoff potential (dots on the USDA map) is receiving commodity program payments (dark green areas of the map) (Claassen, 2007).

It is reasonable for policy makers to expect farmers to reduce and control both soil erosion and nutrient pollution in cost-effective ways as a condition of taxpayer support. Taxpayers, on average, provide $45 to $100 per acre annually in commodity support payments to farmers in the highest nitrogen runoff areas. In contrast, nutrient management plans—plans that optimize crop yield while minimizing nutrient pollution—have a one-time cost, on average, of $5 to $15 per acre, according to the USDA, and costs of updating such plans are modest (Claassen, 2007).



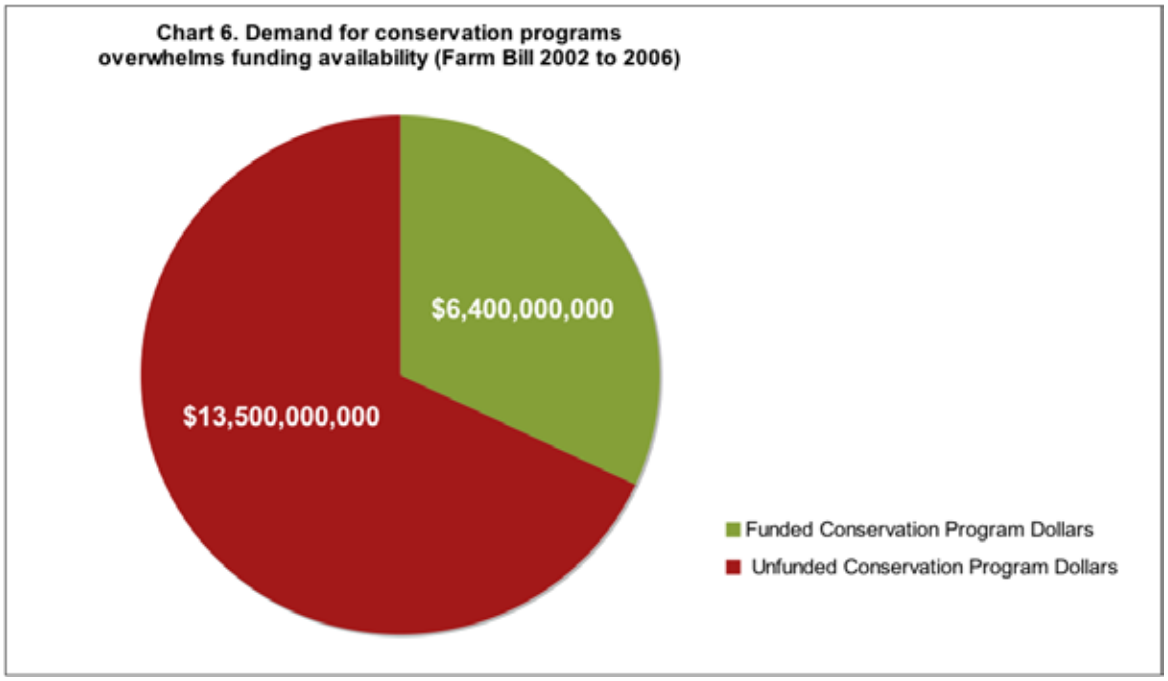
Source: Claassen, 2007.

As a further step, landowners and operators should be required to establish and maintain grass or tree buffers on a minimum area along streams and ponds. Such buffer zones would have multiple environmental benefits. A minimum setback with planted grassed buffers will trap sediment and nutrient runoff and reduce the amount of pollution reaching surface waters. A minimum setback, plus treatment of gully erosion, will help stabilize stream or shore banks and prevent bank erosion sediment from smothering aquatic habitat. Finally, a minimum setback will allow waterside habitat for wildlife and provide nesting and food resources. Several conservation programs, notably the Conservation Reserve Enhancement Program (CREP) and the Conservation Reserve Program's continuous buffer sign-up, provide taxpayer assistance for the express purpose of establishing and maintaining grass, shrub or tree buffers along water bodies.

Finding #4: **Conservation compliance is a valid eligibility requirement for farmers receiving commodity subsidies since the current voluntary, financial assistance approach to solving agricultural environmental problems leaves 70 percent of farmer applications unfunded.**

The amount of taxpayer dollars spent subsidizing agricultural production dwarfs the amount spent on cleaning up or preventing agricultural-environmental problems. Over the 2002 Farm Bill (2002 to 2006), taxpayers have provided about $64 billion in commodity crop subsidies, $10 billion in disaster aid (the majority of both payments was spent on states in the Mississippi River Basin) and only $14 billion to conservation programs (Chite, 2007 and EWG Farm Subsidies Database). The Environmental Working Group (2006) determined that commodity spending overwhelms water quality conservation spending by more than 500 to 1 in the areas of the Mississippi River Basin with the highest nitrogen loadings.

Additionally, voluntary demand from farmers for conservation financial assistance to solve environmental problems dramatically exceeds available funds. According to NRCS, from 2002 to 2006, roughly $500,000 applications from farmers and landowners have been rejected from receiving conservation funding largely due to lack of funds. The total unfunded requests amount to $13.5 billion for conservation practices that would have covered 15 million acres. Thus, farmers have sought two times more conservation assistance than has been supplied (See Chart 6). A major factor in the funding shortfall is the propensity of Congress to de-fund conservation programs and reduce the budgets of the agencies that oversee them in annual appropriations cycles in order to pay for commodity and disaster programs or meet other budgetary shortfalls. Expanding and strengthening conservation compliance and supporting the agencies responsible for its oversight could contribute to solving agricultural-environmental problems during times of tight federal budgets, when insufficient funds are available for voluntary conservation practices.



Source: Data calculated from multiple USDA Natural Resources Conservation Service "Unfunded Conservation Information" websites. Note: The following programs are included: EQIP, WRP, GRP, FRPP, WHIP, CSP. However, CSP did not provide unfunded dollar information. The Conservation Reserve Program (CRP) is not displayed here.

Finding #5: Conservation compliance should be expanded and strengthened to help reduce additional soil erosion and nutrient pollution associated with the increase in agricultural biofuels production.

In 2007, fifteen million more acres of corn were planted than had been grown in 2006 in response to burgeoning demand for ethanol (and continued strong export demand for U.S. grain) (NASS, 2007). The expansion of corn production ostensibly serves to meet energy policy goals of reduced dependence on foreign oil and lower emissions of climate changing gases. However, the soil and water quality scientists are increasingly concerned about unintended local and regional environmental consequences of an expansion in corn production (Simpson et al, 2007).

Currently, crop production, whether for feed grain use or ethanol production, is not subject to federal environmental standards or guidelines to minimize soil erosion or nutrient pollution. The only environmental performance standard now applied to corn production is the soil conservation plan required of farmers on just the portion of the corn crop that is subsidized and produced on highly erodible land. Expanding and strengthening conservation compliance to all subsidized cropland provides an important policy option for dealing with potential increases in soil erosion and nutrient pollution that may accompany the increase in corn production to supply the ethanol boom.

JUSTIFICATION: ENSURING FARM PROGRAM PAYMENTS BENEFIT THE PUBLIC GOOD

A wide array of conservation organizations have supported incentive programs for farmers to assist in the protection of agricultural resources and environment quality. If the government will not sufficiently help farmers solve environmental problems through voluntary incentive-based programs, it is reasonable for the public to expect, at minimum, that various forms of agricultural subsidies will not make soil and nutrient pollution of surface waters worse. It is also reasonable for taxpayers to expect that investments in agricultural subsidies come with a *quid pro quo* for the beneficiaries: cost-effective practices to protect our land, air, and water.

Solving agriculture's water quality and aquatic resource problems takes targeted and focused interventions at the watershed scale. Most conservation funding continues to be spent on a non-targeted basis and only recently have state and regional pilot projects been developed to target and focus watershed-level efforts.

Conservation compliance is a broad-brush policy instrument and should be seen as requiring a basic measure of pollution prevention on all acres getting subsidies. Conservation compliance will not solve the nation's agricultural water quality problem, but it can reduce the likelihood of pollution and improve water quality.

RECOMMENDATIONS FOR IMPROVING CONSERVATION COMPLIANCE

The Highly Erodible Land Conservation Compliance program suffers from a number of weaknesses in design and implementation. What follows is a list of the primary weaknesses and action that could be taken to make progress towards reducing the unintended, environmental harm resulting from subsidized agricultural activities. Addressing these issues will require changes in the federal law and regulations.

Expand the limited reach of compliance

Problem: A great deal of erosion is occurring on cropland that is not classified as highly erodible and is as damaging a source of sediment and nutrients as highly erodible cropland. Conservation compliance only requires soil conservation measures on highly erodible cropland.

Solution: Amend federal law to require conservation compliance on all cropland acres receiving farm program benefits.

Solution: Amend the statute to include crop insurance in the list of farm program benefits that are subject to conservation compliance.

Problem: Current soil conservation requirements have little or only very indirect effects on nutrient pollution and degradation of aquatic and riparian habitat.

Solution: Amend the statute to require nutrient management plans, not just soil conservation plans, on cropland receiving farm program benefits.

Solution: Amend the statute to require a meaningful minimum setback from streams for crop production on land receiving farm program benefits. Allow producers to meet this requirement by enrolling sufficient acres in the continuous sign-up of the Conservation Reserve Program or other conservation incentive programs in order to achieve technical specifications for riparian buffers or filter strips on a site-by-site basis.

Establish better and consistent standards

Problem: Currently, conservation compliance requires that approved soil conservation plans or systems achieve a "substantial reduction" in erosion—a weak standard that was further weakened in implementation.

Solution: Require NRCS to develop a better standard than "T" for soil conservation plans that would include new standards for soil degradation (erosion, loss of organic matter, compaction, etc.) and standards reflecting the environmental implications of soil degradation. In addition, NRCS should consider developing soil erosion reduction goals related to sediment loads within specific watershed basins as a more effective approach to reducing soil erosion through required soil conservation plans.

Solution: While those new standards are being developed, amend the statute to require soil conservation plans that reduce sheet and rill erosion, the worst kinds of water erosion, to the Soil Loss Tolerance Level (T).

Solution: Require all current and future conservation plans to meet these upgraded standards.

Ensure better enforcement

Problem: Emphasis on and enforcement of conservation compliance lagged after passage of the 1996 Farm Bill, which introduced a number of new waivers and exemptions that made enforcement more difficult. In the decades since, soil continues to wash away and the Gulf of Mexico Dead Zone grows larger. Reclaiming conservation compliance as an effective policy tool can put American farming back on a path to saving its soil and restoring the health of the nation's waters.

Solution: Mandate an annual compliance review of at least one percent of crop fields subject to conservation compliance provisions.

Solution: Allow graduated penalties scaled to severity of the violation and degree of cooperation by the producer in correcting deficiencies. Eliminate most other waivers and exemptions.

Solution: Mandate funding from the Commodity Credit Corporation, which disburses the crop subsides, to support the technical assistance by NRCS staff and certified third-parties needed to develop and implement conservation plans and to conduct mandated status reviews.

Improve data collection, evaluation and reporting

Problem: Insufficient data are being collected and evaluated by NRCS and FSA Compliance staff preventing these agencies from being able to properly evaluate and provide evidence that 98 percent of farmers are in compliance with the policy provisions.

Solution: Require NRCS and FSA to document and report:

1) What level of erosion reduction is required in each approved soil conservation plan,
2) What level of erosion reduction is actually being achieved by each soil conservation plan,
3) If there was a violation, whether the appropriate action was taken to ensure the problem is corrected and the plan is fully implemented,
4) How much erosion is occurring on the tracts receiving waivers for not fully implementing the plan (e.g. economic and personal hardship, good faith, technical violation, severe conditions, etc.) but are counted as in compliance anyway,
5) A complete statistical profile of farmers deemed in and out of compliance, and
6) The number of tracts with violations associated with the benefits at risk of denial and benefits actually denied.

EWG is a nonprofit research organization with offices in Washington, DC and Oakland, CA. EWG uses the power of information to educate the public and decision-makers about a wide range of environmental issues, especially those affecting public health. The Environmental Working Group prepared this report for the Mississippi River Water Quality Collaborative, with support from the McKnight Foundation. The opinions expressed in this report are those of the Environmental Working Group and do not necessarily reflect the views of the Collaborative or the McKnight Foundation. EWG is responsible for any errors of fact or interpretation contained in this report.

For references and the entire report, please see: http://ewg.org/reports/compliance

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Cover photo: Soil erosion and water run-off on a cornfield. Source: USDA NRCS. Photo credit: Lynn Betts.

Related EWG report: "Dead in the Water: Reforming wasteful farm subsidies can restore Gulf fisheries" at http://www.ewg.org/reports/deadzone

ABOUT THE MISSISSIPPI RIVER WATER QUALITY COLLABORATIVE

The Collaborative is comprised of environmental organizations from states bordering the Mississippi River as well as regional and national groups that work on Mississippi River issues. The purpose of the Collaborative is to harness the resources and expertise of diverse organizations to reduce all types of pollution entering the river. Mississippi River Water Quality Collaborative members who are jointly releasing this report include:

Environmental Law & Policy Center
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Environmental Working Group
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Gulf Restoration Network
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