

Conservation Programs As They Relate to ESA

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Outline – What are we trying to answer?

How Do Conservation Plans Fit into ESA?

How are conservation programs being positioned within ESA?

What if a Grower is in a Conservation Program that is not a Certified Conservation Program?

What Does All of this Mean for our Growers?



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How Do Conservation Plans Fit into ESA?



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Currently an open comment period for the proposed process to become an EPA Qualified Conservation Program or an EPA Qualified External Party

- EPA Qualified Conservation Program
 - A conservation program whose participants achieve the maximum number of mitigation points that a pesticide label could require (9 point)
- EPA Qualified External Party
 - An individual or an organization whose members meet the qualifications of a Runoff/Erosion Specialist



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How are conservation programs being positioned within ESA?



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Qualified Conservation Program

- Gold Standard
- A conservation program that has gone through the application process and been approved by the EPA to become Qualified.
- Helps farmers meet ESA pesticide mitigation requirements for runoff and erosion
- A farmer implements proven soil/water conservation practices
- Earn up to 9 points for runoff/erosion by verifying measures like buffers, cover crops, or terraces



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Qualified Conservation Program

- USDA-NRCS EQIP 595 – ONLY Qualified Conservation Program currently
- Producers can apply for EQIP 595 financial or technical assistance through NRCS
 - Develop a conservation plan for their whole farm that would identify any needs for erosion or runoff concerns
 - Based on the findings of the conservation plan – farmer and advisor evaluate the possible mitigation combinations for each field that will meet the growers' objectives and achieve 9 mitigation points
- Participation and implementation of a Qualified Conservation Plan appears to make achieving ESA compliance for runoff/erosion mitigation very achievable



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EXAMPLE

Table 17. Example of Three Different Options of Mitigation Measures Identified during Conservation Planning Utilizing NRCS CPS 595 and Enrolled in EQIP

Mitigation Measure		Option 1	Option 2	Option 3
Existing mitigation measures in place	50ft riparian buffer	2	2	2
Total Points for Mitigation in Place <i>prior to</i> EQIP Participation		2		
Mitigation practice options identified by EQIP	Grassed waterway	2	2	2
	Reduced tillage	2	-	-
	Contour farming	2	-	-
	Cover crop	-	3	-
	No-till	-	-	3
	Conservation program	2	2	2
Total Points with Additional EQIP-identified Measures		10	9	9



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What if a Grower is in a Conservation Program that is not a Certified Conservation Program?



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Non-Qualified Conservation Program

- 2 mitigation points can be achieved if a producer participates in a conservation program that is not a Qualified Conservation Program
- Examples:
 - NRCS programs (CSP or EQIP) for practices other than 595 for Water Quality Protection
 - State or Local Conservation Cost-Share Programs
 - Pilot Watershed Conservation Programs



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Requirements for non-qualified conservation programs

- The program provides advice from technical experts –
 - 1 mitigation point is achieved for using a technical expert
- The program provides site-specific guidance
- The program focuses on reducing or managing runoff and/or erosion
- The program provides documentation of program enrollment
- The program includes verification of implementation



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What Does All of this Mean for our Growers?



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Farmer Benefits of Using Conservation Programs for ESA Compliance

- By utilizing a conservation program, farmers will earn mitigation points to credit toward ESA compliance on their farm
- Programs like EQIP can provide valuable technical and financial assistance to farmers
- Offset the cost of achieving ESA compliance as well as address other resource concerns on the farm



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What Does All of this Mean for NAICCC Members?



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- NAICC and the GAC is currently working very closely with the EPA to fully understand their goals and objectives regarding Conservation Programs
- NAICC intends to provide input to EPA regarding the QCP and QEP applications
- When available NAICC intends to apply to be a QEP meaning all our members would be recognized as QEP
- The GAC is working with EPA and USDA to explore a training program to provide to our members similar to the train the trainer concept



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Concluding Thoughts:

- Participation in a conservation program will provide a benefit to farmers in meeting ESA compliance
- Depending on the program and fund availability, certain programs may provide financial assistance to farmers trying to meet ESA compliance
- The current process is proposed and in a comment period at EPA
- NAICC and the GAC is very in tuned to what is being proposed and is regularly conversing with EPA, USDA, and others to fully understand the implications of ESA to best direct our members and growers in how conservation plans will benefit them in the future
- As the application processes are finalized, NAICC intends to apply to be a Qualified External Party which would allow all our members to assist growers with ESA compliance



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THANK YOU

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