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PUBLIC SUBMISSION

Comment on FR Doc # 2023-23755

Posted by the **Economic Research Service** on Jan 4, 2024

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Comment

Overall, there is strong interest in payments offered by federal programs such as EQIP and CSP, but historically, there have not been enough funds to meet the demand and numerous obstacles exist that impede enrollment rates. If the USDA is really interested in scaling the “voluntary long-run adoption of climate smart conservation practices,” they will need to ensure that the full cost of implementation of these practices is covered for each farmer. The increased allocation of money to EQIP and CSP through IRA funding should allow for higher rates of enrollment. It is also encouraging that the USDA has expanded the official list of recognized climate-smart practices, but robust data on the cost of adoption of each of these practices is necessary to ensure that adopting and maintaining these practices is an economically sustainable choice. Additionally, there must be an understanding of the funding necessary to cover possible losses farmers face in transitioning to renewable practices.

RIPE’s mission is to enable producers to earn a fair return for implementing voluntary conservation practices. This means that farmers and ranchers must receive payments that meet or exceed implementation costs, maintenance and management costs, and economic losses during transition to new practices. RIPE’s Coalition members, many of whom operate in the Midwest, agree that this payment system is necessary in order to advance equity and incentivize them to consider adoption of climate-smart practices. Without a payment that fully covers their cost of implementation, farmers face financial risks that threaten their livelihoods.

Coalition members have clearly stated that this lack of adequate payment is compounded by complexity of the application process, narrow program eligibility requirements and overall lack of flexibility in the programs. Particularly in regards to cover crops, members have noted an inadequate payment rate for the cost of adoption for multi-species cover crop mixes. CSP has great potential to advance a more sustainable agriculture sector through its comprehensive approach to helping farms as a whole. However, the complexity of the application process and inadequate technical assistance has prevented its benefits from being maximized. Because these obstacles can discourage farmers from adopting climate-smart practices

entirely, it is vital that the USDA simplifies and streamlines the process of application to ensure EQIP and CSP are more accessible.

Comment ID

ERS-2024-0001-0007



Tracking Number

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Comment Details

Submitter Info

Organization Name

Rural Investment to Protect our Environment

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December 15, 2023

Ms. Julie Parker
Economic Research Service, United States Department of Agriculture
1400 Independence Avenue SW.
Washington, DC 20250-0517

Via email at ers.pra@usda.gov

RE: Comments regarding a proposed data collection on cover crop use by corn and soybean farmers in the Midwestern United States; 88 FR 73825, docket number 0536–NEW.

Dear Ms. Parker:

The National Corn Growers Association (NCGA) greatly appreciates this opportunity to comment regarding the Economic Research Service's (ERS) proposed data collection that will (1) survey corn and soybean farmers in the Midwestern United States to study farmers' preferences for participating in programs that support cover cropping and (2) gather new information about current cover cropping practices (docket number 0536–NEW). Founded in 1957, NCGA represents more than 36,000 dues-paying corn growers in all 50 states, and the interests of more than 300,000 farmers who contribute through corn checkoff programs in their states. NCGA has long been actively engaged in partnering with the United States Department of Agriculture (USDA) to support conservation program participation by farmers, including programming to support cover crop adoption, and we offer our comments below from that perspective and experience.

NCGA supports the conduct of this survey and ERS's efforts in general to help USDA craft more effective cover crop adoption policies and programming. We also encourage ERS to expand this data collection effort to include gathering information from the extensive group of farm-level

technical and programming experts that we work with to support farmer adoption and use of cover crops. There is more than one form that ERS outreach to this community could take, and we discuss these in more detail below. NCGA is also fully prepared to assist ERS in any way that we can to connect with this body of technical and programming experts and with the growers themselves as part of the ERS survey.

Our practical experience with cover crop adoption programs is the result of our past and ongoing partnerships in major soil health initiatives. Most recently, we are co-leads of the Farmers for Soil Health (FSH) initiative that was awarded a \$95 million USDA Climate-Smart Commodities grant. Under that initiative, we are working with colleagues in the soybean and pork communities to leverage \$70 million in financial assistance in 20 states for cover crop adoption and use by approximately 4,500 farmers and involving approximately 500,000 acres over five years. This work is being managed at the state-level by commodity organization partners who have considerable practical experience with the challenges farmers face in the adoption of cover crops. These state-level managers will direct an extensive, 20-state network of private agronomists, providing the technical assistance needed to support the adoption of these practices; those agronomists too have a wealth of practical experience in these areas.

One of the precursors that made the FSH initiative possible was NCGA's 7-year Soil Health Partnership (SHP) which, while focused in Iowa, Illinois, and Indiana, had a presence in 16 states. SHP also had a team of technical experts working on the ground to help producers adopt cover crops. Those experts made possible the SHP's research and education components involving things like replicated side-by-side soil trials on production fields. A considerable amount of quality data relevant to cover crop adoption was collected over that 7-year effort.

We encourage ERS to draw upon this considerable body of experience and the knowledge and information held by this team of practical program managers and technical experts in their collection efforts. Specifically, we suggest the following:

Focus Groups to Support Survey Design—We believe that members of Farmers for Soil Health's existing body of state program managers and agronomic technical field advisers could be valuable to ERS as it designs the survey or survey's it will be using. We suggest that a group of these experts be selected to serve in a survey design focus group to help you identify and refine the survey's questions. Such expertise could prove invaluable to ensure that the questions asked of growers are most likely to yield the most meaningful and useful answers.

Develop Surveys for Growers and Program Managers/Technical Experts—We note your focus on a survey of growers on these questions. We suggest that you consider also surveying the non-federal state program managers as well as those agronomists who are working with growers in support of cover crop adoption. In addition to the agronomic advisers working under the FSH initiative, there are a number of other agronomists/advisers from the Certified Crop Advisor (CCA) community who are working in this space.

Consider Other Data Sources—As noted above, the Soil Health Partnership collected a considerable amount of quality data relevant to cover crop adoption over that program's 7-year effort. This anonymized data still allows for soils and region-specific understanding of cover crop adoption and factors that affected that adoption as well as their agronomic and environmental success. NCGA would welcome the chance to work with ERS to explore the appropriate use of this data, should that be of interest. Such work of course must guarantee producer confidentiality and privacy.

We support ERS's effort to conduct this survey work and very much want it to succeed and lead to better, more informed conservation programming. NCGA welcomes the opportunity to assist ERS in this work, including the assembling of focus groups or reaching out to growers and other industry experts to conduct the survey.

Sincerely,

A handwritten signature in cursive script, appearing to read "Harold Wolle, Jr.", written in dark ink.

Harold Wolle, Jr.
President, National Corn Growers Association



IL CORN • *Illinois Corn Growers Association*
P.O. Box 1623 (61702)
14129 Carole Drive
Bloomington, IL 61705
P 309.557.3257

December 19, 2023

Spiro Stefanou
Administrator, Economic Research Service, USDA
355 E St SW
Washington, DC 20024

Re: Docket# 0536-NEW- "Corn & Soybean Grower Survey" – FR Doc. 2023-23785 F

Dear Administrator Stefanou,

IL Corn Growers Association (IL Corn) appreciates the opportunity to submit comments on the Corn and Soybean Grower Survey.

IL Corn represents the 50,000 farmers growing more than 11 million acres of corn in Illinois. We have been leaders in the conservation space and are committed to helping IL farmers meet the goals of the IL Nutrient Loss Reduction Strategy and other sustainability and climate smart goals. In fact, not only did IL Corn create a program (PCM-Precision Conservation Management), that was one of the first RCPP early renewals in the country, we are also part of two USDA Climate Smart Commodity Grants.

As you work to finalize your questions and targeted respondents, we would like to suggest the following for consideration:

1. **Land ownership-** Illinois, like many Midwest states, has a very high percentage of non-operating landowners. While the farmer tenant most likely is operating a family-owned business (farm), some of the assets like the land are rented, usually on a yearly basis. Many of the existing contracts today require the landowner to be the signatory, which can present a challenge. Likewise, when considering implementing costly conservation practices and systems changes, many times a farmer will prioritize these practices on their owned acres before considering use on rented land. When inquiring about practices used or being considered, we also suggest you inquire about the ownership of that land.
2. **Crop rotation-** Cover crop management is very different depending on the cash crop that follows. For example, managing a cover crop before corn is much more intensive and requires a higher level of management than a cover crop prior to soybeans. One of the primary reasons is the competition that occurs early in the season for nitrogen between the cover crop and corn, which requires supplemental nitrogen unlike soybeans. We suggest you ask about how cover crops are used ahead



IL CORN
WWW.ILCORN.ORG

IL CORN GROWERS ASSOCIATION

P.O. Box 1623 (61702)
14129 Carole Drive
Bloomington, IL 61705
P 309.557.3257

of each crop type instead of assuming that cover crop usage is static regardless of the following cash crop.

3. **Program usage-** IL Corn has firsthand experience working with NRCS programs, private incentives, and a combination of the two. Currently, over sixty percent of farmers enrolled in our PCM program who are using cover crops, are doing so outside of NRCS practice standards rendering them ineligible for program payments. We have also found that a very small percent of farmers are even interested in attempting to sign up for a program due to the cumbersome application, excessive timeline for the review and decision making process, and unlikelihood of being funded. We suggest asking questions about why farmers are choosing not to engage with NRCS and what program changes would entice them to want to apply and sign up for program opportunities.
4. **Technical assistance-** IL Corn appreciates your intent to discuss where farmers are getting their technical assistance. We know in a state like ours without a robust extension system and limited local resources from NRCS and SWCDs, that the private sector plays a vital role. Inquiring who those private providers are and how they can work alongside NRCS in the future will be imperative for success.
5. **Survey participants-** Again, Illinois may be unique to other states, but prioritizing farmers who have participated in CSP/EQIP programming will not be a true reflection of farmer perception or evaluation of program satisfaction. In fact, we have a farmer leader who has applied for EQIP for four years in a row and his project has never been funded. The survey also needs to reflect and understand the challenges and perceptions of farmers such as this.

Thank you again for your time and allowing us to comment on this survey. Identifying the barriers and creating programs to address them is critical to helping farmers implement conservation practice adoption at the needed scale and in concise timeframe. In order to address water quality and climate concerns, wide scale adoption of practices is needed which requires a true system change. This change will only happen when programs meet farmers where they are and provide the resources needed for successful implementation.

If you have any questions about ideas discussed in this document, please contact Megan Dwyer, IL Corn Director of Conservation & Nutrient Stewardship at mdwyer@ilcorn.org.

Sincerely,

Dave Rylander- IL Corn Growers Association, President



December 13, 2023

Submitted Via Federal eRulemaking Portal (<http://www.regulations.gov>)

Economic Research Service

U.S. Department of Agriculture

Re: Document Citation: 88 FR 73825

Docket Number: 0536–NEW

Document Number: 2023-23755

Federal Register: Friday, October 27, 2023; Vol. 88, No. 207; Page 73825

Request for Public Input About Corn and Soybean Grower Survey

The Midwest Cover Crops Council (MCCC) submits these comments of strong support for the proposed survey on farmers' preferences for participating in federal cover crop programs. The MCCC seeks to significantly increase the amount of continuous living cover on the Upper Midwestern agricultural landscape. Since 2006, the MCCC has facilitated the sharing of cover crop knowledge within the Midwest, raising awareness and support for cover crops, expanding cover crop research, providing education and training to farmers and agencies, and developing policy incentives and programs to increase farmer adoption. As such, the findings and data from this survey are of great utility for our work to advance cover cropping.

Despite evidence of environmental and agronomic benefits, farmer adoption of cover crops is limited to about 5% of cropland, nationally.¹ Recent research found that federal and state conservation programs play a significant role in increases in adoption.² These programs play a vital role in reaching the next phase of middle and late adopters of cover crops. Understanding the demographics, history of cover crop use, and preferences of farmers will help organizations like MCCC in our outreach to farmers and support of programs that help meet farmers conservation needs. Better understanding motivation of cover crop adoption is critical to the work of MCCC and partners. Any assessment of barriers to cover crop adoption that could be included in the survey would aid organizations such as the MCCC in reaching non-adopters by removing barriers.

To optimize the value of this survey, it should be as comprehensive as possible. Therefore, we recommend that the survey looks at a broad range of federal programs, not limited only to those offered by Natural Resources Conservation Service (NRCS) but other models of incentives like the Pandemic Cover Crop Program offered by Risk Management Agency (RMA). Crop insurance is utilized by the vast majority of row crop farmers in the Midwest and may have a significant impact on growers adoption of cover crops. The survey should assess barriers to cover cropping through crop insurance as well farmer preferences for incentives such as premium reductions and subsidies.

We thank Economic Research Service for taking this proactive approach and we greatly look forward to the results of this survey.

The mission of the MCCC is to facilitate widespread adoption of cover crops across the Midwest, including 12 states and the Canadian provinces of Ontario and Manitoba. The MCCC has strong involvement from Midwestern land grant Universities including The Ohio State University, Michigan State University, Purdue University, University of Illinois, University of Minnesota, University of Wisconsin, Iowa State University, University of Missouri, Kansas State University, University of Nebraska, South Dakota State University, and North Dakota State University.

MCCC Contact

Program Manager

Anna Morrow

annamorrow@purdue.edu

317-392-6417

midwestcovercrops.org

¹ Steven Wallander et al., “Cover Crop Trends, Programs, and Practices in the United States” (U.S. Department of Agriculture, Economic Research Service, February 2021), <https://www.ers.usda.gov/webdocs/publications/100551/eib-222.pdf?v=5090.6>.

² Qu Zhou et al., “Recent Rapid Increase of Cover Crop Adoption Across the U.S. Midwest Detected by Fusing Multi-Source Satellite Data,” *Geophysical Research Letters* 49, no. 22 (2022): e2022GL100249, <https://doi.org/10.1029/2022GL100249>.



December 21, 2023

Dr. Spiro Stefanou
Administrator, Economic Research Service, USDA
355 E St SW
Washington, DC 20024

Dear Administrator Stefanou,

On behalf of the AGree Coalition, thank you for the opportunity to provide input on the Corn and Soybean Grower Survey. AGree is a multi-stakeholder coalition made up of farmers and farm groups, environmental and conservation NGOs, food companies, and agribusinesses that works together towards enduring policy change. AGree partners believe there are real opportunities for federal agriculture policy to incentivize and scale conservation practices that reduce greenhouse gas emissions, improve soil health, and enhance water quality while reducing farmer costs and improving profitability.

For over a decade, our Coalition has advanced the adoption of conservation on croplands, largely in the corn and soybean-growing Midwestern states. Our work has shown that policies influence producer farming decisions, including whether conservation practices are adopted. This survey is an important tool to collect data that can be used to improve policies to increase adoption of conservation practices like cover cropping, a conservation practice that improves both economic and environmental outcomes on cropland.

Accordingly, we encourage ERS and its partners to survey respondents on topics related to conservation practice adoption, including the following:

1) Incentive payment structure

A better understanding is needed regarding farmers' familiarity with different conservation incentive payment opportunities and which are most appealing. For example, what factors are most important to farmers when deciding whether to participate in such an opportunity: payment amount, acreage limitations, reporting burden, ease of applying, length of time a conservation practice must be implemented, penalties if contracted acreage isn't planted, or something else? Are farmers more interested in partnering with USDA agencies or the private sector to receive funding that helps offset the cost associated with adopting new practices?

2) Maintenance of practices

With the limited amount of public dollars available to incentivize conservation practice adoption, how can policies and other benefits improve persistence in conservation practice maintenance after financial incentivizes have stopped? For example, would crop insurance premium reductions or informational benefits (such as benchmarked performance of an enterprise) better encourage both adoption and long-term maintenance of conservation practices like cover crops? Would greater flexibility regarding the use of haying/grazing for forage or planting winter annuals for harvest improve practice continuation? How does program administration and continuation differ on rented versus owned acres? Does planting cover crops ahead of different cash crops impact the continuation of conservation practices? Are producers accessing technical assistance to support new

conservation practice adoption and, if so, do they access this technical assistance through NRCS, university extension services, or private providers? Does technical assistance impact practice continuation? How do yields on cover cropped acres compare to yields on no-till and conventionally farmed acres? Do yields affect practice maintenance?

3) Crop insurance policy

USDA has clarified that cover crops are considered a “good farming practice” for federal crop insurance purposes. However, we continue to hear anecdotes from farmers who fear cover crop use could jeopardize their insurance eligibility. Furthermore, the innovative farmers who lead on new practice adoption – those who first started “planting green,” for example – report that their innovation makes them ineligible for crop insurance. Similarly, the regulations for planting cover crops in the event of prevented planting claims are very prescriptive. Does this hinder farmers’ willingness to plant cover crops? And do farmers feel the crop insurance program accurately captures risk related to conservation practices? The survey should clarify producer attitudes about the relationship between planting cover crops and obtaining and maintaining crop insurance. Survey results should inform any policy changes still needed to address producer concerns.

4) Ease of application for different government programs

How can the application process for NRCS programs be streamlined to better encourage participation and reduce the administrative burden for producers and the agency? Are there conservation practice incentive programs (federal, state, or private) that serve as models for implementing conservation incentives programs?

5) Requirements for seeding mixes, rates, and timing restrictions

Scientific evidence increasingly demonstrates that planting broader seed mixes (including both grains and legumes) is better for building soil health. However, concerns persist regarding seeding rates, timing restrictions, and the cost and availability of less widely used seed mixes. How have these concerns affected farmers’ willingness to adopt cover crops? Should higher cost-share payments be available for farmers who choose more diverse and costly seed mixes? Are more flexible planting and harvesting times indicated to account for geographic and other variables?

We appreciate the opportunity to share our ideas for this survey. Better understanding conservation practice adoption and permanence will be critical to achieving desired environmental outcomes. We look forward to learning the results of this work and building on it to improve our understanding of additional regions and crops.

Sincerely,

The AGree Coalition



December 21, 2023

Docket Clerk, U.S. Department of Agriculture, Economic Research Service
1400 Independence Avenue SW, Mailstop 1800
Washington, DC 20250-0002

Attn: Docket ID ERS-2023-23755

The Center for Rural Affairs is a private non-profit organization, established in 1973 and based in Lyons, Nebraska. The Center works to promote economic opportunity, environmental stewardship, and policies that strengthen rural communities. This includes support for U.S. Department of Agriculture (USDA) working lands conservation programs.

I. Background

The Center has a strong history of engagement with corn and soybean producers in Nebraska and Iowa as well as Minnesota, South Dakota, and Kansas. Through one-on-one conversations, small group discussions, listening sessions, and surveys, our staff has gained extensive insight into farmers' experiences with conservation practices and programs, specifically the Conservation Stewardship Program (CSP) and the Environmental Quality Incentives Program (EQIP).

We are encouraged to see USDA Economic Research Service (ERS) express an interest in gathering direct feedback from Midwest producers about cover crop adoption. The following are suggestions for your consideration while designing the questions and distribution model of the survey.

II. Survey considerations

- A. Distribute the survey outside planting and harvesting seasons.** The Center has found January–March and June–August to be the most accommodating portions of producers' schedules. In addition to mailers, provide hard copies to county USDA Service Centers and an online option.
- B. Ask for input on non-federal programs that foster cover crop adoption.** We realize the focus of this survey is to gather information on CSP and EQIP. However, based on feedback from producers in Nebraska and Iowa, we have found state and private cost-share programs to be equally, if not more, appealing



to farmers trying cover crops for the first time—often the result of higher payment rates or the ease of the application process. Asking farmers about localized models may provide insight for USDA to consider when making adjustments to federal cost-share opportunities.

- C. Seek opportunities for crop insurance to support conservation.** Our team is pleased that USDA Risk Management Agency (RMA) recently updated its Good Farming Practices Handbook to support approved conservation practices, and we encourage ERS to consider other intersections between crop insurance and conservation. Specifically, we recommend asking farmers about the Pandemic Cover Crop Program, which was highly popular among corn and soybean producers in our constituency. Through the program, producers who planted cover crops received an automatic \$5 per acre discount on their crop insurance premiums the following year.
- D. Consider motivating factors beyond cost-share and technical assistance.** Cost-share and technical assistance are important to producers' adoption of cover crops. However, it has been our experience that the decision to adopt new farming methods is incredibly personal. We recommend that USDA-ERS include questions that explore the nuances behind these decisions, such as:
- a. How long did you consider cover crops before planting them for the first time?
 - b. Upon submitting a cost-share application, had you previously planted cover crops, or were you planting cover crops for the first time?
 - c. Do any farmers in your personal network plant cover crops?

III. Conclusion

Cover crops are an important tool for farmers who are invested in soil health and the resilience of their operations. In order to increase adoption, however, we must pay attention to the questions, concerns, and feedback of producers, and this survey is a valuable step in this effort. Thank you for your support and consideration of our suggestions.

Sincerely,

Kalee Olson
Senior Policy Associate

December 21, 2023

Submitted Via Federal eRulemaking Portal (<http://www.regulations.gov>)
Economic Research Service
U.S. Department of Agriculture

Re: Document Citation: 88 FR 73825
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Federal Register: Friday, October 27, 2023; Vol. 88, No. 207; Page 73825

Request for Public Input About Corn and Soybean Grower Survey

Dear Administrator Stefanou,

American Farmland Trust, National Wildlife Federation, and the Natural Resources Defense Council are pleased to submit these comments regarding the Corn and Soybean Grower Survey. We commend the Economic Research Service (ERS) for conducting this survey, which will be of immense value for the United States Department of Agriculture (USDA), policymakers, researchers, and nonprofits like ours who are eager to better understand the needs of farmers who have not yet adopted cover crops or those who want to increase and maintain their use.

Our organizations work across the country to help farmers adopt environmentally sound practices through policy, education, training, and public outreach. We have a shared goal of advancing long-run cover crop adoption because of the environmental and economic benefits they provide to farmers and society, including improved soil health, biodiversity, crop yields, carbon sequestration; and reduced nutrient runoff, soil erosion, and use of expensive fertilizer and chemical inputs. Together, these benefits from cover crops will lead to a more viable farm economy, better environmental outcomes, and improved resilience to the impacts of increasing flood, drought, and extreme weather.

We strongly recommend that, in addition to asking questions that will inform the design of conservation programs like the Environmental Quality Incentives Program (EQIP), ERS seek information on farmer preferences and interactions with crop insurance, including real or perceived barriers to cover crop adoption presented by crop insurance, and the effectiveness of incentive programs like USDA's Pandemic Cover Crop Program (PCCP) offered in 2021 and 2022. The PCCP, and state programs like it in Iowa, Illinois, Indiana, and Wisconsin, presented farmers with a new way to support planting cover crops: an administratively simple process to report adoption in exchange for a modest discount on per-acre premiums. Crop insurance is used by the majority of Midwest farmers and more than 90% of corn and soybean farmers, and it would be a missed opportunity if ERS did not include questions that illuminate the interactions between crop insurance and conservation decision making in this important survey.¹

¹ Rosch, Stephanie. February 18, 2021. Congressional Research Service. "Federal Crop Insurance: A Primer." <https://crsreports.congress.gov/product/pdf/R/R46686>

Regarding Subsection (a), on the practical utility of the information collected by the survey

Recommendation #1: Include Questions about Crop Insurance

We strongly recommend that ERS include questions about crop insurance both to illuminate whether participation in crop insurance remains a barrier to conservation practice adoption, and to determine whether low-cost, easily accessible incentives (like those offered in the PCCP), are more effective in incentivizing long-run adoption. Modeled on highly popular state-level programs in the Midwest, farmers enrolled 10-12 million acres in the PCCP.² For instance, the Illinois Department of Agriculture's Fall Covers for Spring Savings Program was oversubscribed within *hours* of the application being made available.³ At a minimum, **the survey should ask farmers about their knowledge and use of the PCCP and/or state crop insurance incentive programs in comparison to programs like EQIP and the Conservation Stewardship Program (CSP) which have higher per-acre payment rates, but more time-intensive application processes.**

The survey description in the Federal Register states that flexibility and ease of the application process are factors ERS is exploring in understanding farmer decision-making. Our organizations can attest that flexibility and ease of enrollment are key reasons Midwestern farmers support their state programs and the PCCP, despite lower per-acre payments for cover crops. **ERS should make the most of the taxpayer dollars and public resources being put into this survey by including questions that examine farmer preferences for easily accessible, modest crop insurance incentives for cover crops.** As such, we suggest that ERS include scenarios that require no contract and/or provide easier program access in exchange for a lower payment/payments through a crop insurance premium rebate. It would also be valuable to know farmers' perception of cover crops as a risk-reduction strategy, and if their use should thus be recognized and incorporated into the crop insurance program.

The survey should also include questions asking whether the producer is enrolled in crop insurance, and whether they think they could lose their coverage if they plant cover crops, or "misstep" in using good farming practices, (e.g., terminating a cover crop late). Unfortunately, there have been some reported instances in the past of farmers being penalized by their agents and denied coverage due to their use of cover crops. While Congress and USDA's Risk Management Agency (RMA) have done much work to correct this, the perception may persist and impact willingness to experiment with new conservation practices for farmers with crop insurance. Therefore, not asking such questions could result in ERS missing a key factor in farmer decision-making.

Recommendation #2: Explore Barriers to Long-Run Cover Crop Adoption

Although cover crop adoption increased by 50% between 2012 and 2017, they were still only planted on 5% of eligible acres in 2017.⁴ Better understanding why farmers do not adopt cover crops, or do not maintain the practice over time, will help to inform future conservation program design, technical

² American Farmland Trust. May 17 2022. "What State Received the Most Pandemic Cover Crop Program Funding?" <https://farmland.org/what-state-received-the-most-pandemic-cover-crop-program-funding/#:~:text=In%20the%202021%20crop%20year,%2C%20Iowa%2C%20Indiana%20and%20Missouri.>

³ Illinois Department of Agriculture. December 13, 2023. "IDOA Fall Covers for Spring Savings Crop Incentive Program Applications Go Live Dec 15." <https://itgov.illinois.gov/news/press-release.29411.html>

⁴ Wallander et al. February 2021. Economic Research Service. "Cover Crop Trends, Programs, and Practices in the United States." <https://www.ers.usda.gov/webdocs/publications/100551/eib-222.pdf>

assistance, and other support. **The survey should include a question about the barriers farmers experience, and how—and if—they were surmounted.** The following barriers are often identified in social science research:

- Lack of personal knowledge, or available technical or culturally appropriate assistance, to overcome the risk of adopting a new practice
- Insufficient finances or financial assistance to adopt cover crops
- Insufficient access to necessary inputs such as equipment or seeds
- Insecure or short-term land tenure, since these farmers may have less incentive to invest in improving soils they do not own
- Fear of reputational damage due to low social acceptance of cover crops and other soil health practices in the local community

The survey should also examine whether a farmer has discontinued cover cropping, or chosen to leave a program such as EQIP or CSP before the end of the contract. Or, in the case of CSP, chosen not to renew the contract.

It is also our understanding that this survey will oversample producers that have utilized cover crops and government programs in the past. While it is important to understand why those producers continue or discontinued cover crop use, ERS should expand their survey to understand what barriers remain for farmers who have never utilized cover crops or sought public funding. Better understanding barriers will be instrumental for scaling up long-run adoption of cover crops for new and previous adopters.

Recommendation #3: Determine Program Characteristics that Encourage Long-Run Adoption

In addition to better understanding the barriers that farmers face to adopting cover crops, there is also more to learn about the most effective and efficient ways to overcome these barriers and incentivize long-run adoption using public dollars.

The results of the Corn and Soybean Grower Survey will have real world applications, helping to develop a better understanding of what public and private program designs are most effective at incentivizing successful cover crop adoption that lasts beyond the end of the contract or incentive. To illuminate this behavior, the survey should include questions that reveal preferences around producer experiences with both USDA programs such as CSP and EQIP, as well as state-level programs. State-level programs may have more attractive elements like higher payment rates and reduced paperwork burden for farmers. Most importantly, **the survey should include questions about whether or not farmers have enrolled in a state or federal program that incentivizes cover crops through crop insurance, and determine why farmers may choose one program over another.** Some producers “stack” non-federal incentives with USDA conservation programs, and producer attitudes towards the effectiveness of this strategy should be evaluated.

Recommendation #4: Include Questions about Technical Assistance and Access to EQIP and CSP

Support for planting cover crops and adopting other soil health practices through EQIP and CSP is in high demand. This speaks both to the benefits farmers anticipate receiving from planting cover crops as well as NRCS’ ability to administer programs effectively. Despite this, many producers acknowledge programs could be more streamlined, and requests for technical assistance are often greater than USDA’s capacity to fulfill. In addition to informing ideal program design, it would be useful for the survey to also explore:

- How producers access technical assistance from NRCS or other USDA programs, or from Technical Service Providers, and if they feel this support is sufficient,

- The role of farmer-to-farmer education (whether or not a farmer has an EQIP or CSP contracts) in the willingness of farmers to experiment with new practices and if they feel such networking opportunities are adequate and accessible,
- Whether or not financial cost-share is sufficient to support practice adoption, and how practice retention should be incentivized post-contract, and
- How the details of NRCS Conservation Practice Standards, and their usefulness to the farmer or technical assistance provider impact their conservation adoption decision-making.

Relatedly, USDA recently increased the use of “Act Now” to streamline applications for EQIP and CSP. The policy allows the state to quickly approve an application based on simple threshold scoring, rather than the slower competitive process of batching and ranking applications. This change could significantly reduce farmer application wait times, and seriously improve the overall experience. **If ERS considers it likely that a farmer would know whether or not their application was expedited by Act Now, the survey should collect this information and seek to understand how such streamlining influences their enrollment decisions.** The agency should also collect the information from NRCS and compare responses of those who benefitted from Act Now versus those who did not. Understanding the role of the new, potentially transformative, policy of Act Now on a farmer’s experience of EQIP and CSP will inform whether or not NRCS should expand the use of threshold scoring.

Regarding Subsection (d), on minimizing the burden of the survey’s collection of information

Recommendation #1: Ensure that the Survey’s Utility Outweighs its Burden

Our organizations see this survey as a critical opportunity to gather the information necessary to design programs that are effective at incentivizing successful long-run cover crop adoption that extends well beyond the program or incentive - therefore using taxpayer dollars most effectively. We believe that so long as the survey asks the questions necessary to holistically inform the next iteration of conservation program design as described above, its utility will far outweigh the burden.

Recommendation #2: Make the Survey Accessible and Consider the Use of an Incentive

The more farmers who respond to the survey, the more useful the results will be. As such, ERS should ensure that the survey is accessible in multiple formats (e.g., print, online, through mobile app), and is translated into all predominant local languages at the same time as it is made available in English. ERS should also engage in outreach and education efforts to tell farmers of the importance and value of the survey, to reassure them that the data will not be used for any purpose other than research, and that the results will only be shared in aggregate. ERS should also consider establishing a hotline where farmers can ask for clarification about survey questions. Finally, farmers are extremely busy, and might find it challenging to find the time to fill out a survey. ERS should consider developing an incentive for the completion of the survey, such as entry into a lottery for a cash prize.

Thank you for the opportunity to submit comments on the Corn and Soybean Grower Survey. Our organizations look forward to serving as a resource in the development of this important tool and reviewing results.

American Farmland Trust
National Wildlife Federation
Natural Resources Defense Council

Contact: Emily Liss, Farm Viability Policy Manager at American Farmland Trust eliss@farmland.org

