CREP Training Notes

Trainings:

Mt Vernon January 12, 2016

Puyallup January 13, 2016

Chehalis January 14, 2016

Ellensburg January 26, 2016

Dayton January 27, 2016

Trainers:

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Notes from all sessions:

# Producer Interest

* Q: When does the CRP-2C get signed by landowner/participant? Application Form is the CRP-2C. Recommended that producers initial and date the form to indicate landowner/participant is ready to begin the planning process. Signature comes after eligibility determination and rest of form filled out.
* CRP-2C form is the Application
* landowner/participant initial and date stamp on top of form to get process started
* Q: Can manual CRP-2C forms be used? Though FSA has discouraged the use of manual forms we understand there needs to be a form that starts the process. (Rod) Follow up needed.
* Q: Does FSA have a deadline for processing actions at end of Federal FY (Sept. 30th?): Yes, Sept. 1st is the typical deadline.

# Land Eligibility

* Feasibility: This is technical judgment from technical staff (NRCS or CD). Extremely wet or steep, rocky sites that are difficult to grow trees will prove difficult sites for buffer establishment and should not be enrolled in the program.
* Is site appropriate for CREP?
  + OSF, MM, TSB-Determine if site has suitable habitat for any of the species. WDFW and USFWS can provide assistance, but landowner/participant needs to understand regulatory agencies will visit property and possibly identify a listed species using their land. Explanation of the 4d rule can help alleviate concerns about their ability to farm the rest of the site. These ESA listed species will create a longer time frame to determine if the site is feasible for CREP buffer.
  + NRCS and FSA agreed years ago we would not authorize buffer installations through natural regeneration (i.e. one cannot just put up a fence without planting anything under CREP). The basis of this was that in eastern WA we would not get a successful buffer established within 2 years as the CRP rules call for, and in western WA invasive species would overcome any naturally regenerated desirable species.
* Cropland: Cropping history-5 of last 6 years
* Existing easements: FSA will need to review deed conditions before determining land is eligible for initial enrollment.
  + Example where FSA has determined land not eligible is with old farm loan default properties and land has WDFW or USFWS easement along stream that precludes farming.
  + Send FSA easement deed early in process.
* Conservation easements: must happen after CREP contract approved.
* Contract expiration is Sept. 30th, Federal Fiscal year.
* Q: How long will this eligibility process typically take? If simple app from individual owner, if producer comes into office to fill out eligibility forms. Goal would be 30-days. Will take more time for new producers not in USDA system.
* Q: What about farmland preservation easements? Most are going to allow continued farming, which allows FSA to determine land is Cropland or Marginal pastureland. FSA will need to send copy of deed and easement terms to legal staff for review BEFORE land eligibility is established.
* Q: Does the cropland have to have a water body running through it? Yes. Buffer begins at ordinary high water line. No set distance to define riparian area but CREP policy only allows enrolling max of 180’ from Ordinary High Water line
* Q: Can one side of a stream be eligible and one side not? Yes. If the one side can support the practices and is legally and physically capable and the other side does not meet those criteria, but our preference is to always enroll both side of the stream if the producer owns both sides.
* Can NRCS or CD determine that only a portion of the offered acres are eligible? Yes. For example if the proposed buffer area has a large rock outcropping where trees can’t be established, it (the outcropping) should be determined ineligible. If it is small, we can ignore it and include the land, but if it is very large we should exclude it.
* Can the producer specify what acreage they are offering to exclude to take out a home site or a road or a livestock feeding area? No, infrastructure as described is not farmable, so would not be eligible.

# Marginal Pasture

* Marginal pastureland: This is FSA’s call.
* Congress did not define
* FSA has concluded it is “land along the edge” of water body. Broad perspective by FSA
* Does not need to fit NRCS definitions
* FSA guidance available in supplemental CREP policy (pink sheets)
* Land must be able to function as pasture
* Active gazing is not required
* CDs can gather info such as historic farming use of site, current use, plant cover, parcel history, current veg cover in over mid and understory, etc. This will help FSA make determination of marginal pasture.
* Riparian areas used by variety of livestock for browse (grass and/or shrubs), shade, water, calving, etc. Doesn’t have to be perfect pasture.
* No longer a need to have separate contracts for marginal pasture and cropland. Will include all eligible land in same contract
* CoC role is not to question technical calls as to if the ground is a functional buffer.
* Q: How do we separate forestland from marginal pasture? There is not a definite distinction. We can generally tell the obvious cases, like land with very few trees is probably pasture, while land in a mountainous, widely forested setting is probably forest land and is not eligible. The tough call is the middle ground. If the land have enough trees to provide a functioning buffer, whether it is forestland is moot since the land is already ineligible. If it has trees, but the technical agency says it is not a functioning buffer, then the COC will have to make the call. Some things they should consider are the larger setting (i.e., are there just trees along the creek or is there a widespread area largely covered by trees, would the land be considered “forestland” by another agency, such as DNR or FS).
* Q: When does CREP pay for infrastructure (fence and watering facilities)? New contracts: Must have history of livestock. Re-enrollments: if land ownership has changed and livestock are now on the farm, the new landowner/participant could receive cost share for needed infrastructure.
* Q: Does marginal pastureland have to have current livestock use? No, if land is capable of being grazed, it will qualify. Guidance to CoC is to be liberal in designating land as marginal pasture.
* Can a producer offer only a portion of their eligible marginal pastureland as a CREP offer? In general, no, but it depends on the configuration of the pasture(s) or field(s). All of a pasture or field must be enrolled. If a producer has more than one pasture or field unit, technically, they can enroll one, but not another, but the resource goals of the program are not met if all of the reach needs buffered and only a portion is included in the contract.

# Producer Eligibility

* Landowner/participant eligibility includes AGI, 1026, entity documents. Do this early in process. Set up appointment with FSA and introduce landowner/participant to FSA staff. Phone conversation between landowner/participant and FSA a minimum.
* If tenant opts out of CREP when landowner/participant is contract holder, FSA needs a statement in writing from tenant acknowledging they are opting out. Other option is assigning a zero share.
* Q: Can a land trust enroll in CREP? Potentially. FSA will need to review the structure of the organization and any conditions on the deed that would preclude agriculture on property.
* Q: Is same requirement for tenant option to participate for re-enrollments. No, situation differs. FSA can clarify. (Rod)
* Q: Does the operator opting out of the CREP participation need to be documented? Yes it does. FSA needs to know that they waive their right to participate.
* Q: Is there an annual payment limit? Yes, $50,000 for rental and PIP combined per year. Can get complicated with national and regional entities.
* Q: Is there income limit? Yes, AGI form is used to determine if participant makes more than $900,000 per year. Needed to be filed for all individuals with interest in land.
* AGI=Adjusted Gross Income

# Cultural Resources

* FSA Environmental Coordinator is doing literature reviews.
* CR consultation needs to be complete before CRP-1 is signed.
* CR-Definition of undertaking is up to FSA. Environmental Quality Manual gives guidance to CEDs. Example is pounding fence posts. For CREP, this is not considered an undertaking. Ground disturbing activities that disturb the soil profile are considered undertakings. Most activities are undertakings.
* Good idea for FSA to be conservative in determinations. CD’s cannot determine which contractor and tree planting methods the landowner will use. Thus, it is beneficial to complete CR consultation assuming the use of the most ground disturbing method to install practices.
* Communication between CD and FSA early in process to lay out how the buffer will be installed is critical.
* Ok to be conservative in the description of undertaking. This way FSA will have to consult. This allows more flexibility during final planning and project installation.
* FSA will need to contact Kyle, FSA Environmental Coordinator for SHPO database review. CDs please do not contact her directly.
* Info gathered in other CR projects for other programs can be given to FSA to be used to streamline consultation.
* Do letters go out to tribes? Yes. Both 30 day letters go to tribes.
* FSA responsibility to make effect determination on Cultural Resources.
* FSA local office staff will send the request for database search to Kyle at FSA SO.
* County offices responsible for sending the 30 day consultation letters to SHPO and the tribes.
* Q: Can FSA say “no” to completing a CR survey? It depends. Most of the time we will do a survey. FSA reserves the right to say no in specific situations.
* Q: How long does a CD need to advertise a CR survey contract? 2 weeks
* Q: How many contracts have “died” due to CR process? At least 4. Two situations due to landowner choice; they did not want CR survey on property. Two where tribe said no work will occur on site. In most other parts of state, projects do not end based on Tribal consultation or survey.
* Q: What happens when NRCS writes the CREP plan? The FSA CR process is followed.

# Process

* Privately Identifiable Information: FSA and NRCS can share all data. FSA can share data with CDs related to a CREP applicant.
* CRP-2C is the CREP application. If it is not fully completed and signed in 6 months, it is technically supposed to be thrown out and completed again. Use discretion if the process is nearly complete rather than starting over.
* Contract length: Min of 10, Max of 15 years, can negotiate in between.
* In order for producer to receive max 15 years of payments, contract must be approved by Sept. 30th.
* Critical for landowner to meet with FSA to gain a better understanding of the long term commitment. There can be serious repercussions if contract landowner has to pay back funding due to non-compliance.
* FSA explains that all CREP payments are taxable income. 1099 will be issued EVEN if their payment is assigned. Send link tax guide memo (that links to FSA Tax guide for landowner/participant’s) (Rod).
* Landowner/participant needs to understand CREP is a long term commitment.
* If property is sold, buyer must assume contract. Critical for terms of contract transfer be included in sale agreement. CREP rental agreements are not a title commitment that will show on title review.
* Options for client FSA interaction in remote situations: FSA needs to speak by phone at minimum. Face-to-face is preferred.
* Up front: Be sure to explain that “no touch” does not mean landowner/participant is not responsible for maintaining a functional buffer. Stewardship ethic is essential to buffer success.
* Assignment of payment from landowner/participant to contractor/vendor is allowed. FSA can give copy of the assignment paperwork to go to the CD. WSCC cannot pay vendors directly but CD can pay vendor directly.
* PIP and PIP loan. PIP purpose is to provide 90% (50 +40) to landowner/participant at time of buffer establishment. PIP loan is a complex process where WSCC covers PIP costs until the PIP is paid by FSA when all practices are completely installed. Landowner/participant assigns payment to WSCC so that WSCC is certain loan gets repaid. Used when delay causes long time and/or substantial cash outlay to reduce financial burden on landowner/participant.
* $50,000 annual payment limit for PIP, rental. Factors
* GIS Note: Remember that FSA must trace (not import a shape file) the GIS shapefile from the CD into Terra software. CD staff should limit GPS data points to those critical for establishing the buffer boundary. Ok to send the GIS shapefile to FSA.
  + Acreage in CD shape files won’t always match the polygon that is drawn by FSA. FSA acreage needs to match CPO. FSAs acreage is the official contract acreage.
* Important to discuss Pro’s and Con’s with producer before they sign CRP-1.
* Feasibility analysis: Don’t be afraid to reach out across CD and NRCS office boundaries to see if others have tackled planting a site that is similar to the planning unit under consideration for CREP.
* Soil Rental Rates: Base rental rate per county multiply by Productivity factor. Start with dry-land rental rates multiplied by productivity rate (this comes to FSA WA from NHQ) (there are 10 categories). Local FSA county committees no longer have ability to alter rental rates. Data for setting rental rates comes from NASS. NASS data is limited in WA, so there is not much flexibility.
* Rental rate estimate generated by CD is valuable tool for producer to use as a decision tool. Need to revisit the spreadsheet tool to be sure it is consistent with FSA tools and costs. (Brian)
* Q: Does NRCS need to sign off on all FSA 848B forms? Rod says no, up to CEDs. Travis suggests CoC agenda item to document decision in minutes. Have DC, CED, CD participate. May differ by work unit.
* Q: Does the producer have to have a completed whole farm plan before they apply for CREP? No. As long as the CD and/or NRCS agree that buffer establishment is feasible at the site, the CD can proceed with conservation planning via TA funding (CD from WSCC and NRCS via direct charge TA)
* Q: If NASS data is not available, what data is used to set base rental rates? Economics staff from FSA NHQ use a variety of data sources (NASS, RMA, etc.).

# Forms and Paperwork

* FSA848B (old FSA 245)-Form needs to be signed by landowner/participant and CD. Lists what needs to be paid for at the time. No strict format for reporting/documenting what has been completed on this form.
* If CD is the vendor/contractor installing the buffer practices, NRCS will sign the 848B form to prevent conflict of interest.
* Suggested sending FSA848A form that lists all the FSA components along with the 848B form.

# Getting Everyone Paid

* CD’s be sure to ask for WSCC funding before expenses are incurred. This is based on cost estimate.
* Form FSA 848B is the “Practice Certification” form. Landowner/participant signs saying work is done. Then CD/NRCS does field review. Bottom line, both landowner/participant and CD/NRCS signs. Vendor (tree planter, fence construction) does not need to sign.
* Julie reminded class that bills from contractors (tree planting, fences, etc.) need to be addressed to landowners, NOT CDs. Otherwise this will cause a delay in making payments.
* Q: FSA Request for Reimbursement form for Practice Installation: What goes on the 848B form?
  + Landowner tells FSA what went on the ground. Can be free form, can use codes, any format is acceptable
  + 848A form lists all of the FSA codes and components that are authorized to be installed (from CPO). FSA can send this to producer along with 848B. CD/NRCS can use the 848A form to assist with clarifying to landowner what is approved for cost share
  + A second block filled out by the certifying agency-CD or NRCS
* FSA is noting the state 10% cost share on bottom of form. CD needs this to voucher for State funds for cost-share.
* Q: Who approves practice installation from technical side, CD or NRCS? This is FSA’s decision. Most of time it will be a CD technician. Until WSCC certification process is active, FSA will rely on CD Manager’s assessment of their staff’s technical ability. NRCS is available to assist CD to train on how to do practice certification.
* Q: Can the FSA state Committee set economic thresholds for cost/benefit? No, state guidance will not be issued due to the diversity of the program statewide. Local COC along with CD and NRCS planners are encouraged to sit down and establish local cost hold downs so that producers are being treated fairly across county lines.

# Buffer Width

* Minimum buffer width for new enrollments **AFTER APRIL 1, 2016**: For CREP eligible stream reaches it will now be 50’ minimum width on 70% of the planning reach length for CP22-391. For CP22-422, 15’ wide hedgerows still allowed on non-fish bearing streams draining into Eligible (mapped) stream reaches up to 10 miles from confluence with eligible stream. CP22-422 is also allowed on CREP mapped stream reaches. Rod to look into revising CREP supplements in handbook to allow 35’ hedgerows to improve water quality. NRCS practice standard will allow greater than 15’ (Rod)
* Minimum buffer width for re-enrollments: 35ft will be “grandfathered” in. Can add the additional 15’ into new contract because of the new NRCS width requirements. Run proposals of new fence by CoC in plenty of time before contract will expire. May not be worth expense of old fence removal and new fence installation. Cost/Benefit is CoC determination.
* Q: Can the 30% of the buffer that is allowed to be less than 50Ft wide be 0 feet wide? Yes. (Rachel)
* Can 30% allowable buffer length (less than 50 feet wide) be calculated by adding both sides to get total length? Yes, consider buffer as one-sided. Total length is two time stream length; gaps not greater than 30% of total length are allowed, even if all on one side.

# Maintenance Funding

* Maintenance Cap generally $2000/ac total for the 5-year maintenance period; more for smaller parcels. Detailed scale: $2,700/acre for contracts 2 acres or less in size, $2,350/acre for contracts between 2-9 acres, and $2,000/acre for contracts 9 acres or larger.
* Q: Is there a set form for State Reimbursement and Maintenance contract? Yes, but Brian needs to revisit.
* WSCC looks at 1) is there a signed contract? 2) are costs within caps and allowed time frame? 3) is the exhibit D filled out before the work is done?
* Q: When does maintenance period begin: Immediately following installation of the first plant material.
* Q: Can maintenance funding from WSCC be used for removing the fabric strips: Yes, if it falls within the maintenance cap for the site. Be sure to include removal estimates in initial conservation plan development. Be aware that a seeding to replace the fabric may be needed.
* Q: Will the state pay maintenance costs on contract re-enrollments? (Brian) State will pay maintenance for anything cost shared with FSA.

1. Q: Will SCC pay for fabric removal and seeding? SCC will cover these costs if project is within 5 years of first planting and under the allowed maintenance cost per acre.

# Mid Contract Management

* Purpose is to enhance and maintain the stand. Current options are thinning, beaver management, weed control, small replants. Send suggestions on other items that could be cost shared as mid contract management to Rod via CED. Remember large replants considered stand failure. If failure is not due to landowner/participant action, then FSA can cost share on replanting.
* Intent is to reinvigorate the stand or take actions needed for Enhancement or treat deficiency in buffer.
* Three practices cost shared: Beaver control, thinning, weed control, tree tube removal.
* Primary component of mid-contract management is weed control. Other actions needed could be thinning, beaver mgt. Consider adding snag creation and tree tube removal. Send other ideas to Rod. (Rod)
* Mid-contract management differs from post plant weed control to get stand establishment.
* FSA will reimburse up to 50%, up to $125/ac for life of contract. State will match, so landowner allowed up to $250/ac.
* FSA does not need to pay for the activity in order for it to count towards the required mid-contract management.
* Let landowners know that CREP is asking them to “grow a crop” that is a buffer. It will require their attention and O&M.
* Mid Contract Management is mandatory since 2003 in all contracts. Remember this requirement is driven by mid-west CRP. Old process of allowing CoC to waive requirement is no longer an option. State CoC can waive the requirement.
* Q: Mid contract management: Is there a form? Yes contact cost share document
* Q: Does mid-contract management need to be cost shared? No. If producer completes management at no expense to government, as long as producer documents the completed actions to FSA, the requirement is met.
* Q: What if the stand fails due to no fault of landowner? If technical agency says stand has failed, FSA can provide 50% cost (no PIP) to replant. WSCC has funding also.

# Reenrollments

* Contract expirations are tracked on Federal Fiscal Year-Sept. 30th.
* 35’ buffer is acceptable for re-enrollment.
* Re-enrollment and buffer establishment: Change is coming. FSA will continue to pay cost share at time of re-enrollment. This may change and will be more restrictive. Coming from NHQ. If land is not being maintained, mid-contract management is last chance to bring contract up to compliance. Rod will keep us posted.
* Rod says to ignore the rule that says FSA cannot start the re-enrollment process until 6 months before expiration.
* Follow up needed on need for new CPA-52 for Re-enrollments-Rod/Rachel/FSA Env. Compliance specialist
* CDs can assist by reaching out to landowner/participant’s to ensure they understand the need to reenroll before the existing contract expires.
* Technician goes out to site to determine if the buffer is functioning. If yes, then reenrollment is warranted. If not and minor enhancements are needed, re enrollment is warranted. If buffer has failed, the contract is in violation and contract holder will pay back funding to Gov (plus interest).
* Ensure mid-contract management is in the new plan for re enrollment if it was not in the original conservation plan.
* NRCS needs to sign. Ok for CD to add cover sheet and describe current state of the buffer and how you know it is a functional buffer.
* New CPA-52 will be completed and signed off.
* At the present time FSA will pay to bring a buffer back up to standards at re-enrollment so long as the buffer’s shortcomings do not amount to a violation of the current contract.
* Q: What happens if land sale occurs? New owner needs to assume the contract or original owners (contract holder) is liable for payback to GOV. Recommended that if sale is planned, the seller should include the transfer of the CREP in the purchase and sale terms.
* Q: What is needed for the conservation plan for re enrollment? If no additional work is needed, the plan can be simple. Cover sheet with old plan, note why no work is needed (or what habitat is being provided by maturing buffer) and have everyone sign.
* Q: If the contract lapses, not reenrolled before expiration. Is it ever eligible again? Not normally. If reason the contract did not get re-signed is due to FSA or NRCS inaction, yes the site could be reenrolled.
* Q: When does the reenrollment process begin? Rod says FSA does not have to wait until 6 months before contract expiration to begin the reenrollment period. The earlier the better.
* Re enrollment site investigation: Determine if the buffer is on a proper trajectory towards the objective plant community in the Conservation Plan.
* Q: When does CREP pay for infrastructure (fence and watering facilities)? New contracts: Must have history of livestock. Re-enrollments: if land ownership has changed and livestock are now on the farm, the new landowner/participant could receive cost share for needed infrastructure.
* Q: Will the state fund O&M for re-enrollments? SCC will provide maintenance funding for any components that are cost-shared by FSA at the time of re-enrollment.

# Odds and Ends

* Beavers
  + Beaver Management: HAVE a Plan at time of enrollment. Who will monitor? Involving WDFW in plan review ahead of time before beaver become a problem.
  + Beaver Management-Try to anticipate what will happen on a contract in area that has existing or historic habitat. Program managers at FSA and WSCC understand the value of beaver in salmon recovery. They also understand the negative impacts that can happen when flooding extends outside the CREP buffer onto farmland or neighboring land.
  + Beaver management plans should be included in all conservation plans where we anticipate beaver moving onto the site. Need to be in a planning mode, not reactionary mode. Consider how much tolerance we have on the site; include beaver assessment in initial resource inventory. Look for signs, current and historic. Ask the landowner.
  + -Determine who will watch for beaver dams. WDFW HPA is needed for removal of all but very small dams (when hand work can remove the dam)
  + Commission has contract with APHIS for removal. Removal is last option.
  + Re-enrollment of lands with beaver pond flooding can be eligible. See FSA Notice 102.
* Boundary of CREP should not include stream bed. Do not draw creek bed into CREP.
* Ensure landowner/participant understands the post-CREP contract ramifications related to conversions to trees in that county (DNR, county critical ordinances)
* CED prefers to have clients come into FSA office and sign the CRP-1. This assists with ensuring landowner/participant is aware of contract requirements (sale, violations, etc.)
* Consider giving the landowner/participant a copy of the CRP-1 appendix early in process. This gives them all the details up front.
* When should we pay for fence? Must have existing livestock operation. CREP is not in business to set up new farm enterprises.
* CoC can deny a project based on cost-benefit. Will send Whatcom CoC cost benefit table related to fence. (Brian)
* Copies of Payment assignment forms can go from FSA to CDs.
* Recreational mowing: Ensure mowing happens outside of April 1-July 1st nesting season after initial buffer establishment is completed. Landowner/participant is not allowed to mow the area if no post plant weed control need.
* CREP designated streams: Riparian buffers-391 or 422; Small tributary streams can do 422 hedgerows. Outside of CREP designated streams, 422 can be installed up to 10 miles upstream.
* Successor contracts: Exhibit in manual that FSA sends to landowner/participant. FSA will begin providing a copy to CD when contracts are transferred to new landowner/participant.
* To fence or not to fence? Livestock must be present on the planning unit.
  + Cost of fence limited to 4-strand barb wire. landowner/participant can pay balance of cost if a different type of fence installed. CoC sets fence costs.
* Successor contracts: Exhibit in manual that FSA sends to landowner/participant. FSA will begin providing a copy to CD when contracts are transferred to new landowner/participant.
* Q: Is prescribed grazing an option within a CREP contract area? No, not at this time. We acknowledge the fact that managed grazing can be a useful tool to control invasive plant species. Rod will follow up again with NHQ to determine if the new Farm bill opened any new opportunities for managed grazing. (Rod)
* Q: What do you do when soil survey has Water mapped in the soil survey? FSA establishes a rental rate often with NRCS input.

#### PARKING LOT ITEMS

1. Consistent rental rate spreadsheet (Brian)
2. Consider developing a CREP Plan review checklist (Rachel)
3. Cultural Resources: Definition of Undertaking? (Rod)
4. State maintenance and reimbursement contract: Brian working on a new version (Brian)
5. SVAP2: Send out (Rachel)
6. Status reviews? Who is responsible for what? (Rod)
7. Buffers on Non-CREP reaches: Update CREP supplemental policy to increase 422 Hedgerow from 15’ to 35’ to improve water quality (Rod)
8. Can we combine CR for CREP & Instream project and have FSA be lead agency? (Jerry@Jefferson CD) (Rachel) to send Rod recommendation)
9. ESA: Gopher, Oregon Spotted Frog-Need to determine a path forward (Rachel)
10. CoC criteria for marginal Pasture (Travis)
11. CoC meetings-How to improve communication, especially initial land eligibility? (Rod)
12. Contract transfer-FSA report to CD
13. Status Reviews? (Rod)
14. Update Guidance on how FSA to use FSA-848B (Rod)
15. PIP Loan Process (Brian)
16. Conversation with FSA, NRCS, WSCC leadership about who signs off on practice certification
17. CD Manager to provide info on CED on technician qualifications (Rod/Brian)
18. Pairing CREP and Other State funding and CR consultation (Rachel)
19. Productivity multiplier: Where is it? (Rod) *Brian working on spreadsheet with actual rental rates. Probably don’t need this.*
20. WDOE 50-Ft buffer requirement? (Rachel)
21. Provide link to eligible stream map on WSCC website (Brian) <http://scc.wa.gov/crep-manual-and-training-documents/>
22. Printing CPA-52 Guide sheets: what is required? (Rachel)
23. CREP EA for WA and National CRP EA: send out (Rachel)
24. How to step thru CRP-2C with FSA software not able to partially complete the form? (Rod)
25. Local Cost Effective Determination by CoC? Send Whatcom CoC example (Brian)
26. Consider establishing local CREP objectives with cost/benefit caps
27. CREP plans in Customer Service Tool Kit? (Rachel)
28. CP 22 Non-CREP buffer width requirement? (Rod)
29. 500 stems vs 300 stems? CREP policy no longer specifies stocking rate

The following came in from an NRCS staffer on paper handed to me after class (Brian to move these to appropriate section after getting answers):

* 1. *Can the specify what acreage they are offering to exclude , to take out a home site or a road or a livestock feeding area? (Rachel)*

# References

CREP Environmental Assessment, US Department of Agriculture Farm Service Agency, WA CREP Final Programmatic Environmental Assessment, August 2006.

The Beaver Restoration Guidebook, Working with Beaver to Restore Streams, Wetlands, and Floodplains, July 2015.

Area specific topics

* Puyallup/Chehalis
  + Environmental Compliance-Need to set up meeting with Martha, Rod on how to handle inventory of prairie species and Oregon Spotted Frog. Is any form of consultation with USFWS on the table? (Rachel)