



September 2024

# CONSERVATION RESERVE PROGRAM

## Improving How USDA Selects Land Could Increase Environmental Benefits

# GAO Highlights

Highlights of [GAO-24-106311](#), a report to congressional requesters

## Why GAO Did This Study

CRP is one of the largest USDA conservation programs for agricultural land in the U.S. In fiscal year 2023, USDA provided \$1.8 billion in rental payments for 22.9 million acres enrolled in CRP. CRP, which FSA administers, was established by the Food Security Act of 1985 and most recently reauthorized by the Agriculture Improvement Act of 2018. It has three types of enrollment—general, which includes land that may have at least a certain level of soil erosion; continuous, which focuses on small, targeted portions of land; and grassland, which is typically used for livestock grazing. CRP's implementing regulation cites cost-effectiveness as one objective.

GAO was asked to review FSA's oversight of CRP. This report, among other things, examines the methods FSA uses to select CRP offers and the extent to which FSA reviews these methods and updates them as needed.

To conduct this review, GAO analyzed USDA documents and interviewed eight experts, including current and former USDA officials and academics who authored studies on CRP. GAO also analyzed USDA data on CRP for fiscal years 1986 through 2023.

## What GAO Recommends

GAO is making four recommendations, including that FSA develop a process to periodically review its methods for selecting CRP offers, and then address any resulting findings, as appropriate. USDA generally agreed with all four recommendations.

View [GAO-24-106311](#). For more information, contact Steve Morris at (202) 512-3841 or [morris@gao.gov](mailto:morris@gao.gov).

September 2024

## CONSERVATION RESERVE PROGRAM

### Improving How USDA Selects Land Could Increase Environmental Benefits

## What GAO Found

To participate in the U.S. Department of Agriculture's (USDA) Conservation Reserve Program (CRP), landowners and operators take agricultural land out of use and implement conservation practices, or agree to protect grassland, in exchange for annual rental payments. CRP focuses on environmentally sensitive land, such as those on which crop production can result in environmental damage. The program has three types of enrollments—general, continuous, and grassland—that all share some grass-related conservation practices. Continuous enrollment can also include water quality practices.

### Examples of Land in USDA's Conservation Reserve Program



Prairie with wildlife



Filter strip on farmland



Cattle on grassland

Source: U.S. Department of Agriculture (USDA). | [GAO-24-106311](#)

To participate in general and grassland enrollments, landowners and operators make competitive offers, which USDA's Farm Service Agency (FSA) scores and selects for acceptance. To score these offers, FSA considers their potential benefits and costs. For example, for general enrollment, FSA calculates an offer's total score by combining points for environmental benefits related to soil erosion, wildlife habitat, and water quality, among other things, with points related to the relative cost. FSA then ranks and selects offers based on their scores. For continuous enrollment, FSA typically automatically accepts offers if they meet certain criteria, except for one project on migratory birds, butterflies, and pollinators, in which offers are competitive.

According to some studies GAO reviewed and experts GAO interviewed, FSA has opportunities to further improve its selection methods to increase the program's environmental benefits and cost-effectiveness. For example, FSA could increase points for establishing native wildflowers that benefit pollinators and expand the use of competition for continuous enrollment. FSA officials agreed that such opportunities could exist.

While FSA has generally made some small changes over the years to its selection methods, it does not have a systematic process to periodically review its methods. In 2023, FSA made a larger change by updating how it estimates soil erosion benefits to increase accuracy. FSA has held some meetings internally, such as after general enrollment periods, and with other federal agencies (most recently in 2019) to discuss its methods for selecting offers. However, developing a process to regularly review its methods would better position FSA to identify potential improvements. Addressing any findings resulting from these periodic reviews could help increase CRP's cost-effectiveness and environmental benefits.

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## Abbreviations

CREP	Conservation Reserve Enhancement Program
CRP	Conservation Reserve Program
EBI	Environmental Benefits Index
ERS	Economic Research Service
FSA	Farm Service Agency
FWS	U.S. Fish and Wildlife Service
FY	fiscal year
NASS	National Agricultural Statistics Service
NRCS	Natural Resources Conservation Service
SAFE	State Acres for Wildlife Enhancement
USDA	U.S. Department of Agriculture

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September 25, 2024

The Honorable Kirsten Gillibrand  
Chair  
Subcommittee on Livestock, Dairy, Poultry,  
Local Food Systems, and Food Safety and Security  
Committee on Agriculture, Nutrition, and Forestry  
United States Senate

The Honorable Cory Booker  
United States Senate

The Conservation Reserve Program (CRP) is a federal program that seeks to offset the detrimental effects that agricultural practices can have on the environment, such as soil erosion and runoff from fertilizers or pesticides entering waterways. The program also seeks to conserve and improve grassland. CRP pays landowners and operators to take environmentally sensitive agricultural land out of production and devote them to conservation practices.<sup>1</sup> These practices, which include establishing grasses or trees as land cover, can achieve long-term program goals such as preventing soil erosion, improving water quality, and reducing loss of wildlife habitat. For example, one study estimated that CRP increased the number of young waterfowl by 1.5 million annually in one prairie region.<sup>2</sup> For grassland, CRP pays landowners and operators to protect grassland, rather than taking the land out of use.

The Farm Service Agency (FSA), within the U.S. Department of Agriculture (USDA), administers CRP. To participate in CRP, landowners and operators offer land to FSA for conservation in exchange for rental payments.<sup>3</sup> FSA uses various methods to select from these offers, such as a competitive offer process that considers environmental benefits and

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<sup>1</sup>Operators include those who lease the land or otherwise have the landowner's approval to enroll in the program. Land on which crop production can result in environmental damage is considered environmentally sensitive.

<sup>2</sup>R. G. Drum et al., *Assessing the Biological Benefits of the USDA-Conservation Reserve Program (CRP) for Waterfowl and Grassland Passerines in the Prairie Pothole Region of the United States: Spatial analyses for targeting CRP to maximize benefits for migratory birds*, Final Report for USDA-FSA Agreement: 12-IA-MRE-CRP-TA (April 2015).

<sup>3</sup>To participate in the program, landowners and operators agree to devote whole or partial fields to conservation practices in exchange for an annual rental payment, incentive payments, and cost-share assistance from USDA.



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cost. In fiscal year (FY) 2023, USDA provided \$1.8 billion in rental payments to landowners and operators for 22.9 million acres enrolled in the program. CRP is one of USDA's largest conservation programs, according to USDA's FY 2025 budget document.<sup>4</sup>

CRP was established by the Food Security Act of 1985 (1985 Farm Bill) and has been reauthorized multiple times, most recently in 2018.<sup>5</sup> The 1985 Farm Bill and the reauthorizing legislation set certain minimum or maximum numbers of acres that USDA can enroll in CRP.<sup>6</sup> Other factors, such as agricultural commodity prices and rental rates paid to landowners and operators, influence the amount of acreage enrolled in CRP, according to USDA and other studies.<sup>7</sup> The program's implementing regulation cites cost-effectiveness as part of the program's objectives.<sup>8</sup> Over the past 20 years, peer-reviewed studies by academia and USDA have identified opportunities for the program to more cost-effectively achieve environmental benefits, such as by adjusting its methods for selecting offers.

We last reported on CRP in 1995.<sup>9</sup> In that report, we found that CRP could provide longer-term environmental benefits at less cost with certain modifications. We recommended, for example, that Congress consider

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<sup>4</sup>Other large USDA programs, administered by USDA's Natural Resources Conservation Service, include the Environmental Quality Incentives Program and the Conservation Stewardship Program. Both of these programs work with producers to develop a conservation plan outlining conservation practices and activities based on management objectives for the farm or ranch.

<sup>5</sup>Food Security Act of 1985, Pub. L. No. 99-198, § 1231, 99 Stat. 1354, 1509; Agriculture Improvement Act of 2018, Pub. L. No. 115-334, § 2201(a), 132 Stat. 4490, 4530.

<sup>6</sup>The 1985 Farm Bill set the highest acreage limit at 40 million to 45 million acres by 1990. The 2014 Farm Bill set the lowest acreage limit at 24 million acres. The 2018 Farm Bill set the acreage limits so that it gradually increased from 24 million in FY 2019 to 27 million acres in FY 2023.

<sup>7</sup>Brian Cornish et al., "Impact of changes in Title II of the 2018 Farm Bill on the acreage and environmental benefits of Conservation Reserve Program," *Applied Economic Perspectives and Policy*, vol. 44, no. 2 (2022): 1100–1122. Heesun Jang et al., "An empirical structural model of productivity and Conservation Reserve Program participation," *Land Economics*, vol. 94, no. 1 (2018): 1–18. U.S. Department of Agriculture, Economic Research Service, *The Influence of Rising Commodity Prices on the Conservation Reserve Program*, Economic Research Report No. 110 (Washington, D.C.: February 2011).

<sup>8</sup>7 C.F.R. § 1410.3(c).

<sup>9</sup>GAO, *Conservation Reserve Program: Alternatives Are Available for Managing Environmentally Sensitive Cropland*, RCED-95-42 (Washington, D.C.: Feb. 21, 1995).

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modifying CRP to focus more on creating buffer zones—strips of trees or other plants bordering waterbodies to improve water quality and wildlife habitat—rather than on removing whole fields from production. Congress adopted this recommendation in the 1996 Farm Bill.<sup>10</sup>

You asked us to review FSA’s oversight of CRP. This report (1) describes the methods FSA uses to select CRP offers and the composition of acres and rental payments in the program, (2) examines the extent to which FSA reviews its selection methods and updates them as needed, and (3) examines the extent to which FSA analyzes and reports on CRP’s environmental benefits. This report also provides data on various aspects of the program, such as average USDA rental payments per acre, the length of time that acres are enrolled in the program, the distribution of acres and rental payments by state and county, and the use of various conservation practices (see appendixes I through VI).

To provide information on the methods FSA uses to select offers, we focused on factors that FSA uses to select offers for three types of CRP enrollment, and the composition of acres and rental payments in CRP. We reviewed FSA documents such as FSA’s handbook for the program.<sup>11</sup> We also reviewed FSA documents on the methods FSA uses to score, rank, and select offers (referred to as indexes) and determine the bid cap—the maximum rental rate that landowners and operators can receive for an offer. We also interviewed officials from FSA about these selection methods.

To examine the extent to which FSA reviews its methods to select offers, we focused on the benefits of FSA’s methods for selecting land offered for CRP, according to studies and experts; the extent to which FSA uses science-based information to select CRP offers;<sup>12</sup> opportunities FSA has to improve its methods, according to studies and experts; and the extent to which FSA reviews its selection methods to determine whether they need updating. We reviewed FSA documents and interviewed officials. We also compared FSA’s actions against criteria, such as USDA’s *Fiscal*

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<sup>10</sup>Federal Agriculture Improvement and Reform Act of 1996, Pub. L. No. 104-127, § 332, 110 Stat. 888, 994.

<sup>11</sup>U.S. Department of Agriculture, *Agricultural Resource Conservation Program, 2-CRP* (Washington, D.C.: Feb. 10, 2023).

<sup>12</sup>For the purpose of this report, we define science-based information as information based on scientific research and data.

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*Years 2022–2026 Strategic Plan* and our key practices for evidence-based policymaking.<sup>13</sup>

In addition, we reviewed agency and academic studies—including peer-reviewed academic journal articles and USDA reports—on CRP and FSA’s methods for selecting CRP offers. We also interviewed eight experts identified through literature searches who primarily authored these reports and articles. See appendix VII for more information on how we selected these studies and experts.

To examine the extent to which FSA analyzes and reports on CRP’s environmental benefits, we focused on the extent to which FSA has used science-based information to estimate key environmental benefits, and the extent to which FSA has analyzed and reported on environmental benefits by type of enrollment. We reviewed research that USDA conducted or funded related to CRP benefits.

To provide data on various aspects of CRP, we analyzed USDA data from FY 1986 through FY 2023, including on number of acres enrolled, USDA rental payments, and how those acres and rental payments are distributed by state and county. We reviewed the reliability of these data, including identifying any omissions and anomalies, and determined that they were sufficiently reliable for the purposes of reporting information on CRP acreage and payments. For more information on the scope and methodology of our data analysis, see appendix VIII.

We conducted this performance audit from October 2022 to September 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>13</sup>U.S. Department of Agriculture, *Strategic Plan: Fiscal Years 2022–2026* (Washington, D.C.: March 2022) and GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023). The key practices we used from this report are assessing the evidence, using evidence to learn, applying learning to decision-making, communicating learning and results, and involving stakeholders.

## Background

According to USDA's handbook for the program, CRP is intended to cost-effectively assist landowners and operators in conserving and improving the nation's natural resources, including by focusing on:

- protecting the nation's soil, water, and wildlife resources;
- improving and preserving water quality; and
- enhancing fish and wildlife habitat.

Landowners and operators participating in CRP use conservation practices such as establishing or maintaining native and introduced grasses and legumes, permanent wildlife habitats, and filter strips and restoring wetland.<sup>14</sup> Figure 1 shows examples of different types of land in CRP.

**Figure 1: Examples of Land in USDA's Conservation Reserve Program**



Prairie with wildlife



Filter strip on farmland



Cattle on grassland

Source: U.S. Department of Agriculture (USDA). | GAO-24-106311

CRP was implemented in 1986 with one type of enrollment—general enrollment—but has evolved to encompass three types of enrollment:

<sup>14</sup>Introduced species are those that evolved elsewhere and have been transported and purposely or accidentally disseminated by humans. A filter strip is a narrow band of grasses, legumes, and forbs—plants that are not woody and have broad leaves. Filter strips improve water quality by intercepting sediment and nutrients, mitigate erosion by reducing the negative impacts of wind and water, and provide habitat and corridors for wildlife. Wetlands are low-lying ecosystems where the water table is always at or near the surface. They perform vital ecological functions, including providing critical habitat for wildlife and waterfowl, mitigating floods by slowing down and absorbing excess water during storms, purifying water by filtering out pollutants before they enter streams and lakes, among other things.

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- **General enrollment.** This type of enrollment is open to land that meet certain criteria, such as having at least a certain level of soil erosion.<sup>15</sup> Landowners and operators compete nationally for acceptance into CRP based, in part, on anticipated environmental benefits during specified enrollment periods. Land accepted for general enrollment is removed from agricultural production, and landowners and operators implement common conservation practices that can include establishing or maintaining vegetative cover of introduced grasses and legumes.
  - **Continuous enrollment.** This type of enrollment focuses on small, targeted portions of land. Landowners and operators typically may enroll their land at any time (i.e., continuously) during the year without competition if the land and conservation practices meet certain criteria. Land in continuous enrollment is removed from agricultural production, and the conservation practices implemented include those related to water quality, such as establishing filter strips and riparian buffers, and restoration of wetlands.<sup>16</sup> Continuous enrollment also shares some grass-related conservation practices with general enrollment.
  - **Grassland enrollment.** This type of enrollment focuses on “working lands,” or land that often continues to be used for livestock grazing while in CRP. The enrollment process for grassland is similar to general enrollment. In contrast to the other two types of enrollment, landowners and operators typically continue grazing operations while conserving and improving grassland, rather than taking the land out of use. Grassland enrollment tends to have the largest average number of acres per contract, according to USDA documents.

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<sup>15</sup>USDA uses an erodibility index, which includes the potential for water or wind erosion to adversely affect the long-term production of the offered land.

<sup>16</sup>Riparian buffers are strips of trees bordering streams, wetland areas, and other waterbodies to improve water quality and wildlife habitat.

Table 1 provides information on the characteristics of each type of enrollment.

**Table 1: Characteristics of Enrollment Types in USDA’s Conservation Reserve Program (CRP)**

	General	Continuous	Grassland
First year of enrollments	1986	1997	2016
Contract length (years)	10–15 <sup>a</sup>	10–15 <sup>a,b</sup>	10–15 <sup>a</sup>
Crop history requirement	Yes <sup>c</sup>	Yes <sup>c</sup>	No
Land use while in program	Temporarily removed from production	Temporarily removed from production	Typically working land (haying/grazing)
Minimum acreage set by 2018 Farm Bill	None	8.0–8.6 million acres <sup>d</sup>	1.0–2.0 million acres <sup>e</sup>
Maximum acreage set by 2018 Farm Bill	24.0–27.0 million acres for the entire CRP <sup>f</sup>		

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

<sup>a</sup>The contract length for each type of enrollment is generally 10 to 15 years, but contract lengths for a certain pilot—the Soil Health and Income Protection Program—are 3 to 5 years.

<sup>b</sup>A pilot within continuous enrollment—Clean Lakes, Estuaries, and Rivers Initiative—offers 30-year contracts.

<sup>c</sup>Federal law requires that, to be eligible for general or continuous enrollment, cropland must, in general, have been annually planted or considered planted to an agricultural commodity in 4 of the 6 crop years from 2012 through 2017.

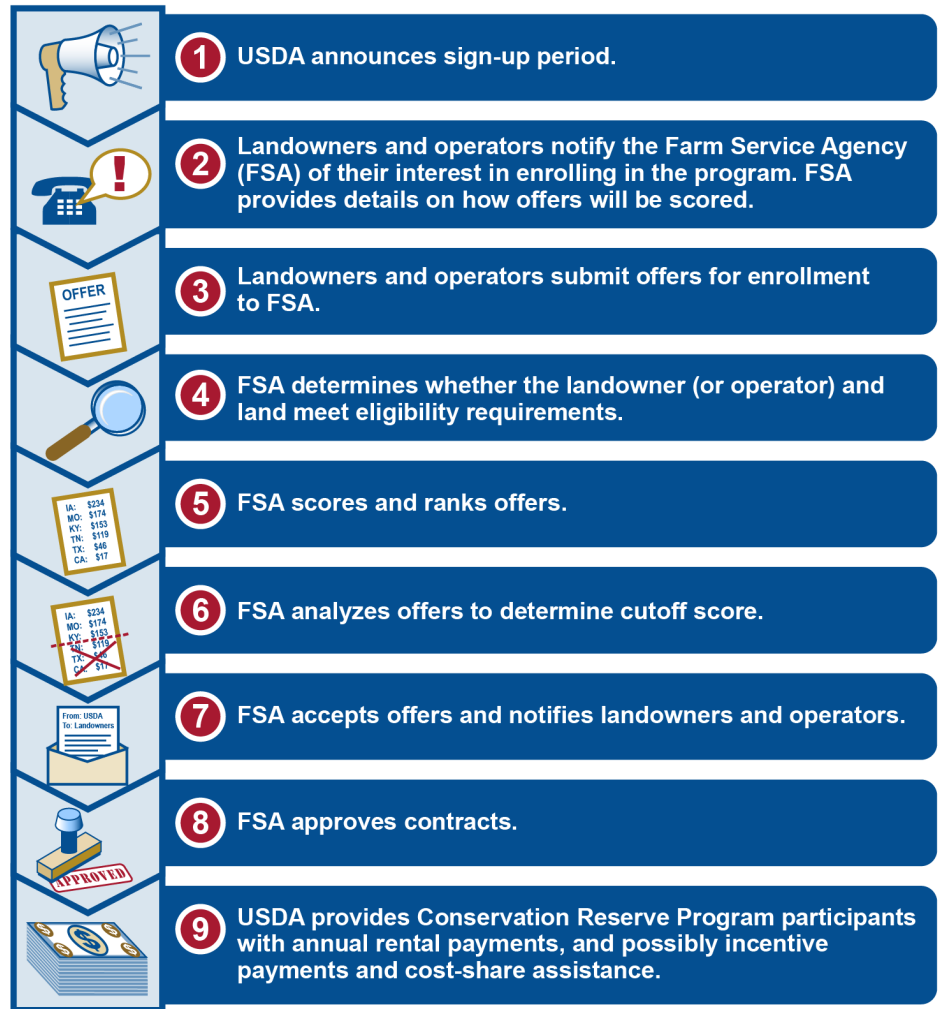
<sup>d</sup>The 2018 Farm Bill sets a minimum continuous enrollment at 8.0 million acres for fiscal year (FY) 2019, 8.25 million acres for FY 2020, 8.5 million acres for FY 2021, and 8.6 million acres for FY 2022 and FY 2023. Agriculture Improvement Act of 2018, Pub. L. No. 115-334, § 2201(c)(3), 132 Stat. 4490, 4534 (codified at 7 U.S.C. § 3831(d)(6)(B)).

<sup>e</sup>The 2018 Farm Bill sets a minimum grassland enrollment at 1.0 million acres for FY 2019, 1.5 million acres for FY 2020, 2.0 million acres for FY 2021 through FY 2023. Pub. L. No. 115-334, § 2201(c)(2), 132 Stat. 4490, 4532 (codified at 7 U.S.C. § 3831(d)(2)).

<sup>f</sup>The 2018 Farm Bill set the maximum acreage enrollment for the entire CRP at 24.0 million acres in FY 2019, 24.5 million acres in FY 2020, 25.0 million acres in FY 2021, 25.5 million acres in FY 2022, and 27.0 million acres in FY 2023. Pub. L. No. 115-334, § 2201(c)(1), 132 Stat. 4490, 4531 (codified at 7 U.S.C. § 3831(d)(1)).

According to FSA’s handbook for CRP, the process for general and grassland enrollments starts with the announcement of a sign-up period (see fig. 2).

**Figure 2: Process for General and Grassland Enrollments in USDA’s Conservation Reserve Program**



Sources: GAO analysis of U.S. Department of Agriculture (USDA) information; GAO (icons). | GAO-24-106311

Note: Operators include those who lease the land or otherwise have the landowner’s approval to enroll in the program.

- **USDA announces sign-up period.** USDA opens a sign-up period for general and grassland enrollments and invites landowners and operators to submit offers.
- **Landowners and operators notify FSA of their interest in enrolling in CRP. FSA provides details on how offers will be scored.** Landowners and operators inform FSA about the specific land they want to offer for CRP. FSA then provides landowners

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and operators with details on factors FSA will use to score and rank offers. FSA also provides landowners and operators with a maximum allowable rental rate that is specific to the offered land, as described in more detail below.

- **Landowners and operators submit offers for enrollment to FSA.** During the sign-up period, landowners and operators submit offers that include the conservation practices they propose to establish on their land.
- **FSA determines whether the landowner (or operator) and land meet eligibility requirements.** General and grassland enrollments share some landowner eligibility requirements. For example, a landowner or operator must have owned or operated the land for at least 12 months prior to the close of the sign-up period, or 12 months prior to submitting an offer under continuous sign-up periods. Each enrollment type also has additional land eligibility requirements specific to that type. For example, under general enrollment, the cropland must, in general, have been annually planted or considered planted to an agricultural commodity in 4 of the 6 crop years from 2012 through 2017.<sup>17</sup> Also, for grassland enrollment, the land must contain forbs or shrubland for which grazing is the predominant use.<sup>18</sup>
- **FSA scores and ranks offers.** For general and grassland enrollment, FSA uses an index that assigns points for various environmental benefits, as well as for a cost factor that gives fewer points for offers with higher bids (i.e., rental rates). Points for some environmental benefits in the general enrollment index are based on computer models that rely on science-based information and produce measures. For example, one model projects the amount of soil erosion that may be prevented for the land associated with a specific offer.<sup>19</sup> FSA staff determine points for other environmental benefits according to criteria in FSA's CRP handbook, which was developed using FSA and Economic Research Service (ERS) officials' professional judgment. USDA's information systems use the indexes to produce a total score for

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<sup>17</sup>16 U.S.C. § 3831(b)(1)(B). Historically, this time period for land to have been annually planted or considered planted to an agricultural commodity is updated with each new farm bill.

<sup>18</sup>16 U.S.C. § 3831(b)(3)(C). There are additional land eligibility requirements specific to general and grassland enrollment.

<sup>19</sup>Models are representations of real-world systems.



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each offer. After the sign-up period ends, FSA uses these scores to rank all offers for general or grassland enrollment.

- **FSA analyzes offers to determine cutoff score.** Officials select a minimum score for each enrollment type that is based on the offers FSA received for that type.
- **FSA accepts offers and notifies landowners and operators.** FSA accepts all offers with a score above the cutoff score and notifies landowners and operators of acceptance. Landowners and operators with acceptable offers are able to withdraw their offers within a certain period of time.
- **FSA approves contracts.** FSA approves contracts for landowners and operators whose offers were accepted and who did not withdraw their offer to enroll in the program.

The process for landowners and operators to enroll in the program begins early in the year with USDA's announcement for landowners and operators to submit offers and ends no later than September 30 with approval of contracts. These contracts take effect and USDA begins making rental payments on October 1.

For all three types of enrollment, FSA determines a maximum rental rate that landowners and operators can receive, known as the bid cap. The bid cap is intended to avoid excessive payments. The cap is specific to the offered land and the type of enrollment and may include some adjustment factors.

- **General and continuous enrollment.** FSA determines bid caps for both types of enrollment by using data from the National Agricultural Statistics Service (NASS) on county average rent and the productivity of soils.<sup>20</sup> USDA adjusts the respective county's average rental rate according to factors such as the land's soil productivity.<sup>21</sup> For example, for land offered in a county with an

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<sup>20</sup>USDA's Cash Rents Survey provides the basis for county estimates of the cash rent paid for irrigated cropland, non-irrigated cropland, and pasture. The 2008 Farm Bill mandated that NASS provide mean rental rates for all counties with 20,000 or more acres of cropland plus pasture. NASS conducts the county-level Cash Rents Survey every year in all states except Alaska and releases national and state estimates each August, according to NASS's website. For more information, see <https://www.nass.usda.gov/Surveys/>.

<sup>21</sup>The soil productivity factor is measured by the soil productivity index, which is based on the publicly available National Commodity Crop Productivity Index developed by NRCS. CRP enrollment has generally been capped at 25 percent of the cropland in each county.

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average annual rental rate per acre of \$100 and that has a productivity index of 1.5, with no additional adjustments, the bid cap would be \$150. FSA then includes other factors in these rates, such as a 3, 5, or 10 percent incentive for CRP practices that will increase carbon sequestration or reduce greenhouse gas emissions, and a one-time 10 percent inflationary adjustment that is applied during the first year of enrollment.<sup>22</sup> After considering the various adjustments, the rental rate cannot exceed \$240 per acre for general enrollment or \$300 per acre for continuous enrollment, as of FY 2023.<sup>23</sup>

- **Grassland enrollment.** FSA sets the bid cap at 75 percent of the land's grazing value, which is determined by the NASS pasture rate, and does not provide any adjustments.

Besides the rental payments, which represent about 95 percent of total CRP payments, according to FSA officials, FSA provides other types of financial incentives for landowners and operators to offer land for enrollment in CRP. These include cost-share assistance and incentive payments. For example, FSA provides a cost-share of up to 50 percent of the reimbursable cost of installing a conservation practice. For continuous enrollment only, FSA also provides incentives and adjustments such as a sign-up incentive payment of 32.5 percent of the first full year's annual rental payment at contract approval.

FSA administers CRP with support from other USDA agencies. Specifically, USDA's Natural Resources Conservation Service (NRCS), which administers other USDA conservation programs, provides technical support functions.<sup>24</sup> Other USDA agencies such as the Agricultural Research Service, ERS, the National Institute of Food and Agriculture,

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<sup>22</sup>This includes a 20 percent rental rate incentive for CRP water quality practices that will improve water quality by reducing sediment loading, nutrient loading, and harmful algal blooms, according to an FSA document.

<sup>23</sup>An exception to this limit within CRP is the Conservation Reserve Enhancement Program (CREP). FSA's CREP is a public-private partnership program that allows states, tribal governments, non-profits, and private entities to partner with FSA to implement CRP practices that address certain conservation and environmental objectives.

<sup>24</sup>FSA and NRCS currently administer over 20 programs and subprograms that are directly or indirectly available to assist producers and landowners who wish to practice conservation on agricultural land.

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and the U.S. Forest Service provide research and educational and technical assistance.

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## USDA Uses Various Methods to Select CRP Offers for Each Type of Enrollment

USDA's FSA uses various methods to select CRP offers for each type of enrollment. It uses similar competitive methods to select offers for general and grassland enrollments. Specifically, for general enrollment, FSA uses an Environmental Benefits Index (EBI) that is composed of factors representing environmental benefits and a factor related to cost. For grassland enrollment, FSA uses an index composed of benefits factors and a factor related to cost. For continuous enrollment, FSA typically automatically accepts offers that meet certain criteria.

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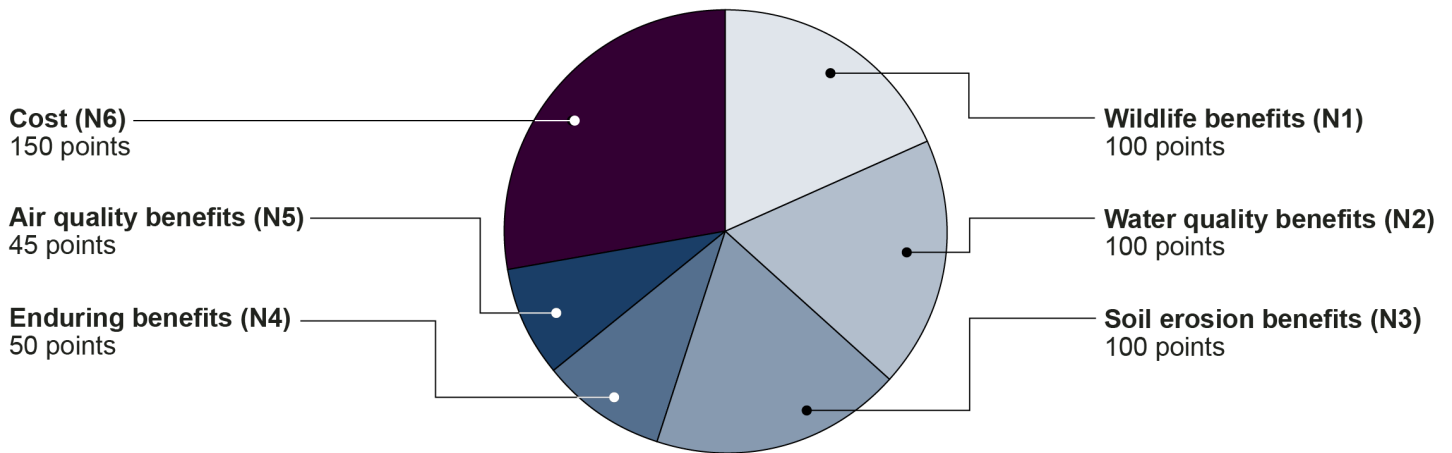
### What factors does FSA use to select offers for general enrollment?

To select offers for general enrollment, FSA uses the EBI, a competitive method to score offers. The EBI has six ranking factors that total to determine the EBI score. Five factors relate to environmental benefits—soil erosion, water quality, air quality, wildlife, and enduring benefits—while the sixth relates to the cost per acre of the offer (see fig. 3).<sup>25</sup> Cost factor points are calculated in part based on the extent to which proposed rental rates are below the maximum allowed rental rates (bid caps). Lower rental rates receive more points than higher rental rates.

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<sup>25</sup>For the cost factor in the EBI, USDA's formula for 125 out of 150 points is:  $a \cdot (1 - (\text{Bid}/b))$ . The bid represents a landowner's or operator's requested rental payment. The "a" represents the relative weight of cost factor as compared with environmental benefits score, and has been 125 since 1997, when it was changed from 190. The "b" is the highest rental payment in each signup and has been 240 since 2020 after having increased four times since 1997.

**Figure 3: Maximum Points and Formula for the Environmental Benefits Index (EBI) Used to Score and Rank Offers for General Enrollment in USDA’s Conservation Reserve Program (CRP), as of Fiscal Year 2023**



Benefits  $N1 + N2 + N3 + N4 + N5 = \text{EBI benefits score (maximum 395 points)}$

Environmental Benefits Index  $N1 + N2 + N3 + N4 + N5 + N6 = \text{Total EBI score (maximum 545 points)}$

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

USDA uses the letter N before each factor for general enrollment.

Wildlife benefits factor (N1): to encourage landowners and operators to plant cover on contract acreage that will be beneficial to wildlife.

Water quality benefits factor (N2): to evaluate the potential for improving water quality by reducing (1) sediment, nutrients, and other pollutants from entering water ways and aquifers; (2) downstream flood damage through the restoration of hydrology; and (3) the leaching of nitrates and pesticides into groundwater.

Soil erosion benefits factor (N3): to evaluate the on-farm benefits of reduced soil erosion.

Enduring benefits factor (N4): to evaluate the likelihood that the practice established will persist, be maintained, and provide benefits beyond the initial CRP contract period.

Air quality benefits factor (N5): to evaluate the air quality improvements from reducing airborne dust and particulate from cropland wind erosion that causes damage to nearby affected population concentrations. This factor also provides points for the value of land for carbon sequestration.

Cost factor (N6): to consider the relative cost of CRP offers by providing greater weight to offers with lower rental rates.

Some of the factors have subfactors. For example, the water quality benefits factor has a subfactor for location in a water quality zone

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identified by a state committee and submitted to USDA for approval.<sup>26</sup> The EBI assigns points to each factor and subfactor (as shown in fig. 3).<sup>27</sup> Points for soil erosion, water quality, and air quality are at least partially derived using science-based information from computer models. Points for other benefits are based on criteria found in the FSA's CRP handbook. These criteria are based on FSA, ERS, and NRCS officials' professional judgment. According to FSA officials, models are not yet available for all the factors and subfactors.

After assigning points for each offer, FSA ranks the offers by total points. For more information about the EBI, see appendix IX.

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## What factors does FSA use to select offers for grassland enrollment?

To select offers for grassland enrollment, FSA uses an index as part of a competitive method to score offers. From 2020 through 2023, the grassland index has had seven ranking factors that total to determine the score. Four of these factors relate to environmental benefits, one relates to the demographic of the landowner or operator, one relates to the size of the livestock operation, and the seventh relates to the cost per acre of the offer (see fig. 4).<sup>28</sup>

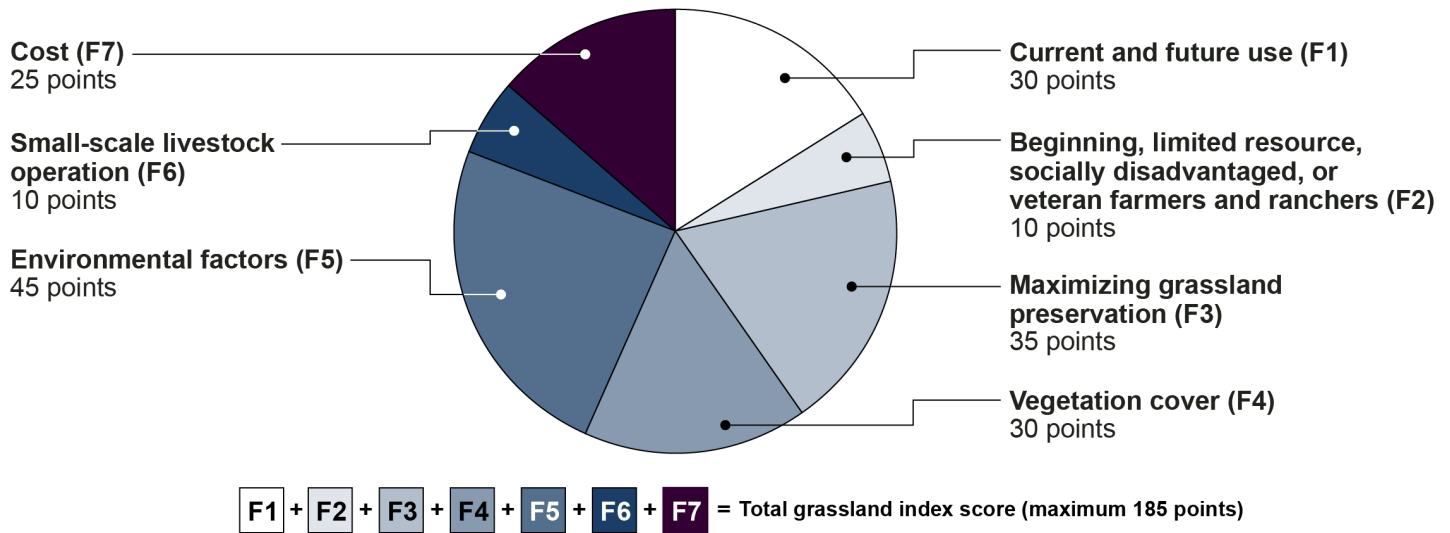
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<sup>26</sup>Water quality zones are intended to be areas where proposed land may contribute to groundwater or surface water quality impairment and assist in meeting certain federal, state, or local water quality laws. The zones are identified by state committees who are primarily active farmers and ranchers nominated by members of Congress and selected by the Secretary of Agriculture. The state committee may consult with a state technical committee that includes agricultural producers, certain forest landowners, and others who represent a variety of disciplines in soil, water, wetlands, plant, and wildlife sciences, including USDA and state representatives. The state committees submit their zones to USDA for approval.

<sup>27</sup>Criteria for indexes are in FSA's handbook for the program. See U.S. Department of Agriculture, *Agricultural Resource Conservation Program*.

<sup>28</sup>The beginning, limited resource, socially disadvantaged, or veteran farmers and ranchers factor is intended to encourage producers who meet certain demographic requirements to submit offers for their land. These requirements are determined by USDA, and USDA's form CCC-860 provides the definitions for each group. Landowners and operators complete this form to certify their inclusion in one or more of these groups. In addition, the small-scale livestock operation factor assigns points if the landowner certifies that they are eligible for a small-scale livestock operation, which is an operation with 140 grazing animal units or fewer. Different kinds of animals are assigned different units, per FSA's handbook for CRP. For example, a dairy cow is 1.40, a heifer is 0.86, and a goat is 0.15. Landowners and operators also certify that they will not offer more than 200 acres for the program.

**Figure 4: Maximum Points and Formula Used to Score and Rank Offers for Grassland Enrollment in USDA’s Conservation Reserve Program (CRP), as of Fiscal Year 2023**



Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

USDA uses the letter F before each factor for grassland enrollment.

Current and future use factor (F1): to encourage continued usage of the land. This factor is intended to retain most of the environmental benefits of expiring CRP land.

Beginning, limited resource, socially disadvantaged, or veteran farmers and ranchers factor (F2): to encourage landowners and operators who meet certain demographic requirements, set by USDA, to submit offers for their land.

Maximizing grassland preservation factor (F3): to encourage continued grassland usage of land in areas subject to threat of conversion.

Vegetation cover factor (F4): to assign points for practices on the land offered.

Environmental factors (F5): to encourage conservation in areas of designated candidate, threatened, or endangered species or critical habitat.

Small-scale livestock operation factor (F6): to assign points if the landowner or operator certifies that they are eligible for a small-scale livestock operation, which is an operation with 140 grazing animal units or less. Different kinds of animals are assigned different units, per FSA’s handbook for CRP. For example, a dairy cow is 1.40, a heifer is 0.86, and a goat is 0.15. Landowners and operators also certify that they will not offer more than 200 acres for the program.

Cost factor (F7): includes two subfactors. One assigns points for land located in counties in which the rental rate is less than or equal to \$15 per acre. The second assigns points to offers with a rate that is lower than the respective county rental rate.

The environmental factors include whether grassland preservation is maximized and whether threatened or endangered species are known to be in the area. The cost factor has two subfactors that assign points for offers (1) in counties in which the payment rate is less than or equal to \$15 per acre or (2) that are below the corresponding county rental rate. FSA does not use science-based information from computer models to assign points to the factors and subfactors; rather, the points are based

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on a list of criteria in the CRP handbook, which was developed based on FSA officials' professional judgment with advice from other agencies. For certain subfactors, state committees identify which areas of their state should receive certain points and submit these areas to USDA for approval.<sup>29</sup> For more information about the grassland index, see appendix X.

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**How does FSA choose offers for continuous enrollment?**

For continuous enrollment, FSA automatically accepts offers of environmentally sensitive land devoted to certain conservation practices if the land and landowner or operator meet certain eligibility requirements and enrollment levels do not exceed the statutory cap.<sup>30</sup>

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<sup>29</sup>Certain zones are identified by state committees who are primarily active farmers and ranchers nominated by members of Congress and selected by the Secretary of Agriculture. The state committee may consult with a state technical committee that includes agricultural producers, certain forest landowners, and other professionals who represent a variety of disciplines in soil, water, wetlands, plant, and wildlife sciences, including USDA and state representatives. The state committees submit their zones to USDA for approval.

<sup>30</sup>See 7 C.F.R. § 1410.31(d).

### USDA's State Acres for Wildlife Enhancement (SAFE) Project on Migratory Birds, Butterflies, and Pollinators

The U.S. Department of Agriculture (USDA) established a project within its SAFE initiative within its Conservation Reserve Program (CRP) in 2017 in cooperation with partners. The project sought to enroll certain wetlands that provide critical habitat for migratory birds and other wildlife species.

These wetlands specifically include areas with playa lakes, which are round hollows in the ground that fill with water after spring rainstorms or are fed by water from underlying aquifers. They support a variety of wildlife, including waterfowl, and are located in states such as Colorado, Kansas, Nebraska, New Mexico, Oklahoma, and Texas.

An official from USDA's Farm Service Agency stated that before the SAFE project, USDA had difficulty enrolling these wetlands in CRP. The official said that farmers were reluctant to enroll these wetlands because they can be agriculturally productive during periods when the land is not wet. Thus, farmers were more inclined to keep the land in production than offer it for CRP.

The project resulted in increased enrollment of playa wetlands in parts of Kansas, Nebraska, and Oklahoma, according to USDA. As of August 2023, USDA had enrolled over 17,000 wetlands acres across Kansas, Nebraska, and Oklahoma through the project.

#### Playa Lakes



Sources: GAO analysis of USDA information; Natural Resources Conservation Service (photo). | GAO-24-106311

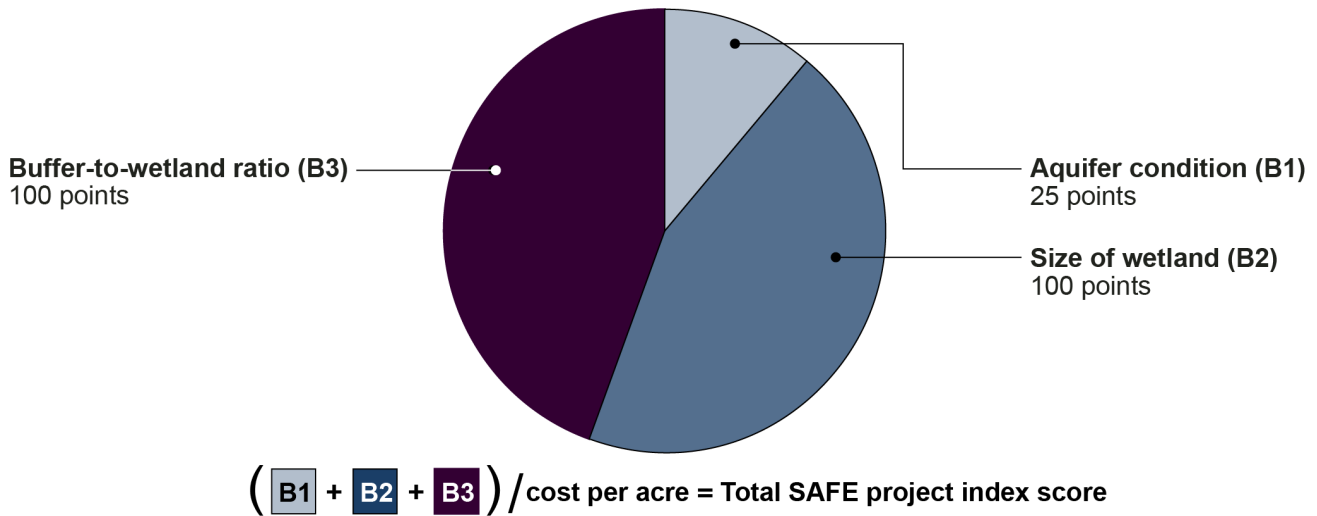
Because FSA typically does not use a competitive method for continuous enrollment, it does not use specific scoring and ranking factors. Instead, FSA accepts offers throughout the fiscal year, except for one specific project.<sup>31</sup> Specifically, for four sign-ups from 2017 to 2023, FSA tested the use of competitive bidding with an index, rather than automatically accepting offers that met certain criteria, for a project within its State Acres for Wildlife Enhancement (SAFE) initiative under continuous enrollment. For two of those sign-ups (in 2022 and 2023), FSA sought to cost-effectively enroll high-benefit wetland acres through the SAFE project (see sidebar) by using a benefit-cost ratio—a ratio of benefit score divided by rental rate—to score and select offers rather than automatically enrolling acres that met certain criteria (see fig. 5).<sup>32</sup>

<sup>31</sup>In addition to this project, another effort within CRP scores and ranks offers. Specifically, in FSA's CREP partnership with the state of Minnesota, the state is responsible for evaluating, scoring, and ranking offers as part of the application process. For land to be eligible for its CREP, Minnesota requires that it also be enrolled in the state's conservation easement program, and the state evaluates, scores, and ranks the offers for this program.

<sup>32</sup>The benefit-cost ratio scored and selected offers based on three factors that related to the condition of the aquifer, the size of the wetland, and the buffer-to-wetland ratio. Additionally, USDA ranked offers separately from seven focal areas in Kansas, Nebraska, and Oklahoma, within the SAFE eligibility area. USDA also determined that up to 50 percent of offers could be accepted in any of the sign-ups. Wetlands are low-lying ecosystems where the water table is always at or near the surface. They perform vital ecological functions, including providing critical habitat for wildlife and waterfowl, mitigating floods by slowing down and absorbing excess water during storms, purifying water by filtering out pollutants before they enter streams and lakes, among other things. See GAO, *Farm Programs: USDA Should Take Additional Steps to Ensure Compliance with Wetland Conservation Provisions*, GAO-21-241 (Washington, D.C.: Apr. 2, 2021).



**Figure 5: Maximum Points and Formula for Scoring and Ranking Offers for the SAFE Project on Migratory Birds, Butterflies, and Pollinators within Continuous Enrollment, as of Fiscal Year 2023**



SAFE = State Acres for Wildlife Enhancement

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

USDA uses the letter B before each factor for this project's index.

Aquifer condition factor (B1): to encourage enrollment of land situated over declining portions of an aquifer.

Size of wetland factor (B2): to encourage enrollment of larger wetlands. Wetlands are low-lying ecosystems where the water table is always at or near the surface. They perform vital ecological functions, including providing critical habitat for wildlife and waterfowl, mitigating floods by slowing down and absorbing excess water during storms, and purifying water by filtering out pollutants before they enter streams and lakes.

Buffer-to-wetland ratio (B3): to encourage enrollment of land that contains less buffer and more wetland. Buffers are borders of grass or trees or both along rivers, streams, or other waterways.

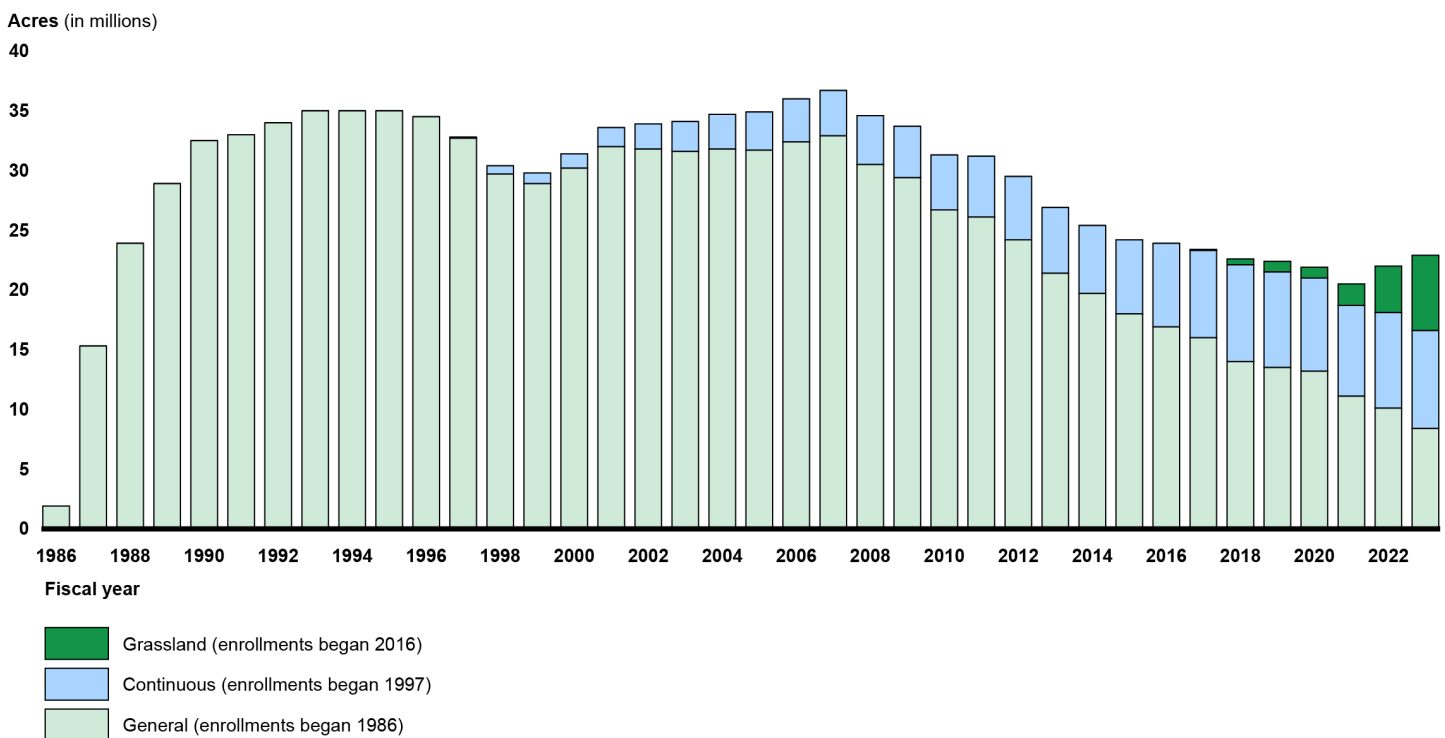
## What has been the composition of acres and rental payments in CRP?

The number of acres enrolled in CRP and amount of total rental payments have fluctuated over time. Total acreage generally increased from 1.9 million acres in FY 1986—the program's first year of enrollments—to a high of 36.8 million acres in FY 2007. It then decreased to 22.9 million acres in FY 2023, in part due to lower acreage maximums set by Congress.<sup>33</sup> In addition, the portion of land in continuous and

<sup>33</sup>The following are the maximum CRP acreage set by each farm bill: 1985 Farm Bill, 45 million acres; 1990 Farm Bill, 45 million acres; 1996 Farm Bill, 36.4 million acres; 2002 Farm Bill, 39.2 million acres; 2008 Farm Bill, 32 million acres; and 2014 Farm Bill, 27.5 million acres in FY 2014, 26 million acres in FY 2015, 25 million acres in FY 2016, and 24 million acres in FY 2017 and FY 2018. Beginning with the 2018 Farm Bill, the acreage limitation gradually increased until it reached 27 million acres in FY 2023. The 2018 Farm Bill established maximum and minimum levels per year for acres enrolled in CRP. In fiscal year 2023, the maximum for the overall CRP was 27 million acres, the minimum was 8 million acres for continuous enrollment, and 2 million acres for grassland enrollment.

grassland enrollments have increased since each type was introduced, while acres in general enrollment have decreased. Figure 6 shows acreage trends by type of enrollment since CRP began enrollments in 1986.

**Figure 6: Acres Enrolled in USDA’s Conservation Reserve Program, by Enrollment Type, Fiscal Years 1986–2023**



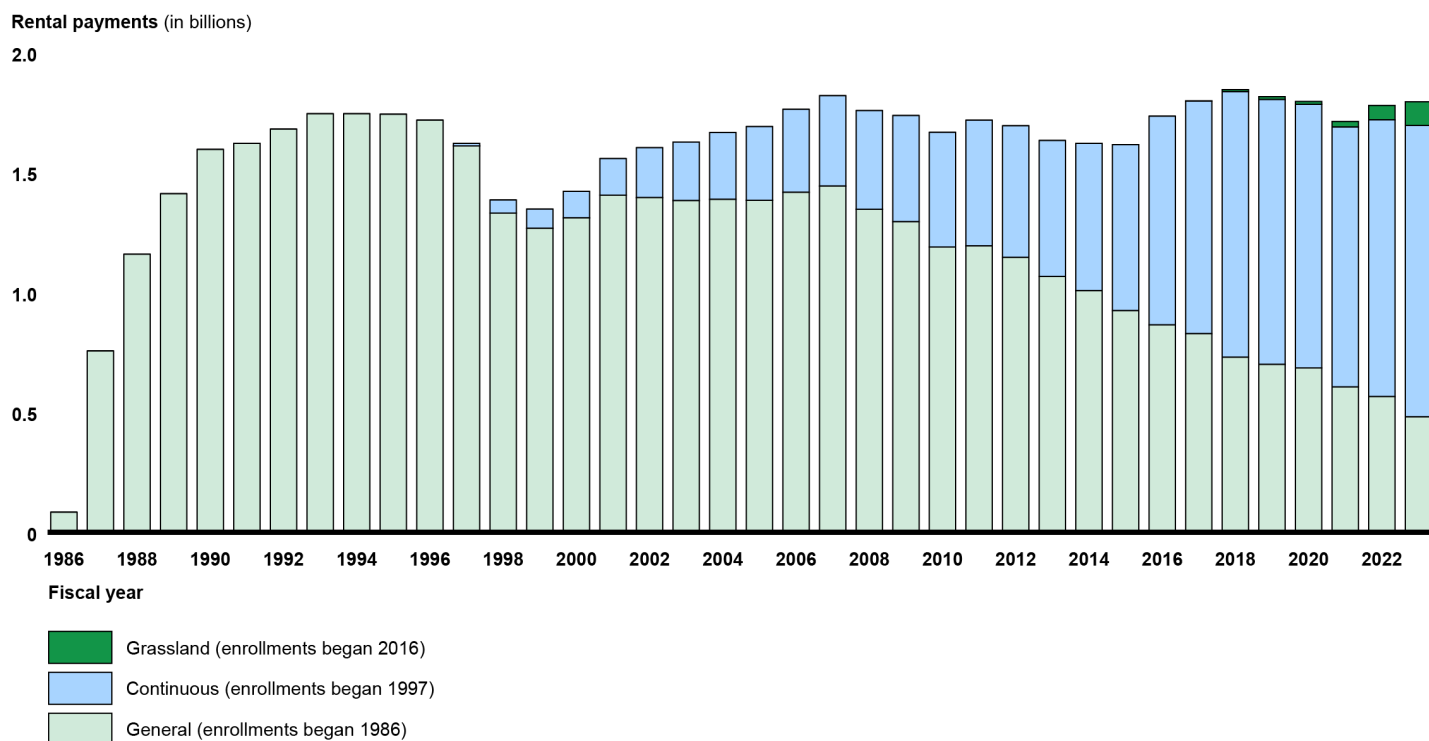
Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

As figure 6 shows, for FY 2023, general enrollment and continuous enrollment each comprised more than a third of acres (8.4 million and 8.2 million, respectively), while grassland enrollment accounted for more than a quarter (6.3 million acres). Also, for FY 2023, general enrollment comprised about a quarter of rental payments (\$480 million); continuous enrollment, two-thirds (\$1.2 billion); and grassland enrollment, about 5 percent (\$99 million).

Total annual rental payments ranged between \$1.3 billion and \$1.8 billion (not adjusted for inflation) per year from FY 1989 through FY 2023. As with acres enrolled, the portion of total rental payments for continuous and grassland enrollment have generally increased since their introduction, while the portion for general enrollment has generally

decreased since 2006. In addition, total annual rental payments for continuous enrollment have exceeded those for general enrollment since fiscal year 2016. Figure 7 shows total annual rental payments by type of enrollment since CRP's implementation.<sup>34</sup>

**Figure 7: Total Rental Payments (not adjusted for inflation), by Type of Enrollment, for USDA's Conservation Reserve Program, Fiscal Years 1986–2023**



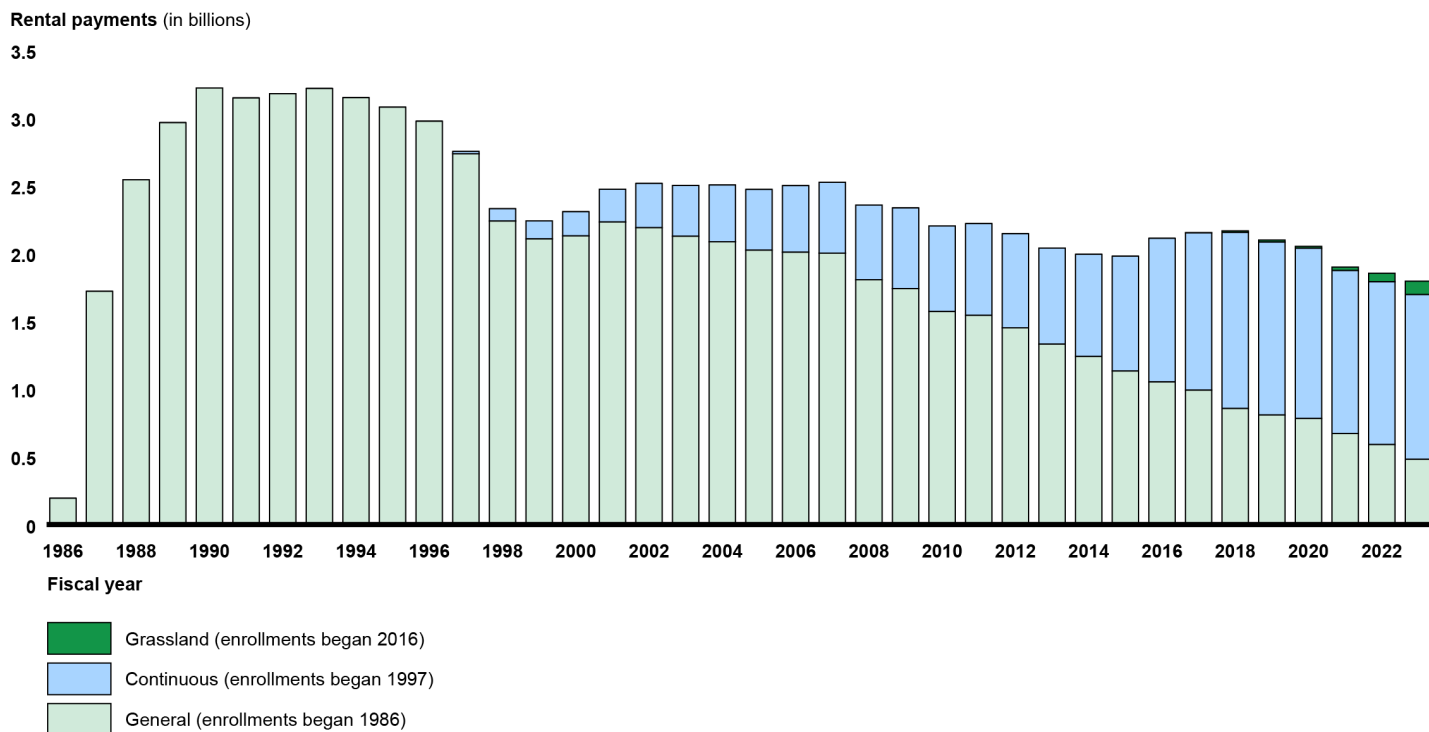
Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

When adjusted for inflation, total CRP rental payments peaked in the early 1990s, decreased until FY 1999, and then stayed within a narrow range until FY 2007, when total inflation-adjusted payments were about

<sup>34</sup>During our review, we identified contracts for which rental rates were higher than USDA's maximum rate. On March 28, 2024, we notified FSA of this deficiency. Based on the preliminary results from FSA's investigation, FSA officials stated that they estimated the overpayments to be about \$180,000 for 126 contracts from FY 2017 through FY 2023. This represents less than 0.01 percent of the \$12.5 billion in rental payments that USDA made over this time. The FSA officials said that this error likely occurred when the maximum rental rates were uploaded into new software prior to the FY 2017 contract payments. As of April 2024, USDA had not completed its investigation. We plan to follow up with USDA on the results of its investigation and any corrective actions based on this investigation.

\$2.5 billion. Since then, total inflation-adjusted payments have generally decreased (see fig. 8), reaching \$1.8 billion in FY 2023. This decrease generally coincided with the decrease in total CRP acres.

**Figure 8: Total Rental Payments (adjusted for inflation), by Type of Enrollment, for USDA’s Conservation Reserve Program, Fiscal Years 1986–2023**



Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

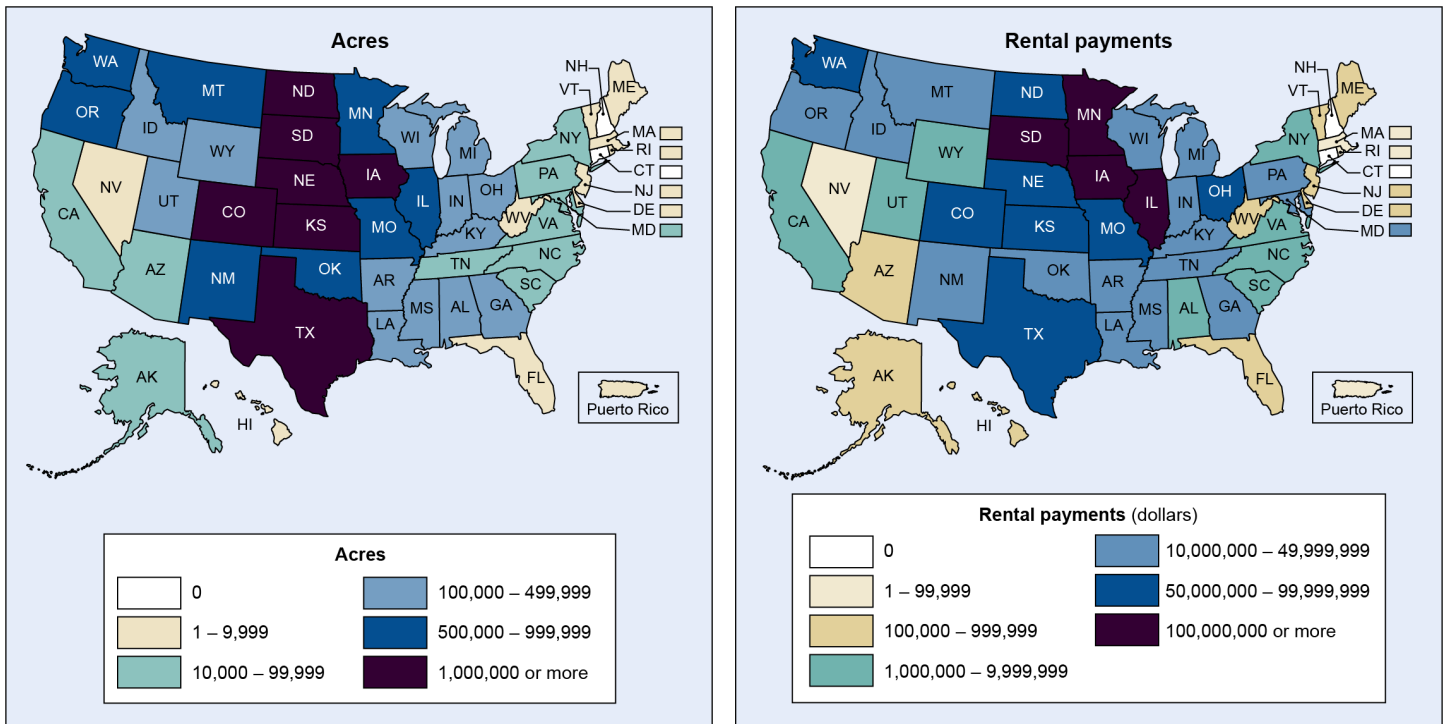
Note: We adjusted the rental payments for inflation to fiscal year 2023 dollars.

Appendixes I and II provide more information on historical CRP rental payments per acre and how long acres have been enrolled in the program.

**What was the geographic distribution of acres and rental payments for FY 2023?**

The distribution of acres and payments varied geographically. About 57 percent (13 million acres) of acres enrolled in FY 2023 were in seven states in the central U.S., and total rental payments varied across states but did not necessarily correlate with acreage. Figure 9 shows acreage enrolled and rental payments by state for fiscal year 2023.

**Figure 9: Total Acres Enrolled and Rental Payments, by State or Territory, in USDA’s Conservation Reserve Program, Fiscal Year 2023**



Sources: GAO analysis of U.S. Department of Agriculture (USDA) information; Map Resources (map). | GAO-24-106311

The seven states comprising 57 percent of acres enrolled—Colorado, Iowa, Kansas, North Dakota, Nebraska, South Dakota, and Texas—enrolled at least 1 million acres each. The states with the most acres in general enrollment were the Great Plains states of Colorado, Kansas, and Texas.<sup>35</sup> Continuous enrollment was most concentrated in the Dakotas, Illinois, Iowa, and Minnesota. Grassland enrollment was most concentrated in the Great Plains states of Colorado, Nebraska, New Mexico, and South Dakota.

Almost half (48 percent) of total rental payments went to four states—Illinois, Iowa, Minnesota, and South Dakota—which received at least \$100 million each. The states with the highest rental payments varied by type of enrollment. For example, the five states that received the most in rental payments for continuous enrollment were Illinois, Iowa, Minnesota,

<sup>35</sup>The Great Plains in the U.S. include at least portions of 10 states: Colorado, Kansas, Montana, New Mexico, Nebraska, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming.

Missouri, and South Dakota. In contrast, the five states that received the most in rental payments for grassland enrollment were Colorado, Kansas, Nebraska, New Mexico, and South Dakota. For more information about the distribution of acres and rental payments by state in FY 2023, see appendix III.

We also analyzed county-level distribution of acres and rental payments; appendixes IV and V present the results of these analyses.

**How do acreage per contract and acreage per conservation practice vary by enrollment type for FY 2023?**

For FY 2023, we found that acreage per contract and acreage per conservation practice varied by type of enrollment. For example, median acreage per contract for grassland enrollment was five times greater than that for general enrollment. Also, grass and legume practices represented 71 percent of general enrollment and 28 percent of continuous enrollment. Table 2 provides more information on these topics. For more information on acres and rental payments by conservation practices, see appendix VI.

**Table 2: Acreage and Conservation Practices by Type of Enrollment in USDA’s Conservation Reserve Program (CRP), Fiscal Year 2023**

	General	Continuous	Grassland
<b>Median number of acres per contract</b>	30 acres	6 acres	151 acres
<b>Range in acres per contract<sup>a</sup></b>	1 to 603 acres	0.3 to 189 acres	4 to 3,326 acres
<b>Largest conservation practices (percent of acres in type of enrollment)<sup>b</sup></b>	Establishment or maintenance of: Permanent native grasses (45%) and introduced grasses and legumes (26%).	Establishment or maintenance of: Permanent native grasses (14%), introduced grasses and legumes (14%), permanent wildlife habitat (10%), filter strips <sup>c</sup> (8%), riparian buffers <sup>d</sup> (6%), and duck nesting habitat (6%).  Also, restoration of wetlands <sup>e</sup> (non-floodplain) (10%).	Maintenance of: Permanent grass and legumes on grassland <sup>f</sup> (98%).

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Note: Legumes are plants that have seeds in a pod and improve soil by taking nitrogen from the air.

<sup>a</sup>To provide a typical range for CRP contract acreage without reference to extreme outliers, we excluded the CRP contracts with the lowest and highest 1 percent of entries.

<sup>b</sup>We selected the largest conservation practices that sum to at least two-thirds of the acreage for each type of enrollment.

<sup>c</sup>A filter strip is a narrow band of grasses, legumes, and forbs—plants that are not woody and have broad leaves. Filter strips improve water quality by intercepting sediment and nutrients, mitigate erosion by reducing the negative impacts of wind and water, and provide habitat and corridors for wildlife.

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<sup>d</sup>Riparian buffers are strips of trees bordering streams, wetland areas, and other waterbodies to improve water quality and wildlife habitat.

<sup>e</sup>Wetlands are low-lying ecosystems where the water table is always at or near the surface. They perform vital ecological functions, including providing critical habitat for wildlife and waterfowl, mitigating floods by slowing down and absorbing excess water during storms, purifying water by filtering out pollutants before they enter streams and lakes, among other things.

<sup>f</sup>This practice applies only to grassland enrollment and the land may be used for haying or grazing.

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## USDA May Have Opportunities to Further Improve How It Selects Offers for CRP but Conducts Limited Reviews of Its Selection Methods

According to 17 studies and eight experts, USDA has opportunities to further improve its methods for selecting CRP offers to increase the program's overall benefits and cost-effectiveness. FSA has taken steps to use science-based information, through updated computer models, to assign points for scoring certain environmental benefits. FSA uses this information to more accurately estimate the environmental benefits for CRP offers, according to FSA officials. However, the agency has not begun using science-based information to score other benefits, according to agency officials. Additionally, FSA does not have a process for periodically reviewing its selection methods, which includes soliciting and publicly reporting experts' suggestions on these methods, and updating the methods as needed.

## What benefits do FSA's current selection methods have, according to studies and experts?

FSA's current selection methods have various benefits, including potentially increasing environmental benefits, according to two studies we reviewed and eight experts we interviewed.<sup>36</sup> For example, the introduction of the EBI expanded the environmental benefits that CRP targets beyond soil erosion to include improvements in wildlife habitat, water quality, and regional conservation priorities, according to two studies.<sup>37</sup> Furthermore, according to one of those studies, using the EBI, rather than the prior methods that were based on soil erosion alone, to select offers might have increased CRP benefits associated with

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<sup>36</sup>U.S. Department of Agriculture, Economic Research Service, *Conservation Program Design: Better Targeting, Better Outcomes*, Economic Brief No. 2 (March 2006). The 2006 paper provided the estimates which were based on work from the following paper: U.S. Department of Agriculture, Economic Research Service, *Economic Valuation of Environmental Benefits and the Targeting of Conservation Programs: The Case of the CRP*, Agricultural Economic Report No. 778 (Washington, D.C.: April 1999).

<sup>37</sup>An EBI was first developed for use in ranking offers in 1991, but ranking did not play a prominent role in determining offer acceptability until 1997. John Johnson et al., *Stakeholders Look at the Conservation Reserve Program Through Different Windows*, The Conservation Reserve Program—Planting for the Future: Proceedings of a National Conference (Fort Collins, CO: June 2004).

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freshwater recreation, wildlife viewing, and pheasant hunting from \$459 million to \$828 million per year.<sup>38</sup>

Additional benefits of the EBI and other indexes include their simplicity, transparency, and cost-effectiveness, according to experts, who include academics and current and former FSA and ERS officials<sup>39</sup>:

- The indexes are fairly easy for FSA to calculate using available data.
- The indexes provide transparency because landowners and operators as well as researchers can see how the scores are calculated.
- The indexes are useful in selecting offers. In addition, the EBI increased the program's cost-effectiveness, according to an ERS study and two experts.

However, eight experts identified opportunities to increase the program's cost-effectiveness, as described below.

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### To what extent does FSA use science-based information to help select CRP offers?

FSA uses science-based information from computer models to help assign points for some of the benefits in the EBI. These points are used to help select CRP offers for general enrollment, but FSA is not using such information for the benefits in the grassland index. In addition, FSA has completed some efforts, and has others under way, to increase the use of science-based information for assigning points in these indexes. FSA officials stated that these efforts can provide additional objective, site-specific information to further improve land selection, resulting in increased environmental benefits. When science-based information from computer models is not available, FSA relies on a criterion found in FSA's CRP handbook, which was developed based on the professional

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<sup>38</sup>U.S. Department of Agriculture, Economic Research Service, *Conservation Program Design: Better Targeting, Better Outcomes*.

<sup>39</sup>The experts were generally less familiar with the indexes used for the grassland sign-up and for the SAFE project on migratory birds and other wildlife within continuous sign-up. They based their comments on these indexes on copies of the indexes that we provided for their review prior to interviews.



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judgment of USDA officials with input from state committees and their advisors who identify zones that can receive points specified in the EBI.<sup>40</sup>

In the EBI, FSA uses science-based information from computer models to derive at least some of the points for soil erosion benefits, water quality benefits, and air quality benefits, but none of the points for wildlife benefits or enduring benefits.<sup>41</sup> In 2023, FSA began using updated models to more accurately estimate rates of soil erosion and associated surface runoff for land offered for CRP, according to an FSA document and FSA officials. One model incorporates site-specific biophysical processes—such as rainfall, rate of runoff, soil properties, and slope—to provide more reliable estimates for average annual soil loss related to rainfall. The other model simulates the effect of wind erosion, and both help with assigning points for soil erosion, water quality, and air quality. In addition, the improved accuracy of the updated models may enhance CRP's cost-effectiveness because the EBI now gives more points to land with the potential for greater soil erosion, according to FSA officials. However, FSA did not adopt these models for CRP until 13 to about 20 years after they were developed and other USDA agencies began using them. FSA officials said that incorporating the updates into USDA's older computer systems took over 3 years.<sup>42</sup>

In addition, FSA has taken steps to increase the use of science-based information, based on models, to assign points for wildlife and other benefits in the EBI and grassland index. For example, in 2020, FSA contracted with the Department of the Interior's U.S. Fish and Wildlife Service (FWS) to use hundreds of broad-scale bird density models to identify areas that host a diverse selection of bird species, according to

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<sup>40</sup>USDA's point system assigns points, for example, based on the number and types of species of plants and whether they are native or introduced. It also assigns points based on whether the area is in a zone (such as for wildlife, air quality or water quality) identified by a state committee with advice from a state technical committee and approved by USDA.

<sup>41</sup>Enduring benefits are the likelihood that the practice will provide benefits beyond the contract period. USDA does not consider soil erosion or water quality in its grassland index because these are not the purposes of grassland enrollment. Rather, the program emphasizes support for grazing operations, plant and animal biodiversity, and grassland and land containing shrubs and forbs under the greatest threat of conversion, according to USDA.

<sup>42</sup>In addition, FSA officials had concerns that landowners would object to the new model if their offers were rejected based on a low EBI score. Thus, USDA notified landowners whose offers were rejected on this basis that they could request USDA re-evaluate their offer. However, few bidders made this request, according to FSA officials.

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FWS officials. Species were placed in groups that have similar requirements and are associated with grassland or forests. This was done so optimal CRP locations could be identified to provide wildlife benefits that align with the conservation practice being delivered (e.g., grass restoration versus woody planting).<sup>43</sup> FWS completed its update of the wildlife-related science-based information in March 2024, according to FSA and FWS officials. However, it is unclear whether FSA will incorporate the science-based information from the updated model into its indexes. We asked, but FSA officials had not yet decided whether they planned to use it to help score and select offers for general or grassland enrollments. FSA currently provides points for wildlife locations based on generally county-level zones identified by state committees and their advisors.

In another effort to increase the use of science-based information, as part of the same 2020 FSA contract, FWS developed a model to improve the accuracy of information used to assign points for one part of the grassland index—the risk that grassland will be converted to cropland or development. FSA currently estimates this risk using various factors, such as the percentage of grassland in that county. The new model, which FWS completed in 2023, predicts the risk of grassland conversion at a local level over the next 20 years. The model uses historical data from the past 20 years on grassland loss and its relationship to land cover, soil property, topography, climate, and socioeconomic factors, according to FSA and FWS officials.<sup>44</sup> FSA officials stated they had not decided whether they planned to incorporate the science-based information from this model into their grassland index, as of February 2024.

Historically, FSA has not updated its indexes to incorporate the use of science-based information from available computer models in a timely manner. USDA's core values include basing "decisions and policy on science and data that are reliable, timely, relevant, and free from political interference," according to USDA's *FY 2023 Performance Plan and Fiscal*

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<sup>43</sup>Birds are used as a bioindicator of ecosystem health affecting wildlife because (1) their ranges and environment associations are well understood; (2) they use all food and nutrition levels of the ecological pyramid—that is, birds eat plant seeds, insects, frogs, fish, and small mammals; (3) they have demonstrated response to environmental conditions; and (4) they are easily identified and measured.

<sup>44</sup>A manuscript describing this work has been accepted for publication in the *Journal of Conservation Biology*, according to FWS officials from the Habitat and Population Evaluation Team.

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*Years 2022–2026 Strategic Plan*.<sup>45</sup> In addition, our key practices for evidence-based policymaking include using evidence to learn and applying learning to decision-making, such as using evidence to inform management decisions.<sup>46</sup> By building on its existing efforts by incorporating, in a timely manner, reliable science-based information from models or other sources into the agency’s methods for selecting offers, as appropriate, FSA may be able to more accurately estimate the benefits of CRP offers, increasing the program’s environmental benefits and cost-effectiveness.

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What opportunities exist for FSA to improve its selection methods, according to studies and experts?

According to 17 studies we reviewed and eight experts we interviewed, FSA has opportunities to further improve its methods for selecting CRP offers to further increase the program’s benefits and cost-effectiveness, consistent with CRP’s objectives.<sup>47</sup> These include the following:

- **Use benefit-cost ratio.** FSA could adjust the indexes to use benefit-cost ratios—benefit points divided by rental rate—so that they measure cost-effectiveness, according to five experts and two studies. For example, if two offers scored 300 points for benefits and their rental rates were \$100 and \$50, respectively, the first offer would receive a score of 3 (points per dollar) and the second a score of 6 (points per dollar). In contrast, using EBI, the two offers would receive 73 points and 99 points, respectively. Thus, the benefit-cost ratios are proportional to costs, but EBI points are not. Using a benefit-cost ratio could have substantially increased acreage and environmental benefits for the same cost when compared with using the EBI, according to a 2016 study.<sup>48</sup> FSA officials stated that if they were to use this methodology for

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<sup>45</sup>U.S. Department of Agriculture, *FY 2023 Performance Plan* (Washington, D.C.: March 2022); and *Strategic Plan: Fiscal Years 2022–2026* (Washington, D.C.: March 2022).

<sup>46</sup>[GAO-23-105460](#).

<sup>47</sup>Specifically, CRP’s objectives are “to cost-effectively reduce water and wind erosion, protect the Nation’s long-term capability to produce food and fiber, reduce sedimentation, improve water quality, create and enhance wildlife habitat, and other objectives including, as appropriate, addressing issues raised by State, regional, and national conservation initiatives and encouraging more permanent conservation practices, including, but not limited to, tree planting.” 7 C.F.R. §1410.3(c).

<sup>48</sup>Ruiqing Miao et al., “Assessing Cost-effectiveness of the Conservation Reserve Program (CRP) and Interactions between the CRP and Crop Insurance,” *Land Economics*, vol. 92, no. 4: 593–617.

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enrollments, the agency would have to consider statutory language on state historic enrollment requirements.<sup>49</sup>

- **Increase reliance on science-based information, such as from models.** Increasing reliance on science-based information, such as from models or other sources, rather than professional judgment to assign points could ensure the indexes better reflect actual benefits, according to three experts. For example, one expert suggested developing science-based information that could be converted to assign points for climate change benefits within the EBI.
- **Adjust points assigned to certain benefits.** For example, increasing the points for establishing native plants—particularly native wildflowers—that support insects and pollinators could produce better outcomes, according to three experts. Such practices have a high level of benefits but can be substantially more expensive for landowners and operators to plant, as compared with basic grass cover, according to a 2022 ERS study.<sup>50</sup> The study states that as a result, landowners and operators may lack an incentive to establish such beneficial plants.
- **Consider alternatives to bid caps.** To overcome difficulties with setting bid caps (maximum allowable rental rates), FSA could consider using a different approach, according to five experts. Bid caps tend to be low, according to five experts. Bid caps that are too low can discourage landowners and operators from submitting offers, reducing competition among the remaining, potentially more expensive offers, according to three studies.<sup>51</sup> The

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<sup>49</sup>State historic enrollment requirements refers to a provision in the 2018 Farm Bill. The 2018 Farm Bill states that at the beginning of each of fiscal years 2019 through 2023, to the maximum extent practicable, the Secretary of Agriculture shall allocate to the states proportionately 60 percent of the available number of acres each year for enrollment in the conservation reserve, in accordance with historical state enrollment rates.

<sup>50</sup>U.S. Department of Agriculture, Economic Research Service, *Cover Practice Definitions and Incentives in the Conservation Reserve Program*, Economic Information Bulletin 233 (Washington, D.C.: February 2022).

<sup>51</sup>U.S. Department of Agriculture, Economic Research Service, *Options for Improving Conservation Programs: Insights From Auction Theory and Economic Experiments*, Economic Research Report No. 181 (Washington, D.C.: January 2015); Daniel Hellerstein et al., “The Effective Use of Limited Information: Do Bid Maximums Reduce Procurement Cost in Asymmetric Auctions?,” *Agricultural and Resource Economics Review*, vol. 39, no. 2 (2010): 288–304; and Peter Cramton et al., “Improving the Cost-Effectiveness of the Conservation Reserve Program: A Laboratory Study,” *Journal of Environmental Economics and Management*, vol. 108 (2021).

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remaining offers face little competition to reduce their bids to increase their likelihood of enrolling into CRP. This makes the remaining offers more expensive than when they face higher competition to enroll in the program. These studies suggested FSA use an approach that allows greater flexibility for participants to bid what they are willing to accept to enroll in the program. For example, FSA could use information that it maintains or the bidding process itself to identify appropriate rental payment rates, according to a 2021 study.<sup>52</sup>

- **Expand use of competition for continuous enrollment.** Increasing the use of a competitive process would enable FSA to measure the benefits and cost-effectiveness of offers for continuous enrollment, according to two experts. These experts said that the competitive process could be especially useful in acquiring the most cost-effective offers for similar practices, such as grass practices, that general and continuous enrollment have in common.

Seven experts identified challenges FSA could face in pursuing some of these opportunities, including political, stakeholder, and information technology challenges. For example, some said changes in methods—such as adjusting an index to use a benefit-cost ratio—could shift the location of CRP land and rental payments from certain counties and states to others. FSA officials agreed that stakeholders might object to certain changes in methods because these changes could affect their land, payments, or environmental benefits. These officials also said that USDA’s software and hardware are dated, making some changes difficult.<sup>53</sup>

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To what extent does FSA review its selection methods to determine whether they need updating?

While FSA officials have periodically discussed the EBI and grassland index in meetings, FSA has conducted limited reviews of its selection methods (i.e., how it selects CRP offers) over the past 20 years or so, and generally did not have much documentation of these review meetings, according to these officials. FSA officials were able to provide limited records related to a few meetings, such as the agenda for a meeting held in 2009 with ERS and other agencies, and they stated that

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<sup>52</sup>Peter Cramton et al., “Improving the Cost-Effectiveness of the Conservation Reserve Program: A Laboratory Study.”

<sup>53</sup>In addition, ERS officials told us they were uncertain whether USDA had the authority to implement the suggestion to use an alternative method to bid caps.

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the most recent meeting with staff from other agencies to discuss EBI was in 2019.<sup>54</sup>

Over the same time frame, FSA made a few, generally small, updates to its methods—specifically, the EBI—for selecting CRP offers. For example, FSA periodically adjusted the two parameters it uses to calculate the cost factor—one related to the maximum bid cap, and the other related to the weight of the cost factor relative to the environmental benefits score. FSA also made a few small changes related to determining points for the EBI, according to a summary officials provided. For example, FSA eliminated the points it previously assigned to the wildlife habitat monoculture cover—a cover composed of a single plant species.<sup>55</sup> In addition, as described above, in 2023 FSA began using data from two updated computer models to assign points for soil erosion and water quality benefits in the EBI.

Although former FSA and ERS officials stated that FSA’s intention when it developed the EBI was to change it as research became available to support improvements, key aspects of the EBI have changed little over the past 20 years. Key EBI characteristics that have not changed include the following:

- The EBI method of adding a benefit score to a cost factor has not changed since 1997.
- The environmental benefits categories (e.g., air quality) and the maximum points assigned to each category have not changed since 2003.

Two former FSA and ERS officials said the agency has been slow to implement changes that would enhance CRP due to concerns over the potential ramifications of upsetting stakeholders—including congressional, farm, and environmental stakeholders—if acres and payments are redistributed to other counties or states. They also cited concerns over difficulties in implementing changes with outdated information systems. One former official cited the 20-year delay in

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<sup>54</sup>In addition, FSA officials meet after each general sign-up to discuss how well the sign-up worked. Also, in 2009, USDA held a meeting on the EBI with officials from the Environmental Protection Agency, Department of Commerce (National Oceanic and Atmospheric Administration), and Department of the Interior FWS and the U.S. Geological Survey).

<sup>55</sup>The points the EBI previously assigned to wildlife habitat monoculture cover comprised 10 points of the maximum 395 total EBI benefit points.

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updating the soil erosion model as an example. Current FSA officials agreed that there may be opportunities to improve the selection methods and that challenges may arise from stakeholders and outdated information systems.

A 2001 study noted that the EBI was not intended to be a rigid index, but to be adjusted and improved depending on the progress of sign-ups, perceived deficiencies, and changed priorities.<sup>56</sup> Furthermore, *USDA's FY 2023 Performance Plan and Fiscal Years 2022–2026 Strategic Plan* cite USDA's core value of basing "decisions and policy on science and data that are reliable, timely, relevant and free from political interference."<sup>57</sup>

However, FSA has only conducted limited reviews of its methods for selecting CRP offers because it does not have a process for doing so or for routinely soliciting expert views on these methods, according to FSA officials. *USDA's Fiscal Years 2022–2026 Strategic Plan* places an emphasis on building evidence to inform decision-making and calls for the agency to conduct an analysis of alternative decision-making strategies for USDA's conservation programs, including CRP.<sup>58</sup> In addition, our key practices for evidence-based policymaking include (1) assessing the evidence, such as establishing routine processes to identify and assess relevant evidence; and (2) involving a range of stakeholders, such as researchers, which we have found is often vital to the success of federal efforts.<sup>59</sup> In addition, these key practices include using evidence to learn and apply learning to decision-making, such as using evidence to inform management decisions. In this case, FSA could address findings resulting from reviews of its CRP selection methods as a way to use evidence and apply it in agency decision making. As described above, experts have identified potential opportunities for FSA to adjust its methods in ways that could further improve the program.

FSA officials generally agreed that developing a process for reviewing how FSA selects CRP offers could be helpful in increasing the program's

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<sup>56</sup>Marc O. Ribaud et al., "Environmental Indices and The Politics of the Conservation Reserve Program," *Ecological Indicators*, vol. 1, no. 1 (2001): 11-20.

<sup>57</sup>U.S. Department of Agriculture, *FY 2023 Performance Plan and Strategic Plan: Fiscal Years 2022–2026*.

<sup>58</sup>Specifically, USDA stated this to achieve objective 1.3, "Restore, Protect, and Conserve Watersheds to Ensure Clean, Abundant, and Continuous Provision of Water Resources." See U.S. Department of Agriculture, *Strategic Plan: Fiscal Years 2022–2026*.

<sup>59</sup>[GAO-23-105460](#).

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cost-effectiveness. FSA officials said that including academics and others in an expert panel could also be beneficial. However, they said that the panel would need to understand the realities of managing the program and that some changes might take a long time to implement. In addition, all eight experts we interviewed generally agreed that a process for reviewing these methods should include steps for soliciting reliable and timely information from scientists and economists, including those not in USDA, and publicly reporting on suggestions they make for improvements to FSA's methods. GAO's key practices for evidence-based policymaking highlight the importance of communicating relevant information internally to leaders and staff and externally to key stakeholders, such as Congress.<sup>60</sup>

By developing a process to periodically review its methods for selecting CRP offers, FSA would be better positioned to identify potential changes, based on reliable and timely science-based information. Including in this process a step to solicit and publicly report on suggestions from experts would help the agency ensure key stakeholders, such as Congress and researchers, understand the steps FSA may take to better achieve CRP's objectives. Finally, by addressing any findings resulting from its periodic reviews, as appropriate, FSA may increase the environmental benefits and cost-effectiveness of CRP.

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## FSA Has Analyzed and Reported CRP's Environmental Benefits to Some Extent

FSA uses science-based information from computer models to estimate some key environmental benefits. However, it has not analyzed environmental benefits by type of enrollment and has not published annual reports on CRP's environmental benefits since 2017.

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### To what extent does FSA use science-based information to estimate key environmental benefits?

For some key environmental benefits, FSA has used science-based information from computer models to estimate annual soil erosion and water quality benefits from CRP since at least 2006. For example, FSA has a model incorporating science-based information on site-specific biophysical processes—such as rainfall, soil properties, and slope—to provide these estimates for average annual soil loss related to rainfall and related water quality. In 2023, FSA officials said they began using

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<sup>60</sup>[GAO-23-105460](#).



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updated computer models to re-estimate these environmental benefits more accurately.

In addition, FSA has been working with FWS to incorporate the use of the science-based information on wildlife that FSA obtained from FWS to estimate overall wildlife benefits.<sup>61</sup> The new model can use data from USDA's information systems to estimate wildlife benefits for each CRP site, practice, and enrollment type, or for the entire program, according to documents on the effort as well as FSA and FWS officials. Having information on wildlife benefits by enrollment type and for CRP overall, for the first time, can provide insights to USDA managers and Congress on CRP's performance in this area and whether changes are needed.

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To what extent has FSA analyzed and reported environmental benefits by type of enrollment?

FSA generally has not analyzed and reported environmental benefits by type of enrollment and has not reported on environmental benefits for CRP as a whole since FY 2017. Specifically:

- **Benefits by type of enrollment.** FSA generally has not analyzed and reported on environmental benefits for CRP by type of enrollment, with one exception. FSA has reported on water quality benefits for conservation practices used in continuous enrollment, most recently for FY 2021.<sup>62</sup> In June 2023, we discussed with FSA officials the feasibility of analyzing each environmental benefit separately for each type of enrollment, and they told us it was not feasible. However, in September 2023, they told us that they had identified a way to estimate environmental benefits by type of enrollment.
- **Benefits for the entire CRP.** FSA previously reported on benefits for the entire CRP for FY 2006 through FY 2017 on its website. However, an FSA official told us that FSA stopped reporting these benefits after FY 2017 because it was not a priority for the administration at that time, and the official who developed the reports had retired.

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<sup>61</sup>USDA has partnered with a variety of organizations to conduct studies on the benefits of CRP, including for select animal species and locations. For example, USDA contracted with the FWS for a study which estimated that between 1992 and 2012, CRP resulted in the hatching of over 37 million additional ducks from the North Dakota, South Dakota, and northeastern Montana portion of the prairie pothole region, which includes wetlands that serve as habitat.

<sup>62</sup>The 2018 Farm Bill requires USDA to annually report on estimated water quality benefit summaries, with respect to continuous water quality practices. Pub. L. No. 115-334, § 2201(a)(3), 132 Stat. 4490, 4533 (codified at 16 U.S.C. § 3831(d)(3)(D)).

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In May 2024, an FSA official told us they expect to analyze and report updated data on environmental benefits, including water quality benefits, for 2006 through 2023 by the end of the fiscal year. According to this official, they expect to do so for the entire program and by enrollment type. The FSA official said they also plan to report data on wildlife benefits for the entire program and by type of enrollment for FY 2023 by the end of FY 2024.

However, it is uncertain whether FSA will publicly report this information annually in the future, given prior lapses in reporting. USDA's annual performance plans cite USDA's core value of basing decisions and policy on science and data that are reliable, timely, and relevant. In addition, GAO's key practices for evidence-based policymaking highlight the importance of communicating relevant information internally to leaders and staff, and externally to key stakeholders, such as Congress.<sup>63</sup>

By annually analyzing and publicly reporting on CRP's environmental benefits, including by enrollment type and the entire program, FSA and external stakeholders would better understand the distinct benefits of each enrollment type in CRP and their performance over time. Such information could enable legislators to make better informed decisions about each type of enrollment, such as in setting acreage minimums or caps. This information could also help stakeholders such as landowners, operators, and environmental organizations better understand the benefits of, and make informed decisions about, participating in the program.

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## Conclusions

CRP seeks to offset detrimental effects that agricultural practices can have on the environment by paying landowners and operators to conserve land using practices that achieve certain environmental benefits. The methods FSA uses to select offers of land for CRP have some benefits. Opportunities exist to increase the program's environmental benefits and cost-effectiveness, according to experts and studies by academia and USDA.

To select land for the program, FSA relies on science-based information to assign points for certain environmental benefits, but not for others, in its index for general enrollments. To assign points for other benefits for general enrollment, and for grassland enrollment, FSA relies on less objective methods that are based on FSA staff's professional judgment,

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<sup>63</sup>[GAO-23-105460](#).

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with advice from other agencies. However, FSA has recently developed additional science-based information and computer models to, for example, provide estimates of wildlife benefits on different types of land. FSA has not yet decided whether to incorporate this information into its indexes. By incorporating science-based information—based on models or other sources that FSA determines to be appropriate and reliable—to assign points for benefits, FSA could more accurately estimate the environmental benefits of each offer for general and grassland enrollment. Doing so could increase the overall benefits that the program achieves for its cost.

Further opportunities exist to increase the program's environmental benefits and cost-effectiveness, according to experts and studies by USDA and academia. However, FSA has made generally small changes to its selection methods—specifically, the EBI—over the past 20 years. FSA does not have a process for periodically reviewing these methods that includes soliciting and publicly reporting experts' suggestions for improvements. Involving a range of stakeholders, such as researchers, is supported by key practices for evidence-based policymaking that we have highlighted in our prior work. By developing and implementing such a process, FSA could help ensure it identifies and capitalizes on opportunities to increase CRP's environmental benefits and cost-effectiveness.

FSA previously published annual summaries of the environmental benefits for the entire CRP but has not done so since FY 2017 and has not analyzed and published these benefits by enrollment type. Analyzing and reporting on environmental benefits by type of enrollment—general, continuous, and grassland—could help USDA managers, Congress, and other stakeholders better understand the different benefits of each enrollment type and make better informed decisions about the program.

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## Recommendations for Executive Action

We are making the following four recommendations to USDA:

The Administrator of USDA's FSA should build on existing efforts by incorporating, in a timely manner and as appropriate, reliable science-based information from models or other sources into the agency's methods for assigning points that are used to select offers for CRP. (Recommendation 1)

The Administrator of USDA's FSA should develop a process to periodically review its methods for selecting offers for CRP. Such a process should specify the frequency of the reviews and include soliciting

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and publicly reporting on suggestions from experts, including non-USDA scientists and economists. (Recommendation 2)

The Administrator of USDA's FSA should address any findings resulting from its periodic reviews to enhance its methods for selecting offers for CRP, as appropriate. (Recommendation 3)

The Administrator of USDA's FSA should annually analyze information on environmental benefits by type of enrollment and for the entire program, and publicly report the information, such as on its website. (Recommendation 4)

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## Agency Comments and Our Evaluation

We provided a draft of this report to USDA for review and comment. FSA provided written comments and ERS provided technical comments, which we incorporated as appropriate. In FSA's comments, reproduced in appendix XI, it generally agreed with all four recommendations but noted challenges with the first.

Specifically, while FSA agreed that using recent studies and models would provide a more reliable, science-based approach to assigning points for selecting CRP offers, it noted that implementing certain updates to the current scoring methods could require significant resources and an analysis of impacts to the program, and could take considerable time. It also stated that any new legislation, such as the farm bill, could affect FSA's implementation of this recommendation. As discussed earlier in the report, we acknowledge the challenges that FSA may experience in updating its current scoring methods. We maintain that the effort would be beneficial because FSA could then more accurately estimate the benefits of CRP offers, increasing the program's environmental benefits and cost-effectiveness.

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We are sending copies of this report to the appropriate congressional committees, the Secretary of Agriculture, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

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If you or your staff have any questions about this report, please contact me at (202) 512-3841 or [morriss@gao.gov](mailto:morriss@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix XII.

A handwritten signature in black ink that reads "Steve D. Morris". The signature is written in a cursive, slightly slanted style.

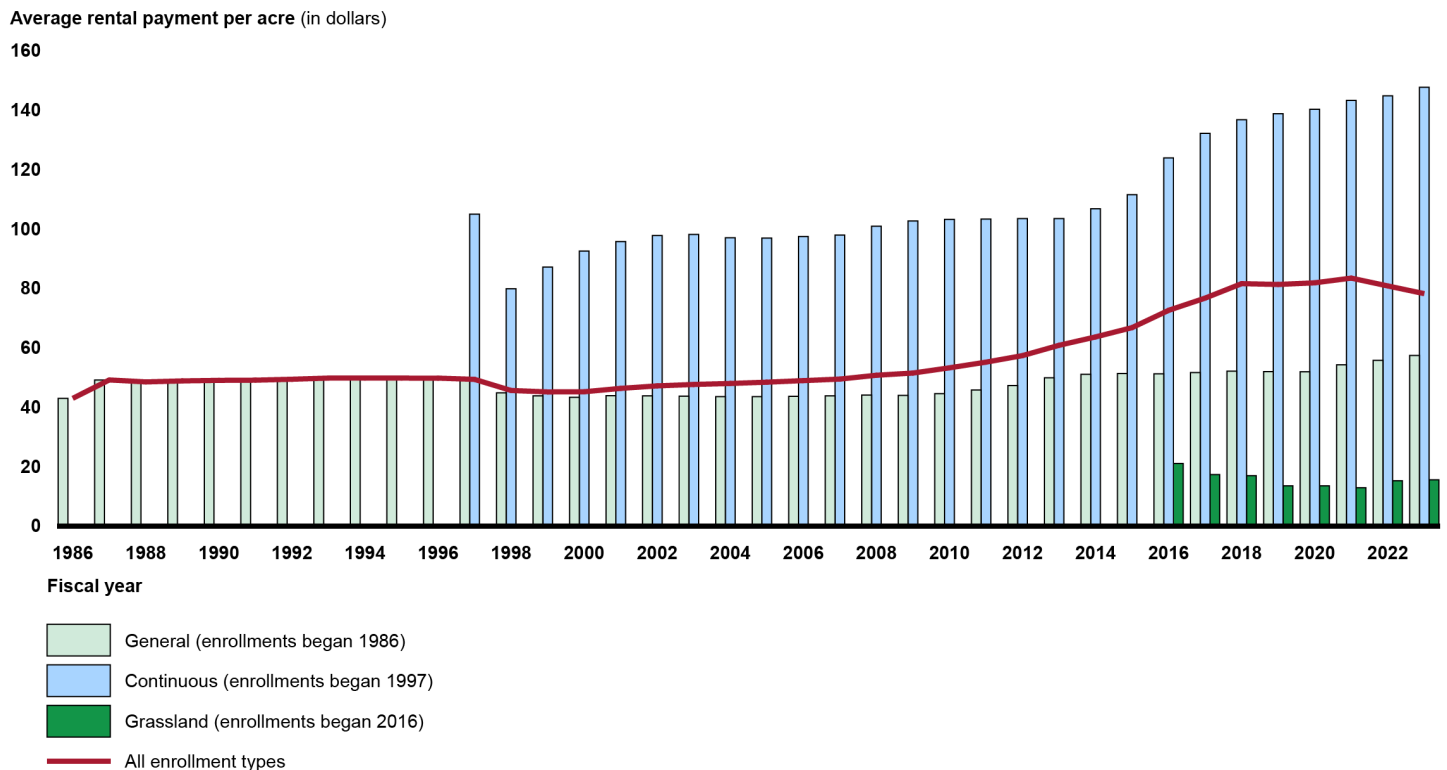
Steve D. Morris  
Director, Natural Resources and Environment

# Appendix I: Information on Average Rental Payments per Acre

Since the establishment of the Conservation Reserve Program (CRP), administered by the U.S. Department of Agriculture’s (USDA) Farm Service Agency, the average rental payment per acre for the program as a whole and by type of enrollment has generally increased when not adjusted for inflation but decreased when adjusted for inflation, according to our analysis of USDA data.

The average per-acre payment for the overall program increased from \$42.99 in fiscal year (FY) 1986 to \$78.23 in FY 2023. Similarly, average per-acre rental payments for general enrollment increased from \$42.99 in FY 1986 to \$57.44 in FY 2023. In contrast, average per-acre rental payments for grassland enrollment decreased since its establishment, from \$21.03 in FY 2016 to \$15.57 in FY 2023. (See fig. 10.)

**Figure 10: Average Rental Payment per Acre (not adjusted for inflation) for USDA’s Conservation Reserve Program, by Type of Enrollment, Fiscal Years 1986–2023**



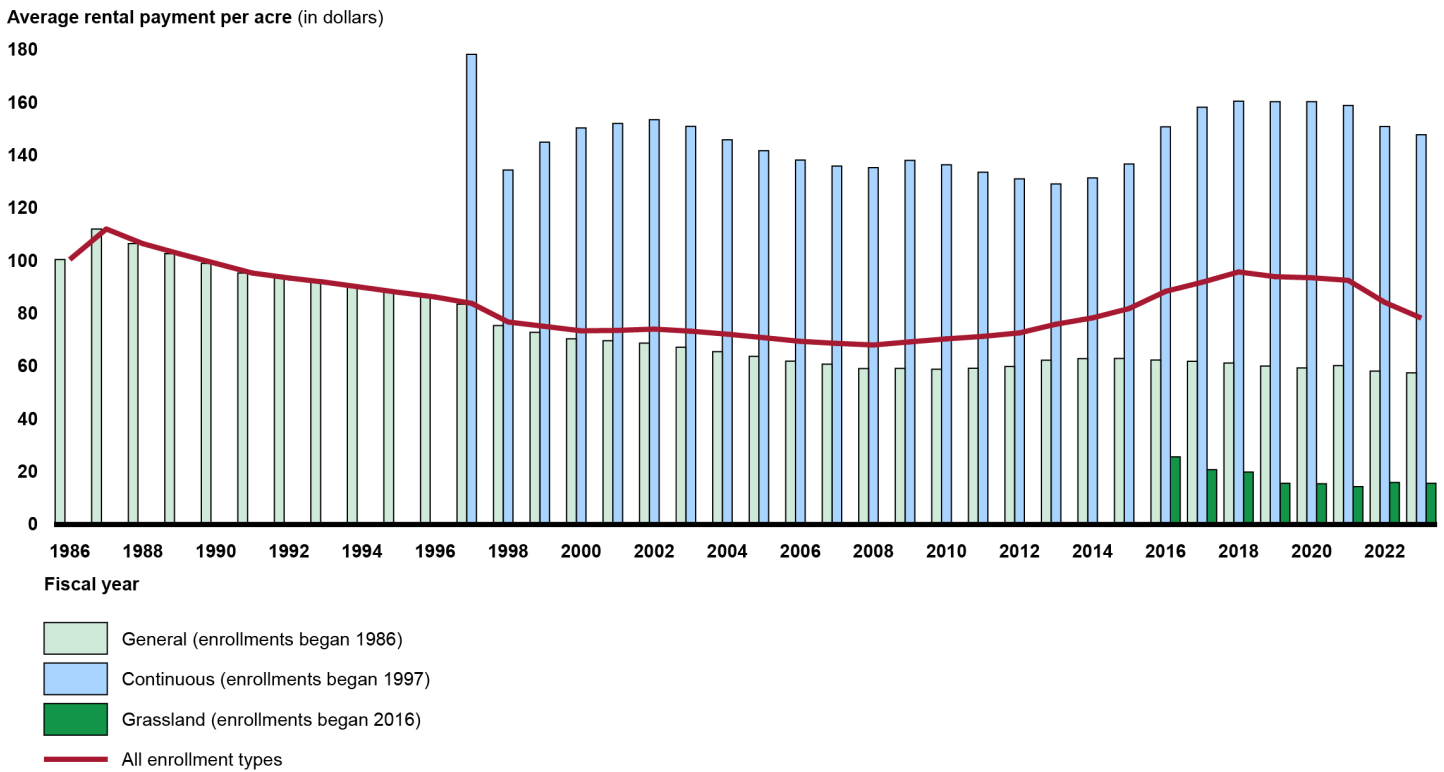
Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Note: To calculate the average rental rate, we averaged the contract rental rates, weighted by the number of acres under contract. This provided the rent paid for the average acre.

**Appendix I: Information on Average Rental Payments per Acre**

When adjusted for inflation, the average rental payment per acre decreased for overall and general enrollment. Specifically, the per-acre payment decreased from \$100.44 in fiscal year 1986 to \$78.23 for the program overall and \$57.44 for general enrollment in FY 2023. For grassland enrollment, the decrease was greater when adjusting for inflation, from \$25.59 in FY 2016 to \$15.57 in FY 2023. (See fig. 11.)

**Figure 11: Average Rental Payment per Acre (adjusted for inflation) in USDA’s Conservation Reserve Program, by Type of Enrollment, Fiscal Years 1986–2023**



Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

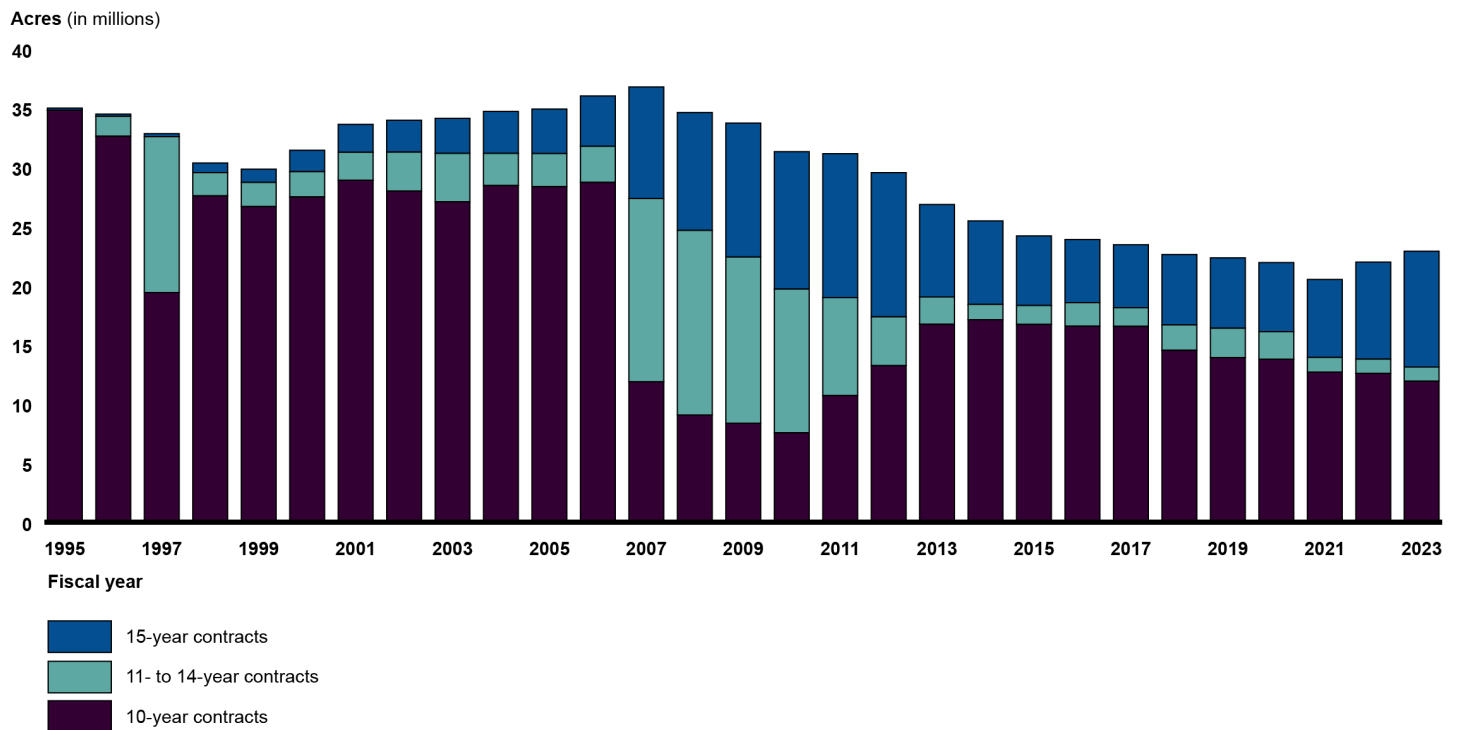
To calculate the average rental rate, we averaged the contract rental rates, weighted by the number of acres under contract. This provided the rent paid for the average acre. We adjusted the rental payments for inflation to fiscal year 2023 dollars.

# Appendix II: Information on the Number of Years Land Is Enrolled

The length of contracts, years enrolled, and type of land enrolled in the Conservation Reserve Program (CRP), administered by the U.S. Department of Agriculture’s (USDA) Farm Service Agency (FSA), have varied over time, according to our analysis of data from USDA.

**Length of contracts.** In general, the proportion of acres held in longer-term contracts has increased over time since fiscal year (FY) 1995, the earliest time frame for which data were available, according to our analysis of contracts for all three types of CRP enrollment (general, continuous, and grassland). For example, in FY 1995, over 99 percent of acres (34.8 million) were held in 10-year contracts, while 0.5 percent were held in 15-year contracts. In comparison, in FY 2023, just over half (51.9 percent or 11.9 million acres) were held in 10-year contracts, while 42.7 percent were held in 15-year contracts. An additional 5.2 percent (1.9 million acres) were in 11- to 14-year contracts, and 0.2 percent were in 30-year contracts (see fig. 12).

**Figure 12: Length of Contracts for Acres Enrolled in USDA’s Conservation Reserve Program, Fiscal Years 1995–2023**



Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Note: General, continuous, and grassland enrollments began in 1986, 1997, and 2016, respectively. Contract lengths are generally 10 to 15 years, but contract lengths for certain initiatives can be as



**Appendix II: Information on the Number of Years Land Is Enrolled**

short as 3 years or as long as 30 years. There are so few contracts for 3 to 5 years and for 30 years that they are not visible in the figure.

In 1994 and 1995, USDA offered 1-year contract extensions instead of conducting general sign-ups, according to a USDA FY 2019 annual summary for CRP.<sup>1</sup> These contract extensions help explain the increased portion of contracts in FY 1997 being longer than 10 years, according to an FSA official. Then, in part due to a high number of contracts due to expire, in 2007 through 2010, USDA offered 2- to 5-year contract extensions, in part to stagger expirations over time, according to a 2017 study.<sup>2</sup> Landowners and operators holding 82 percent of expiring acreage opted for these extensions, according to that study.

**Length of time enrolled.** More than half of the 22.9 million acres enrolled in CRP as of September 30, 2023, had been in the program for less than 10 years, and more than 20 percent of the 22.9 million acres have been in CRP for at least 20 years, according to our analysis of USDA field-level data. Land can be re-enrolled after contracts expire, which explains why land may be enrolled for more than 10 or 15 years. Table 3 provides information on how long acres had been enrolled in the program as of the end of fiscal year 2023.

**Table 3: Number of Acres and Years Enrolled in USDA’s Conservation Reserve Program (CRP), as of Fiscal Year 2023**

Years enrolled in CRP	Acres (in millions)	Percentage of CRP total acres
1–10	13.9	61%
11–20	4.3	19%
21–30	2.3	10%
31 or more	2.5	11%
<b>Total enrolled as of Sept. 30, 2023</b>	<b>22.9</b>	<b>100%</b>

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Note: The sum of the acres or percentages do not add to the totals due to rounding.

<sup>1</sup>U.S. Department of Agriculture, *Conservation Reserve Program: Annual Summary and Enrollment Statistics (FY 2019)* (n.d.).

<sup>2</sup>Daniel Hellerstein, “The US Conservation Reserve Program: The evolution of an enrollment mechanism,” *Land Use Policy*, vol. 63 (2017): 601–610.

# Appendix III: Information on How Acres and Rental Payments Are Distributed, by State

In fiscal year (FY) 2023, 22.9 million acres were enrolled in the Conservation Reserve Program (CRP), administered by the U.S. Department of Agriculture’s (USDA) Farm Service Agency (FSA). Over half of these acres were in seven states in the central U.S.—Colorado, Iowa, Kansas, Nebraska, North Dakota, South Dakota, and Texas. Each of these seven states enrolled at least 1 million acres, and in total they had over 13 million CRP acres, or 57 percent of total CRP acreage. The states with the most acres varied by type of enrollment, as table 4 and figure 13 show. The states with the most acres in general enrollment were the Great Plains states of Colorado, Kansas, and Texas.<sup>1</sup> Continuous enrollment was most concentrated in the Dakotas, Illinois, Iowa, and Minnesota. Grassland enrollment was most concentrated in the Great Plains states of Colorado, Nebraska, New Mexico, and South Dakota.

**Table 4: Five States with the Highest Total Acreage Enrolled in USDA’s Conservation Reserve Program (CRP), by Type of Enrollment, Fiscal Year 2023**

Acres in millions

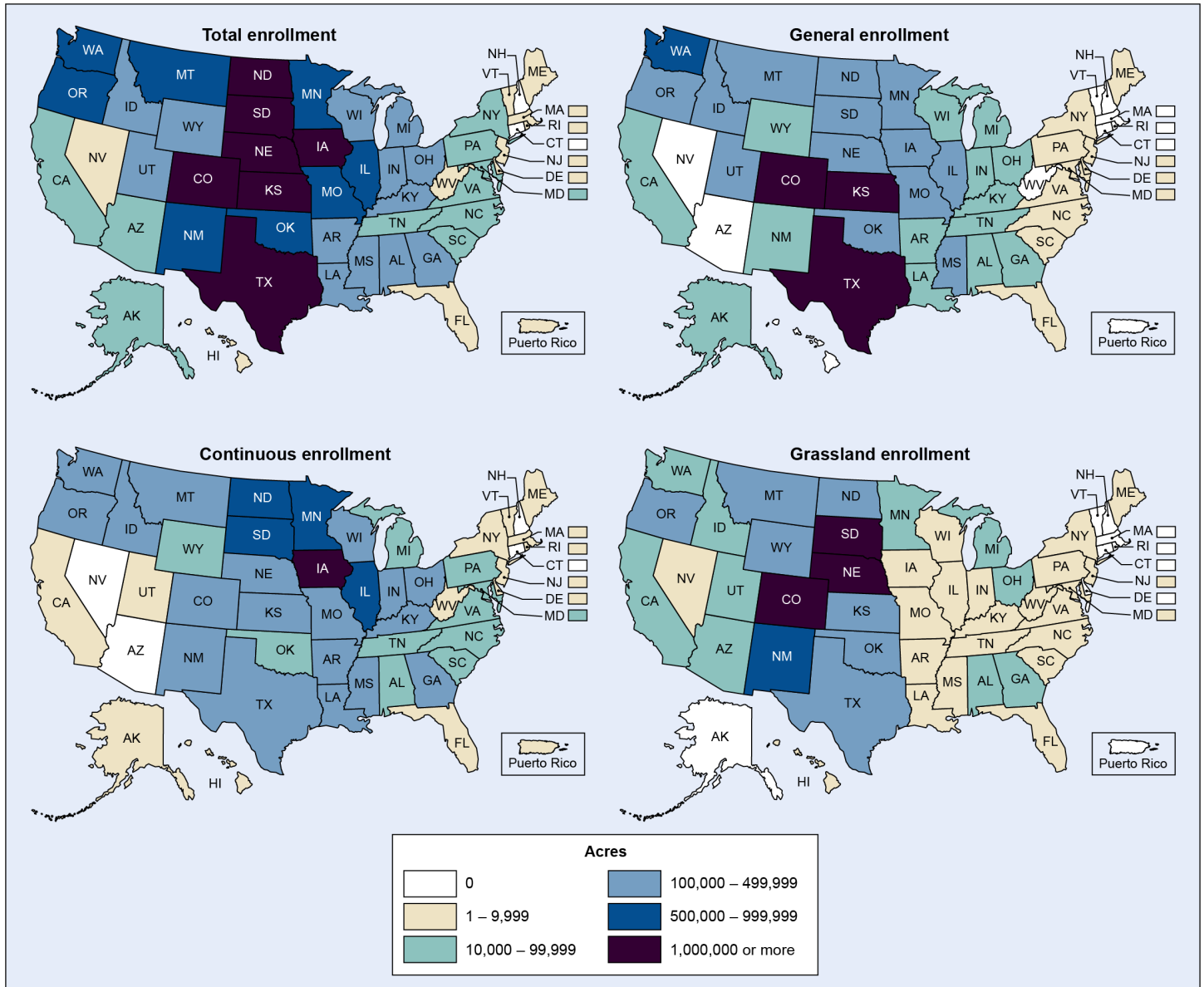
General enrollment		Continuous enrollment		Grassland enrollment		Total CRP enrollment	
State	Acres	State	Acres	State	Acres	State	Acres
TX	1.5	IA	1.3	NE	1.2	CO	2.4
CO	1.1	SD	0.8	SD	1.2	TX	2.2
KS	1.1	MN	0.7	CO	1.2	SD	2.1
WA	0.7	ND	0.7	NM	0.7	NE	1.8
IA	0.3	IL	0.6	KS	0.3	KS	1.7

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

<sup>1</sup>The Great Plains in the U.S. include at least portions of 10 states: Colorado, Kansas, Montana, New Mexico, Nebraska, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming.

Appendix III: Information on How Acres and Rental Payments Are Distributed, by State

Figure 13: Total Acres Enrolled, by Type of Enrollment and State or Territory, in USDA’s Conservation Reserve Program, Fiscal Year 2023



Sources: GAO analysis of U.S. Department of Agriculture (USDA) information; Map Resources (maps). | GAO-24-106311

Total rental payments vary across states but do not necessarily correlate with acreage. Four states—Illinois, Iowa, Minnesota, and South Dakota—received at least \$100 million each in rental payments, comprising almost half (48 percent) of total rental payments. The states with the highest

**Appendix III: Information on How Acres and Rental Payments Are Distributed, by State**

rental payments varied by type of enrollment, though, as table 5 and figure 14 show. The five states receiving the most in total CRP rental payments are also the five states receiving the most in continuous enrollment rental payments—Illinois, Iowa, Minnesota, Missouri, and South Dakota—but those states varied with general and grassland enrollment.

**Table 5: Five States with the Highest Total Rental Payments in USDA’s Conservation Reserve Program (CRP), by Type of Enrollment, Fiscal Year 2023**

Dollars in millions

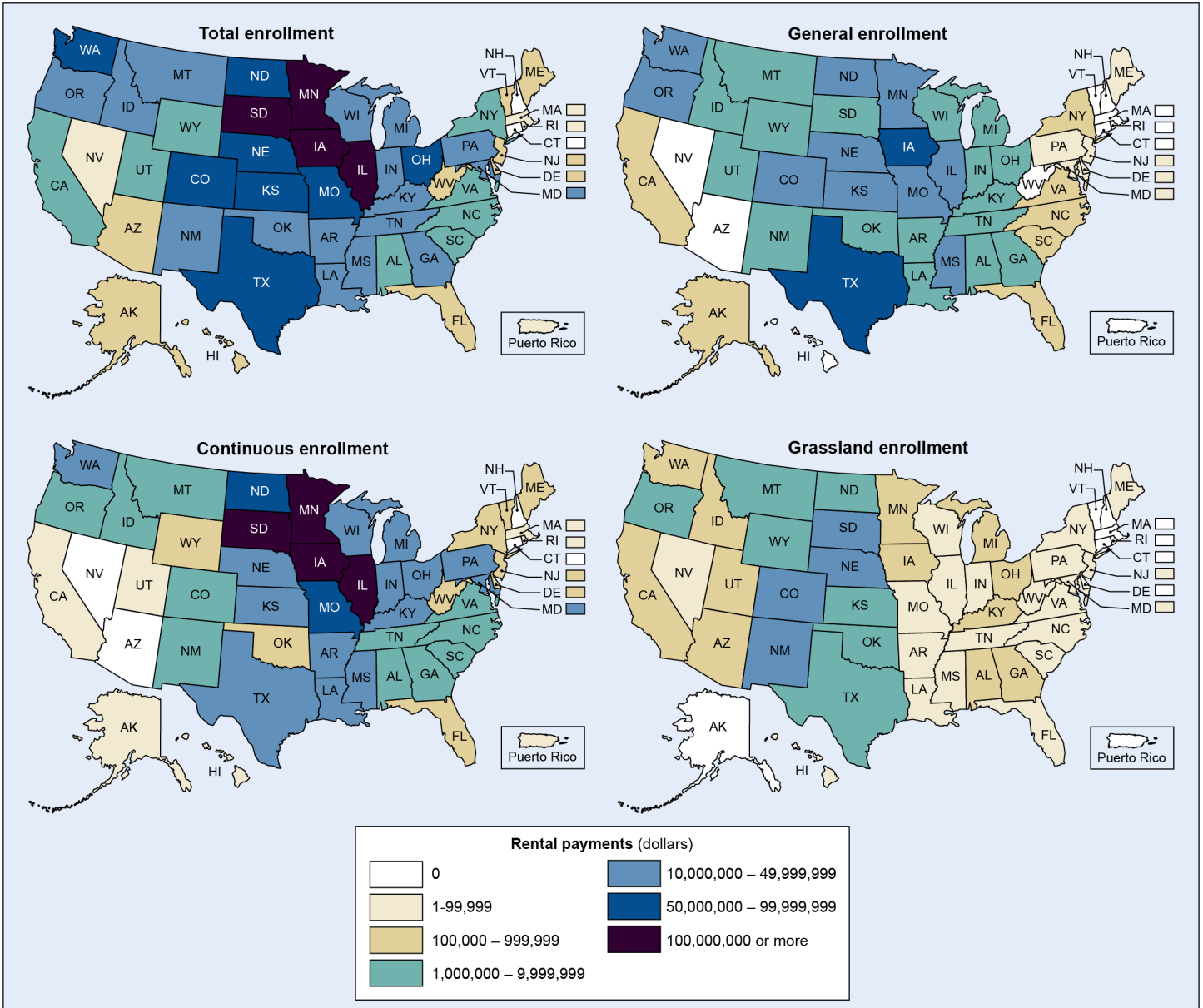
General enrollment		Continuous enrollment		Grassland enrollment		Total CRP enrollment	
State	Rental payments	State	Rental payments	State	Rental payments	State	Rental payments
IA	\$60.3	IA	\$342.0	SD	\$19.2	IA	\$402.5
TX	53.6	IL	140.5	CO	19.2	IL	173.7
KS	48.9	MN	128.8	NE	18.3	MN	150.8
MO	42.1	SD	103.8	NM	10.2	SD	129.5
WA	39.8	MO	57.7	KS	5.6	MO	99.8

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Note: Rental payments do not include certain cost-share payments (up to 50 percent of the reimbursable cost of installing a conservation practice) and incentive payments (incentives and adjustments such as a sign-up incentive payment of 32.5 percent of the first full year annual rental payment at contract approval and incentives tied to specific conservation practices).

Appendix III: Information on How Acres and Rental Payments Are Distributed, by State

Figure 14: Total Rental Payments, by Type of Enrollment and State or Territory, for USDA’s Conservation Reserve Program, Fiscal Year 2023



Sources: GAO analysis of U.S. Department of Agriculture (USDA) information; Map Resources (maps). | GAO-24-106311

Similar to total rental payments per state, rental payments per acre vary across states and do not necessarily correlate with acreage. Table 6 shows FY 2023 CRP rental payments per acre for the top five states, by

**Appendix III: Information on How Acres and Rental Payments Are Distributed, by State**

each type of enrollment and total CRP enrollment. Figure 15 shows per-acre rental payments, by state and type of enrollment.

**Table 6: Five States with the Highest Average Rental Payments per Acre in USDA’s Conservation Reserve Program (CRP), by Type of Enrollment, Fiscal Year 2023**

In dollars

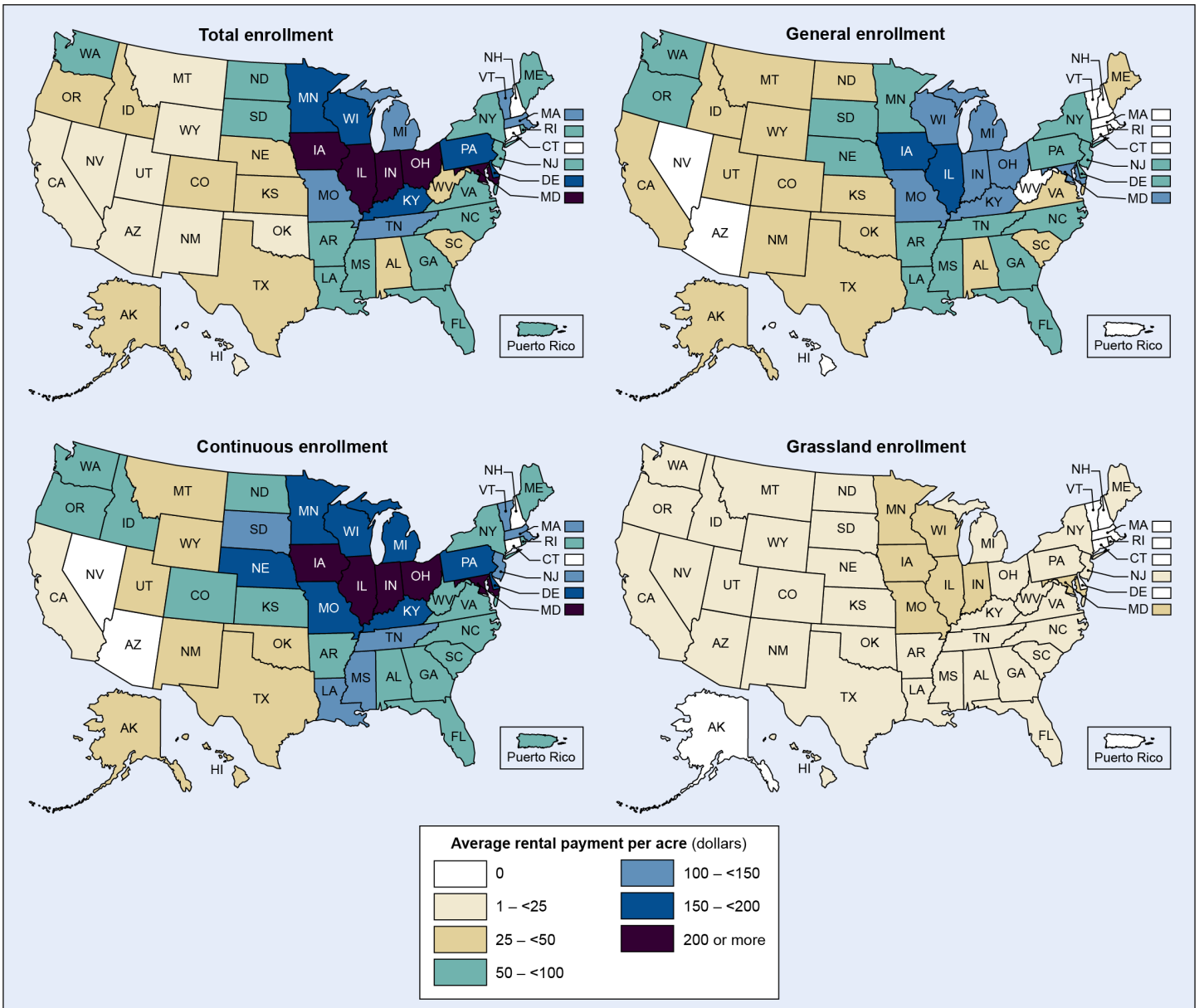
General enrollment		Continuous enrollment		Grassland enrollment		Total CRP enrollment	
State	Average rental rate	State	Average rental rate	State	Average rental rate	State	Average rental rate
IA	\$173	IA	\$256	IA	\$38	MD	\$243
IL	156	OH	252	MD	34	IA	238
IN	136	MD	250	IN	34	OH	223
KY	135	IL	234	IL	30	IL	214
MO	132	IN	223	WI	27	IN	207

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Note: Rental payments do not include certain cost-share payments (up to 50 percent of the reimbursable cost of installing a conservation practice) and incentive payments (incentives and adjustments such as a sign-up incentive payment of 32.5 percent of the first full year annual rental payment at contract approval and incentives tied to specific conservation practices).

Appendix III: Information on How Acres and Rental Payments Are Distributed, by State

Figure 15: Average Rental Payment per Acre for USDA’s Conservation Reserve Program, by Type of Enrollment and State or Territory, Fiscal Year 2023



Sources: GAO analysis of U.S. Department of Agriculture (USDA) information; Map Resources (maps). | GAO-24-106311

Rental payments do not necessarily correlate to acreage because the program’s rental rates are higher in some parts of the country than others and vary by type of enrollment. FSA calculates a CRP rental payment per

**Appendix III: Information on How Acres and Rental Payments Are Distributed, by State**

acre for general and continuous enrollment using per-acre estimates of county average market dryland and irrigated cash rental rates for cropland from USDA's National Agricultural Statistics Service (NASS). FSA also uses additional information supplied by state FSA state committees and Conservation Reserve Enhancement Program partners. These rental rates are generally higher in Illinois, Indiana, and Iowa, compared with states farther West, which have more enrolled acres. For grassland enrollment, the rental payment per acre is based on the pastureland rental rates from NASS surveys and are considerably less than for cropland.

Table 7 provides information by state on the number of acres and rental payments for each type of enrollment and in total for CRP.

**Table 7: Total Acres Enrolled and Total Rental Payments in USDA's Conservation Reserve Program (CRP), by Type of Enrollment and by State or Territory, Fiscal Year 2023**

State or territory	General enrollment		Continuous enrollment		Grassland enrollment		Total CRP enrollment	
	Acres	Rental payment	Acres	Rental payment	Acres	Rental payment	Acres	Rental payment
AK	10.8k	\$444.1k	693	\$31.7k	0	\$0	11.5k	\$475.9k
AL	61.4k	\$3.0m	33.7k	\$1.7m	11.9k	\$192.5k	\$107.0k	\$4.9m
AR	25.6k	\$1.8m	166.9k	\$14.5m	452	\$6.5k	193.0k	\$16.4m
AZ	0	\$0	0	\$0	15.2k	\$208.2k	15.2k	\$208.2k
CA	23.2k	\$835.1k	1.0k	\$25.9k	39.6k	\$595.0k	63.8k	\$1.5m
CO	1.1m	\$34.0m	128.1k	\$8.2m	1.2m	\$19.2m	2.4m	\$61.3m
CT	0	\$0	0	\$0	0	\$0	0	\$0
DE	80	\$6.7k	3.0k	\$466.6k	0	\$0	3.0k	\$473.3k
FL	4.1k	\$274.0k	2.1k	\$132.5k	1.5k	\$29.4k	7.7k	\$435.9k
GA	31.9k	\$2.4m	110.3k	\$8.4m	17.6k	\$371.4k	159.8k	\$11.1m
HI	0	\$0	1.3k	\$61.6k	3.7k	\$40.7k	5.0k	\$102.3k
IA	348.9k	\$60.3m	1.3m	\$342.0m	3.8k	\$145.2k	1.7m	\$402.5m
ID	183.9k	\$8.4m	154.9k	\$9.4m	38.2k	\$426.3k	377.0k	\$18.3m
IL	212.0k	\$33.2m	600.1k	\$140.5m	1.0k	\$31.4k	813.1k	\$173.7m
IN	34.4k	\$4.7m	157.3k	\$35.0m	294	\$9.9k	192.0k	\$39.7m
KS	1.1m	\$48.9m	349.4k	\$21.3m	331.4k	\$5.6m	1.8m	\$75.8m
KY	42.7k	\$5.8m	100.8k	\$18.9m	5.2k	\$127.8k	148.7k	\$24.8m
LA	27.2k	\$1.8m	223.1k	\$23.3m	1.4k	\$26.5k	251.7k	\$25.1m
MA	0	\$0	9	\$865	0	\$0	9	\$865
MD	625	\$67.3k	41.3k	\$10.3m	1.1k	\$36.3k	43.0k	\$10.4m



**Appendix III: Information on How Acres and  
Rental Payments Are Distributed, by State**

ME	1.2k	\$51.8k	1.9k	\$137.3k	89	\$1.4k	3.2k	\$190.4k
MI	20.4k	\$2.2m	67.4k	\$11.4m	26.4k	\$435.3k	114.2k	\$14.1m
MN	222.8k	\$21.6m	741.8k	\$128.8m	11.5k	\$300.5k	976.1k	\$150.8m
MO	319.8k	\$42.1m	381.0k	\$57.7m	3.4k	\$87.0k	704.2k	\$99.8m
MS	184.6k	\$12.2m	285.3k	\$29.3m	849	\$12.3k	470.8k	\$41.5m
MT	310.5k	\$9.2m	178.0k	\$6.9m	319.2k	\$4.0m	807.7k	\$20.0m
NC	9.0k	\$574.0k	11.7k	\$1.2m	853	\$16.2k	21.5k	\$1.7m
ND	286.4k	\$13.5m	733.6k	\$53.9m	104.6k	\$1.7m	1.1m	\$69.1m
NE	347.0k	\$23.1m	268.2k	\$43.4m	1.2m	\$18.3m	1.8m	\$84.9m
NH	0	\$0	0	\$0	0	\$0	0	\$0
NJ	144	\$7.8k	1.3k	\$141.3k	173	\$3.5k	1.7k	\$152.6k
NM	88.8k	\$2.4m	109.0k	\$3.2m	659.2k	\$10.2m	857.0k	\$15.8m
NV	0	\$0	0	\$0	3.0k	\$30.0k	3.0k	\$30.0k
NY	2.6k	\$149.6k	9.5k	\$947.2k	3.4k	\$72.2k	15.5k	\$1.2m
OH	27.3k	\$3.2m	187.0k	\$47.2m	12.7k	\$302.2k	227.0k	\$50.7m
OK	307.2k	\$8.3m	12.7k	\$517.8k	303.2k	\$5.3m	623.1k	\$14.1m
OR	348.1k	\$19.0m	105.3k	\$8.2m	146.3k	\$1.8m	599.7k	\$29.0m
PA	133	\$8.8k	81.4k	\$12.7m	964	\$22.9k	82.5k	\$12.7m
PR	0	\$0	495	\$25.4k	0	\$0	495	\$25.4k
RI	0	\$0	28	\$2.1k	0	\$0	28	\$2.1k
SC	4.8k	\$184.3k	20.8k	\$1.1m	1.8k	\$35.7k	27.4k	\$1.3m
SD	100.7k	\$6.6m	808.8k	\$103.8m	1.2m	\$19.2m	2.1m	\$129.5m
TN	47.5k	\$4.6m	47.6k	\$5.8m	3.8k	\$54.4k	98.8k	\$10.4m
TX	1.5m	\$53.6m	315.7k	\$13.5m	317.2k	\$5.4m	2.2m	\$72.5m
UT	101.7k	\$2.9m	213	\$9.3k	56.0k	\$564.8k	157.8k	\$3.5m
VA	6.1k	\$254.3k	18.0k	\$1.5m	5.4k	\$94.5k	29.5k	\$1.9m
VT	0	\$0	2.0k	\$240.2k	0	\$0	2.0k	\$240.2k
WA	674.4k	\$39.8m	275.0k	\$21.6m	19.7k	\$226.8k	969.2k	\$61.6m
WI	57.9k	\$6.9m	134.4k	\$26.6m	1.1k	\$30.2k	193.4k	\$33.6m
WV	0	\$0	4.7k	\$394.2k	5.0k	\$63.0k	9.6k	\$457.3k
WY	82.4k	\$2.1m	10.4k	\$299.5k	283.3k	\$3.6m	376.1k	\$6.0m
<b>Total</b>	<b>8.4m</b>	<b>\$480.5m</b>	<b>8.2m</b>	<b>\$1,214.8m</b>	<b>6.3m</b>	<b>\$98.8m</b>	<b>22.9m</b>	<b>\$1,794.1m</b>

Legend: k = thousands; m = millions

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Note: The sum of the acres or rental payments may not add to the totals due to rounding.

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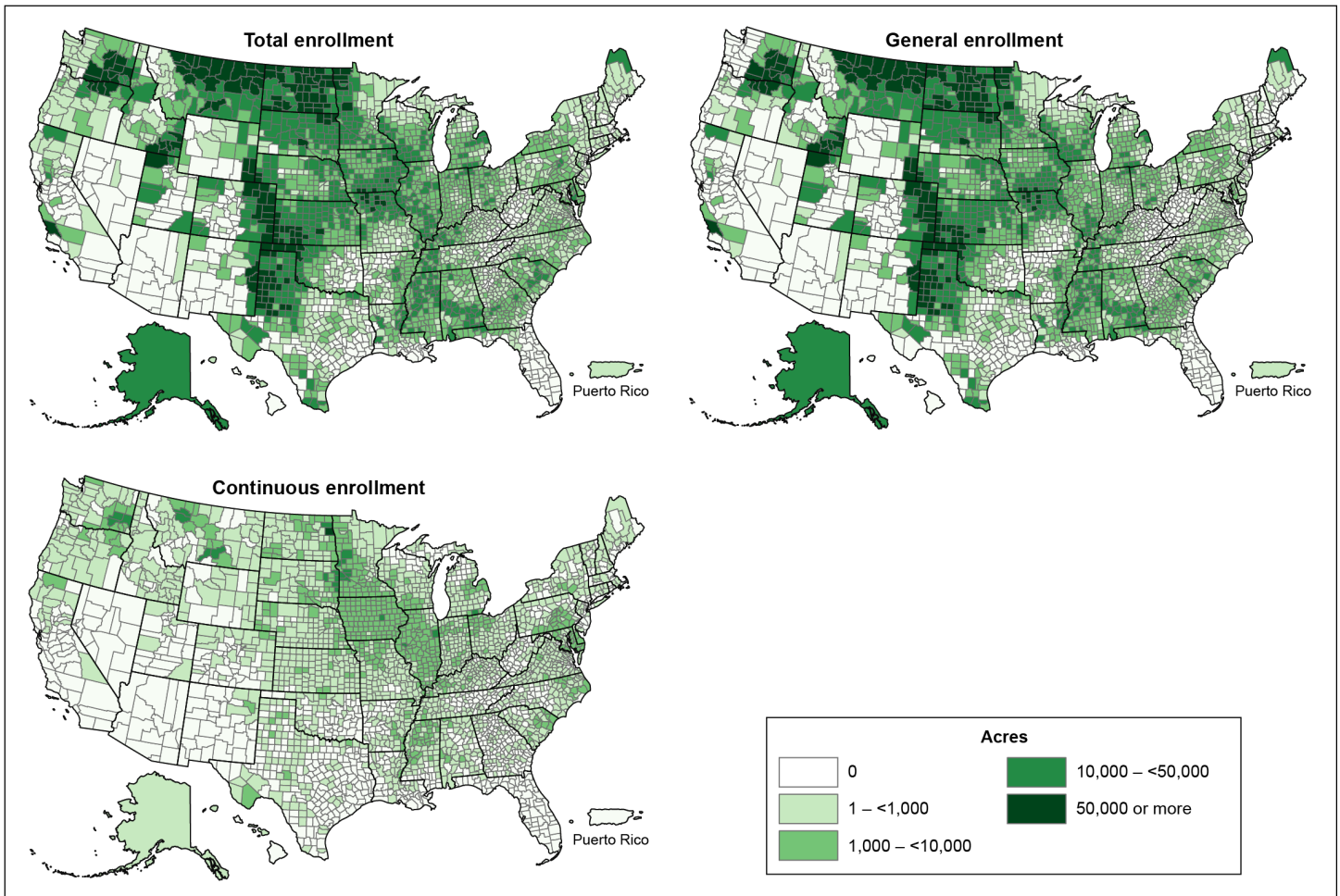
# Appendix IV: Information on Acres Enrolled, by County, Fiscal Years 2003, 2013, and 2023

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This appendix provides county-level information on acres enrolled in the Conservation Reserve Program (CRP), administered by the U.S. Department of Agriculture's (USDA) Farm Service Agency, for select fiscal years (FY). Overall, the number of acres enrolled in CRP have fluctuated over time. In addition, the portion of land in continuous and grassland enrollments have increased since each type was introduced, while acres in general enrollment have decreased. Figures 16 through 18 show county-level information on acres in the program for FYs 2003, 2013, and 2023, by type of enrollment, according to our analysis of USDA data.

In FY 2003, CRP enrolled a total of 34.1 million acres. The acres in general enrollment (31.6 million) were most concentrated in western Kansas, the Texas panhandle, eastern Colorado, and North Dakota with other areas of substantial acres, such as southern Iowa, northern Missouri, and eastern Washington. Continuous enrollment acres (2.5 million) were most concentrated in Iowa, Illinois, and western and southern Minnesota. (See fig. 16.)

Figure 16: Acres Enrolled in USDA’s Conservation Reserve Program, by Type of Enrollment and County, Fiscal Year 2003



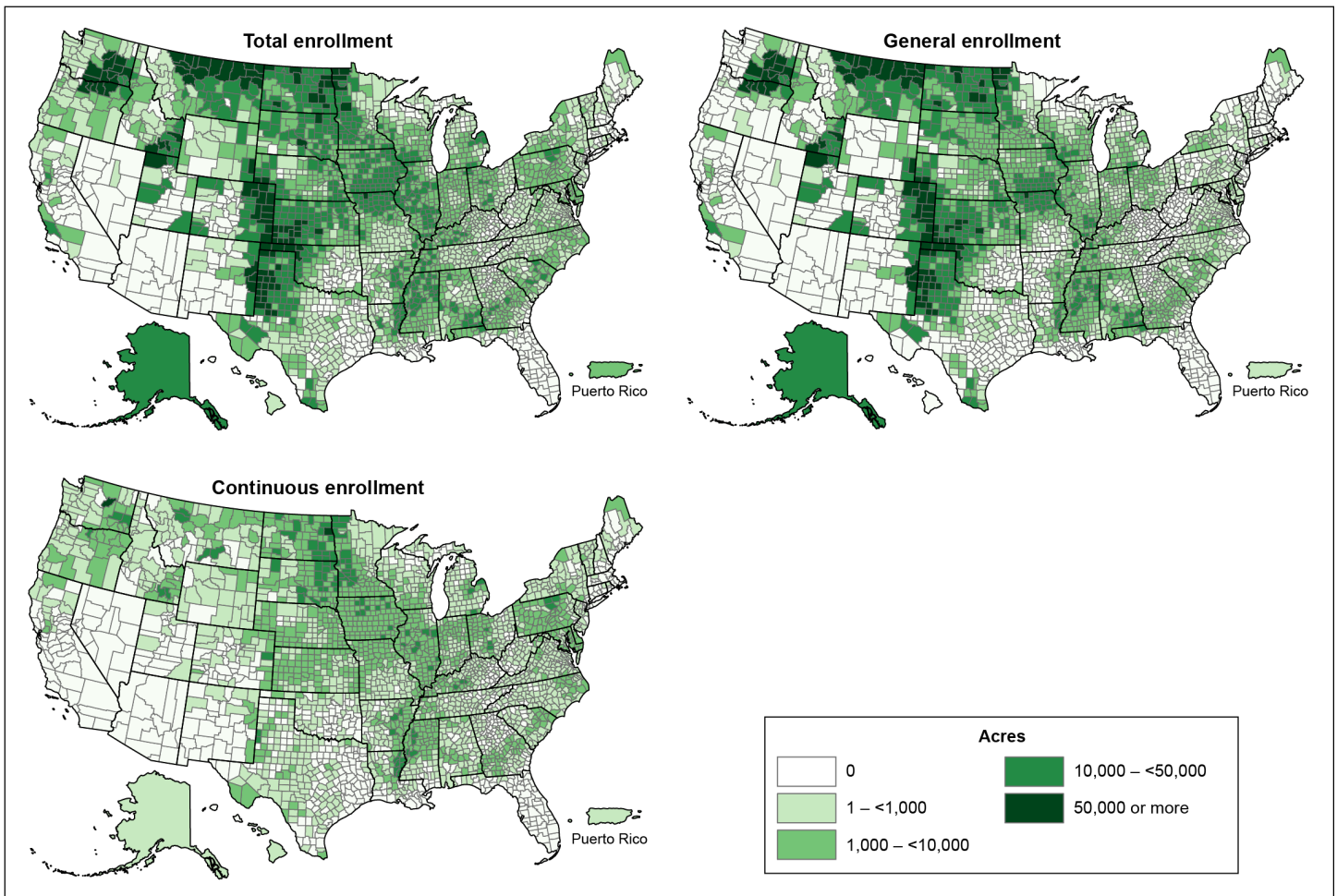
Sources: GAO analysis of U.S. Department of Agriculture (USDA) data; Census Bureau (geographic boundaries). | GAO-24-106311

Note: General, continuous, and grassland enrollments began in 1986, 1997, and 2016, respectively. As a result, grassland enrollment is not included in this figure. All values represent county-level information for the Conservation Reserve Program, except for Alaska and Puerto Rico, which are at the state (territory) level.

In FY 2013, CRP enrolled a total of 26.8 million acres, a decrease of about 7.3 million acres from FY 2003. Acres in general enrollment (21.4 million) also decreased from FY 2003, while continuous enrollment acres (5.5 million) more than doubled. The decrease in general enrollment acres was broadly dispersed and included counties in Montana, North Dakota, and South Dakota. The increase in continuous enrollment acres included counties in North Dakota, South Dakota, Kansas, Iowa, Illinois,

eastern Arkansas, eastern Louisiana, Mississippi, southern Georgia, and Pennsylvania. (See fig. 17.)

Figure 17: Acres Enrolled in USDA's Conservation Reserve Program, by Type of Enrollment and County, Fiscal Year 2013



Sources: GAO analysis of U.S. Department of Agriculture (USDA) data; Census Bureau (geographic boundaries). | GAO-24-106311

Note: General, continuous, and grassland enrollments began in 1986, 1997, and 2016, respectively. As a result, grassland enrollment is not included in this figure. All values represent county-level information for the Conservation Reserve Program, except for Alaska and Puerto Rico, which are at the state (territory) level.

In FY 2023, CRP enrolled a total of 22.9 million acres, a decrease of about 4 million acres from FY 2013. Acres in general enrollment (8.4 million) also decreased from FY 2013, while acres in continuous enrollment (8.2 million) increased. Grassland enrollment acres, which were zero in 2013, represented over a quarter (6.3 million) of total acres

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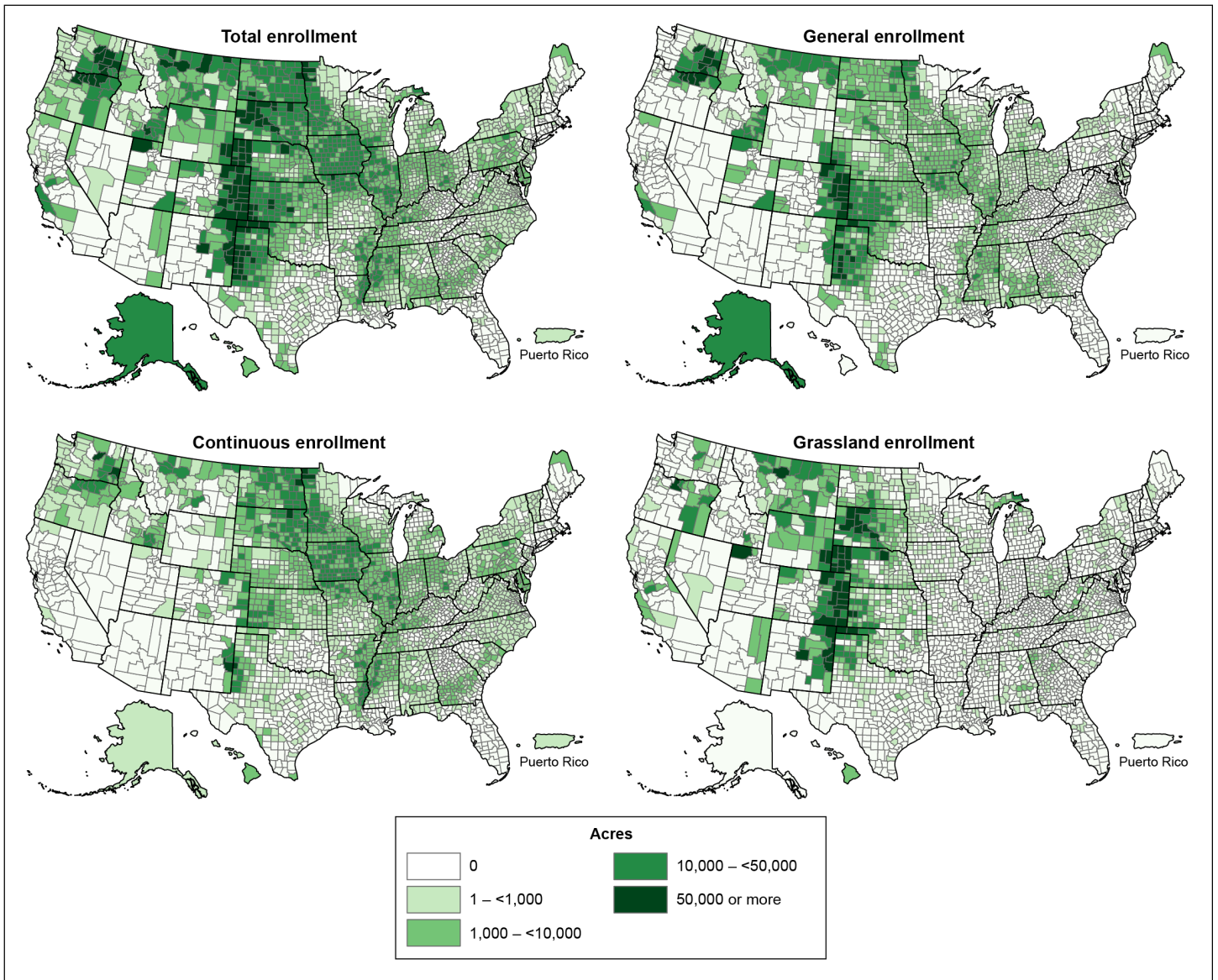
**Appendix IV: Information on Acres Enrolled, by  
County, Fiscal Years 2003, 2013, and 2023**

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in FY 2023. The decreases in general enrollment acres occurred broadly, including in in Montana, North Dakota, South Dakota, and western Kansas, as well as other areas, such as southern Iowa, northern Missouri, and Mississippi. The increase in continuous enrollment acres included counties in Iowa, North Dakota, South Dakota, western Kansas, the Texas panhandle, and eastern New Mexico. Grassland enrollment acres were mostly in counties in a band stretching from western South Dakota to eastern New Mexico, along with counties in other states, including Montana, Wyoming, and Oregon. (See fig. 18.)

Appendix IV: Information on Acres Enrolled, by County, Fiscal Years 2003, 2013, and 2023

Figure 18: Acres Enrolled in USDA’s Conservation Reserve Program, by Type of Enrollment and County, Fiscal Year 2023



Sources: GAO analysis of U.S. Department of Agriculture (USDA) data; Census Bureau (geographic boundaries). | GAO-24-106311

Note: All values represent county-level information for the Conservation Reserve Program, except for Alaska and Puerto Rico, which are at the state (territory) level.

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# Appendix V: Information on Rental Payments for Acres Enrolled, by County, Fiscal Year 2023

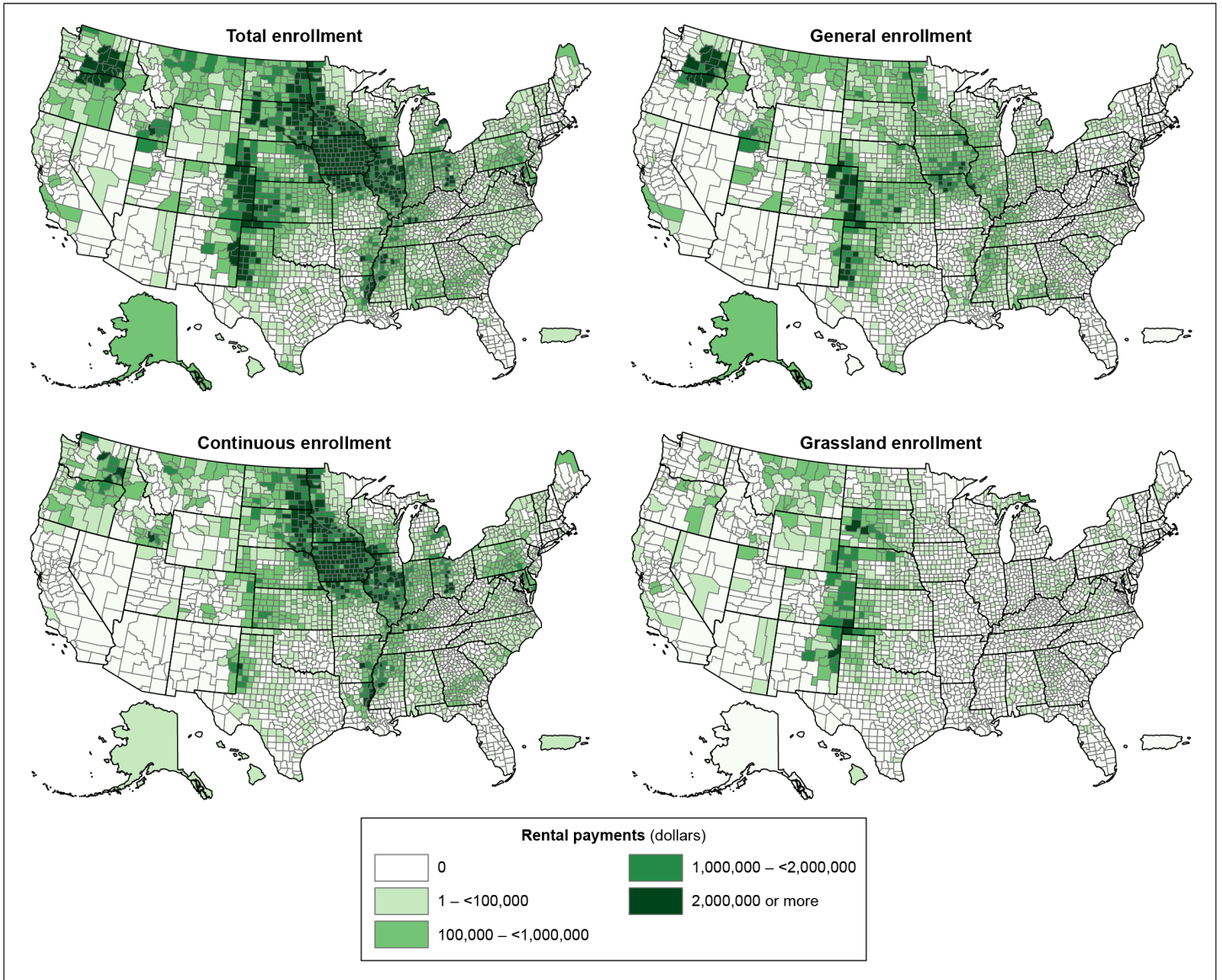
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We analyzed rental payments by county in total and by enrollment type for the Conservation Reserve Program (CRP), administered by the U.S. Department of Agriculture's (USDA) Farm Service Agency, for fiscal year (FY) 2023, using USDA data (see fig. 19). In FY 2023, USDA made a total of \$1.8 billion in annual rental payments. Specifically, information for each enrollment type is as follows:

- For general enrollment, rental payments were \$481 million (27 percent of the total). Counties with relatively high rental payments were in Washington and Oregon as well as a band of counties from eastern Colorado and western Kansas to the Texas panhandle.
- For continuous enrollment, rental payments were \$1.2 billion (68 percent of the total). Counties with relatively high rental payments extend from eastern North Dakota and western Minnesota through eastern South Dakota and Iowa to Illinois.
- For grassland enrollment, rental payments were \$99 million (6 percent of the total). Counties with relatively high rental payments were in the Great Plains in western South Dakota, western Nebraska, eastern Colorado, and eastern New Mexico.

Appendix V: Information on Rental Payments  
for Acres Enrolled, by County, Fiscal Year 2023

Figure 19: Rental Payments for Acres Enrolled in USDA’s Conservation Reserve Program, by Type of Enrollment and County, Fiscal Year 2023



Sources: GAO analysis of U.S. Department of Agriculture (USDA) data; Census Bureau (geographic boundaries). | GAO-24-106311

Note: All values represent county-level information for the Conservation Reserve Program, except for Alaska and Puerto Rico, which are at the state (territory) level.



# Appendix VI: Information on Conservation Practices, by Acreage and Rental Payments, Fiscal Year 2023

To participate in the Conservation Reserve Program (CRP), landowners and operators devote land to various conservation practices to help achieve long-term program goals such as preventing soil erosion, improving water quality, and reducing loss of wildlife habitat. Three practices related to the establishment of grasses or legumes accounted for over 60 percent of the land enrolled in CRP in fiscal year (FY) 2023, as shown in table 8. The next largest conservation practices in terms of acreage were the establishment or maintenance of permanent wildlife habitat and restoration of rare and declining habitat.<sup>1</sup> Table 8 shows the largest conservation practices in terms of acreage, by type of enrollment, in CRP, administered by the U.S. Department of Agriculture’s Farm Service Agency, in FY 2023.

**Table 8: Largest Conservation Practices, by Acreage and Type of Enrollment, for USDA’s Conservation Reserve Program (CRP), Fiscal Year 2023**

Conservation practice	Acres (in millions) (percentage)			
	General enrollment	Continuous enrollment	Grassland enrollment	Total CRP enrollment
Maintenance of permanent grass and legumes on grassland <sup>a</sup>	0.0 (0%)	0.0 (0%)	6.2 (98%)	6.2 (27%)
Establishment or maintenance of permanent native grasses	3.7 (45%)	1.2 (14%)	0.0 (0%)	4.9 (21%)
Establishment or maintenance of permanent introduced grasses and legumes	2.1 (26%)	1.1 (14%)	0.0 (0%)	3.3 (14%)
Establishment or maintenance of permanent wildlife habitat	0.9 (11%)	0.8 (10%)	0.0 (0%)	1.7 (7%)
Restoration of rare and declining habitat <sup>b</sup>	1.0 (12%)	0.3 (3%)	0.0 (0%)	1.3 (6%)
Restoration of wetlands (non-floodplain)	0.0 (0%)	0.8 (10%)	0.0 (0%)	0.8 (4%)
Establishment or maintenance of filter strips <sup>c</sup>	0.0 (0%)	0.6 (8%)	0.0 (0%)	0.6 (3%)
Establishment or maintenance of riparian buffers <sup>d</sup>	0.0 (0%)	0.5 (6%)	0.0 (0%)	0.5 (2%)
Establishment or maintenance of pollinator habitat	0.1 (1%)	0.5 (6%)	0.0 <sup>e</sup> (0%)	0.5 (2%)
Restoration of wetlands on floodplains	0.0 <sup>f</sup> (1%)	0.4 (5%)	0.0 (0%)	0.5 (2%)
Other	0.5 (6%)	2.1 (25%)	0.1 (2%)	2.6 (11%)
<b>Total</b>	<b>8.4 (100%)</b>	<b>8.2 (100%)</b>	<b>6.3 (100%)</b>	<b>22.9 (100%)</b>

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Notes: Percentage refers to the percentage of acres specific to each enrollment type—general, continuous, or grassland. For total CRP enrollment, percentage refers to acres for the entire program.

Legumes are plants that have seeds in a pod and improve soil by taking nitrogen from the air.

Wetlands are low-lying ecosystems where the water table is always at or near the surface. They perform vital ecological functions, including providing critical habitat for wildlife and waterfowl,

<sup>1</sup>This practice is intended to restore critically endangered, endangered, and threatened habitats.

**Appendix VI: Information on Conservation Practices, by Acreage and Rental Payments, Fiscal Year 2023**

mitigating floods by slowing down and absorbing excess water during storms, and purifying water by filtering out pollutants before they enter streams and lakes, among other things.

The sum of the acres or percentages may not add to the totals due to rounding.

<sup>a</sup>This practice applies only to grassland enrollment and the land may be used for haying or grazing.

<sup>b</sup>This practice is intended to restore critically endangered, endangered, and threatened habitats.

<sup>c</sup>A filter strip is a narrow band of grasses, legumes, and forbs—plants that are not woody and have broad leaves. Filter strips improve water quality by intercepting sediment and nutrients, mitigate erosion by reducing the negative impacts of wind and water, and provide habitat and corridors for wildlife.

<sup>d</sup>Riparian buffers are strips of trees bordering streams, wetland areas, and other waterbodies to improve water quality and wildlife habitat.

<sup>e</sup>Grassland enrollment, in fiscal year 2023, included 3,100 acres of pollinator habitat, which rounds to 0.0 in the table.

<sup>f</sup>General enrollment, in fiscal year 2023, included 48,630 acres of wetland restoration on floodplains, which rounds to 0.0 in the table.

The three practices related to establishment of grasses or legumes accounted for about 41 percent of rental payments in FY 2023, as shown in table 9. Establishment or maintenance of filter strips and restoration of rare and declining habitat were the next largest conservation practices in terms of rental payments.<sup>2</sup> Table 9 shows the largest conservation practices in terms of rental payments, by type of enrollment, in CRP, in FY 2023.

**Table 9: Largest Conservation Practices, by Total Rental Payments, for USDA’s Conservation Reserve Program (CRP), Fiscal Year 2023**

Conservation practice	Rental payments (dollars in millions) (percentage)			
	General enrollment	Continuous enrollment	Grassland enrollment	Total CRP enrollment
Establishment or maintenance of permanent native grasses	\$172.1 (36%)	\$140.6 (12%)	\$0.0 (0%)	\$312.8 (17%)
Establishment or maintenance of permanent introduced grasses and legumes	\$133.5 (28%)	\$142.0 (12%)	\$0.0 (0%)	\$275.5 (15%)
Establishment or maintenance of permanent wildlife habitat	\$51.8 (11%)	\$100.8 (8%)	\$0.0 (0%)	\$152.6 (9%)
Establishment or maintenance of filter strips <sup>a</sup>	\$0.0 (0%)	\$142.7 (12%)	\$0.0 (0%)	\$142.7 (8%)
Restoration of rare and declining habitat <sup>b</sup>	\$77.1 (16%)	\$56.5 (5%)	\$0.0 (0%)	\$133.6 (7%)
Restoration of wetlands (non-floodplain)	\$0.0 (0%)	\$117.4 (10%)	\$0.0 (0%)	\$117.4 (7%)
Establishment or maintenance of pollinator habitat	\$6.8 (1%)	\$105.3 (9%)	\$0.1 (0%)	\$112.2 (6%)

<sup>2</sup>A filter strip is a narrow band of grasses, legumes, and forbs—plants that are not woody and have broad leaves. Filter strips improve water quality by intercepting sediment and nutrients, mitigate erosion by reducing the negative impacts of wind and water, and provide habitat and corridors for wildlife.

**Appendix VI: Information on Conservation Practices, by Acreage and Rental Payments, Fiscal Year 2023**

Maintenance of permanent grass and legumes on grassland	\$0.0 (0%)	\$0.0 (0%)	\$96.7 (98%)	\$96.7 (5%)
Wetland restoration on floodplains	2.9 (1%)	\$76.6 (6%)	\$0.0 (0%)	\$79.5 (4%)
Establishment or maintenance of riparian buffers <sup>c</sup>	\$0.0 (0%)	\$68.2 (6%)	\$0.0 (0%)	\$68.2 (4%)
Other	\$36.3 (8%)	\$264.6 (22%)	\$2.1 (2%)	\$303.0 (17%)
<b>Total</b>	<b>\$480.5 (100%)</b>	<b>\$1,214.8 (100%)</b>	<b>\$98.8 (100%)</b>	<b>\$1,794.1 (100%)</b>

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

Notes: Percentage refers to the percentage of rental payments specific to each enrollment type—general, continuous, or grassland. For total CRP enrollment, percentage refers to rental payments for the entire program.

Legumes are plants that have seeds in a pod and improve soil by taking nitrogen from the air.

Wetlands are low-lying ecosystems where the water table is always at or near the surface. They perform vital ecological functions, including providing critical habitat for wildlife and waterfowl, mitigating floods by slowing down and absorbing excess water during storms, and purifying water by filtering out pollutants before they enter streams and lakes, among other things.

The sum of the rental payments or percentages may not add to the totals due to rounding.

<sup>a</sup>A filter strip is a narrow band of grasses, legumes, and forbs—plants that are not woody and have broad leaves. Filter strips improve water quality by intercepting sediment and nutrients, mitigate erosion by reducing the negative impacts of wind and water, and provide habitat and corridors for wildlife.

<sup>b</sup>This practice is intended to restore critically endangered, endangered, and threatened habitats.

<sup>c</sup>Riparian buffers are strips of trees bordering streams, wetland areas, and other waterbodies to improve water quality and wildlife habitat.

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# Appendix VII: Methodology for Literature Review and Expert Selection

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We conducted our review of literature related to the Conservation Reserve Program (CRP) from January 2023 to August 2023. To identify studies on CRP and the methods that the U.S. Department of Agriculture's (USDA) Farm Service Agency (FSA) uses to select CRP offers, we searched publications from the USDA's Economic Research Service (ERS) website since 1999, as well as journals published by the Agricultural and Applied Economics Association. We also searched databases, including Agricola, Econlit, and Scopus for publications since 1996, using the keywords "conservation reserve program" and "cost-benefit," "environmental benefit index," and "cost-effectiveness." Additionally, we identified related studies from these searches and also from the experts we interviewed. Our search resulted in identifying 57 studies, including peer-reviewed journal articles and USDA reports.

We evaluated these 57 studies and selected 34 of them based on their methodological rigor and relevancy. All 34 studies were published in peer-reviewed journals or by USDA. To assess the methodological quality of the selected studies, we obtained information about each study and the methodology, and we found that the data sources, modeling, and statistical analyses were clearly presented based on generally accepted social science standards. Relevancy was primarily based on the study examining the benefits and cost-effectiveness of CRP and identifying improvements that may be made in FSA's methods to score and select CRP offers.

The structure of the Environmental Benefits Index (EBI)—that is, adding environmental benefits factors to a cost factor—has not changed since 1997. Thus, we did not include studies prior to that date but included several studies after that date that are more than 10 years old. While the magnitude of estimated effects drawn from older studies may or may not apply to current conditions, their suggestions on how the EBI can be improved are still valid.

We also interviewed eight experts who primarily authored reports and articles identified through our literature searches. The experts were three academics, as well as three current and two former officials from USDA's ERS or FSA. These experts have knowledge of and experience with CRP, and with scoring and selecting CRP offers. They have generally published multiple articles on CRP's methods for scoring and selecting offers.

We asked these experts a variety of questions on FSA's methods, including some questions beyond the scope of their studies. Not every

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**Appendix VII: Methodology for Literature  
Review and Expert Selection**

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expert answered every question or commented on every topic, in part because they have different areas of expertise and experience.

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# Appendix VIII: Methodology for Data Analysis

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To provide detailed information on the Conservation Reserve Program (CRP), administered by the U.S. Department of Agriculture's (USDA) Farm Service Agency, we analyzed USDA data from fiscal years (FY) 1986 through 2023, and presented the results of these analyses in objective one and appendixes I to VI. Specifically, we analyzed the following:

- acres enrolled in CRP and total rental payments, FY 1986 through FY 2023;
- average rental payments per acre, FY 1986 through FY 2023;<sup>1</sup>
- number of years land is enrolled in CRP, as of FY 2023;
- acres enrolled in CRP and total rental payments, by state, FY 2023;
- acres enrolled in CRP, by county, FY 2003, FY 2013, and FY 2023;
- total rental payments, by county, FY 2023; and
- largest conservation practices in terms of acreage and rental payments, FY 2023.

Our analysis described above was based on USDA's annual snapshots of its data on CRP from FY 1995 (the earliest available) through FY 2023, as well as number of acres enrolled and related USDA rental payments per fiscal year nationwide, which were publicly available on USDA's website. USDA's annual snapshots include contract-level data, such as data on CRP sign-ups, conservation practices, and geographic locations associated with the contracts.

USDA's rental payments for CRP land occur in arrears (e.g., contracted acres and rental rate in 2002 result in a rental payment in 2003). USDA has reported on rental payments using this method. However, rental payments in this report represent the amount obligated that fiscal year, based on CRP acres and rental rates. To effectively compare USDA's rental payments for CRP over time, we adjusted the payments using the Personal Consumption Expenditures price index. FSA officials agreed this was an appropriate price index to use for our analysis.

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<sup>1</sup>To calculate the average rental rate, or rental payment per acre, we averaged the contract rental rates, weighted by the number of acres under contract. This provided the rent paid for the average acre.

To assess the reliability of these data, we performed electronic data testing to identify missing values, unexpected values, omissions, logical inconsistencies, and duplicates. Before implementing data cleaning procedures, we checked the data's consistency against aggregated year-by-year CRP totals that FSA published at the county and state levels. We made small adjustments to the CRP data to correct observed anomalies. For example, we corrected invalid FIPS codes associated with the locations of a small number of contracts, and we removed a small number of duplicate contracts. The effect of these adjustments on our reported totals is minimal. Finally, we interviewed knowledgeable FSA staff about how to interpret certain data fields and about known data limitations. We concluded that the data were sufficiently reliable for the purposes of reporting CRP acreage and payment information.

# Appendix IX: Factors and Related Points for the Environmental Benefits Index

The U.S. Department of Agriculture’s Farm Service Agency uses an Environmental Benefits Index (EBI) to select land offered for general enrollment in its Conservation Reserve Program (CRP). The EBI is composed of five factors related to environmental benefits and a factor related to cost. Table 10 describes the factors, subfactors, and related points in the EBI.

**Table 10: Factors and Related Points in the Environmental Benefits Index that USDA Uses in Its Conservation Reserve Program (CRP)**

<b>Factors and subfactors</b>	<b>Purpose</b>	<b>Possible points</b>
<b>Wildlife benefits</b>	<b>To encourage landowners and operators to plant cover on contract acreage that will be beneficial to wildlife. It consists of three subfactors.<sup>a</sup></b>	<b>0 to 100</b>
Cover	To evaluate cover based on the covers expected to become established and the planting rates. <sup>b</sup>	0 to 50
Wildlife enhancement	To evaluate enhancements based on the size, shape, and composition of the potential wildlife habitat or food plot.	0 to 20
Wildlife priority zone <sup>c</sup>	To identify locations of land that may contribute to the restoration of habitat of threatened or endangered species or contribute to the restoration of certain species of national, regional, state, or local significance.	0 or 30
<b>Water quality benefits</b>	<b>To evaluate the potential for improving water quality by reducing (1) sediment, nutrients, and other pollutants from entering water ways and aquifers; (2) downstream flood damage through the restoration of hydrology; and (3) the leaching of nitrates and pesticides into groundwater.</b>	<b>0 to 100</b>
Water quality zone <sup>c</sup>	To identify locations where proposed land may contribute to groundwater or surface water quality impairment and assist in meeting certain federal, state, or local water quality laws.	0 or 30
Groundwater quality	To evaluate the potential for the movement of nutrients and pesticides for a specific soil.	0 to 25
Surface water quality	To evaluate the potential amount of sediment that is delivered to water ways, the population within the watershed that would benefit most directly from improved surface water quality, and other related factors.	0 to 45
<b>Soil erosion benefits</b>	<b>To evaluate the on-farm benefits of reduced soil erosion, including sheet and rill erosion, and wind erosion.<sup>d</sup></b>	<b>0 to 100</b>
<b>Enduring benefits</b>	<b>To evaluate the likelihood that the practice established will persist, be maintained, and provide benefits beyond the initial CRP contract period.</b>	<b>0 to 50</b>
<b>Air quality benefits</b>	<b>To evaluate the air quality improvements from reducing airborne dust and particulate from cropland wind erosion that causes damage to nearby affected population concentrations. It also provides points for the value of land for carbon sequestration.</b>	<b>3 to 45</b>
Wind erosion impacts	To evaluate the potential wind erosion impacts, including the distance-weighted population that may be impacted by wind erosion.	0 to 25
Air quality zone <sup>c</sup>	To evaluate whether land is located in areas where agriculture significantly impacts air quality or is located within 50 miles of national parks with high-quality air standards.	0 or 10
Carbon sequestration	To provide a relative index of the projected carbon sequestration benefits of CRP cover types over the expected life of the practice.	3 to 10



**Appendix IX: Factors and Related Points for  
the Environmental Benefits Index**

<b>Cost factor</b>	<b>To consider the relative cost of CRP offers by providing greater weight to offers with lower rental rates.</b>	<b>0 to 150</b>
Cost subfactor	To determine the number of points to assign an offer based on the proposed rental rate (bid) and other factors. The formula is: $a \cdot (1 - (\text{Bid}/b))$ , where "a" equals the maximum number of points the Farm Service Agency decides to assign to CRP offers for cost, and "b" is the maximum rental rate USDA will provide for CRP offers.	0 to 125
Offer less than the maximum rental rate	To provide points for offers whose offered rental rates are below the maximum per acre rental rate.	0 to 25

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

<sup>a</sup>Operators include those who lease the land or otherwise have the landowner's approval to enroll in the program.

<sup>b</sup>A planting rate is an expression of the number of pounds of seed per acre.

<sup>c</sup>Zones are defined by state committees, which are primarily active farmers and ranchers nominated by members of Congress and selected by the Secretary of Agriculture. The state committee may consult with a state technical committee, which includes agricultural producers, nonindustrial private forest landowners, and other professionals who represent a variety of disciplines in soil, water, wetlands, plant, and wildlife sciences, including USDA and state representatives.

<sup>d</sup>Sheet and rill erosion is the physical removal of soil from the land surface by the action of rainfall, melting snow, irrigation, or runoff. Sheet erosion is a process in which detached soil is moved across the soil surface by sheet flow, often in early stages of runoff. Rill erosion occurs as runoff water begins to concentrate in small channels or streamlets. Wind erosion is the detachment and transport of soil particles caused by wind.

# Appendix X: Factors and Related Points for the Grassland Index

The U.S. Department of Agriculture’s Farm Service Agency uses an index to select land offered for grassland enrollment in its Conservation Reserve Program (CRP). The grassland index has seven ranking factors that total to determine the score. Four of these factors relate to environmental benefits, one relates to the demographic of the landowner or operator, one relates to the size of the livestock operation, and the seventh relates to the cost per acre of the offer. Table 11 describes the factors, subfactors, and related points for the index.

**Table 11: Factors, Subfactors, and Related Points of the Grassland Index USDA Uses for Its Conservation Reserve Program (CRP)**

<b>Factors and subfactors</b>	<b>Purpose</b>	<b>Possible points</b>
<b>Current and future use</b>	<b>To encourage continued usage of the land and to retain most of the environmental benefits of expiring CRP land.</b>	<b>0 to 30</b>
Expiring CRP	To encourage owners and operators who continue to maintain and use land that is currently in the CRP in an environmentally sustainable way. Keeping these acreages in grass cover is intended to help preserve most of the environmental benefits established under general CRP. <sup>a</sup>	0 to 20
Existing CRP cover	To provide additional points depending on the current CRP cover.	0 or 10
<b>Beginning, limited resource, socially disadvantaged, or veteran farmers and ranchers</b>	<b>To encourage landowners and operators who meet certain demographic requirements, set by USDA, to submit offers for their land.</b>	<b>0 or 10</b>
<b>Maximizing grassland preservation</b>	<b>To encourage continued grassland preservation in areas subject to threat of conversion.</b>	<b>0 to 35</b>
Land under threat of conversion (county)	To assign up to 10 points if over 50 percent of the offered acreage is in a county under threat of conversion.	0 to 10
Land under threat of conversion	To assign up to 20 points if over 50 percent of the offered acreage is within an area identified as under a national threat of conversion.	0 or 20
Contract length	To assign 5 points if the offer is for a 15-year contract.	0 or 5
<b>Vegetation cover</b>	<b>To assign points for practices on the land offered.</b>	<b>0 to 30</b>
<b>Environmental factors</b>	<b>To encourage conservation in areas of designated candidate, threatened, or endangered species or critical habitat.</b>	<b>0 to 45</b>
Wildlife priority zone	To assign 15 points if over 50 percent of the offered acreage is within an approved state wildlife priority zone.	0 or 15
State grassland priority enrollment criteria	To assign 15 points if over 50 percent of the offered acreage is in a state grassland CRP zone.	0 or 15
Grassland CRP national priority zone	To encourage continued grassland preservation and to provide an incentive for environmentally sensitive areas. If over 50 percent of the offer is in one of the national priority zones, the offer will receive 15 points.	0 or 15

**Appendix X: Factors and Related Points for the  
Grassland Index**

<b>Small-scale livestock operation</b>	<b>To assign points if the landowner or operator certifies that they are eligible for a small-scale livestock operation, which is an operation with 140 grazing animal units or fewer.<sup>b</sup> Landowners also certify that they will not offer more than 200 acres for the program.</b>	<b>0 or 10</b>
<b>Cost factor</b>	<b>To consider cost as a factor in selecting offers. The subfactor used is dependent on the location of the land.</b>	<b>0 to 25</b>
Cost subfactor	To assign points to offers for land located in counties in which the maximum rental rate is less than or equal to \$15 per acre.	0 or 15
Offer less than maximum rental rate	To assign points to offers with a rate that is lower than the respective county maximum rental rate.	0 to 25

Source: GAO analysis of U.S. Department of Agriculture (USDA) information. | GAO-24-106311

<sup>a</sup>Operators include those who lease the land or otherwise have the landowner's approval to enroll in the program.

<sup>b</sup>Different kinds of animals are assigned different units, per the Farm Service Agency's handbook for CRP. For example, a dairy cow is 1.40, a heifer is 0.86, and a goat is 0.15.

# Appendix XI: Comments from the U.S. Department of Agriculture



United States  
Department of  
Agriculture

Farm  
Production  
and  
Conservation


Farm  
Service  
Agency

1400 Independence Avenue, SW  
Mail Stop 0510  
Washington, DC 20250

**DATE:** August 20, 2024

**TO:** Steve Morris  
Director, Natural Resources & Environment  
General Accountability Office

**FROM:** Steven Peterson STEVEN PETERSON Digitally signed by STEVEN PETERSON  
Date: 2024.08.22 08:16:45 -0400  
Associate Administrator

**THROUGH:** John J. Berge   
Acting Deputy Administrator for Farm Programs

**SUBJECT:** Government Accountability Office (GAO) Audit # GAO-24-106311—"Improving How USDA Selects Land Could Increase Environmental Benefits" Draft Report for Recommendations, 1, 2, 3 and 4

The U.S. Department of Agriculture (USDA), Farm Service Agency (FSA) is submitting responses for which FSA is responsible be accepted based on the support of the information provided in this memorandum. FSA is submitting four recommendations for executive action to GAO.

#### **RECOMMENDATION 1:**

The Administrator of USDA's Farm Service Agency should build on existing efforts by incorporating, in a timely manner and as appropriate, reliable science-based information from models or other sources into the agency's methods for assigning points that are used to select offers for the Conservation Reserve Program.

#### **Agency Response**

USDA agrees that utilizing recent studies and models provide a more reliable, science-based approach for assigning points used to rank and select offers for the competitive general CRP and Grassland CRP signup types. Extensive updates to the current scoring methods may require significant resources, analysis of impacts to the program, and may take considerable time. Resources and factors to consider are software platform, policy requirements, testing, and implementation. Implementation will be impacted by any new legislation such as farm bill and it may affect resources and

factors mentioned. Funding may be necessary and timeframes for completion may need extension. It is also noted that models used must be readily available and updated to support Nationwide implementation of the CRP.

**RECOMMENDATION 2:**

The Administrator of USDA's Farm Service Agency should develop a process to periodically review its methods for selecting offers for the Conservation Reserve Program. Such a process should specify the frequency of the reviews and include soliciting and publicly reporting on suggestions from experts, including non-USDA scientists and economists.

**Agency Response**

USDA agrees with the recommendation to periodically review its methods for selecting CRP offers. Although a process is still underway and due to the complexity of the methods and the time constraints associated with changes, USDA believes a thorough review should be conducted every 5 years. This aligns with the current farm bill cycle and provides adequate time to solicit comments, review the comments and determine whether updates and changes should be made relative to the comments received. USDA will need to consider how publicly reporting suggestions from experts, including non-USDA scientists and economists will be meaningful and incorporated to the implementation of CRP.

**RECOMMENDATION 3:**

The Administrator of USDA's Farm Service Agency should address any findings resulting from its periodic reviews to enhance its methods for selecting offers for the Conservation Reserve Program, as appropriate.

**Agency Response**

USDA agrees to address any findings that are a result of the periodic reviews to enhance its methods for selecting offers for CRP.

**RECOMMENDATION 4:**

The Administrator of USDA's Farm Service Agency should annually analyze information on environmental benefits by type of enrollment and for the entire program, and publicly report the information, such as on its website.

**Agency Response**

USDA agrees to develop strategies for an annual analyzation on information regarding environmental benefits by type of enrollment and for the entire program while publicly reporting information.

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# Appendix XII: GAO Contact and Staff Acknowledgments

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## GAO Contact

Steve D. Morris, (202) 512-3841 or [morriss@gao.gov](mailto:morriss@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Nkenge Gibson (Assistant Director), John Barrett (Analyst in Charge), Xiang Bi, Kevin Bray, Gary Brown, Tara Congdon, Thomas Cook, Cindy Gilbert, Benjamin T. Licht, Grant Mallie, Jason Rodriguez, Alec McQuilkin, Cynthia Norris, Beverly Peterson, Dan Royer, and Wes Sholtes made significant contributions to this report.

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