

**From:** [Rebecca Messinger](#)  
**To:** [Oliver Orjiako](#); [Jose Alvarez](#); [Sonja Wiser](#)  
**Subject:** FW: USDA - Conservation Reserve Program Suitability and Feasibility Determination for wetlands  
**Date:** Monday, March 4, 2024 8:39:46 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good morning,

Please see the below email from CCCU. Thank you.



**Rebecca Messinger**  
Clerk to the Council  
COUNTY MANAGER'S OFFICE

564-397-4305



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**From:** Kathleen Otto <Kathleen.Otto@clark.wa.gov>  
**Sent:** Saturday, March 2, 2024 4:54 PM  
**To:** Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>  
**Subject:** FW: USDA - Conservation Reserve Program Suitability and Feasibility Determination for wetlands



**Kathleen Otto**  
County Manager

564.397.2458



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**From:** Clark County Citizens United, Inc. <[cccuinc@yahoo.com](mailto:cccuinc@yahoo.com)>  
**Sent:** Saturday, March 2, 2024 1:10 PM  
**To:** Gary Medvigy <[Gary.Medvigy@clark.wa.gov](mailto:Gary.Medvigy@clark.wa.gov)>; Karen Bowerman

<[Karen.Bowerman@clark.wa.gov](mailto:Karen.Bowerman@clark.wa.gov)>; Michelle Belkot <[Michelle.Belkot@clark.wa.gov](mailto:Michelle.Belkot@clark.wa.gov)>; Glen Yung <[Glen.Yung@clark.wa.gov](mailto:Glen.Yung@clark.wa.gov)>; Sue Marshall <[Sue.Marshall@clark.wa.gov](mailto:Sue.Marshall@clark.wa.gov)>; Kathleen Otto <[Kathleen.Otto@clark.wa.gov](mailto:Kathleen.Otto@clark.wa.gov)>

**Subject:** USDA - Conservation Reserve Program Suitability and Feasibility Determination for wetlands

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FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN UPDATE

**USDA - Conservation Reserve Program Suitability and Feasibility Determination - Version 1.0 June 2018 1 | Page**

Worksheet Instructions

Suitability and Feasibility (S&F) is the technical eligibility determination performed by NRCS, Technical Service Provider (TSP) or partner conservation planners for Continuous Conservation Reserve Program (CRP) including the Conservation Reserve Enhancement Program (CREP). CRP policy requires a technical determination of all the following:

- existing cover is not functioning as the practice offered
- acreage offered is suitable for the practice offered • practice offered is needed and feasible to solve the resource concern
- practice offered meets the purpose of the practice according to Exhibit 11.

The “Documentation of Suitability and Feasibility Worksheet” (Worksheet) is required to be completed by a conservation planner and provided to FSA. The Worksheet has been designed to assist conservation planners with their documentation, but ultimately the conservation planner is responsible to ensure that information included on the Worksheet satisfies the above questions and supports the determination. Conservation planners must have appropriate knowledge, skills and abilities to make a S&F determination, along with knowledge of CRP CP1 policy.

CRP policy is written in 2-CRP which can be accessed online at the FSA Intranet. Reference 2-CRP for policy on each CRP CP including a list of NRCS Conservation Practice Standards (CPS) that are approved for implementing a CRP CP. Upon receipt of CRP offer, FSA will complete a series of eligibility determinations. FSA will then forward the offer to NRCS for the completion of the S&F technical eligibility determination<sup>2</sup>. The CRP S&F Determination process falls within Phase I and II, Steps 1 - 7 of the NRCS Conservation Planning Process.

Figure 1 diagrams the NRCS planning process in relation to the CRP S&F determination.

1. Important to understand the terms “CRP Practice” (CRP CP) vs. “NRCS Conservation Practice Standard” (CPS). Each CRP Practice has specific program

requirements to address certain resource concerns such as water quality, soil erosion, etc. CRP Practices are installed by following NRCS CPS. Each CRP Practice is supported by multiple CPS such as 393 Filter Strip, 315 Herbaceous Weed Control, 645 Upland Wildlife Habitat Management, etc.

2. Reference 2-CRP for information on the Continuous Signup Process Flow. Version 1.0 June 2018 2 | Page Conservation Planning to Support CRP Phase I – Collection and Analysis

1. Identify Problems and Opportunities Narrow the scope of inventory to the offer area and adjacent land when applicable. Determine if site conditions required by the CRP CP are met.
2. Determine Objectives Conservation Planners will consult with the CRP client to ensure that the CRP CP will meet their objectives, and that client objectives support the CRP CP purpose and policies.
3. Inventory Resources Inventory the offer area and document information relevant to the resource concerns targeted the CRP CP in the offer.
4. Analyze Resource Data Analyze the site information collected and use NRCS tools and planning criteria to determine if there is a resource concern present. Analysis of the resource concerns will determine if the CRP CP is needed. Phase II Decision Support
5. Formulate Alternatives Narrow the alternative to the CRP CP in the offer and supporting NRCS CPS. Be mindful of alternatives commonly used in the region which may influence the feasibility or suitability elements.
6. Evaluate Alternatives Evaluate the CRP CP and associated CPS to determine the effects in addressing client's objectives and benefits to the resource concerns targeted by the CRP CP. Evaluate NEPA Special Environmental Concerns to determine if the CRP CP may have a negative impact. Determine if the CRP CP in the offer meets feasibility and suitability. If modification to the offer is needed to make it acceptable then document on the Worksheet and communicate with client and FSA.
7. Make Decisions Return the CRP-2C, digital imagery, Worksheet, and supporting documentation to FSA. Communicate determination results with client to assist with their decision on how to proceed.

Figure 1 Version 1.0 June 2018

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### CRP Re-enrollment

Expiring Continuous CRP contracts that are re-enrolling into the same CP do not require a S&F determination, although a field review is required. Conservation planners will complete a field review to determine if the CRP CP will continue to function to satisfy the purpose of the CRP CP. If during the field visit it is discovered an error was made in the original S&F determination, then the conservation planner will document and provide information to FSA. FSA will review and may ask NRCS to complete the S&F worksheet to determine if the offer is eligible for re-enrollment. Expiring General or Continuous CRP contracts that are re-enrolling into a different Continuous CRP CP do require an S&F determination.

In these cases, existing vegetation that may be addressing a resource concern targeted by the CP in the new offer will not negatively impact the S&F determination. When completing Element #2 “Practice Need” and Element #3 “Practice Feasibility”, determine if there is a need to re-enroll as a different CP and document which resource concerns the new CP will be solving, significantly improving or maintaining. Communicate technical information such as transitioning cover type and/or engineering that may have to occur when re-enrolling into a different CP to ensure the clients objectives are met and that it is feasible to complete the transition.

Consider Element #4 “Practice Suitability” carefully when a client is interested in re-enrolling into a different CRP CP to ensure that the location is suitable for the transition. Element #1 Site Conditions / Program Requirements Determine if site conditions meet CRP CP program requirements. Use this element to document field observations related to current land use<sup>3</sup> and cover type<sup>4</sup> .

Element #1 also functions to determine if specific site conditions such as maximum/minimum offer size required by the CRP CP policy will be met. Narrow the scope of field inventory to the land indicated in the offer and adjacent land when necessary. If needed, take photos to document site conditions and attach to the Worksheet along with a map that references the photo location and date taken. For CRP CP practices with site program requirements use the check boxes to indicate which site condition(s) are being met.

All site conditions must be met to determine that an offer meets this element. Examples of required site conditions are:

- CP21 Filter Strip requires the offer be adjacent and parallel to an eligible water body, minimum width of 20 feet and a maximum average width of 120 feet.
- CP23 Wetland Restoration requires the restoration of a wetland that has been devoted to agricultural use, the wetland area in the offer is within the 100-year floodplain of a permanent river or stream, the wetland area of the offer includes a minimum of 51 percent hydric soils, and the buffer to wetland ratio does not exceed 3 acres buffer to 1 acre wetland.

A determination of “No – Site Conditions Not Met” on the Worksheet Element #1 results in the offer not being eligible.

<sup>3</sup> Use land use designations as defined in NRCS National Planning Procedures Handbook.

<sup>4</sup> Describe the observed cover type as accurately as possible without conducting a formal vegetative survey. Version 1.0 June 2018

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Practice Needs

Determine if there is a resource concern. CRP CPs are designed to solve or significantly improve specific resource concern(s) which are described in 2-CRP. NRCS resource concern cause definitions that align with the purpose of each CRP CP are listed on the Worksheets. In this element a conservation planner will evaluate if a resource concern exists in the offer area and adjacent land when necessary, and specifically, if a resource concern exists that is targeted by the CRP CP in the offer.

Use NRCS evaluation tools and planning criteria as a basis to determine the condition of a resource concern. A minimum of 1 resource concern cause must be present within the offer area to meet this element. For some CRP CP's the Worksheet indicates which resource concern must be present. Indicate a positive Needs determination by identifying which resource concern cause(s) are present. When determining practice need consider the existing vegetative cover. If existing cover is solving the resource concern(s) of the CRP CP, then the determination must be that the CRP CP is not needed (reference the above re-enrollment section for information related to existing cover on expiring CRP contract acres).

Examples of CRP CP needs are:

- CRP CP8A Grass Waterway offer. During the field visit it was observed that perennial grass cover was established in the offer area and was controlling gulley erosion. The determination was that a CRP CP8A was not needed because the resource concerns of CP8A were met.
- CRP CP22 Riparian Buffer offer. Upon a field visit the conservation planner observed little to no perennial vegetation between a qualifying seasonal stream and the ag operation. A determination was made that there was a need to install a CP22 to reduce delivery of sediment and nutrients to the water body. A determination of "No – Practice Not Needed" on the worksheet element #2 results in the offer not being eligible.

Element #3 Practice Feasibility Determine if the CRP CP will solve or significantly improve the identified resource concern(s) targeted by the CRP CP. Practice feasibility is a determination if the CRP CP offered will solve or significantly improve the identified resource concern(s) within the offer area and the client's willingness and ability to install the required NRCS CPS. Conservation planners will review the CRP CP purpose and determine if the resource concern(s) will be solved or significantly improved through implementation of the NRCS CPS associated with the offered CRP CP.

Use NRCS planning criteria and evaluation tools as a basis to document expected improvements by implementing the CRP CP. Feasibility is not met when the client is not willing to install a CPS to a level that meets minimum standards. CRP does allow participants to install a CRP CP that will go beyond meeting the minimum level of an identified resource concern while staying within the allowable size as specified in the CRP CP policy. Examples of CRP CP feasibility are:

- CRP CP16A Shelterbelt Establishment offer. Conservation planner determined that there is a resource concern per the CP16A purpose in 2-CRP, but the client is not willing to install the number of tree rows to meet the NRCS CPS. Feasibility is not met. Version 1.0 June 2018 5 | Page
- CRP CP21 Filter Strip offer. Conservation planner calculated the minimum width of the filter strip to be 50 feet to solve the identified resource concern. The client would like to install a 120 foot wide filter strip which does meet feasibility because the CPS minimum design width is met (50 feet) and CRP CP21 policy allows for enrollment up to 120 feet wide.

A determination of "No – Practice Not Feasible" on the worksheet element #3 results

in the offer not being eligible. Element #4 Practice Suitability Determine if the CRP CP and supporting CPS can be applied to the land. The suitability determination is based on site characteristics that influence the ability to apply the CPS to support the CRP CP. To complete this element the conservation planner will consider site characteristics, customer objectives, NRCS CPS used to implement the CRP CP, and other factors that influence the ability to install the required CPS.

The conservation planner will determine if land offered is suitable for the installation of the CPS needed to address the resource concern, and if after installation the CRP CP will function as planned. Factors that influence site suitability include but are not limited to: soils, hydrology, geology, topography, legal requirements, ownership requirements, safety issues. Suitability examples are as follows:

- CPR CP22 Riparian Buffer offer. A determination of site conditions/program requirements, need and feasibility is met. According to soil and forestry information the site is not suitable for tree establishment, suitability is not met.
- CRP CP9 Shallow Water Area for Wildlife offer.

A determination of site conditions/program requirements, need and feasibility is met. Hydrology, topography and soils do allow for the construction of a shallow water area that will provide wildlife with water for the majority of the year, suitability is met. A determination of "No" on the worksheet element #4 results in the offer not being eligible. Suitability and Feasibility Determination Findings In this section, the conservation planner will document the findings. If all four elements are met, indicate by checking the top box in this section. If one or more of the four elements in this determination are not met (site conditions/program requirements, needs, feasibility, suitability) check the second box. In cases where all four elements were not met but a modification to the offer would satisfy any failing elements, check the third box and communicate with FSA and the client on suggested modification.

#### Documentation

The conservation planner will provide field notes and documentation regarding their determination and any other information that might be needed by NRCS or FSA to render or support a decision. Use form NRCS CPA-6 or alternative approved documentation form and attach to the worksheet. Provide FSA with a GIS shapefile of the CRP CP location when necessary. When documentation is complete return the CRP-2C, digital imagery, Worksheet and supporting documentation to FSA. Version 1.0 June 2018 6 | Page

#### Water Body Definitions

Streams having perennial flow: A natural, altered or man-made linear drainage feature that transports water as confined surface flow, has a defined channel (bed and bank) and during normal precipitation years, supports flow for the entire year.  
Streams having seasonal or intermittent flow: A natural, altered or man-made linear drainage feature that transports water as confined surface flow, has a defined channel (bed and bank) and contains water for only part of the year but more than just during and/or after a rainfall or snowmelt.

Sinkhole or Karst areas:

Karst topography is landscape underlined with dissolvable rock such as limestone or dolomite. Over time water dissolves the rock and creates underground voids that water travels through. CRP allows the establishment of filter strips (CP21, CP22 and CP29) around locations where surface water can enter these underground drainage systems through openings in the surface commonly referred to as a sinkhole.

Permanently flooded wetlands:

Land with the predominance of hydric soils and is inundated with surface water from flooding or ponding throughout the year in all years. Intermittently exposed wetland: Land with the predominance of hydric soils that has inundation by surface water for most years, but the soil surface is infrequently exposed to air following extreme drought.

Semi-permanently flooded wetlands:

Land with the predominance of hydric soils that is inundated with surface water for most of the year, but commonly the soils are exposed to air during dry periods. When surface water is not present the water table is shallow. Seasonally flooded wetlands: Land with the predominance of hydric soils that is inundated with surface water during the wet season, and such inundation is expected to occur for at least 21-consecutive days under normal environmental conditions (NEC)<sup>5</sup>. When surface water is not present the water table is shallow.

Permanent water bodies:

Water bodies that include constructed water bodies that contains water cover throughout the year in all years and provides at least a seasonal flow of surface water from the water body off the farm.

Playa Lake:

Bodies of water that occur in the Southern High Plains of the United States. Surface water in Playa Lakes is ephemeral meaning that water is held temporarily after precipitation events and then become dry. <sup>5</sup>

Normal Environmental Conditions (NEC) are defined in the NRCS National Food Security Act Manual, FSA Wetland Identification Procedures, paragraph (2-11). Related to wetland hydrology, NEC are the hydrologic conditions (depth, duration, frequency) that would be expected to occur during the wet portion of the growing season under normal climatic conditions (not abnormally wet or abnormally dry).

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Definition of Agricultural Drained Land

(CRP CP39 Constructed Wetland) Agricultural Drained Land: Land used to produce food or fiber that drains water as surface runoff, subsurface flow or through artificial drainage systems to downstream receiving waters. Water moving from agricultural drained land has a high likelihood of carrying nutrients and chemicals used for production purposes.

Definition of 100-year Floodplain

100-year Floodplain: The geologic floodplain, or the low, broad, flat expanse of land

extending from the stream bank to the valley wall, or to land of markedly increased elevation adjacent to the valley wall. See Figure 2 for illustrated examples of the 100-year floodplain on a contour map. The Federal Emergency Management Agency (FEMA) hosts an interactive website called “FEMA Flood Map Service Center”. The FEMA site (<https://msc.fema.gov/portal>) has floodplain maps that can be used to define the 100-year floodplain. Figure 2 Version 1.0 June 2018 8 | Page

#### Calculating Amounts of Hydric Soil

Certain CRP CPs such as CRP CP23 Wetland Restoration require documentation of hydric soil to support site suitability for wetland restoration within the CRP offer area. When documenting the presence and amount of hydric soil refer to your State guidance. Begin by determining if the offer contains a location(s) that was a wetland and is now devoted to agricultural use. If such a wetland is present, map the location and use soil survey information or field data to determine the amount of hydric soil. Include a calculation of hydric soil amounts within the offer area to support the S&F determination.

Clark County Citizens United, Inc. P.O. Box 2188 Battle Ground, Washington 98604  
E-Mail [cccuinc@yahoo.com](mailto:cccuinc@yahoo.com)