

CONSERVATION RESERVE PROGRAM

Washington State Policy Concerns & Advocacy Priorities

Washington Association of Wheat Growers

109 E. First Ave., Ritzville, WA 99169 | (509) 659-0610 | wawg.org

Updated: 2026 | Farm Bill Conference Advocacy Document

Executive Summary

The Conservation Reserve Program (CRP) is one of the most important conservation tools available to Washington State farmers — not just for agriculture, but for public health, air quality, and environmental protection across the state's dryland farming regions. CRP is far from a program of niche interest. It is a critical economic and environmental pillar for the dryland farming communities of Central and Eastern Washington.

This paper documents the persistent, unresolved issues facing Washington farmers participating in CRP, with particular focus on the arid Columbia Basin, the Tri-Cities region, the Horse Heaven Hills, and Douglas County — areas where fragile, highly erodible soils and intense wind erosion create both conservation urgency and regulatory pressure on producers.

The 2026 House Farm Bill (the Farm, Food, and National Security Act of 2026) largely extends the existing CRP program through fiscal year 2031 with a flat acreage cap and no major structural reforms. Congressional staff have confirmed that "scoring challenges" prevented the CRP modernization provisions proposed in the 2026 Farm Bill from advancing. This makes the conference process a critical opportunity to push for meaningful reform.

Key issues remain unresolved:

- Rental rates that do not reflect the economic reality of dry-land farming regions
- NASS surveys that fail to capture crop-share rental agreements, skewing the rate baseline
- Payment limitations frozen at \$50,000 since the 1980s, capping how much land can be enrolled
- EBI scoring disruptions caused by the transition to RUSLE2/WEPS that have not been fully corrected for all affected regions
- County acreage caps that have locked farmers out of enrollment in high-participation counties like Douglas — one of only ~13 such counties nationally — compounded by a waiver process that requires County Commissioners to initiate, not the FSA County Committee
- Inadequate cost-share for mid-contract management, particularly during drought
- No mechanism for local soil, climate, or land data to formally correct national model errors

1. Why CRP Matters: Washington's Dryland Farming Regions

1.1 More Than Just Erosion Control — A Public Health Issue

Washington State's CRP story spans diverse geography — from the high-rainfall Palouse hills to the bone-dry Columbia Basin. But the program's most urgent environmental and public health role is in Washington's arid interior — the Columbia Basin, the Horse Heaven Hills, Douglas County, and the Tri-Cities region. Here, fragile soils, low rainfall (as little as 6–8 inches annually), and relentless southwest winds create one of the most severe windblown dust environments in the American West.

The Benton Clean Air Agency, in coordination with the Washington State Department of Ecology and EPA, has documented that the Columbia Plateau's silty, fine-grained soils — once broken down by tillage, traffic, or drought — will not re-form clods and are extremely susceptible to wind erosion. This is not an agricultural nuisance; it is a classified air quality emergency.

Air Quality Nonattainment: A Documented Public Health Crisis

In 1990, the U.S. EPA officially designated the Wallula area as being in "nonattainment" for particulate matter (PM10) — meaning it failed to meet federal health standards. The Wallula nonattainment area spans parts of Walla Walla, Lincoln, Benton, and Franklin counties. Agricultural dust from exposed fields — particularly from the Horse Heaven Hills — was the primary contributing source. Working with the agricultural community on conservation practices, including CRP enrollment, was central to achieving compliance. That work is never finished.

The Washington State Department of Ecology's 2019 High Wind Fugitive Dust Mitigation Plan for the Tri-Cities specifically identified agricultural dust sources as the primary concern, noting that dust storms frequently occur in the spring through fall months. In April 2021, I-90 was closed from Moses Lake to Ritzville due to extreme dust storm conditions — a stark reminder of what is at stake.

1.2 The Horse Heaven Hills: Ground Zero for Wind Erosion

The Horse Heaven Hills — the rugged, semi-arid uplands of Benton and Yakima counties south of the Yakima River — are among the most wind-exposed dryland farming areas in the Pacific Northwest. Southwest winds regularly exceed 40 mph, picking up soil from exposed fields and driving it into the Tri-Cities metro area and the Wallula area downriver.

For farmers in this region, CRP is not a choice between farming and conservation — it is a choice between farming the fragile margins and facing regulatory enforcement action from Ecology for air quality violations. CRP enrollment of the most erodible parcels in the Horse Heaven Hills serves a dual purpose: it protects the farmer's economic interest by removing unproductive ground from farming costs, and it serves the broader public interest by reducing PM10 emissions that directly harm human health.

Farmers in this region have already implemented many best management practices — conservation tillage, cover crops, residue management — but some fields are simply too fragile, too steep, and too exposed to manage within conventional crop production. These are precisely the lands CRP was designed to protect.

1.3 The Columbia Basin and Douglas County: High Enrollment, Hard Limits

Douglas County provides perhaps the clearest example of a region where the CRP program is both urgently needed and structurally limited. The county has historically had some of the highest CRP participation rates in Washington State, reflecting the large proportion of land that is conservation-priority by nature — including critical wildlife habitat as well as erodible dryland soils. Importantly, much of Douglas County is not mapped as Highly Erodible Land (HEL). It is the county's critical wildlife habitat — sagebrush steppe, native shrublands, and raptor habitat — that has made this ground eligible for CRP enrollment and that makes protecting it so important.

However, Douglas County has repeatedly bumped against the county-level acreage enrollment cap — a statutory limit set at 25% of a county's cropland. When CRP contracts expire and the county approaches or exceeds the cap, farmers with expiring land cannot re-enroll, even when their land is clearly eligible — whether for critical wildlife habitat values or for highly erodible soil conditions. This forces productive conservation land back into crop production, often on ground that serves irreplaceable ecological and air quality functions.

In 2020, when Douglas County producers were locked out of the CRP general signup, a temporary workaround was found using the EQIP Sage Grouse Initiative — a program with very different objectives than soil conservation. This is not a solution. It is a symptom of a program that needs structural reform.

Douglas County: A Model of the Problem

Under the 2018 Farm Bill, State Acres for Wildlife Enhancement (SAFE) acres — previously exempt — began counting toward the county CRP acreage cap. This change, which received little attention nationally, had an outsized impact in Douglas County, effectively locking wildlife habitat and conservation-priority parcels out of re-enrollment. Given that much of Douglas County's CRP enrollment is wildlife habitat eligible rather than HEL-driven, SAFE's inclusion in the cap is particularly damaging. WAWG has advocated for a waiver process; the 2026 Farm Bill conference is an opportunity to codify one.

The Pearl Hill Fire of September 2020, which burned over 223,000 acres in Douglas County and destroyed significant CRP acreage, further highlighted the county's vulnerability and the importance of re-establishing conservation cover as quickly as possible. Fire-damaged CRP land must have a clear re-enrollment pathway.

1.4 The Palouse and Transition Counties: Where Dry Meets Productive

The Palouse region — covering primarily Whitman and parts of Garfield, Asotin, and Columbia counties — is Washington's highest-productivity dryland wheat country. It is also where the most documented model correction work has occurred. For eight years, Palouse producers and WAWG fought to correct discrepancies in the NCCPI soil productivity model that were causing CRP EBI scores to dramatically undervalue steep-slope Palouse soils. That work, completed through the FSA/NRCS collaboration detailed in Section 3, ultimately produced model corrections that benefited the entire state.

The Palouse matters in the CRP story not as the dominant narrative, but as the proof of concept: local producers with documented on-the-ground knowledge, working with state agency partners, can correct national model errors. That precedent now belongs to every wheat-growing region in Washington.

Lincoln County occupies a particularly important transitional position. Situated between the arid Columbia Basin and the higher-rainfall Palouse, Lincoln County farmers often straddle multiple CRP program dynamics simultaneously: they face the Basin's wind erosion challenges in their

western portions while managing Palouse-type soils in the east. The county's 5-year average published rate of \$54.59 and the 2025 proposed rate of \$69 reflect some improvement, but after the statutory 85% proration the actual CRP payment is \$58.65/acre — and Lincoln County has historically been one of the counties most affected by NASS survey distortions. Crop-share arrangements are the norm, cash rent data is unreliable, and the actual payment of \$58.65 likely significantly understates what comparable crop-share ground is worth in Lincoln County's more productive eastern sections.

1.5 The Broader Columbia Basin: Dry, Fragile, and Underserved

Counties like Adams, Grant, Franklin, Lincoln, and Benton share many of the same characteristics: low annual rainfall, highly erodible soils, significant proportions of land that barely pencil as cropland in average years, and communities that bear the public health costs of windblown dust. These are not areas well served by programs calibrated primarily for high-productivity agricultural land.

Only 2.1% of Washington State CRP acres are classified as prime farmland. This is the clearest possible evidence that CRP in Washington is doing exactly what it should — protecting fragile, non-prime land from erosion. Every barrier to enrollment in these regions undermines the program's core mission.

2. Rental Rate Issues

2.1 The Statutory 85% Proration: A Built-In Penalty

A foundational issue that is often overlooked in CRP rate discussions: by statute, the maximum CRP rental rate is capped at 85% of the county average dryland cash rent. This means that whatever NASS determines the county average dryland cash rent to be, the farmer receives only 85 cents of every dollar of that figure. The 15% reduction comes off the top, before the check is written.

This 15% haircut was designed as a modest discount to encourage enrollment while preserving fiscal responsibility. In practice, it has become a compounding penalty when layered on top of an already-flawed baseline. Consider Adams County: FSA's proposed 2025 published rate is \$54/acre. The actual annual CRP payment a farmer receives is $\$54 \times 85\% = \$45.90/\text{acre}$. If the \$54 baseline is itself undervalued — because Washington's crop-share farmers report \$0 or guessed figures on NASS surveys — then the producer is receiving 85% of a number that was already too low. The real-world payment can represent well under 70 cents on the dollar of what comparable ground is actually worth in the local market.

The Compounding Problem: Flawed Baseline $\times$ 85%

Step 1: NASS surveys miss crop-share rental values, producing a county average dryland cash rent that understates true land value. Step 2: Statute then pays farmers only 85% of that already-undervalued figure. The result: in Adams County, the published rate is \$54 — but the farmer's actual CRP payment is \$45.90/acre. If the true market-equivalent rent is \$75–\$90/acre (reflecting crop-share values), the farmer is receiving roughly 50–60 cents on the dollar. This is not a conservation incentive. It is a conservation deterrent.

2.2 The NASS Survey Problem

CRP rental rates are determined using USDA's National Agricultural Statistics Service (NASS) cash rent surveys. This methodology has a fundamental flaw for Washington State: the majority of Washington wheat farmers do not operate under cash rent agreements. They operate under crop-share arrangements.

When farmers on crop-share arrangements complete NASS surveys asking about cash rent, they frequently report \$0 — because they have no cash rent to report — or attempt to estimate a cash equivalent they have never actually paid. Both responses produce distorted data that systematically underestimates the value of Washington farmland. The result is a CRP rental rate ceiling built on a flawed foundation, then cut by another 15%.

WAWG's Core Ask on Rental Rates

NASS must redesign its rental rate surveys to capture crop-share arrangements and convert them to cash-equivalent values. Until this structural data problem is fixed, the 85% proration will continue to be applied to an already-undervalued baseline — a compounding discount that makes CRP enrollment economically irrational for many Washington producers who can achieve better returns by staying in production.

2.3 Rate Volatility — Year-to-Year Swings and the Case for the Rate Calculator

Washington farmers have experienced dramatic year-to-year volatility in county average rental rates that defies explanation on economic grounds. In some counties, rates have swung by \$40–\$50 per acre between consecutive years without any corresponding change in land productivity or market conditions. This volatility makes farm planning nearly impossible for CRP participants and discourages new enrollments.

FSA has historically maintained a 10-year and 5-year average rental rate calculator — an administrative tool that smooths out single-year NASS anomalies and gives producers and FSA staff a more stable baseline for evaluating whether a proposed rate is reasonable. This tool is particularly valuable in Washington State where the NASS survey distortions caused by crop-share agreements can produce wildly unrepresentative single-year figures.

Administrative Priority: Retain and Apply the Rate Averaging Calculator

FSA should formally retain and consistently apply its 10-year/5-year average rate calculator in the CRP rental rate determination process. A rolling average smooths the impact of single-year NASS survey anomalies and provides a more defensible, stable baseline. For Washington counties where crop-share survey distortions are most severe, a rolling average also captures the years where survey responses were more representative — providing a partial correction without requiring statutory change.

WAWG has long advocated for a rental rate model that incorporates a rolling multi-year average and explicitly factors in input cost trends. When farm input costs doubled or tripled between 2020 and 2022, CRP rental rates in many wheat-growing counties declined. This is precisely the wrong signal to send to producers considering conservation enrollment.

2.4 What Farmers Actually Receive: 2025 Rate Table With Proration Applied

The table below shows FSA Washington's proposed 2025 published rates alongside the actual CRP payment a farmer receives after the statutory 85% proration is applied. This is the number that matters to a producer doing a pencil test on whether to enroll. In many Columbia Basin counties, the actual payment — after proration — is below the county's own 5-year historical average, and well below what comparable crop-share ground commands in the market.

County	2022 Published	2025 Published	Actual CRP Payment (×85%)	5-Yr Avg (Published)	Notes
Adams	\$46	\$54	\$45.90	\$50.44	Dryland wheat; Columbia Basin
Asotin	\$46	\$54	\$45.90	\$58.74	Steep slopes; Palouse transition
Benton	\$40	\$45	\$38.25	\$47.73	Horse Heaven Hills; PM10 area
Columbia	\$77	\$95	\$80.75	\$74.95	
Douglas	\$44	\$47	\$39.95	\$48.55	Near county acreage cap
Franklin	\$51	\$54	\$45.90	\$54.99	Columbia Basin; PM10 area
Garfield	\$69	\$84	\$71.40	\$68.35	
Grant	\$40	\$54	\$45.90	\$59.65	Columbia Basin dryland
Lincoln	\$54	\$69	\$58.65	\$54.59	Palouse/Basin transition zone

County	2022 Published	2025 Published	Actual CRP Payment (×85%)	5-Yr Avg (Published)	Notes
Spokane	\$55	\$73	\$62.05	\$59.47	
Walla Walla	\$76	\$64	\$54.40	\$70.33	<i>Published rate declined from 5-yr avg</i>
Whitman	\$87	\$94	\$79.90	\$83.79	<i>Palouse wheat country</i>
Yakima	\$150	\$54	\$45.90	\$68.23	<i>Extreme volatility; proration compounds</i>

Note: Green cells = 2025 published rate above 2022. Red cells = below 2022. Orange column = the actual annual payment per acre a farmer receives after the statutory 85% proration. The 5-Year Average shown is the published historical average; actual historical payments were also 85% of those figures.

Benton County illustrates the problem starkly: the 2025 published rate of \$45 sounds modest but is already down from a 5-year average of \$47.73. After proration, the actual payment is \$38.25/acre — for land in the Horse Heaven Hills that sits under direct regulatory scrutiny from the Washington Department of Ecology for windblown dust. The conservation value of enrolling that ground is enormous. The payment is not.

3. Environmental Benefits Index and Erosion Modeling

3.1 The RUSLE2/WEPS Transition

The transition from RUSLE/WEQ to RUSLE2/WEPS for the Environmental Benefits Index (EBI) calculation represented the most significant change to the CRP scoring system in decades. While the updated models are scientifically superior and better capture the actual erosion risk of individual parcels, the transition was not without problems — and those problems hit Washington State particularly hard.

FSA's fact sheet confirmed that RUSLE2 and WEPS may generate "noticeably different erosion results" than legacy models, with a general tendency toward lower water erosion scores and higher wind erosion scores. For many Washington producers, particularly on steep slopes, the result was EBI scores that dropped dramatically — in some cases below competitive thresholds — for land that producers and local FSA staff knew to be highly erodible.

3.2 The NCCPI Model Correction: A Win, but Incomplete

Through sustained advocacy by the Washington Association of Wheat Growers, FSA Washington, and NRCS State Conservationist Roylene Comes at Night, a critical error in the NCCPI (National Commodity Crop Productivity Index) model was identified and corrected. The model was using regional data that did not accurately reflect Washington's actual soil productivity — particularly for steep-slope dryland wheat areas.

NRCS National Resource Soil Scientist Robert Dobos identified the specific discrepancies and made corrections to the Small Grains Index for Washington State. The new index versus old index comparison shows significant movement in scores for Washington soils — predominantly upward, meaning that land which was being undervalued by the model is now more accurately represented. This movement benefits both the environmental purpose of CRP (accurately identifying high-erodibility land) and the farmer's ability to compete for enrollment.

Robert Dobos also noted that Asotin County (WA603) shows data points consistently above the regression line, indicating that the model still has room for improvement in that specific county and that further refinement is underway.

Lesson Learned: Local Data Matters

The NCCPI model correction for Washington State was only possible because producers, wheat growers associations, and state FSA/NRCS leadership persisted in documenting the discrepancy with real on-farm data. The national office confirmed that producers and associations must provide documented scientific evidence — surveys, studies, field data — to support any model correction. This process must be formalized and made accessible for all states.

3.3 Outstanding Issues: EBI Scoring and the Baseline Problem

Even with the NCCPI correction, structural issues remain with the EBI scoring system. The transition from legacy models to RUSLE2/WEPS caused the historic EBI score range — which had generally run from 240–260 for competitive cutoffs — to shift significantly. In some signups, the cutoff dropped to 184, suggesting a recalibration of the entire scoring distribution rather than an equal-footing transition.

WAWG has consistently advocated that if new models are used to calculate EBI, the baseline cutoff must be recalibrated to maintain comparable enrollment outcomes. A change in

methodology should not produce a de facto reduction in program access. To date, this structural recalibration has not been comprehensively implemented.

3.4 HELI Eligibility Disruptions

The Highly Erodible Land Initiative (HELI) — the non-competitive enrollment pathway for the most erodible land — requires an Erodibility Index (EI) of 20 or greater. With RUSLE2/WEPS generating different EI values than legacy models, some parcels that had previously qualified for HELI fell below the threshold, requiring them to compete in the general signup instead. For some of Washington's most fragile farmland, this represented a significant barrier to continued enrollment.

4. Payment Limitations: A 1980s Cap in a 2026 Economy

Individual CRP payment limitations were set at \$50,000 per person in the 1980s. They have not been meaningfully adjusted since. Over that same period, farmland values have increased dramatically, input costs have risen severalfold, and the scale of family farm operations has grown to reflect modern agricultural economics.

The practical result: Washington State farmers who could and would enroll additional highly erodible acres in CRP are already at the payment cap on their existing contracts. The marginal land — the steepest slopes, the most wind-exposed parcels — stays in production not because the farmer wants to farm it, but because the program cannot accommodate more acres at a payment rate that makes enrollment viable.

This is a particular problem in Washington because our dryland farming operations tend to be large-acreage, low-per-acre-value enterprises. A payment cap calibrated for the Midwest corn belt — where high-value land requires fewer acres to hit the cap — is structurally misaligned with the Washington dryland wheat economy.

Legislative Priority: Raise the Payment Cap

WAWG supports increasing the individual CRP payment limitation from \$50,000. A figure indexed to inflation since the 1980s would suggest a cap in the range of \$150,000–\$175,000 at minimum. Alternatively, a cap tied to a percentage of county average CRP payments, or a tiered structure based on operation size, would better serve the program's conservation mission in large-acreage dryland farming states.

In the near term — before statutory change can be achieved — producers who have reached the CRP payment cap should be actively counseled on complementary USDA programs that can fund additional conservation work on the same operation. The Environmental Quality Incentives Program (EQIP), in particular, can fund conservation practices on land that cannot enter CRP due to payment limitations, including practices such as residue management, cover crops, and wind erosion control that address the same resource concerns driving the CRP need. Local FSA and NRCS staff should be equipped and encouraged to conduct joint enrollment discussions that treat CRP and EQIP as complementary tools in a producer's conservation portfolio, not competing options.

5. County Acreage Caps: Locking Out Conservation

Federal statute limits CRP enrollment to 25% of a county's cropland acres. This limitation was designed to prevent CRP from taking too much land out of agricultural production in any one area. In practice, however, the cap has become a barrier to conservation in counties that have historically embraced the program most enthusiastically.

Douglas County is one of only approximately 13 counties nationwide that have encountered this acreage cap ceiling in a meaningful way. That small number itself carries an important message: this is not a widespread abuse of the program's intent. These are counties with unusually high concentrations of genuinely fragile, conservation-appropriate land — counties that enrolled heavily precisely because CRP was the right tool for their land base. Capping them out punishes success, not excess.

Spotlight: Douglas County — 1 of ~13 Nationally

Douglas County, Washington, is among a small group of roughly 13 counties nationally that have hit the statutory 25% cropland enrollment cap. In each of these cases, high enrollment reflects a high proportion of genuinely conservation-priority land — in Douglas County's case, primarily critical wildlife habitat rather than HEL-designated soils. These counties represent a natural constituency for a targeted statutory fix. A coordinated advocacy effort connecting the affected counties and their congressional representatives could produce a compelling case for a narrow waiver provision that would have minimal national budget impact.

When a county like Douglas reaches the 25% threshold, farmers with expiring contracts — and with land that clearly qualifies for re-enrollment — cannot get back into the program. Their land is released from conservation cover and returned to production, often on soils that will immediately begin to erode under tillage. The conservation benefits built over a 10-year contract are lost.

An additional procedural barrier compounds the problem: under current rules, any county acreage cap review or waiver process must be initiated by the local Board of County Commissioners — elected county government officials — rather than the FSA County Committee. Most producers, and even many FSA staff, are unaware of this distinction. The County Committee (COC) — the body farmers interact with for day-to-day CRP administration — does not have the authority to initiate the cap review process on its own. This means that producers seeking relief from the cap must engage county government leadership, not just their FSA office, which adds a political and procedural layer most farmers have no experience navigating.

Advocacy Action: Close the Procedural Gap

WAWG recommends that FSA Washington develop producer-facing educational materials clearly explaining the county acreage cap waiver process and the role of County Commissioners in initiating it. Additionally, WAWG supports statutory language clarifying that the FSA County Committee should have co-authority — alongside County Commissioners — to initiate a cap review when a county's highly erodible land inventory justifies it. The current requirement creates an unnecessary barrier that has nothing to do with the conservation merit of the underlying land.

The situation was made worse by the 2018 Farm Bill's change to count SAFE acres toward the county cap. SAFE — the State Acres for Wildlife Enhancement program — was previously exempt from the CRP acreage limit, reflecting its distinct wildlife-focused mission. Removing that exemption has had unintended consequences in counties like Douglas where SAFE participation is high.

Proposed Solutions:

- Restore the SAFE exemption from county CRP acreage caps, recognizing its distinct wildlife mission and allowing it to operate in parallel rather than competing with core CRP enrollment.
- Establish a statutory waiver process allowing counties to exceed the 25% cap for parcels with EI scores above a defined threshold (e.g., $EI \geq 20$), ensuring that the most erodible land can always be enrolled.
- Create a priority re-enrollment pathway for land affected by wildfire or other declared disasters that destroys existing CRP cover.

- Clarify in statute that post-fire emergency re-enrollment should not count against the county cap for a defined recovery period.

6. Mid-Contract Management and Technical Assistance

Establishing a successful CRP stand is only the beginning of a 10-year commitment. The stand must be maintained, managed, and — in drought years — actively protected to survive. Washington's dryland farming regions experience periodic D2 and D3 drought designations that can devastate CRP plant stands that would otherwise be healthy.

WAWG supports robust mid-contract management (MCM) cost-share at levels that reflect actual costs. Unfortunately, cost-share percentages have declined over time even as the cost of seed, herbicide, and labor has risen. In drought years, the gap between available cost-share and actual management costs can make stand survival economically impossible for some producers.

6.1 The Plant Density Standard Problem: Science vs. Compliance

Among the most significant and least-discussed issues in CRP compliance is the plant density standard applied in Washington State. Under current NRCS policy for Washington (2026 Technical Considerations), CRP participants must achieve and maintain 1.0 desirable plant per square foot — reduced to 0.8 plants per square foot only for locations with annual precipitation under 12 inches. A final stand evaluation verifies these thresholds hold for the life of the contract.

These standards appear straightforward. The problem is that they are inconsistent with the scientific guidance NRCS's own technical experts established for the Intermountain West — the region Washington's arid dryland counties belong to ecologically and agronomically.

NRCS Plant Materials Technical Note No. 12 (TN-12), Guidelines for Determining Stand Establishment on Pasture, Range and Conservation Seedings — authored by NRCS specialists from the Boise, Salt Lake City, and Spokane offices — provides a Plant Density Guide based on mean annual precipitation and ecological site type. Applying that guide to Washington's dryland CRP areas produces a stark comparison:

Precipitation Zone	Ecological Site	TN-12 Target Density (plants/sq ft)	CRP WA Standard (plants/sq ft)	Relationship
Under 10"	Loamy	0.5 – 1.0	0.8 – 1.0*	CRP at top of or above TN-12 range
Under 10"	Shallow, Gravelly, Stony, Eroded	0.3 – 0.7	0.8 – 1.0*	CRP EXCEEDS entire TN-12 range
10" – 12"	Loamy	0.7 – 1.5	0.8 – 1.0*	Within range, but at low end for problem soils
10" – 12"	Shallow, Gravelly, Stony, Eroded	0.5 – 1.0	0.8 – 1.0*	CRP at top of or above TN-12 range

**CRP Washington standard: 1.0 plants/sq ft for areas ≥ 12 " precipitation; 0.8 plants/sq ft for areas < 12 " precipitation. Source: NRCS Washington 2026 Technical Considerations. TN-12 data: NRCS Plant Materials Technical Note No. 12, October 2011.*

The table makes a critical point: for the shallow, gravelly, stony, or eroded soils that dominate CRP fields in the Horse Heaven Hills, the Columbia Basin, and the drier portions of Douglas County — areas receiving under 10 inches of annual precipitation — TN-12 identifies a scientifically appropriate target density of 0.3 to 0.7 plants per square foot. CRP Washington's compliance standard of 0.8 plants per square foot exceeds the entire TN-12 range for these soil

types. A stand that NRCS's own technical guidance would classify as successful on that site is a stand that fails CRP compliance.

NRCS's Own Science vs. NRCS's Own Compliance Standards

TN-12 states explicitly: 'a stand density which would be considered poor on a well drained, moist upland site might be excellent on a drier semi-desert site.' It further states that 'the criteria to be applied to any particular seeding should be based on local experience, observation and production potential of the site.' The CRP compliance standard of 1.0 plants/sq ft (0.8 under 12") was not calibrated to Washington's arid dryland sites. It reflects a national standard appropriate for higher-rainfall environments. Applying it uniformly to sites that TN-12 says support 0.3–0.7 plants/sq ft sets up producers for compliance failures that have nothing to do with management quality.

This problem is compounded by the drought dynamics discussed in the following section. Native and introduced grass stands in the <10" and 10–12" precipitation zones that meet TN-12's target density in normal years will routinely fall below the 0.8 threshold during D2 or D3 drought years — not because of stand failure in any agronomic sense, but because the CRP standard was never calibrated for the natural variability of these environments. The result can be contract termination and payback demands on producers whose stands are, by the best available NRCS science, completely healthy.

TN-12 also provides critical context on re-evaluation timing that is relevant here. For native species, TN-12 recommends watching and managing stands for two or more years before making a failure determination. On sites with hard or dormant seed, evaluation should extend into the second growing season. Under drought conditions, TN-12 notes that 'failure may occur during the second year under unusually dry weather conditions' and recommends against hasty replanting judgments. NRCS stand status reviews — and the FSA compliance determinations that follow from them — that do not account for these factors, including whether a drought year is distorting the density count, are applying a standard the underlying science does not support.

Advocacy Position: Align CRP Compliance with TN-12

WAWG requests that FSA and NRCS jointly review the CRP plant density compliance standards for Washington State against NRCS Plant Materials Technical Note No. 12. Specifically: (1) The 0.8 plants/sq ft threshold for areas under 12" precipitation should be further reduced for shallow, gravelly, stony, and eroded soils to align with TN-12's range of 0.3–0.7 for those site types. (2) Stand evaluations conducted during or immediately following a D2/D3 drought designation should be held to TN-12's drought-adjusted standards, not the normal-year compliance threshold. (3) For native species plantings, TN-12's two-to-three year evaluation timeline should be formally incorporated into CRP stand certification protocols.

Current rules for NRCS stand status reviews and FSA compliance determinations do not adequately account for drought stress. A stand that would pass muster in a normal rainfall year may fall below density thresholds during a D3 drought through no fault of the producer. NRCS stand status reviews should formally incorporate drought designation data and year-to-date precipitation totals when evaluating stands, and FSA compliance determinations should reflect those findings.

WAWG further supports flexibility in allowed plant species during drought conditions. In arid regions, limiting plant options to species that perform well in average years but fail during extended drought can doom an otherwise well-managed stand. The approved species list should reflect the actual climatic variability of Washington's dryland regions.

6.2 Nesting Season Flexibility

The field access restriction from April 1 to July 15 to protect the primary nesting season — a date established through coordination with the Washington Department of Fish and Wildlife — is an important conservation tool, but it should be implemented with some flexibility for management activities that would actually improve stand quality and long-term habitat value. This is particularly relevant for post-drought recovery work that may need to occur in early spring.

6.3 Technical Assistance Timing

NRCS technical assistance and stand status reviews are most valuable when they occur early enough in a contract period to allow corrective action. An FSA compliance determination — based on NRCS stand status review findings — made only in the final year of a 10-year contract, the current common practice, gives the producer no meaningful time to address a deficient stand before contract termination and potential payback obligations.

WAWG recommends that NRCS conduct formal stand evaluations at years 3–4, 6–7, and the current final-year review, giving producers and NRCS staff the opportunity to identify and address problems while remediation is still possible.

7. Native Seed Mixes: EBI Incentives vs. Agronomic Reality

The EBI awards additional points for native grass seed mixes — specifically the 50-point CP2 cover, which requires a five-species native mix including three native grasses, one forb/legume/shrub, and a fifth flexible species. All five species must be certified as established within two years of planting and must be present at the end of the 10-year contract.

In theory, this incentive structure encourages maximum ecological value. In practice, it creates significant risk for producers in Washington's dryland regions, particularly those with existing weed pressure or annual precipitation below 12 inches.

Native species have weaker seedling vigor than introduced species and require exceptional seedbed preparation, precise timing, and sustained weed management to establish successfully. When fields are coming out of introduced grass CRP stands or have significant weed competition, native establishment becomes extremely challenging. A failed stand can result in contract termination and repayment of all program dollars — a catastrophic outcome for a farmer who acted in good faith.

WAWG's Recommendation on Seed Mix EBI Design

The 20-point CP2 option (three native species: two grasses, one forb/shrub/legume) better matches the climatic and agronomic reality of Washington's drier regions. WAWG recommends that FSA and NRCS jointly evaluate whether the EBI bonus for the 50-point native mix adequately accounts for the establishment risk differential in arid climates, and whether growers are being inadvertently steered toward a compliance risk that is not in their long-term interest.

8. The 2026 Farm Bill: What Changed — and What Didn't

The Farm, Food, and National Security Act of 2026 (H.R. II, 119th Congress) — the House version of the new farm bill, introduced by Rep. Glenn Thompson of Pennsylvania — was developed under significant budgetary constraints. As congressional staff have confirmed directly to WAWG, the CRP modernization provisions that had been proposed in the 2024 bill ran into scoring challenges and had to be significantly scaled back to achieve budget neutrality on the House floor.

8.1 What the House Bill Does

The House farm bill largely extends the existing CRP program through fiscal year 2031 with minimal structural changes:

- The program authorization is extended from 2023 to 2031 across all major provisions.
- The maximum acreage enrollment cap is maintained as a flat cap (unchanged from current law) through fiscal year 2031, rather than being expanded as had been proposed.
- The continuous enrollment target of not fewer than 8,600,000 acres is codified through September 30, 2031.
- State enrollment rate provisions are updated to cover fiscal years 2026 through 2031.
- The Farmable Wetland Program is extended through 2031.

Critically, the House bill does NOT include the CRP modernization provisions — expanded acreage caps, updated payment limitation adjustments, or structural EBI reforms — that Washington State farmers had been hoping for.

8.2 The Conference Opportunity

Congressional staff from Rep. Thompson's office have explicitly told WAWG that the House bill is "not the final product" — it is what was needed to get the bill to the floor. The conference process between the House and Senate versions of the farm bill represents the most significant remaining opportunity to incorporate the CRP reforms that Washington farmers need.

Action Item for WAWG and Washington's Congressional Delegation

The conference is where CRP gets fixed — or doesn't. WAWG should immediately engage with both Washington State senators and House members on the Agriculture Committee to ensure that the following provisions are included in the conference report: (1) Increased or inflation-indexed payment limitations; (2) Restoration of the SAFE exemption from county acreage caps; (3) A formal waiver process for counties at or near the 25% cap for highly erodible land; (4) NASS survey reform to capture crop-share arrangements; (5) A process for states to provide documented local data to correct national model errors.

8.3 What This Means for Washington Growers Right Now

For the 2026 signup, CRP operates under current rules with the RUSLE2/WEPS models and the corrected NCCPI data for Washington State. The Palouse region soil data corrections made through the FSA/NRCS collaboration will benefit 2024 and subsequent signups. The rental rate proposals submitted for 2025 reflect FSA Washington's best effort to advocate for producers within the national system.

Growers should note that the 2026 Technical Considerations fact sheet from NRCS Washington provides updated guidance on seed mix selection, seedbed preparation, and compliance

timelines. In particular, the guidance on weed pressure categorization and the distinction between CP1, CP2, and CP4D mixes is critical for producers making enrollment decisions.

9. WAWG Priority Advocacy Positions

Based on the foregoing analysis, WAWG identifies the following as its priority CRP advocacy positions for the 2026 Farm Bill conference and ongoing administrative engagement:

Legislative Priorities (Farm Bill Conference)

- **Increase the individual CRP payment limitation from \$50,000 to a level reflecting 40+ years of inflation and the economics of large-scale dryland farming operations.**
- **Restore the SAFE program exemption from county CRP acreage caps, or establish a formal statutory waiver process for counties near the 25% threshold.**
- **Require NASS to redesign cash rent surveys to capture and convert crop-share arrangements to cash-equivalent values for use in CRP rental rate calculations.**
- **Establish a formal, documented process for state FSA and NRCS offices to submit local soil, climate, and land data to correct national model errors in RUSLE2/WEPS/NCCPI.**
- **Require EBI baseline recalibration whenever a significant methodology change (such as the RUSLE2/WEPS transition) is implemented, to maintain comparable competitive access.**
- **Create a fire/disaster recovery re-enrollment pathway that does not count against county acreage caps during a defined post-disaster recovery period.**

Administrative Priorities (FSA/NRCS National)

- Complete the NCCPI model refinement for Asotin County (WA603) as noted by NRCS scientist Robert Dobos, and establish a regular review cycle for all Washington State soil map units.
- Implement drought-adjusted NRCS stand status review protocols that formally incorporate drought designation data and year-to-date precipitation when evaluating stand compliance, with FSA compliance determinations required to reflect those findings.
- Increase MCM cost-share to levels that reflect actual costs for stand maintenance in arid climates, with automatic cost-share floor adjustments in D2/D3 drought-designated areas.
- Shift the NRCS stand status review schedule to include mid-contract evaluations at years 3–4 and 6–7, coordinating with FSA compliance determinations, so producers have time to remediate — not only in the final two years of the contract.
- Provide clear, advance communication to producers when EBI model changes will affect scoring, with sufficient lead time for enrollment strategy adjustment.
- Develop an expedited re-enrollment pathway for fire-damaged CRP land, with streamlined conservation plan updates that do not require full re-establishment documentation for stands that were compliant prior to the fire.

State-Level Administrative Priorities

- Washington State FSA and NRCS should maintain the collaborative model established between the state offices and national technical staff for soil data validation, ensuring that future model discrepancies are identified and escalated quickly.
- FSA should work with the Washington Department of Ecology and the Benton Clean Air Agency to formally document the air quality benefits of CRP enrollment in the Horse Heaven Hills and Tri-Cities region, creating a record that supports both federal conservation investment and state clean air compliance planning.
- FSA Washington should prioritize education and outreach for producers in the Columbia Basin, Horse Heaven Hills, and Douglas County on HELI eligibility changes under RUSLE2/WEPS, with county-specific guidance on EI impacts.

10. Conclusion

The Conservation Reserve Program remains one of the most powerful, cost-effective conservation tools available to the American agricultural system. In Washington State's dryland farming regions — the Horse Heaven Hills, the Columbia Basin, Douglas County, the Tri-Cities area — CRP is not just a conservation program. It is a public health program, an air quality tool, a wildfire risk mitigation strategy, and an economic lifeline for producers farming on America's most fragile soils.

The 2026 House Farm Bill, as written, largely maintains the status quo. That is disappointing but not surprising — the same scoring challenges and competing budget priorities that have blocked CRP reform for years remain. What has changed is the urgency. Washington's dryland farmers cannot wait another farm bill cycle for rental rates that reflect reality, payment caps that accommodate their operation scale, and enrollment pathways that keep the most erodible land in conservation cover.

WAWG will continue to work with Washington's congressional delegation, FSA and NRCS state and national leadership, the Tri-State Grain Growers, the Washington Department of Ecology, and local conservation districts — to ensure that the conference process produces a farm bill that genuinely serves the farmers and communities of Washington State. The Washington Grain Commission's continued financial support of WAWG's advocacy work makes this sustained engagement possible.

The foundation has been laid: data corrected, relationships built, and the documented case made. The work is not finished.

Washington Association of Wheat Growers

109 E. First Ave. | Ritzville, WA 99169 | (509) 659-0610 | michelle@wawg.org

This document is prepared for advocacy and educational purposes. It does not constitute legal advice.