Conservation Plan Supporting Organic Transition Plan Criteria
Practice/Activity Code (138) (No.)

1. Definition

A Transition to Organic System Plan is a conservation activity plan documenting decisions by producers who agree to implement a system of conservation practices which assist the producer to transition from conventional farming or ranching systems to an organic production system:

a. Meets NRCS quality criteria for soil erosion, water quality, and other identified natural resource concerns;
b. Addresses elements of a Organic System Plan (OSP) as defined in the USDA National Organic Program (NOP) Standards (www.ams.usda.gov/nop);
c. Complies with Federal, State, tribal, and local laws, regulations and permit requirements;
d. Documents the producer's objectives and decisions for practice implementation during the transition period.

Note: The conservation activity plan may be used by producers to help support their efforts to become a certified operation, but this plan may not be used as a replacement for an Organic System Plan (OSP) as required by the National Organic Program.

2. Transition to Organic Farming Plan Criteria

This section establishes the minimum criteria to be addressed in the development of Transition to Organic System Plan.

A. General Criteria and Plan Requirements:

1. An Environmental Evaluation (EE) (CPA 52) is to be prepared for all activity plans to demonstrate NRCS compliance with the National Environmental Policy Act, National Historic Preservation Act, Endangered Species Act, Environmental Justice, Air Quality, and other designated environmental concerns and environmental laws. The environmental effects from the activity plans on environmental resource concerns should be clearly documented on the EE (CPA-52 form). The following is abbreviated guidance for preparation of the EE:
   a. Planners and TSPs should follow the EE guidance delineated in the National Environmental Compliance Handbook.
   b. The EE describes the existing conditions for all applicable resource concerns.
   c. The EE will assess the resources potentially impacted by the no action, proposed action and any reasonable alternatives.
   d. Guide sheets will accompany the EE, as needed, to provide information on how to assess and deal with special environmental concerns.
   e. The findings section of the EE is to identify whether NRCS has determined based on the analysis of the EE: (1) that a site specific environmental assessment (EA) or an environmental impact statement (EIS) should be prepared based on the significance of potential impacts, or (2) the EE can be tiered to a state, regional, or national programmatic EA or EIS because the

proposed effects have been sufficiently analyzed in a state, regional, national programmatic EA or EIS.

f. TSP and planners are required to complete NRCS' Level I Environmental Compliance training prior to prepare any Form EE CPA 52.

2. A Transition to Organic System Activity Plan must be developed by certified Technical Service Providers (TSPs). The Food, Conservation, and Energy Act of 2008 (FCEA) provides authority to NRCS for practice payments through EQIP which include:

   "conservation activities involving the development of plans appropriate for the eligible land of the producer, including – comprehensive nutrient management planning; and other plans that the Secretary determines would further the purposes of the program…"

   This provides NRCS with the legal authority for use of financial assistance payments to producers through Environmental Quality Incentives Program (EQIP) for development of conservation activity plans prepared by certified TSPs. The specific TSP certification requirements for Transition to Organic Farming Activity Plan is located on the TSP registry (TechReg) web site at: http://techreg.usda.gov/

B. The planner shall consider the following applicable items during the conservation plan development process in support of the OSP:

1. Background and Site Information.
2. Identification of natural resource concerns to be addressed.
3. Producers objectives and goals related to organic production.
4. Site History and transition period (NOP Part 205.202).
5. Seeds and Planting Stock (NOP Part 205.204)
   - Type of seed used: organic, non-organic, untreated, treated or inoculated; if non-organic, untreated seed used must document "good faith effort" seed search for organic seed;
   - Annual seedlings: organic with certificate;
   - Perennial stock: organic, non-organic;
   - Other planting stock: organic, non-organic: rhizomes, shoots, tubers, cuttings or roots;
   - Non-Genetically Modified Organism (GMO) documentation (only needed for crops that have commercially available GM seed).
   - Seed treatment: pelletized, coated, primed, fungicide, insecticide, inoculated.

6. Production of Seedlings, Transplants, Greenhouse Crops (NOP Part 205.204)
   - Soil mix used to grow crops;
   - Method used to separate and identify organic and non-organic areas;
   - Method used to prevent commingling of organic and non-organic plants;
   - Labeling;
   - Prevention of prohibited materials drift/contact through ventilation or irrigation system;
   - Prevention of prohibited materials contact into sensitive areas, through streams, surface water, or irrigation system;
   - Method of cleaning seedling containers, equipment used for both organic and prohibited substances;
   - Method of cleaning and insuring materials stay on site (not airborne or waterborne).
7. Fertility, Soil Quality and Erosion Control (NOP Part 205.203 and 205.205)
   - Crop rotation plan;
   - List of cover crops, hedgerows, and/or artificial structures for beneficial insects, pollinators, bats, and raptors or other diversified plantings in annual and perennial crops;
   - Consideration of wildlife-friendly cover crops;
   - List of nutrients applied (incorporated, foliar, soil inoculants, compost);
   - Results of soil tests, tissue tests, microbiological tests, crop quality testing;
   - Cover crop management;
   - Side dressing, drip applications;
   - Method and frequency of fertility management monitoring;
   - Methods of erosion control and documentation:
     - Soil map units used for erosion prediction and predicted soil erosion from wind and/or water as a result of planned using approved prediction tools such as RUSLE2 and/or WEQ when applicable
8. Production of Compost (NOP Part 205.203)
   - Method of producing compost;
   - Compost that contains manure;
   - Addition of pelleted manure to compost;
   - Uncomposted manure application
9. Crop rotation (NOP Part 205.205)
   - Practices to maintain or improve soil organic matter content;
   - Practices to manage deficient or excess land nutrients;
   - Provide for pest management in annual and perennial crops;
   - Practices to address erosion control.

10. Pest Management (NOP Part 205.206)
    - Substances used for controlling insects or disease;
    - Biological controls including encouraging and managing bats and raptors);
    - Pest control materials and reason for use;
    - Synthetic pesticides used in or around facilities where organic products are stored;
    - Beneficial predators and parasites;
    - Pollinator habitat and pollinator protection.
11. Locations of sensitive resource areas to include:
    a) Rivers, streams, drains, surface waters, coastal waters, wetlands, wells, groundwater, drains, grassed waterways and buffers;
    b) Sensitive plant species and/or essential fish and wildlife 9including invertebrates)habitat (on and off-site), and food plots;
    c) Drinking water sources.
12. Prevention of Contamination by Contact (NOP Part 205.201)
    - Adjoining land use;
    - Width and type of riparian and other vegetative buffers;
    - Width;
    - Separation of organic, non-organic at harvest;
    - Safeguard methods to prevent contamination from drift;
    - Use of lumber treated with prohibited substances;
    - Application equipment, type, and cleaning method documented that is used for both organic and non-organic crops;
    - Water source;
    - Storage of any prohibited materials on farm;
    - Methods of crop storage
13. Livestock (NOP Part 205.236 to 205.239)
    - Livestock, poultry, breeds, gender, numbers, hatch or purchase dates;
    - Livestock products, processing;
    - Crops grown for organic livestock feed;
    - Origin of Livestock - Type, flock ID, date of purchase, whether certified organic, age at purchase, source, projected date of egg-laying, slaughter
    - Livestock Feed - access to pasture for all ruminants
    - Drinking Water Source
    - Operations Producing both Organic and Non-organic livestock. Separation between organic and non-organic livestock.
    - Manure Management - Storage and application techniques, application rates, number of acres manure applied to, and when applied

14. Biodiversity - conservation plants, habitat for birds, pollinators, bats, beneficial insects, natural areas restored or protected, wildlife friendly farm practices

C. Transition to Organic System Plan Specific Element Criteria.

Each of the Transition to Organic System Plan elements will address specific criteria. The degree to which these elements are addressed in the development and implementation of a site-specific Transition to Organic System Plan is determined by the General Criteria in Section 2.A and 2.B and the detailed specific criteria provided for each element of the CPSOT below.

1. Background and Site Information Element. This element provides a brief description of:
    - Name of owner/operator;
    - Farm location and mailing address;
    - Soil map units;
    - Map of streams, surface waters, wetlands on or adjacent to site
    - Conservation plan map;
    - Total acres to be transitioned to organic;
    - Field names or codes;
    - Date producer began management of parcel;
    - Date producer plans to harvest certified organic crops from the parcel;
    - List of crops grown on the parcel, with acreage for each crop
2. Assessment of the natural resource concerns to be addressed. The plan shall identify those natural resource concerns which will need to be addressed by the producer in order to meet requirements of the NOP.
    - Air Quality.
    - Domestic Animals.
    - Fish and Wildlife.
    - Plant Condition.
    - Soil Condition.
    - Soil Erosion.
    - Water Quality.
    - Water Quantity.
3. Producer's objectives and goals related to organic production.
4. Planned NRCS practice standards. This element includes NRCS Field Office Technical Guide (FOTG) approved conservation practices that may be needed to assist producers during the transition to an organic production system. The "Conservation Plan Supporting Organic Transition" may include but is not limited to the conservation practices listed below. (Note: Additional mitigation measures or activities which are not NRCS approved conservation

practices may need to included in this plan to assist the producer meet NOP requirements (e.g., setbacks, animal traps/repellents, animal medications, etc.). Although these activities may be needed by the producer to achieve organic production certification and can be included in this plan as valuable information, these measures are not required as part of this conservation activity plan.)

- Alley Cropping (311).
- Cover Crop (340).
- Conservation Cover (327).
- Conservation Crop Rotation (328).
- Early Successional Habitat Development/Management (647).
- Field Border (386).
- Filter Strip (393).
- Forest Stand Improvement (666).
- Hayland Management (512).
- Hedgerow Planting (422).
- Herbaceous Wind Barriers (603).
- Irrigation System, Microirrigation (441).
- Irrigation Water Management (449).
- Land Smoothing (466).
- Mulching (484).
- Nutrient Management (590).
- Pasture and Hayland Planting (512).
- Pest Management (595).
- Prescribed Grazing (528).
- Residue and Tillage Management, Mulch Till (345).
- Residue Management, No Till/Strip Till/Direct Seed (329).
- Residue Management, Ridge Till (346).
- Residue Management, Seasonal (344)
- Restoration and Management of Rare and Declining Habitats (643).
- Stream Habitat Improvement and Management (395).
- Stripcropping (585).
- Terrace (600).
- Upland Wildlife Habitat Management (645).
- Windbreak/Shelter Belt Establishment (380).

D. References

- USDA National Organic Program (NOP - www.ams.usda.gov/nop).

- California Certified Organic Farmers (http://www.ccof.org/).
- USDA NRCS Field Office Technical Guide (http://www.nrcs.usda.gov/technical/efotg/).
- ATTRA Organic Documentation Forms, Organic Crop and Livestock Workbooks (http://www.attra.org/).

2. Deliverables for the Client – a hardcopy of the plan that includes:

- Cover page – name, address, phone of client and TSP; Total Acres of the Plan, signature blocks for the TSP, producer, and a signature block for the NRCS acceptance.
- Soils map and appropriate soil descriptions.
- Resource assessment results (wind and water erosion, water availability, soil fertility, and others that may be needed).
- For management practices. The planned practices and the site specific specifications on how each practice will be applied; when the practice will be applied, and the extent (acres or number) that will be applied.
- For engineering/structural practices. The planned practice when it will be applied and extent, and located on the conservation plan map.

3. Deliverables for NRCS Field Office:

- Complete Hardcopy and Electronic copy of the client's plan (MS Word copy).
- Digital Conservation Plan Map showing locations of fields, natural and other human installed features, and all planned conservation practices.
- Digital Soils Map.
- Completed CPA 52 and appropriate worksheets.
- Conservation plan schedule of operations