

NB 450-15-1 TCH – Revised Cover Crop Termination Guidelines

National Bulletin: 450-15-1

Date: October 29,
2014

Subject: TCH – Revised Cover Crop Termination Guidelines

Purpose. To provide the revised "NRCS Cropland Cover Crop Termination Guidelines – September 2014, Version 3" document to all offices.

Expiration Date. May 1, 2015

Background. In December 2013, version 2 of the NRCS "Cover Crop Termination Guidelines" was issued via National Bulletin 450-14-2. Since then, some additional concerns with cover crop termination arose regarding the specific management of cover crops in areas under the Risk Management Agency (RMA) summer fallow practice.

To address those concerns, NRCS met with RMA and conducted additional evaluations and consultation to determine more specific guidelines for the use and termination of cover crops used in conjunction with the RMA summer fallow practice.

Integrating cover crops into rotations can significantly improve the resilience of production systems to extreme weather (both drought and heavy precipitation), enhance soil health, improve water quality, and increase carbon sequestration. However, some producers have encountered conflicting USDA program policies related to cover crop management in the RMA designated summer fallow counties.

Due to concerns that cover crops may deplete soil moisture and therefore reduce yield of the insured crop, NRCS evaluated additional research literature, plant growth and soil hydrology models, and input from national and local experts to provide the basis for developing guidelines for terminating cover crops to achieve their conservation benefit while minimizing risk of reducing yield to the following crop due to soil water use.

In addition to the revised "NRCS Cropland Cover Crop Termination Guidelines – September 2014, Version 3" document, RMA is also revising some of their policy and special provisions to be compatible with the revised guidelines.

Explanation. The revised "NRCS Cropland Cover Crop Termination Guidelines – September 2014, Version 3" specifically revised the following:

- Grazing Consideration.—Cover Crop Grazing or Forage Harvest – Cover crops may be grazed or harvested as hay or silage, unless prohibited by RMA crop insurance policy provisions. Cover crops cannot be harvested for grain or seed.
- Definition of Cover Crop.—Crops, including grasses, legumes, and forbs, for seasonal cover and other conservation purposes. Cover crops are primarily used for erosion control, soil health improvement, and water quality improvement. A cover crop managed and terminated according to these guidelines is not considered a "crop" for crop insurance purposes. The cover crop may be terminated by natural causes such as frost, or intentionally terminated through chemical application, crimping, rolling, tillage, or cutting.
- Definition of Termination.—Termination means growth has ended.

The revised "NRCS Cropland Cover Crop Termination Guidelines – September 2014, Version 3" specifically added the following:

Consideration #13: RMAs Summerfallow Practice.—If a crop, or a cover crop, is planted on summerfallow acreage in a fallow year, the following planted crop will not meet the RMA Summerfallow Practice definition until the acres lie fallow for a full crop year. For the 2015 crop year, if a cover crop was planted during the fallow year, the acreage may be insured under the "continuous cropping practice" (if available in your county), or by written agreement (if continuous cropping is not available in your county). For the 2016 and succeeding crop years, if a cover crop is planted during the fallow year, the acreage may be insured under the "continuous cropping practice" (if available in your county), or by written agreement (if continuous cropping is not available in your county) provided the cover crop is terminated at least 90 days prior to planting for summer and fall seeded crops. For early spring seeded crops, terminate the cover crop in the fall or as early as possible in the spring. Please contact your crop insurance agent for more information.

For those States that have RMA-designated summer fallow counties, "Consideration #13" is very critical

to know and understand. When producers utilize cover crops in the RMA summer fallow counties they will be insured under the "continuous cropping" coverage, or by written agreement if continuous cropping is not offered in a summer fallow county. Also, beginning for the 2016 crop year the cover crops in the RMA summer fallow counties must be terminated at least 90 days prior to planting summer and fall seeded crops.

The revised "NRCS Cropland Cover Crop Termination Guidelines – September 2014, Version 3" document represents a consistent, simple, and flexible policy across the USDA Farm Service Agency (FSA), RMA, and NRCS. The new cover crop management guidance allows flexibility for producers and crop consultants to make field-by-field management decisions in order to achieve the economic and conservation benefits cover crops offer. More farmers are finding cover crops are an important component for building healthy soils—soils that are more resistant and resilient to weather extremes.

With this consistent, science-based cover crop guidance, farmers will have a greater opportunity to utilize cover crops on their operations, reaping the conservation and economic benefits that cover crop can provide—healthy soils, clean water, and sustained food and fiber production.

NRCS, FSA, and other interested parties representing conservation and university groups have developed the "NRCS Cover Crop Termination Guidelines" that meets each agency's programmatic needs yet provides the needed flexibility to manage cover crops under diverse situations to achieve their conservation benefits.

The attached "NRCS Cropland Cover Crop Termination Guidelines – September 2014, Version 3" document provides the guidance as to when to terminate a cover crop to minimize the potential risk to reduced yields of the main crop due to soil water limitations. Based on the planned purpose of the cover crop, the cover crop may certainly be terminated earlier than stated in the guidelines.

RMA will reference this document in their policy.

Reference to these guidelines have been made to the revised Conservation Practice Standard (CPS) Code 340, Cover Crop, and dated October 2014 that will be distributed via Technical Guide Notice 160 this month. Previous bulletins that transmitted earlier versions of the "NRCS Cropland Cover Crop Termination Guidelines" directed States to add this criteria to their current CPS Code 340, Cover Crop.

It should also be noted that these guidelines were developed on a national and regional scale, and, in some cases, newer technologies may be available locally that may suggest later termination times for cover crops before planting. As stated in the guidelines, where new technology has at least 3 years of satisfactory performance (achieves historical yield) based on farm records and the written approval of two "agricultural experts" as defined by RMA, the cover crop may be terminated closer to planting, if recommended by the experts. This needs to be done on a case-by-case basis and coordinated with the crop insurance agent by the producer.

Contact. For questions or information about the guidelines or training, please contact Norman Widman, National Agronomist, Ecological Sciences Division, at (202) 720-3783.

/s/

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[Attachment](#)