



U.S. DEPARTMENT OF AGRICULTURE

REQUEST FOR VARIANCE FARMERS FOR SOIL HEALTH PARTNERSHIP FOR CLIMATE SMART COMMODITY GRANT MINNESOTA COVER CROP 340

REQUEST

Farmers for Soil Health (FFSH) requests a variance to the use of Conservation Practice Standard (CPS) Cover Crop 340 for projects implemented through the Partnership for Climate Smart Commodity Grant awarded to the National Fish and Wildlife Foundation.

JUSTIFICATION

FFSH proposes that:

Corn and soybeans are the major crops grown in Minnesota, encompassing about eight million acres (corn) and seven million acres (soybeans) annually.

- On corn acres, the current planting dates required under NRCS 340 conservation practice standards make it very difficult for farmers to establish cover crops after corn, especially north of I-94. Given this limitation, we request a variance for most cover crops to extend the planting date by two weeks, from November 1 to November 15. For rapeseed/canola, we propose extending the planting date by a month, from October 1 to November 1.
- Current planting rates called for in the Minnesota 340 practice standards can be a barrier to new cover crop acres. We propose a 25% reduction in planting rates to provide an “on-ramp” for farmers new to cover crops, providing lower risk and simplified options.
- We believe hypothesize that any reduction in GHG benefits that would come from lower seeding rates will be overcome by the number of producer participants gained and overall impact will be greater over time.

SUPPORTING DOCUMENTATION

FFSH proposes:

Incorporated Planting				
Species	MN NRCS Rate	Variance Rate	MN NRCS Date (South of I-94)	Variance Date (Statewide)
Winter Barley	50 lbs/ac PLS	37.5 lbs/ac PLS	1-Nov	15-Nov
Winter Cereal Rye	50/55 lbs/ac PLS	37.5 lbs/ac PLS	1-Nov	15-Nov



U.S. DEPARTMENT OF AGRICULTURE

Winter Triticale	50 lbs/ac PLS	37.5 lbs/ac PLS	1-Nov	15-Nov
Winter Wheat	50 lbs/ac PLS	37.5 lbs/ac PLS	1-Nov	15-Nov
Winter Camelina	3 lbs/ac PLS	2.5 lbs/ac PLS	1-Nov	15-Nov
Rapeseed/Canola	2 lbs/ac PLS	1.5 lbs/ac PLS	1-Oct	1-Nov
Broadcast Planting				
Species	MN NRCS Rate	Variance Rate	MN NRCS Date (South of I-94)	Variance Date (Statewide)
Winter Barley	75 lbs/ac PLS	56 lbs/ac PLS	1-Nov	15-Nov
Winter Cereal Rye	75/83 lbs/ac PLS	56 lbs/ac PLS	1-Nov	15-Nov
Winter Triticale	75 lbs/ac PLS	56 lbs/ac PLS	1-Nov	15-Nov
Winter Wheat	75 lbs/ac PLS	56 lbs/ac PLS	1-Nov	15-Nov
Winter Camelina	5 lbs/ac PLS	3.5 lbs/ac PLS	1-Nov	15-Nov
Rapeseed/Canola	3 lbs/ac PLS	2.25 lbs/ac PLS	1-Oct	1-Nov

FFSH did not provide any other supporting documentation for Minnesota.

NRCS NATIONAL RESPONSE

The national CPS Cover Crop 340 bases the cover crop seeding rates published by land grant university extension, Midwest Cover Crop Council, USDA ARS, Plant Materials Center studies and other research supported documents.

NRCS agrees with FFSH that the greenhouse gas emissions projections will be altered.

NRCS CPS Cover Crop 340 does not allow the harvest of a cover crop for grain or seed.

NRCS Response for Seeding Rate Reduction

NRCS approves the seeding rate reduction of 25% for the selected cover crop species with conditions:

- Water and wind soil erosion is controlled with no visible sheet, rill or wind soil movement observed at the site.
- Cover crop will not be used for grazing.



U.S. DEPARTMENT OF AGRICULTURE

The seeding rate will reduce the seeds per square foot from approximately 15 to 10. The rate change reduces plants per square foot of 12 to 13 down to expected plants of 8 to 9 per square foot.

NRCS Response for Seeding Date Extension

NRCS approves extension of the planting date up to two weeks for barley, cereal rye, triticale and wheat. Any extension beyond the typical November 15 date must document favorable soil temperature, soil moisture and estimated days until first killing frost.

NRCS approves extension of the planting date up to two weeks for camelina. Plant as late as possible (November) to allow rosette development before the expected first killing frost.

NRCS approves extension of the planting date to November 1 for rapeseed/canola. Planting date prior to a killing frost need to be timed to achieve about 6 true leaves and good root reserves.

NRCS Technical Determination for Extended Live Cover Plantings

NRCS supports the inclusion of winter annuals, small grains, and short term perennials as part of a Conservation Crop Rotation which may span multiple crop years. During the period between crop planting and next crop year harvest, no cover crop is present. The cash crop (commodity, intermediate) provides services of erosion prevention, nutrient cycling, biomass production and carbon sequestration, and root-soil-soil organism synergy. For purposes of a sustainability or regenerative index, environmental service scores, or low carbon intensity programs, NRCS supports recognition of these services provided by a crop intended for harvest in the same manner of recognition as a cover crop.

NHQ Status: approved

Name: Dr. Betsy Dierberger, National Agronomist, Date: April 4, 2024