



May 22, 2015

IOWA INSTRUCTION 190-393 – SIGNATURES FOR CERTIFICATION AND IOWA
ELECTRONIC FORM, ENVIRONMENTAL
EVALUATION WORKSHEET, NRCS-CPA-52

IA393.0 PURPOSE

This Iowa Instruction provides clarified direction on who can sign certification of environmental evaluations documented on the NRCS-CPA-52 and information to field offices on transitioning to the new Iowa electronic Environmental Evaluation Worksheet, NRCS-CPA-52 form.

IA393.1 SCOPE

This will be followed by all Iowa NRCS employees.

IA393.2 FILING INSTRUCTIONS

This Iowa Instruction will be posted on the Iowa NRCS Employee Website, which can be accessed under the Topics/People/NRCS Employees/Iowa NRCS eDirective, or at this link [Iowa NRCS eDirectives website](#).

IA393.3 EXHIBITS

See attachment.

Jay T. Mar
State Conservationist

Attachment

E

(IA Instruction 190 – 393 First Edition – May 2015)

IOWA INSTRUCTION 190-393 – SIGNATURES FOR CERTIFICATION AND IOWA
ELECTRONIC FORM, ENVIRONMENTAL
EVALUATION WORKSHEET, NRCS-CPA-52

1. PURPOSE:

This Iowa Instruction provides clarified direction on who can sign certification of environmental evaluations documented on the NRCS-CPA-52 and information to field offices on transitioning to the new Iowa electronic Environmental Evaluation Worksheet, NRCS-CPA-52 form.

2. CANCELLATION:

This Instruction cancels Iowa Instruction 180-380 "Environmental Evaluation Worksheet, IA-CPA-52," and cancels Iowa Instruction 180-389 "Certification of the CPA-52 Environmental Evaluation Worksheet" due to change in filing location.

3. BACKGROUND:

NRCS is unique in having a National Environmental Evaluation (EE) process - documented on the NRCS-CPA-52 form - for compliance with the National Environmental Policy Act (NEPA). States and field offices are to use the national NRCS-CPA-52 to ensure the integrity of our process for compliance with NEPA. States are not to modify the national form unless approval is granted by the National Environmental Coordinator.

Iowa received approval for a modified version of the national NRCS-CPA-52 form on April 30, 2015, from Andree DuVarney, National Environmental Coordinator. The modified Iowa Environmental Evaluation Form NRCS-CPA-52 is for use in Iowa only.

4. REFERENCES:

The NRCS-CPA-52, Environmental Evaluation Worksheet, is a required form for the nine-step NRCS conservation planning process. The NRCS-CPA-52 provides for legal and technical accountability of NRCS in regards to the National Environmental Policy Act of 1969 (NEPA). A new 2015 Iowa Environmental Evaluation Form NRCS-CPA-52 is available for field offices to use.

3. EXPLANATION:

This instruction provides direction to Iowa NRCS employees on the timing of certification/signature of that form by the Responsible Federal Official (RFO). The main content elements will not change, only the software format. Field offices will commence using this form immediately after training is provided in each area.

The new Iowa NRCS-CPA-52 form is located on the Statewide Shared drive at <S:\NRCS\NRCS statewide shared\190 ECS Ecological Sciences\CPA-52>. As revisions are made the newest form will be placed in this location and a bulletin will

IOWA INSTRUCTION 190-393 – SIGNATURES FOR CERTIFICATION AND IOWA
ELECTRONIC FORM, ENVIRONMENTAL
EVALUATION WORKSHEET, NRCS-CPA-52

be sent out notifying field office staff and directing them to this site to download the most current version.

Training will be scheduled within the areas shortly. **Contact your local Area Resource Conservationist with questions.**

This new Iowa NRCS-CPA-52 form has been revised and enhanced for Iowa. It is more interactive and user friendly with drop down menus that includes reference materials. Selections made from the drop down menus will prefill sections to facilitate completing the form.

Approved By:



Date:

5/27/15

Jay T. Mar
State Conservationist
Natural Resources Conservation Service
210 Walnut Street, Room 693
Des Moines, IA 50309-2180

Attachment
Exhibit A

IOWA INSTRUCTION 190-393 – SIGNATURES FOR CERTIFICATION AND IOWA
ELECTRONIC FORM, ENVIRONMENTAL
EVALUATION WORKSHEET, NRCS-CPA-52

Exhibit A

Background and Need

Iowa Corrective Action Plan (dated January 2013) Findings 7 and 9 identify the issues associated with incomplete or improper use and documentation of the NRCS-CPA-52 in all planning and programs. The NRCS-CPA-52 form is required by policy in the General Manual (GM) 180-409 and in the 512 Conservation Program Contracting Manual. It is the form used to document the planning process and compliance with NEPA (see 7 CFR 650).

Proper documentation using the NRCS-CPA-52 helps protect employees from liability, and certifies our customers' compliance with local, state, and federal laws and regulations. If these procedures are not followed:

1. NRCS could lose nationwide agreements with regulatory agencies.
2. NRCS employees could be found in violation of NEPA which could be as severe as being a federal felony.
3. Producers risk fines and loss of access to all government programs, along with other significant negative outcomes.

Clarification of Policy

NRCS policy (National Environmental Compliance Handbook (NECH) Subpart C, 610.43, A. (3)) requires an environmental evaluation as a part of every planning activity. The results of this process are documented on the NRCS-CPA-52 worksheet, to:

1. Inform the landowner of the plan's impacts.
2. Provide a record that the environmental evaluation was conducted.

The Responsible Federal Official (RFO) signs and dates the NRCS-CPA-52 to certify its proper completion. However, the RFO should wait to make the finding until all consultations, permits, etc., are finalized. This signature certifies that the proposed action/plan complies with all NRCS policies implementing NEPA and all other applicable federal, state, and local laws/executive orders. This being the case, Responsible Federal Officials will have a Level 3 Planning Certification.

Planners and clients will sometimes complete the planning process through Step 7 and find that permits or consultations are required. In those cases the planner will:

1. Ensure that the NRCS-CPA-52 has been properly completed and supported by the NRCS planning process Steps 1 thru 7.
2. Use the statement provided below in the "Additional Notes" box of section "S" but may not sign the NRCS-CPA-52.

IOWA INSTRUCTION 190-393 – SIGNATURES FOR CERTIFICATION AND IOWA
ELECTRONIC FORM, ENVIRONMENTAL
EVALUATION WORKSHEET, NRCS-CPA-52

“All federal, state, and local laws/executive orders and all NRCS policies have been followed in preparation of this NRCS-CPA-52. Signature by the RFO is pending the submission of the approved consultations and/or permits by the applicable regulatory agency. Permits were filed on (date) consultation began on (date).”

NEPA only applies to federal actions. Highly Erodible Land and Wetland determinations are technical determinations and not considered planning activities.