Rationality, Accountability, and Politics: Critical Analysis of Agri-environmental Policy in USA ¹

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Incentive payments made to farmers through federal conservation programs in the United States are not structured to maximize environmental benefits due to political economic relations of agrienvironmental policy and the broader contours of the corporate neoliberal agri-food regime. Conservation advocates and policy analysts champion opportunities to improve environmental outcomes by introducing a more data-driven and more disciplined approach to allocating and awarding incentive payments. Outcomes here refers to measures of ecosystem structure and function and related representations of (in)security. Beyond analysis of the potential for rationalization of conservation spending in agriculture, I seek to understand how greater expanded accountability applied to environmental outcomes could potentially transform agri-food. Through engagement with initiatives that contest the status quo and seek to advance more targeted approaches to incentivizing conservation and through assessment of constraints to such rationalization, I critically evaluate prospects for expanded accountability applied to design, administration, and assessment of agrienvironmental policy. Accountability is a social relation premised on information flow (i.e., oversight) and potential imposition of sanction (i.e., credible threat).

Agricultural modernization has been contested on ecological grounds for many decades. The state agrienvironmental programs of the last 30 years and those that emerged out of the Dust Bowl of the 1930s can be understood, in part, as products of a resistance movement organized around an environmental critique (EWG; Carson). At the same time, these programs can be understood as constituent of global agrifood. Today’s portfolio of agrienvironmental programs and the relevant administrative procedures grew out of efforts to manage commodity surpluses and associated price risks and economic vulnerability of farmers in globalized agriculture. Conservation (green box) payments have come to be an important mode of income support under WTO rules, and the clientelism exhibited by USDA in relation to environmental standards highlights the corporatist status of global agrifood. Corporatism here refers to stable political relations enjoyed by a network of commercial farmers, finance, industry, civil society professionals (ENGOs), and regulators (Schmitter). This ambiguity – state conservation programs as response to contradictions and as contradiction – invites reflection on the extent to which critique of federal agrienvironmental policy represents a meaningful form of resistance. Further, can a focus on rationalization of state policy and bureaucratic practice be

understood as progressive, or should it be seen as a “high modernist” project (Scott) and a deepening of neoliberal commitments?

Many of my critical social science peers focus attention on ideological, political, and material construction of futures premised on empowerment of small holders (i.e., food sovereignty) and a future characterized by intentional consumption and short supply chains (i.e., responsibilization and relocalization). I argue that relative to analytical goals relative to goals of the mini-conference and as part of a theory of change, adaptation of conventional commercial agriculture advanced through retargeting of public resources (e.g., state agency personnel and budgets; laws, policies and administrative routines; subsidies; R&D; infrastructure...) is worth considering in combination with more sweeping visions of change. In situating this reformist vision in relation to the “frontier of resistance,” I recognize the historical resilience of the incumbent model of agri-food. The past is littered with coopted critiques and ostensibly progressive interventions (e.g., Integrated Pest Management (Benbrook), organic (Guthman), precision farming (Wolf and Buttel)). It is possible that rationalization of conservation programming would bolster the legitimacy of dominant knowledge claims and problem definitions, thereby further cementing the hegemony of global agri-food. That said, a model and practice of agri-food that privileges efforts to address environmental contradictions would be different from the one we have now (Batie, 2009; Potter and Wolf, 2014). The realization of greater accountability in agrienvironmental policy could precipitate destabilization of the social relations and discourses that currently define global agri-food. More modestly, expanded accountability applied to environmental outcomes in agricultural policy would likely emerge out of broader resistance and restructuring.

Analysis of the contradictions embedded in commitments to environmental conservation within federal agricultural policy allows us to deepen our understanding of resistance. As a critique, the aim is to contribute to efforts “to unmask domination and legitimation, highlight internal contradictions, and create space for alternative concepts, discourses, and models to emerge and to gain traction (Bonanno and Wolf, 2016).” In this spirit, I aim to focus attention on resistance projects that contest dominant structures, and also on resistance to reform (i.e., resilience of dominant structures). Exploring resistance ‘to’ and resistance ‘of’ in tandem is one way to act on Bludhorn and Welsh’s call to analyze how we ‘sustain the unsustainable.’ Better understanding of mechanisms that allow for maintenance of structures and relations that are ostensibly discredited by science, policymakers, corporate elites, and various publics, may create space for alternatives.

Given the performative dimensions of sustainability (i.e., something that is realized through references and rhetoric rather than through material change) (Loconto, 2010), it is possible to engage critically with resistance through the sociological concept of “false negativity.” Beyond a

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2 The new political economy of agriculture (Friedland et al., 1991) was very much focused on critiques of the state and the appropriation of public resources and stakes as represented in production agriculture. The ‘consumption turn’ in agrifood studies seems to have shifted the focus of the field in important ways, hence my perception of a need to justify attention to state programs and to farming.
claim that resistance acts may be impotent (i.e., decoupled from the core mechanisms controlling outcomes of interest), it is possible that acts of resistance serve to reinforce and reproduce contested structures and justifications. Through iterative processes of critique and appropriation/cooptation, dominant models maintain legitimacy and integrity. In considering critique as performance, it is worth evaluating the possibility that resistance and critique can be traced back to the requirements of an “all-encompassing bureaucracy.” As part of a response to a “crisis of one-dimensionality” (i.e., stagnation and dissipation arising from lack of stimulation associated with mounting responses to competing ideas and models), hegemons may periodically invite problematization of their own logics and procedures. Following this line of thinking, critique and contestation can contribute to long-run stability and sustainability of problematic models and practices. Distinguishing substantive learning or progress from performances of reflexivity becomes challenging when viewed through this admittedly dark lens.

This paper addresses the impulse to introduce more rationality, accountability, and discipline into agrienvironmental policy, and to understand how such a project might be connected to the transformation of global agrifood. The hope is that this exercise will shed light on broader questions of political economic dynamics. In section 2 I briefly review the historical structure of US agrienvironmental policy that gives rise to ecologically inspired critiques of cost effectiveness. In section 3 I review problems of specification, estimation, and governance that constrain expanded accountability based on cost-effectiveness of conservation payments. Section 4 advances discussion of potential for democratic accountability through a very brief report on USDA’s newly established Resources Conservation Partnership Program. Section 5 concludes.

2. Rationality, accountability and discipline within state agrienvironmental programs

Legislators are largely unwilling to regulate farmers to advance environmental protection, and there is weak willingness to pay for environmental conservation among private parties (citizens and businesses). Farmers, even those renting their farmland, have some willingness to invest in conservation. But soil erosion rates and mining of aquifers, for example, indicate that their willingness or their capacity to invest is not sufficient to conserve long term productivity of farmland. The same is even more clear applied to off-farm environmental degradation attributable to farming (e.g., coastal hypoxia in Chesapeake Bay and Gulf of Mexico, climate change). Similarly, while consumers, communities, and food processors and retailers have an incentive to invest in securing the future of their food supply the scope of investments represented by CSAs, civic agriculture, and supply chain sustainability cannot be seen to be adequate. In this context of institutional failure, the state is the primary funder of conservation in agriculture.

For political, economic, and technical reasons, this spending does not produce as much environmental benefit as could be achieved under an imagined, rationalized resource allocation scheme. The weak geographic targeting of conservation spending and programming has been
contested for at least 25 years (EWG; Hufnagl et al, 2011; Winsten and Hunter, 2011; Sewell 2015) and there is growing awareness of the highly variable performance of conservation interventions when implemented in different biophysical and socioeconomic contexts (CEAP). While criticism has yielded new procedures and tools to advance the cost-effectiveness of conservation spending, gains have been modest (Potter and Wolf, 2014; Wolf, 2014; Batie, 2009). Given some indications that accountability concerns are mounting, it has been suggested that “the benefit-cost question by type of farm conservation program could become the focus for the 2018 farm bill debate (over conservation programming).” (Zulauf 2015).

Today’s agrienvironmental policy and the incentive payments made to farmers under the relevant conservation programs reflect the specific political alignment of the 1980s in which traditional policy goals of commodity supply control and farm income support came to be aligned with maturing critique of both the environmental implications of industrial agriculture (NRC 1992) and the development implications of commodity ‘dumping’ (Potter and Wolf 2014). In other words, agrienvironmental policies and programs are multifunctional. The relevant set of functions reflects the objectives of the diverse set of actors in the political coalition that backed the legislation and sustain the relevant commitments. As a result, the design of the relevant programs does not emphasize cost effectiveness. The funds allocated to environmental conservation within the national Farm Bill do not yield as great a positive effect on the environment as they could. Accountability is not structured to advance a goal of maximizing environmental benefits (or risk reduction) per dollar expended. As is now well understood based on acknowledgement of major gaps between an economistic theoretical representation of payment for ecosystem services (PES) and how incentive-based conservation schemes come to be realized in specific settings each of which is characterized by historically structured social relations, design and administration of conservation initiatives are enmeshed in broader sets of sociopolitical negotiations and struggles.

U.S. agrienvironmental policy is, in many ways, not highly liberalized. There is substantial solidarity and heavy reliance on corporatist governance. First, distribution of conservation payments across regions, commodity sectors, and farmers is heavily politically mediated. The tendency to spread the money around widely (EWG) and to institute quotas that pre-determine investment targets leads to a failure to focus public investment where it can produce the greatest impact on the most significant ecological problems (Hufnagl et al). Secondly, USDA actively seeks to avoid finding itself in a position of disciplining farmers. USDA understands itself to be a supporter of agriculture, and cooperative relations with farmers have long been at the center of efforts to advance natural resource conservation in agriculture. In fact, Congress has prohibited the use of cost effectiveness as a determinant in screening applications for conservation payments – e.g., “If the Secretary determines that the environmental values of two or more applications for payments are comparable, the Secretary shall not assign a higher priority to the application only because it would present the least cost to the program – (from Section 1240B of the Food Security Act of 1985).” Controls on the way market logic is implicated in agrivenvironmental policy presumably bolsters solidarity between USDA and farmers and makes it possible to privilege political relations over economic efficiency and environmental protection. The first consideration speaks to a weak tradition of geographic
targeting of conservation investments. The second speaks to a weak tradition of demanding value for money from farmers. These are the two inter-related axes of rationalization that inform contemporary criticisms and analyses of a potential shift to “outcome-based policy” (Doering et al. 2013; Batie, 2009; Wolf, 2014; Potter and Wolf, 2014).

Environmental NGOs, academics, and oversight bodies within the federal government (OMB & GAO) have raised questions about the effectiveness and efficiency of USDA’s conservation programming. An 80% budget increase for conservation programming in the 2002 Farm Bill relative to the 1996 Farm Bill, layered onto two decades of sustained critique of the effectiveness and efficiency of conservation programming, put USDA on the defensive. Strengthening the knowledge base – and the legitimacy of the knowledge base – through the CEAP emerged as a key response to heightened accountability demands.

“The Conservation Effects Assessment Project (CEAP) was initiated by the USDA Natural Resources Conservation Service (NRCS), Agricultural Research Service (ARS), and Cooperative State Research, Education, and Extension Service (CSREES) in response to a general call for better accountability of how society would benefit from the 2002 farm bill’s substantial increase in conservation program funding. The original goals of CEAP were to establish the scientific understanding of the effects of conservation practices at the watershed scale and to estimate conservation impacts and benefits for reporting at the national and regional levels.” (Duriancik et al. 2008)

A focus on effects in policy analysis is a reaction to traditional assessment procedures that rely on measures of resources expended (inputs) or indirect proxies of outcomes. Outcome-based policy design and analysis has gained traction in social policy in domains such as education, health care, addiction services, and prisons. Applied to the environment, the concept of payment for ecosystem services (PES) has become a dominant reference. PES is premised on quantification of benefit streams attributable to conservation. PES has been widely characterized as a reflection of neoliberalism (Robertson, 2011). At the same time, it can be understood as an outgrowth of concerns about ecological crisis and the (in)adequacy of societal responses.

Within the specific domain of agrienvironmental policy, Winrock International’s Pay-for-Performance initiative has been a visible champion of PES logic (Winsten and Hunter, 2011). As reflected in the title, the general aim is to couple incentive payments made to a particular farmer to the scope and scale of environmental benefits this farmer produces. In practice, Winrock seeks to advance research to estimate the environmental costs and benefits of specific conservation practices such as vegetative buffers or expanded crop rotation in specific biophysical and socioeconomic contexts. They then seek to use the resulting information to prioritize which farmers in a given landscape or watershed are solicited to participate in conservation programs and to produce customized offers that reflect a specific farmer’s

3 50% of funding under the Conservation Stewardship Project was earmarked for cost sharing construction of lagoons and concrete impoundments to manage manure in large-scale livestock operations (CAFOs).
opportunity costs and the expected benefit streams. Through this effort, incentive payments would be targeted toward strategic geographic locations. These payments would support implementation of conservation practices likely to perform well in that specific biophysical and socioeconomic setting. And finally, the amount of payment would reflect the relevant costs and returns. Rationalizing along these three axes - tighter specification of location, conservation practice, and payment - is understood as a means to expand the productivity of investments in environmental conservation. Through access to detailed information about costs and returns of various practices applied in varied settings, program managers can be more strategic in the way they award payments to farmers. At the same time, policy analysts can more effectively discipline program managers.

It is important to note that the logic of Pay-for-Performance and related contemporary critiques of how public funds are awarded to farmers to advance conservation are reflected in administrative routines of contemporary USDA programs. Specifically, the Environmental Benefits Index (EBI) was developed in 1990 in response to concerns about unstructured and unaccountable expenditures within the Conservation Reserve Program. The EBI served as a scoring tool that allowed program managers to quantify and compare environmental benefits associated with parcels of cropland farmers were willing to lease to the government. Similarly, the Conservation Measurement Tool (CMT) is an elaborate scoring rubric that quantifies environmental benefits attributable to farmland under the Conservation Stewardship Program. While USDA has responded to criticisms by introducing measures of discipline into the way resource allocation decisions are made within conservation programs, critics remain unconvinced.

Some of these critics are environmentalists who seek to advance conservation, some are scientists who seek to see new thinking and new tools applied, some are taxpayer advocates and champions of fiscal responsibility. In other words, the interests of the actors critical of existing practices are varied, and we should not treat them as unified and aligned. There is, however, broad support for greater application of data in order to target conservation investments more wisely and to document the effects of this spending so as to enhance accountability. This targeting and this accountability are largely understood through reference to cost-effectiveness. As argued below, expanding ‘bang for the buck’ is a tricky proposition that constrains technocratic reforms and highlights ambiguities within the concept of accountability.

3. The Trouble with Cost-Effectiveness

Cost-effectiveness is a general reference to economic efficiency defined in terms of benefits obtained per unit investment. In seeking to characterize constraints to cost-effectiveness in policy design and program administration I focus on problems of specification, estimation, and political economy.

A. Problems of specification
Specifying the benefits of conservation in agricultural settings in a manner that enables comparisons across socioecological problems and across regions and spatial scales is problematic. How is a unit of nitrogen pollution averted to be compared to a volume of soil erosion averted compared to a unit of wildlife habitat conserved? Whose interests and expertise would guide such a discussion? How do we compare a unit of water quality improvement in rural Idaho compared to suburban Milwaukee (where aggregate willingness to pay is presumably much higher)? In other words, if a sage grouse is spared in southeastern Wyoming and there is no one there to witness it, did it happen? How should differences between local and national assessments of environmental threats be weighted? For example, if Iowa is a leading source of hypoxia in the Gulf of Mexico and the citizens of Iowa do not attach high significance to mitigation of nitrogen pollution, which set of priorities should guide resource allocation? Assigning values in each of these contexts is the stuff of politics, and we do not have established forums and methodologies through which to articulate such values. It is immodest/undemocratic to pretend otherwise.

B. Problems of estimation

At present we do not have data and models to predict the environmental benefits of implementing conservation practices in specific settings. The interplay of biophysical variables including soils, slope, landscape position, and weather and socioeconomic variables including field size, crop rotation, tillage, and fertility management make it very challenging to estimate the environmental benefits of, say, planting a 25’ wide vegetative buffer on the downhill edge of the field. This challenge is compounded if we consider the benefit stream into the future and we consider variability in the species of vegetation planted, the care invested in establishing the plantings and the maintenance of the buffer strip over time.

C. Problems of political economy

If agreements could be forged regarding how to specify and how to estimate environmental values, and these values were employed to rationalize payments within agrienvironmental schemes, the geography of payments would surely differ relative to the general pattern of the past decades. The uncertainties resulting from opening up existing bureaucratic practices that structure how payments are allocated across resource concerns, regions, and commodity sectors would be widely threatening and disruptive.

As discussed above, agrienvironmental funding is allocated in a political environment in which ecological security is one of many competing objectives and interests. Congress is ambivalent about cost effectiveness due to political economic considerations. USDA is ambivalent due to clientist impulses and a belief that voluntarism should trump a principle-agent stance in their relations with farmers. Additionally, developing the technical competencies required to develop and administer a highly targeted approach to awarding conservation payments would be very expensive and would disrupt the existing
organizational culture, which is premised on agents building relationships with farmers (Wolf 2014). Farmers are ambivalent because they value the subsidy and the non-invasive manner in which it is administered. Consumers are ambivalent in that the current logic supports cheap food. As a result, agrienvironmental program managers are constrained in terms of their freedom to privilege cost effectiveness in allocating conservation incentive payments.

In my experience, it is practically impossible to conduct empirical research on cost-effectiveness of agrienvironmental schemes in the United States. USDA and corporatist agrifood more generally have secured a monopoly on the data that would allow for critical assessment of federal conservation spending and outcomes. Cultural, legal and bureaucratic barriers have been erected to defend these data, these programs, and these agencies from scrutiny. The US Farm Bureau Federation has contested all forms of disclosure and surveillance that would enable expanded accountability with respect to conservation payments. Employees of USDA who disclose records of individual farmers are now subject to personal liability claims up to $50,000. USDA officials expressly authorized by farmers, in writing, to share copies of their conservation contracts are unable to do so according to administrative policy of the agency. We have, in effect, organized unaccountability.

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4. Discussion

As we have framed this collective conversation, “(i)n the sociological tradition, the development of resistance is often associated not only with the opposition to undesirable authority but also with the extent to which dominant actors are able to legitimize their power, control subordinate groups, and secure their support. Resistance movements oppose a developmental trajectory and the capacity of incumbents to shape trajectory through barriers to entry and control of public resources and fora including markets, public subsidies, law, courts, media, and culture. In this sense, hegemony – maintaining dominance by undermining debate and social selection processes – is generally what is contested (Bonanno and Wolf, 2016).”

In reflecting on resistance in global agri-food and existing critiques (i.e., assessment of self-limiting character of dominant structures and the alternatives that have emerged in opposition), I focus on the promise and pitfalls of accountability applied to ecological dimensions of sustainability. My argument is that agrifood production and the state sponsored conservation practices that ostensibly make this production sustainable are currently not subject to rigorous empirical assessment of ecological relations. More critical and more comprehensive accounting of environmental conservation would potentially destabilize existing

4 More formally, accountability is weak as applied to the specific objective of environmental protection. I presume that muscular accountability structures are in place to support the flexible commitments of agrienvironmental policy. In other words, an institutional failure at one level can be functional when observed from a different perspective.
cognitive (e.g., discourses and justifications) and material (e.g., public policies, R&D priorities, infrastructure) structures that channel development of agrifood. Resistance movements have not exhausted empirical arguments for reform, in no small part because corporate and corporatist agrifood has defended the relevant data, programs, and processes from critical assessment. At the same time, reform projects focused strictly on expanding scientific understanding and using resulting new technical capabilities to rationalize state conservation programming are likely self-limited because the specification of objectives and the weights attached to incommensurate values will remain controlled by the dominant policy network.

As argued here, the challenges of establishing comparability between multidimensional values and producing credible/legitimate estimates of values lie on top of the historical and political economic considerations that imbue agrienvironmental policy with inertia. In reflecting on efforts to bring more data to bear in a manner that will allow/obligate program managers to privilege cost-effectiveness in awarding incentive payments in support of conservation, we must be wary of “ideological constructs that give the illusion of freedom while constraining behavior and reinforcing structural controls” (Bonanno and Wolf, 2016). Viewed through this lens, I come to question the relationship between accountability and progressive objectives. It seems there is an important distinction to be made between rationalization and accountability. In reflecting on US agrienvironmental policy it becomes clear that a technocratic logic of accountability is unlikely to offer an attractive way forward given linked commitments to ecological sustainability and deliberative democracy. By extending the analysis of agrienvironmental policy and introducing the most recently created federal agrienvironmental program in the U.S., I can offer a heavily qualified argument regarding a democratic logic of accountability.

USDA’s Regional Conservation Partnership Program (RCPP)

The Regional Conservation Partnership Program (RCPP) was authorized within the 2014 Farm Bill.

RCPP offers new opportunities for (the USDA) to work with partners to encourage locally-driven innovation and create high-performing solutions, harness innovation, accelerate the conservation mission, launch bold ideas, and demonstrate the value and efficacy of voluntary, private lands conservation... Successful partnerships will bring an array of financial and technical capabilities to projects, including cash contributions, technical professionals, and assessment experts. (USDA, 2014:7)

RCPP funds local and regional consortia to provide technical assistance to farmers and ranchers to support conservation. Additionally, RCPP funds can be used to develop new technical capabilities to conduct natural resource assessment, conservation planning, and environmental monitoring. NRCS selects projects for funding for 1-5 years based on an open annual call for proposals.

I attach significance to several core features of this new program in relation to the arguments advanced in this paper. First, the partnership model creates potential opportunities for local
actors - private, public (non-USDA), and civil society organizations - to define conservation priorities and participate in resource allocation decision making. Project partners are obligated to match USDA contributions to these local/regional projects, and these investments suggest some sharing of authority with respect to governance and knowledge claims. Such a decentralized approach to agrienvironmental management would strongly contrast with the existing centralized and regimented approach. Second, the emphasis on documenting outcomes through engagement of local actors and local expertise to “demonstrate the value and efficacy of voluntary, private lands conservation” points to contemporary accountability pressures confronting agrienvironmental policy, as discussed above. Evidence of outcomes and efficacy can be used to identify and scale up successful experiments, and these data can be used to legitimate USDA programming. Finally, expanding working relationships with actors beyond farmers and ranchers points to a need for USDA to diversify the clientele they support and who support them (Munck af Rosenschöld and Wolf, 2016).

The newly created RCPP has the potential to empower and catalyze local collectives, which harkens back to progressive ideas of the Agrarian New Deal (Gilbert) and broader conceptions of democratic practice. In such a “low-modernist” (Gilbert) future, USDA can enable efficient, effective, and democratic responses to development challenges. This utopian vision sits in contrast to a rationalized, technified vision in which USDA internalizes contemporary impulses to turn to “big data” to realize our future and ensure outcomes and accountability.

Artificial negativity and the crisis of one dimensionality refer to state of affairs in which the state-capital hegemon confronts limits arising from the lack of a contest of ideas. In such a context it is easy to imagine incumbents performing critiques in order to sustain itself. These critiques advance non-threatening adaptation/learning/innovation and they serve a legitimation function. The bureaucracy creates ‘non-bureaucracies’ - localized, short-term organizations that the public agency keeps on a short leash. This may well describe the RCPP, as preliminary research indicates that RCPP is not opening up new participatory opportunities for local actors to shape how federal resources are allocated (Munck af Rosenschöld and Wolf). But more research is surely needed. There is the potential that RCPP and the longer historical tradition of decentralized governance could allow us to realize some elements of democratic accountability and a low-modernist future.

5. Conclusion

Competition and market logic (i.e., structuring principles guiding behavior and strategy) do not comprehensively govern agrienvironmental policy, and here we see neoliberalism to be uneven and incomplete applied to agrifood (Wolf and Bonanno 2015). Existing modes of oversight and unaccountability enables maintenance of corporate agrifood. More stringent environmental oversight could enable an ecological food regime. More ambitiously, such movement could be part of a socially progressive agrifood regime. If commitments, including labor and ecological relations, were to come into force to guide resource allocation, political steering could support pursuit of normative goals of sustainability.
In reflecting on impotence of alternatives to subvert the dominant paradigm, we argue that “more attention should be devoted to alternative accountings and the constraints to institutionalization of new modes of evaluation” (Bonanno and Wolf). This position derives from belief that the plural values that are currently recognized must be problematized and changed to advance a popular, professional, and public change in agrifood. Future values (manifested by application of low or even negative discount rates) and value claims of silenced population segments (people outside the circle of elites that shape federal agrienvironmental policy) are useful examples. Accountability founded upon locally coordinated deliberation and action in support of national programs may be a way forward. This imagined shift in accounting is relevant for cognitive processes, new discourses, and formal policy analyses.

References


5 Of course, Trumpism demands we reflect critically on calls to redouble commitments to democratic practice.


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