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Joan Claybrook, President

Financial Assistance Programs Division
Natural Resources Conservation Service
EQIP Comments
Room 5231 South Office Building,
14th and Independence Ave, SW
Washington, DC 20250

June 3, 2005

Re: Comments on FR Doc: 05-05556, National Priorities for the Environmental Quality Incentive Program (EQIP)

Thank you for the opportunity to comment on the proposed national priorities for the Environmental Quality Incentive Program. As EQIP is an important program through which the National Resources Conservation Service (NRCS) helps farmers and ranchers protect their soil, water, air, and other natural resources, NRCS' reevaluation of its EQIP priorities is an excellent opportunity to reassess its intent and outcomes.

EQIP was originally designed to help small-scale farmers protect their natural resources. Initially, program payments to farmers were limited to \$10,000 per year, with a maximum of \$50,000 over five years. There was also a ban on EQIP funding going toward waste treatment structures for large-scale concentrated animal feeding operations (CAFOs). The 2002 Farm Bill, however, allowed CAFOs to be eligible for EQIP funding, eliminated the yearly cap, and significantly increased the overall payment cap to \$450,000 over six years. These large payments mean that fewer farms are reached through EQIP than would be otherwise. We also believe that the eligibility of CAFOs for EQIP funding is a mistake, as the federal government should not pay to clean up these facilities' serious manure management problems. Subsidizing CAFOs is a misuse of taxpayer dollars; rather, the EQIP program should prioritize and emphasize funding that helps small-scale farmers and the environment.

The priorities of the EQIP program should shift towards funding projects that help create a diversified farm system that protects and enhances the environment, rather than funneling money towards large scale confined livestock operations. Firstly, EQIP should reinstate the ban on funding animal waste structures for CAFOs. Barring this change, EQIP should ensure that their ranking guidelines do not favor CAFOs. Some states' current ranking guidelines favor operations that have the biggest existing natural resources' problems (like excess manure created by large CAFOs) and operations that

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can pay a larger share of the proposed project (like well-funded industrial livestock operations). Both of these guidelines put small family farms at a disadvantage.

EQIP should prioritize sustainable managed grazing and pasture-based livestock and poultry farms, as well as farms transitioning to organic production. We recommend an EQIP national priority for incentives for intensively managed production systems that address multiple resource concerns, e.g. water quality, wildlife habitat, and soil erosion control, simultaneously through well-designed, well-managed systems. The goal is to provide financial incentives and technical assistance to farmers and ranchers to establish managed rotational grazing and other sustainable pasture and grass-based livestock production systems. EQIP should foster farms that minimize environmental problems from the outset, as opposed to paying CAFOs to attempt to fix the severe environmental problems their operations create.

Another important priority area for EQIP funds should be wildlife conservation. Money should be spent on improving stream flows and ensuring more water availability for wildlife, as opposed to just emphasizing irrigation efficiency. Habitat for native pollinators, which are crucial to many species, should also be a focus of EQIP.

We hope the new priorities that are set for EQIP return the program to its original purpose of helping small-scale family farmers protect their natural resources, rather than subsidizing attempts by large confined livestock operations to come up with a technological fix for the manure management problems that are the inevitable result of their scale and practices.

Sincerely,

Wenonah Hauter
Director, Food Program
Public Citizen