



MISSOURI RURAL CRISIS CENTER

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April 15th, 2009

Docket Number NRCS--IFR--08005
Financial Assistance Programs Division
U.S. Department of Agriculture
Natural Resources Conservation Service
1400 Independence Avenue, SW Room 5237S
Washington, DC 20250-2890

RECEIVED APR 24 2009

Dear Natural Resources Conservation Service,

The Missouri Rural Crisis Center (MRCC) appreciates this opportunity to offer comments on the Proposed Rules for the Environmental Quality Incentives Program (EQIP). MRCC represents 5600 farm and rural member families in Missouri.

EQIP was implemented as a conservation program originally designed to provide cost-share and incentive payments to agricultural producers to address conservation and environmental issues. Yet, increasingly, research has shown that much of the funding for this program is subsidizing the construction of new and expanding large-scale livestock operations. During a turbulent economic environment, one in which, USDA is spending taxpayer dollars to purchase an additional \$25 million dollars of pork and \$60 million dollars of turkey to stabilize the commodity market because of overproduction. We should not be fueling further industrial livestock expansion with taxpayer funded conservation programs.

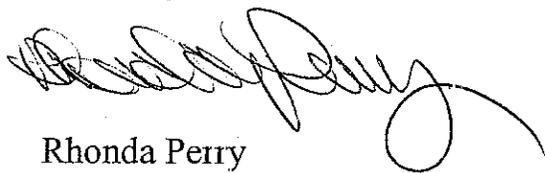
In Missouri, over 20% of all EQIP payments over the last five years have gone toward the storage, treatment and transfer of waste. Also in the last five years, NRCS has approved a total of \$5 million of funding for manure transfer alone in Missouri. Nationally, between 2003 & 2007, roughly 1,000 industrial hog and dairy operations have captured at least \$35 million per year in funding through the EQIP program. These statistics are of great concern to many Missouri farmers and ranchers.

MRCC appreciates your consideration of the following recommendations to help ensure that the EQIP program meets the needs of independent family farmers and their conservation priorities.

- **EQIP should not subsidize the construction or expansion of industrial livestock operations.** During the rulemaking process, USDA should prohibit funding for waste facilities on all new and expanding concentrated animal feeding operations (CAFOs) --- operations with 1,000 animal units or more.
- **The amount of EQIP funding available to an individual operator should be capped** at \$150,000 in order to maximize efficiency in the EQIP program and ensure that funds reach a greater number of applicants. No payment limitation waivers should be issued for so-called "projects of special environmental significance," which were detailed as methane digesters in the Farm Bill.
- **Cost-share rates should encourage greater participation and use of EQIP by more producers to achieve conservation outcomes.** A number of EQIP cost-share rates are at 50%, but in many cases this is not enough of an incentive to leverage producers to accept a contract and address natural resource concerns. NRCS should increase cost-share rates to 75% for the first \$50,000 of all awarded contracts. If contracts are above \$50,000 the remaining value should be awarded at the 50% cost-share rate.
- **Provide complete transparency of our taxpayer dollars.** Taxpayers and policy-makers deserve to know how EQIP funds are being used. USDA should track EQIP funding to livestock operations by size category and amount of manure generated by the operation. USDA should insist that Congress strike existing language prohibiting USDA from releasing detailed information on the use and amount of conservation program contracts.
- **Ensure support for sustainable livestock systems.** Priority should be given to support the development of sustainable livestock systems. Durable practices and costs associated with fencing, watering systems, and the establishment of pastures, for example, should receive at a minimum 75% cost-share and when appropriate 90% cost share.

We once again appreciate the opportunity to comment on the Proposed Rule.

Sincerely,



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