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FAX TRANSMITTAL

DATE: April 15, 2009

TO: USDA/NRCS

Financial Assistance Programs Div

FAX NO.: (202) 720-4265

FROM: Sandra Kunimoto

Division/Branch: Hawaii Dept. of Agriculture

FAX NO.: (8080 973-9613

SUBJECT:

Document ID: CCC FRDOC 0001-0065, Environmental Quality Incentives Program (EQIP)

REMARKS:

Original hard copy will also be mailed.

Total number of pages (including this page): 3

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4/17/09

April 15, 2009

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

Dear Sir:

Subject: Document ID: CCC_FRDOC_0001-0065, Environmental Quality Incentives Program (EQIP)

Thank you for the opportunity to provide comments regarding Document ID: CCC_FRDOC _0001-0065, Document Title: Environmental Quality Incentives Program.

The State of Hawaii has serious concerns over the language currently in this interim final rule which appears to disqualify farmers, ranchers and forestry operations from qualifying for EQIP if they farm or ranch solely on public lands or on public lands that are not contiguous with private lands which would also benefit from the practice

> §1466.8 (6) (c) (2) (iii) "The conservation practices to be implemented on the public land are necessary and will contribute to an improvement in the identified resource concern that is on private land; or"

If that is an accurate interpretation, then approximately 74% (639 of 860) ranches in Hawaii would potentially be disqualified from participating in EQIP. This involves approximately 171,000 of the 766,653 (22%) acres in beef cattle production in Hawaii. In addition, 1,412 farms on 20,489 acres of government lease lands would also be potentially disqualified. This would cause particular hardship to Hawaii's smaller and medium size ranches and farms resulting in significant negative economic impact, potentially causing their demise in these fragile economic times. We have real concerns that the loss of such a significant segment of our farms and ranches could also have a domino effect on the balance of our farms and ranches when critical mass is lost and industry's tangibles such as cooperatives, processing facilities, farm and ranch supply companies, transportation equipment, markets and such can no longer be supported.

Hawaii's fragile environments, limited island resources, geographic isolation and our need to provide a certain level of self sufficiency with food and energy production places us in a particularly vulnerable position with the loss of this program. EQIP has worked very well for farmers and ranchers providing incentives to invest matching resources to protect the environment and natural resources while striving to sustain local food production in a state like Hawaii with very limited land and other resources. Currently, significant emphasis is being made in both the agriculture and forestry industries to achieve, for the State, a level of self sufficiency in food and energy production. Programs like EQIP are a vital part to achieving these goals.

We strongly recommend 7 CFR Part 1466.8 Program Requirements(c) (2) of the Bill be amended to allow farmers, ranchers and forestry operators that operate on public land to be included in EQIP. If such an amendment is not feasible on a national level, we ask that a special consideration exemption be given to Hawaii given our unique position and concerns sited above.

Sincerely,

Sandra Lee Kunimoto
Chairperson, Board of Agriculture