

292

Martin Steitz
21853 Iden Avenue Place North
Forest Lake, MN 55025
zentROUT@me.com

April 2, 2009

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

Please accept these comments on EQIP Interim Final rule.

EQIP should not subsidize the construction or expansion of industrial live-stock operations. During the rulemaking process, USDA should prohibit funding for waste facilities on all new and expanding concentrated animal feeding operations (CAFO) --- 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.

Recalibrate cost-share rates to encourage greater participation and use of EQIP by more producers to achieve conservation outcomes. A number of EQIP cost-share rates are at 50 percent 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 percent for the first \$50,000 of all awarded contracts. If contracts are above \$50,000 the remaining value should be awarded at the 50 percent cost-share rate.

Ensure support for sustainable livestock systems. In order to greatly enhance environmental quality, a national priority should be directed to support the development of highly sustainable livestock systems, particularly rotational grazing. Durable practices and costs associated with fencing, watering systems, and the establishment of pastures, for example, should receive at a minimum 75 percent cost-share and when appropriate 90 percent cost share.

Organic conversion --- a new provision in the farm bill aimed at helping farmers transition to organic production. Please ensure that the final EQIP rule clarify that EQIP Organic Conversion Assistance is available in all counties in all fifty states every year. Also, please ensure that the final EQIP rule makes clear that the limit of \$80,000 over a 4-year period applies only to organic conversion payments and not to all EQIP payments made to organic farmers and ranchers. Organic farmers and ranchers should stand on a equal footing with conventional producers in the funding amounts they can receive from EQIP for their agricultural operations.

Sincerely yours,

A handwritten signature in black ink that reads "Marty Steitz". The signature is written in a cursive, slightly slanted style.

Martin Steitz