

ATTN: Legislative Aide for Farm Bill / Agriculture Issues

May 8, 2007

Dear Senator:

Our organizations urge you to support reform of the Environmental Quality Incentives Program (EQIP) in the next farm bill to prohibit funding for waste storage and handling infrastructure for large-scale Concentrated Animal Feeding Operations (CAFOs), with 1000 animal units or more, or for smaller Animal Feeding Operations (AFOs) which plan to use EQIP funds for capital infrastructure to expand their size. EQIP funding for AFOs should be limited to dealing with existing environmental problems of small and mid-sized operations rather than subsidizing the increased concentration of the nation's animal agriculture sector.

This reform will enable EQIP to meet the needs of the thousands of farmers and ranchers who are now denied EQIP assistance to establish conservation measures in sustainable agricultural systems that do not raise animals in continuous confinement. In addition, it will enhance the overall environmental and conservation performance of the nation's agriculture sector and help maintain healthy rural communities.

We are concerned that some farm bill legislative proposals have been introduced that would nearly double the level of funding for the Environmental Quality Incentives Program (EQIP), up to \$2 billion per year, with no accompanying measures to prevent EQIP funding from being used to pay for capital infrastructure for large-scale CAFOs or expanding AFOs. The proposed legislation introduced to date includes: the Healthy Farms, Foods and Fuels Act (H.R. 1551/S. 919); EAT Healthy America Act (H.R. 1600); Chesapeake's Healthy and Environmentally Sound Stewardship of Energy and Agriculture Act of 2007 (H.R. 1766); and the Farm, Nutrition, and Community Investment Act (H.R. 2144).

Background

Prior to the 2002 Farm Bill, EQIP did not allow funding for waste storage and handling infrastructure for large-scale CAFOs, those with over 1,000 animal units. This was a common sense provision for a conservation program because CAFOs, which concentrate thousands of farm animals in one location, have proven to be major sources of water and air pollution. The CAFO sector wanted a cost-share handout for large-scale capital infrastructure to underwrite expansion of the industry. In addition, the industry wanted an almost ten-fold increase in the EQIP payment limit -- from \$50,000 to \$450,000 per individual contract. The industry even fought off efforts to prevent EQIP from funding CAFO structures in 100-year floodplains, a fiscally and environmentally sound measure to prevent the waste of public dollars.

Since 2002, hundreds of millions of dollars have been given to CAFOs for capital infrastructure. This money was expended without adequate environmental impact review by USDA. Indeed, USDA asserts that it has no way of determining precisely how much EQIP funding has gone to large-scale CAFOs and has not disclosed full information to the public about CAFO funding.

CAFOs continue to be major sources of pollution. They pose such a threat to local public health that the American Public Health Association, in 2003, called for a moratorium on the construction of new CAFOs. In addition, in many states, the Natural Resources Conservation Service ranking systems for EQIP applications perversely rewarded the largest CAFO operators who had the most poorly designed and badly sited operations with the highest priority for EQIP payments. In other states, 25-50 percent of EQIP funding for animal agriculture was reserved annually for CAFOs, giving them an unfair advantage over smaller scale, sustainable farms and ranches. At the same time, one out of two farmers and ranchers who applied for EQIP were being turned down, as CAFO infrastructure soaked up large amounts of the program's funding.

As a general principle, farm bill conservation program funding should not be used to subsidize large-scale capital infrastructure for agricultural operations. Some states have established loan programs for animal waste management systems, with reasonable restrictions to ensure that funds are used only to deal with existing environmental pollution, rather than to create additional pollution problems. A good model is North Dakota's revolving loan program, which requires repayment of the loan, adequate collateral, and specific financial information. This North Dakota program is limited to loans for existing AFOs with a capacity of less than 1,000 animal units which need to renovate or relocate to fully address *existing* surface or groundwater impacts. The North Dakota program does not fund any new or expanding confined AFO of any size nor does it fund existing large-scale CAFOs of more than 1,000 animal units.

We do not oppose increased EQIP funding which is used to increase the overall environmental and conservation performance of the nation's farms and ranches. Using EQIP funding for the proliferation and expansion of CAFOs, however, will not achieve that goal.

Thank you for considering our views,

Sincerely,

Lisa Whelan, Rural Community Organizer
CAMPAIGN FOR FAMILY FARMS AND THE ENVIRONMENT

Traci Bruckner, Assistant Director, Rural Policy Program
CENTER FOR RURAL AFFAIRS

Adrienne Esposito, Executive Director
CITIZENS CAMPAIGN FOR THE ENVIRONMENT (NEW YORK & CONNECTICUT)

Joseph Otis Minott, Esq., Executive Director
CLEAN AIR COUNCIL (PENNSYLVANIA)

Bob Dreher, Vice President of Land Conservation
DEFENDERS OF WILDLIFE

Michele Merkel, Senior Counsel
Karla Raettig, Counsel
ENVIRONMENTAL INTEGRITY PROJECT

Wenonah Hauter, Executive Director
FOOD & WATER WATCH

Miyun Park, Vice President, Farm Animal Welfare
THE HUMANE SOCIETY OF THE UNITED STATES

Patricia Forkan, President
HUMANE SOCIETY INTERNATIONAL

Gayle Keiser, Executive Director
ILLINOIS STEWARDSHIP ALLIANCE

Dennis Olson, Senior Policy Analyst
INSTITUTE FOR AGRICULTURE & TRADE POLICY

Marian Gelb, Executive Director
IOWA ENVIRONMENTAL COUNCIL

Brad Redlin, Director of Agricultural Programs
IZAAK WALTON LEAGUE OF AMERICA

Mary Fund, Communications Director
KANSAS RURAL CENTER

Adam Warthesen, Organizer
LAND STEWARDSHIP PROJECT

Robert T. Gronski, Policy Coordinator
NATIONAL CATHOLIC RURAL LIFE CONFERENCE

Velma Smith, Senior Policy Analyst
NATIONAL ENVIRONMENTAL TRUST

Katherine Ozer, Executive Director
NATIONAL FAMILY FARM COALITION

Rudy Arredondo, President/CEO
NATIONAL LATINO FARMERS & RANCHERS TRADE ASSOCIATION

Gary Holthaus, Administrative Director
NORTHERN PLAINS SUSTAINABLE AGRICULTURE SOCIETY

Trent A. Dougherty, Staff Attorney
OHIO ENVIRONMENTAL COUNCIL

Ed Hopkins, Director, Environmental Quality Program
SIERRA CLUB

Amy Pickle
SOUTHERN ENVIRONMENTAL LAW CENTER

Martha Noble, Senior Policy Associate
SUSTAINABLE AGRICULTURE COALITION

Brise Tencer, Washington Representative for Food & Environment
UNION OF CONCERNED SCIENTISTS

Jeffrey Odefey, Staff Attorney
WATERKEEPER ALLIANCE