



The National Association of State Departments of Agriculture
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March 12, 2003

Mr. Charles Whitmore, Acting Director
Conservation Operations Division
USDA Natural Resources Conservation Service
1400 Independence Avenue, Room 5241
Washington, DC 20250-2890

Dear Mr. Whitmore:

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to comment on the proposed rule to implement the provisions of Title II of the Farm Security and Rural Investment Act of 2002 relating to the Environmental Quality Incentive Program (EQIP).

NASDA represents the commissioners, secretaries, directors of the state departments of agriculture in the fifty states and four territories. Our members strongly support the voluntary, incentive based concept of EQIP. We encouraged a number of the changes made to EQIP by the 2002 Farm Bill, such as giving the states more flexibility, eliminating the size limitations for livestock operations, and decreasing the minimum length of the contract period.

NASDA believes the 2002 Farm Bill enhanced EQIP as a catalyst for a healthy, working agricultural landscape. In particular, we strongly agree with the "locally led" process and having decisions made at the state and local levels whenever possible.

The following are specific suggestions on various sections of the proposed EQIP rule:

- While retaining a portion of EQIP funding to "reward states that demonstrate a higher level of performance" may appear to be responsible, we believe it will add a degree of subjectivity that will unnecessarily complicate the "locally led" process and delay the allocation of funds to states. We believe state and local officials will make sure the funds are used wisely.
- Allocate EQIP funds to states via a simple, fair, and published formula—make this a transparent process.
- Seek to allocate annual EQIP funding in a "seamless" manner. Oftentimes funding is allocated well after the beginning of the fiscal year, causing a "workload crunch" on the NRCS field staff and missed opportunities. Will the fiscal year 2003 EQIP cost-sharing be available in time for farmers, ranchers (especially livestock producers) to take advantage of the program and install soil and water conservation practices this growing/construction season?
- Allow for use of the 75% cost-share level without a State Conservationist's approval.
- Eliminate the need for Regional Conservationists to sign contracts exceeding \$100,000. The State Conservationist (relying on input from state technical committees), we believe, will make good decisions in a "transparent" arena.



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NASDA is a nonprofit association of public officials comprised of the Commissioners, Secretaries, and Directors of agriculture in the fifty states and four territories

In addition, NASDA endorses the Technical Service Provider provisions, which were recently announced. We believe there is a critical need for additional technical assistance to help producers implement conservation practices and plans. The state departments of agriculture welcome the opportunity to work with NRCS to accomplish our mutual environmental goals.

Sincerely,

Richard W. Kirchoff
Executive Vice President & CEO