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Subject: Virginia Dept. of Environmental Quality comments on 2007 Farm Bill I
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The Virginia Department of Environmental Quality wishes to offer the following comments regarding development of the 2007 Farm Bill, specifically relating to the achievement of conservation and environmental goals (Question #4).

- 1) Strengthening the conservation programs, including the Environmental Quality Incentives Program (EQIP), Conservation Security Program (CSP), and others, is critical to the long term health of the environment in agricultural watersheds. These programs can allow the farmer to reduce the cost of implementing critical best management practices to a level that is economically feasible. The typical farmer has no means to pass along costs to the consumer, unlike a retailer that might be able to market a higher priced product under a "green" label. The method by which agricultural commodities are priced does not lend itself to providing benefits for the farmer practicing sound conservation practices, thus the programs offered by the USDA are critical to providing this incentive.
- 2) The concept behind the CSP, whereby farmers who are already doing the right thing are rewarded, should be expanded, as this offers additional incentive for the responsible operator and leads others by example.
- 3) The Wetlands Reserve Program (WRP), Ranchland Protection Program (RPP), Grassland Reserve Program (GPP), and Wildlife Habitat Incentives Program (WHIP) also deserve extension into the 2007 Farm Bill. These programs offer incentives to keep what may be marginal land in a use that promotes environmental protection. These programs, as well as EQIP, are key to achieving the nation's No Net Loss of Wetlands goal and to encouraging wetlands restoration and preservation, which also leads to nutrient reductions in our waterways.
- 4) Adequate funding for technical assistance to implement conservation practices and programs is absolutely essential. Technical assistance is key to a goal of basic BMP implementation and Nutrient Management Plans on all farms. Recruitment and retention of the field staff responsible for helping the farmers implement the programs should be a priority item. These employees play key roles in turning program dollars into environmental protection.
- 5) The cost of USDA programs that reduce the farmers' cost to keep farmland from succumbing to urban sprawl will return significant environmental quality benefits. The cost to address urban non-point source pollution issues is much greater than that necessary to address those in agriculture or silviculture; therefore, emphasis on maintenance of real estate as working lands should be paramount in the 2007 Farm Bill.
- 6) Regulatory and financial incentives should help farmers to achieve conservation and environmental goals on productive agricultural land as opposed to subsidizing the removal of acreage from agricultural use; as an example, forested buffers impose real and opportunity costs to the farmer, but leave at least a percentage of the acreage in production; converting agricultural land to forest may be more

environmentally efficient than a forested buffer, but the income source is changed (as opposed to a straight reduction).

7) We should look for ways for reuse of agricultural waste, particularly from AFOs, into industrial raw material feedstock and fuels. Encouraging these non-traditional exchanges between agriculture and industry could re-route excess waste in areas where land application is not a sustainable solution.

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