



June 25, 2018

Mr. J.R. Flores
State Conservationist
Missouri Natural Resources Conservation Service
601 Business Loop 70 West, Suite 250
Columbia, MO 65203

RE: Comments and recommendations for FY 2019 NRCS Programs

Dear J.R:

On behalf of the Missouri Corn Growers Association and the Missouri Soybean Association, we appreciate the opportunity to provide input on Missouri NRCS Fiscal Year 2019 conservation programs, particularly the Environmental Quality Incentives Program (EQIP). Feedback from our members is clear, EQIP continues to be a very popular voluntary based program among Missouri corn and soybean farmers, a program that has proven to be an effective tool for delivering technical assistance to farmers and getting ag conservation on the ground. We commend you and your staff's leadership, efforts and partnership with Missouri farmers in making EQIP a successful program.

Listed below are our comments and recommendations for fiscal year 2019.

1. As always, we encourage Missouri NRCS to develop and maintain strong working relationships directly with Missouri farmers. Our organizations believe that nothing can quite replace one-on-one local service and on-the-ground assistance from NRCS field staff. These local relationships build trust and helps keep NRCS grounded and informed about the real on-the-farm natural resource needs and challenges Missouri farmers are facing.
2. We encourage NRCS to keep program implementation and delivery as practical and straightforward for farmers as feasible. The application process, paperwork, and requirements for government programs can by itself be an impediment to farmer participation in EQIP. We would encourage NRCS to minimize these types of burdens which may make programs unattractive to some farmers.
3. We are encouraged to hear that cover crops will be Missouri NRCS's top conservation practice both in terms of NRCS funds obligated and by farmer requests. Data presented by NRCS at the State Technical Committee meeting appears to show a 7x increase this year over last in farmer demand for cover crop cost-share. While the increased demand may be partly due to low commodity prices, we also believe farmers are becoming more comfortable with planting and incorporating cover crops into their normal cropping rotations, as well as on a greater percentage of their fields, a trend we hope will continue. While the use of cover crops are not without challenge and may not always be practical on every field or even an option for

every grower, we do strongly support NRCS's conservation efforts in this area. We hope for continued success and we look forward to future partnerships with NRCS around soil health.

4. Lastly, we were troubled by a public comment voiced at the State Technical Committee meeting recommending that NRCS stop providing assistance to Animal Feeding Operations (AFOs), particularly those that choose to sell or transfer (export) all their manure off their farm. The comment insinuated that selling and/or exporting manure off the AFO is an inherently bad practice and that AFOs that do this are somehow less environmentally sound. We strongly disagree with this commenter's position and recommendation and hope that NRCS will too.

The transferring or selling of manure is a perfectly legal and compliant practice and is done for a variety of sound business reasons. Manure is a valuable fertilizer product that farmers strive to manage and apply properly; it's not a waste product that farmers are looking to discard. The fact that neighboring landowners are willing to purchase (and except liability for) an AFO's manure does not mean that it will be mismanaged, land applied improperly or otherwise cause a natural resource concern. In fact, common sense would say it means just the opposite. Even if this was the case, EQIP is tasked with addressing and providing assistance to natural resources concerns, not shy away from them.

Missouri's livestock and poultry industry contributes greatly to the overall strength and diversity of our state's agriculture, the state's #1 industry. Livestock production also represents major in-state markets and thus demand for corn and soybeans grown in Missouri. The vast majority of Missouri hog, poultry and dairy production utilize efficient and environmentally sound modern production barns, confinement facilities and manure management systems. These systems allow livestock farms and neighboring crop farmers to better manage and utilize animal manure as a valuable resource.

To that end, we encourage NRCS to continue providing EQIP assistance to all types and sizes of AFOs, including those that may export their manure.

If you have any questions or would like to discuss any of these items further, please let us know. Thank you for your consideration.

Sincerely yours,

MISSOURI SOYBEAN ASSOCIATION

MISSOURI CORN GROWERS ASSOCIATION