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February 17, 2020

Natural Resources Conservation Service
U.S. Department of Agriculture
Washington, DC 20250

RE: Environmental Quality Incentives Program (EQIP) – Docket Number: NRCS-2019-0009

The National Cotton Council (NCC) is pleased to submit comments on the Environmental Quality Incentives Program (EQIP).

The NCC is the central organization of the United States cotton industry. Its members include producers, ginners, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 10 and 14 million acres of cotton with production averaging 12 to 20 million 480-lb bales annually. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. Farms and businesses directly involved in the production, distribution and processing of cotton employ more than 125,000 workers and produce direct business revenue of more than \$21 billion. Annual cotton production is valued at more than \$5.5 billion at the farm gate, the point at which the producer markets the crop. Accounting for the ripple effect of cotton through the broader economy, direct and indirect employment surpasses 280,000 workers with economic activity of almost \$75 billion. In addition to the cotton fiber, cottonseed products are used for livestock feed and cottonseed oil is used as an ingredient in food products as well as being a premium cooking oil.

EQIP is a successful program that provides valuable cost-sharing between the Natural Resources Conservation Service (NRCS) and producers to enhance conservation and environmental benefits on U.S. farms. Producers can improve production capacity and preserve their farmland with the use of these practices. The use of these practices on commercial scale agricultural operations is the best use of the conservation dollar as these practices can improve a much greater base of resource concerns.

The 2018 farm law made several modifications to the EQIP program and the NCC generally agrees with the interim rule put forth by USDA-NRCS. However, there are some areas that could be improved.

The central components of the EQIP are the conservation practices implemented throughout the country and the extent to which those practices match the conservation needs of farmers and ranchers in their local area. The NCC would like to work closely with the NRCS on ways to further define and refine the practice activities to ensure that they are tailored to fully meet the

needs of cotton growers. Practices should be flexible enough to be adapted to the unique ecosystems and sub-ecosystems that occur throughout the Cotton Belt. Conservation planning and implementation is a continuous process of making improvements to achieve the objectives of reduced soil erosion, improved water quantity and quality, improved air quality, and improved habitat.

A perennial question regarding conservation programs is the ability to quantify improvements to the land. One of the tools that could be utilized in this effort is the use of individual farmer data sources. NRCS would be well served by offering an EQIP practice that would encourage farmers to enroll in, and input their farm data into, sustainability programs such as the U.S. Cotton Trust Protocol. These programs have been or are being developed by most major commodity organizations, as well as other groups, and require producers to show continued improvement – their goals and objectives are very similar to those of NRCS. Having this data would be a powerful tool to show the American taxpayers and global consumers the great conservation work of America's farmers. From a fiduciary standpoint, since these programs require continued improvement, it makes sense for NRCS to offer this type of practice. NRCS programs are highly competitive; at a minimum the agency should offer a ranking increase to those producers who are participating in a recognized sustainability program as these producers are demonstrating their commitment to conserving the land and other natural resources.

We believe ranking applications has worked very well for the program and for producers. This ranking system allows for timely contract offers and places producers on a more level field when applying for contracts and should be continued. The changes made in recent farm laws will further improve the process as producers will be able to compete against similar agricultural operations.

EQIP is a very successful program for cotton producers that helps improve production efficiency while protecting the environment. The NCC looks forward to working with USDA on this and other conservation initiatives for our nation's farmers to keep American agriculture the backbone of this economy.

Sincerely,

A handwritten signature in black ink that reads "Gary M. Adams". The signature is written in a cursive, flowing style.

Gary Adams
President & CEO
National Cotton Council