SEIZING A WATERSHED MOMENT

Making EQIP Work for Water Quality in 10 Mississippi River Border States

Environmental Quality Incentives Program
State Report 2 of 10

ENVIRONMENTAL WORKING GROUP

APPENDIX – STATE REPORTS

ILLINOIS
ENVIRONMENTAL QUALITY INCENTIVES PROGRAM

OVERVIEW

Illinois received an average of $16 million in EQIP technical and financial assistance funds per year from 2003 to 2007, ranking it seventh out of the 10 states that border the Mississippi River for EQIP funds. Illinois is the only state among those ten states that has a statewide competition for all of its EQIP funds.

EQIP applicants choose to participate in one or more of six statewide EQIP categories: (1) General EQIP, (2) Grazing Land Operations, (3) Confined Livestock Operations, (4) Comprehensive Nutrient Management Plan, (5) Forest Management Plan, and (6) Forest Management Implementation. Each EQIP category has its own ranking criteria document called "Ranking Criteria" to evaluate applications. Since all applications compete statewide, there are no local level ranking factors or ranking criteria documents. Only the General EQIP ranking criteria document has (1) a national issues section and (2) a state issues section. The remaining 5 ranking criteria documents only have "state issues" sections.

The Illinois State Technical Committee provides input to the Illinois Natural Resources Conservation Service (NRCS) during the development of ranking criteria categories. Effort is underway in Illinois to revitalize the Local Work Group system. Applications are collected and ranked at local field offices and the state NRCS establishes the ranking cut off points needed for funding on a statewide basis.

ILLINOIS EQIP WEBSITE

http://www.il.nrcs.usda.gov/programs/eqip/

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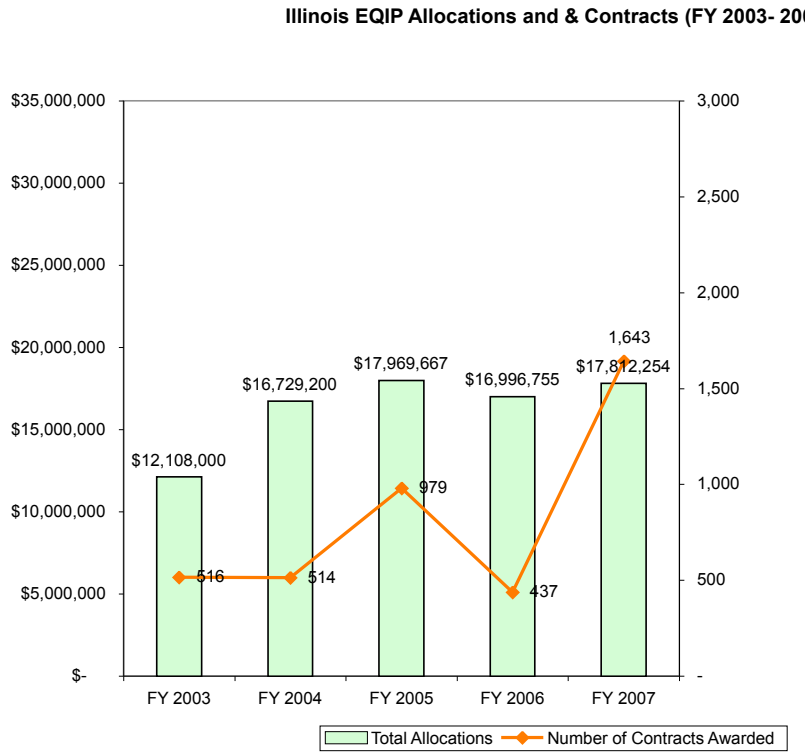
FUNDING AND REACH OF EQIP

EQIP funding is allocated to states using a national formula. The chart below shows the amount of financial and technical assistance Illinois has received from FY 2003 to 2007 and the number of contracts awarded each fiscal year. A total of 4,089 contracts have been entered into with producers between 2003 and 2007 providing $81.6 million and addressing nearly 658,107 acres in the state.



Source: EWG compiled annual data from EQIP's "Allocation" and "Contract" tables found on the USDA NRCS website: http://www.nrcs.usda.gov/programs/EQIP/.

KEY FACTORS ANALYSIS

We analyzed the following factors for indications of the extent to which EQIP in Illinois is focused on reducing sediment and nutrient loads to streams, lakes, and rivers: (1) the presence or absence of qualitative or quantitative goals for pollutant reductions, (2) methods used to allocate state-level funds to counties or other sub-state levels or to specific projects or priorities, and (3) the application ranking criteria used to select participants in EQIP. We relied primarily on the information and data presented on NRCS websites to complete this analysis and followed up on our investigation with interviews of the state EQIP program managers.

Goals

Illinois EQIP did establish the Spoon River Special Project, which had a goal of reducing agricultural sediment pollution to the Illinois River Watershed, and dedicated about 7 percent of its EQIP funds to the project.

Regarding the balance of Illinois EQIP funds, EWG did not find evidence to suggest that Illinois EQIP has a) established explicit quantitative or qualitative goals for EQIP to clean up agricultural sources of pollution, b) identified which lakes, streams, or tributaries are priorities for improvement, c) set a timetable to achieve those goals, or d) established a means to track progress toward the goals. Illinois' application ranking systems do create an implicit set of priorities for treating water quality, but measurable goals and timelines do not exist.

EWG recommends that Illinois EQIP set clear and specific goals for how much and what types of agricultural pollution need to be reduced, which lakes, streams or tributaries are priorities for improvement, and a timetable to achieve those goals. EWG also recommends that Illinois EQIP develop systems to track, evaluate, and report on the environmental performance of EQIP.

Fund Allocation

Illinois EQIP is the only program among the 10 state programs reviewed that pool all of their funds into statewide funding pools. Illinois EQIP pools funding into the program's 6 designated resource concern categories. (See the first 6 categories in the table below). Based on input from the State Technical Committee, Illinois EQIP allocated funds in FY2007 and 2008 to the following 7 funding categories:

Funding by Resource Concern Areas in Illinois (FY 2007 & 2008)				
	Funding for FY 2008	**Percent**	**Funding for FY 2007**	**Percent**
General EQIP	$ 5,445,000	42%	$ 4,485,000	32%
Confined Livestock Operations	$ 4,082,000	32%	$ 5,381,000	38%
Comprehensive Nutrient Management Plans	$ 1,224,000	9%	$ 0	0%
Forest Management Plans	$ 251,000	2%	$ 403,000	3%
Forest Management Implementation	$ 928,000	7%	$ 0	0%
Grazing Land Operations	$ 0	0%	$ 319,000	2%
Spoon River Special Project	$ 0	0%	$ 785,000	6%
Total	$ 12,954,000		$ 14,055,000	

Source: Paula Hingson, the Farm Bill Coordinator for Illinois, provided this table to EWG.

Though many of Illinois EQIP's funding categories are likely to address nutrient and sediment pollution, the six funding categories suffer from a lack of specificity. The

funding categories do not mention the types of pollutants they are addressing, rather they are named after best management practices (CNMPs and Forest Management Plans) or agricultural sectors (Confined Livestock Operations, Grazing Land Operations). In addition, though the title of this table identifies these funding categories as "resource concern areas," there is no mention of EQIP's 8 resource concerns: air quality, domestic animals, fish and wildlife, plant condition, soil condition, soil erosion, water quality, and water quantity. Finally, it is unclear what type of pollutant or source of pollutants are being addressed by Illinois' "General EQIP" fund, which receives nearly half of the state's EQIP funds.

The State Conservationist can move funding between categories depending on the level of interest in particular categories. Ivan Dozier, Assistant State Conservationist (Programs) and Paula Hingson (Farm Bill Coordinator) provided the following description of Illinois EQIP's fund allocation process.

"With input and concurrence from the State Technical Committee, Illinois NRCS starts out by targeting funds into two sub-categories, consistent with national guidelines, with 60% of EQIP funds being focused on livestock agriculture and the remaining 40% on non-livestock (general) agriculture.

Of the livestock related agricultural issues, we target 60% (of the original 60%) for livestock confinement agriculture, and 40% on grazing lands. Funds dedicated to CNMP (Comprehensive Nutrient Management Plan) incentives are sub-pool of the confined livestock category of funds. To help avoid potential contracting violations (such as starting a practice within the first 12 months and not completing practices on schedule) we constantly monitor the backlog of previously approved CNMP completion so we don't approve more applications than our cadre of Technical Service Providers and NRCS personnel can complete.

The remaining 40% of funds that is dedicated to non-livestock practices is also currently divided into a sub-pool of forest management plans and forestry implementation incentives. Currently there is no set targeted spending amount for these funds but again we monitor interest and workload backlog before approving."

Illinois conducted a "special project" in FY 2006 and 2007. The Spoon River had been identified as one of the highest contributors of sediment in the Illinois River Watershed and streambank erosion was identified as a major resource concern. Therefore, EQIP developed a special project to increase adoption of streambank stabilization practices.

What follows is a written description of the Spoon River Special Project from Illinois EQIP managers Dozier and Hingson.

> "Special projects (watersheds, target areas, target resources) are established as a sub-pool under the appropriate livestock/non-livestock category of funds. The

Spoon River Watershed is an example of a special EQIP project. We have had others in the past as well."

"The Spoon River special EQIP project targeted the Spoon River sub-watershed of the Illinois River Watershed. The Illinois River Watershed is a State Priority Watershed for NRCS and the Illinois Conservation Partnership. When the Spoon River Special EQIP project first started in FY 2006, Illinois NRCS pledged a target of $600,000 of EQIP financial assistance to the project. The Illinois Department of Natural Resources, US-EPA, IL-EPA, Illinois Department of Agriculture, local Soil and Water Conservation Districts and the Spoon River Ecosystem Partnership were all involved as partners and the Lt. Governor's Illinois River Coordinating Council endorsed the project.

NRCS established a 75% cost-share rate and separate ranking pool for this watershed (as a sub account of the non-livestock category of funds). IDNR provided additional cost-share that could bring the total share amount up to 100%. EPA assisted with water quality monitoring of the sub-watershed, the Iowa Department of Agriculture (IDoA) provided technical assistance for practice designs, the SWCDs assisted IDNR with administration and the local watershed group helped develop the ranking.

Within the Spoon River Watershed, the Cedar Creek sub-watershed was selected as a reasonable size to have the opportunity for a significant impact with our practices. Although any landowners in the Spoon River Watershed were eligible, additional ranking points were given to projects in the Cedar Creek sub-watershed. The cost share rate was established at 70% (most other practices were at 60%) and the area had it's own cost list based on local cost of raw materials. The interest was high so we directed more funds than was targeted.

In the first year (FY 06) NRCS targeted $750,000 to the watershed but based on interest nearly double that amount was obligated. We finished FY 2006 with 35 contracts totaling $951,729 in the Cedar Creek Watershed and 9 contracts totaling $528,508 in the rest of the Spoon. For a total of 44 contracts with $1,480,237 of EQIP funds. This total amount was a little more than 10% of our total EQIP Financial Assistance allocation in FY 06. On certain sites that also help protect CREP easements, IDNR paid an additional percentage (not to exceed 100% total cost) depending on the proximity the CREP land. IDOA provided some technical assistance with practice designs. IL EPA and US EPA are conducting monitoring.

We originally intended the project to run for one year but because there were still some projects that we had not funded, we ran the special project again in FY 2007, without any emphasis on the Cedar Creek sub-watershed. In FY 2007 we got another 18 contracts totaling $483,420 of EQIP financial assistance. That

was about 3 1/2% of our FY 2007 EQIP allocation. IDNR did not have a supplemental incentive in 2007 and IDOA did not provide technical assistance. NRCS discontinued the special project for 08 because there was no backlog of eligible sites and the State no longer had funds for the partnership. The project was considered a success. Monitoring is ongoing."

EWG commends Illinois for carrying out the Spoon River Special Project. EWG recommends that Illinois EQIP's best opportunity for improving water quality is to ramp up funding for these well-designed, watershed-based clean-up projects.

EWG recommends that Illinois EQIP allocate 60 percent of its EQIP funds to watershed-based clean-up projects by 2012. Illinois EQIP should then allocate the remaining 40 percent of funds by 2012 to funding pools that target high priority natural resource and environmental problems. These state-level funding pools create important opportunities to focus EQIP on the most pressing designated problems. The funding pools allow EQIP managers to select the best applications from all the applications proposing to address the same natural resource or environmental problem.

Application Ranking Criteria

Applications to participate in EQIP in Illinois are evaluated using multiple ranking sheets that include (1) national ranking factors and (2) state ranking factors. Because Illinois is the only state where all EQIP funds compete on a statewide basis, there are no local-level ranking factors. In addition to the General EQIP ranking criteria document which is used to evaluate "non-specific" applications, Illinois uses 5 other ranking sheets to evaluate applications: (1) Comprehensive Nutrient Management Plan (CNMP), (2) Forest Management Plan, (3) Forest Management Implementation, (4) Confined Livestock Operations, and (5) Grazing Land Operations. Each of the 102 counties in Illinois receives applications to all 6 ranking criteria categories. Applications are ranked on a statewide basis against each other within the 6 ranking categories.

Only the General EQIP ranking criteria document has (1) a national issues section and (2) a state issues section. The remaining 5 ranking criteria documents only have "state issues" sections. Illinois EQIP uses a system of Yes/No questions combined with positive points for each ranking category to evaluate applications. Applications that receive a greater total point score get a higher priority for selection and participation in EQIP. The final component of Illinois EQIP's ranking tool is the Cost Efficiency Score, which is a benefit-cost calculation of the practices selected for implementation in the contract. See Box 1 for background information on the cost-efficiency score.

Box 1. The Cost-Efficiency Score

A cost-efficiency score is generated for each application to determine how effective the cost-shared practices will be at addressing the priority resource concerns (soil, water, air, plant, animal, and human). The cost-efficiency score is calculated by multiplying the practice(s)'

Conservation Practice Physical Effects (CPPE) value(s)
x Service life of the practice(s)
/ Average cost of installing and maintaining the practice(s)

NRCS maintains a national database of each practice's CPPE value. CPPE values range from -5 to + 5 reflecting the practice's ability to worsen or improve each resource concern. The CPPE value can be modified by the state or local jurisdiction to reflect the soil, weather, topographic, and other state or local conditions that may impact the effectiveness of the practice.

All 10 Mississippi River border states are using the NRCS Pro-Tracts Cost-Efficiency software to calculate a Cost-Efficiency score for each application. However, because the Cost-Efficiency score is embedded in the software, this step in the ranking process is not transparent since the state EQIP managers were unable to fulfill our request of reviewing the CPPE values given to practices funded by EQIP.

Unlike other states that assign a certain percentage of the total ranking score to the national, state, and cost-efficiency section of their ranking criteria, Illinois' national and state ranking points are not weighted but merely additive to provide a total score for an application. According to Dozier and Hingson, the cost-efficiency factor is weighted within Illinois to provide enough weighting to allow one application to rise above another because the improvement to the environment is higher and the cost of the practices is lower.

To participate in the General EQIP application pool, a producer must agree to address one or more of the following resource concerns in order to qualify for the program: Soil Erosion, Soil Condition, Water Quality, Water Quantity, Fish and Wildlife, and Plant Condition.

To determine how much emphasis Illinois EQIP places in its ranking criteria on the reduction of nutrient and sediment pollution and on geographic priority areas, we attempted a rough calculation of points assigned to questions that appear to address these priorities. We acknowledge that this approach is incomplete and potentially misleading, as it does not account for the effect of the cost-efficiency score in the Ranking Criteria. In addition, the lack of specificity in the ranking criteria made it difficult to identify points for reducing sediment and nutrient pollution and points for applications located in priority areas. Those complications are described in Box 2.

Box 2. The Lack of Specificity in Ranking Criteria

The ranking criteria in all 10 Mississippi River border states lacked sufficient specificity for us to determine with real certainty the emphasis each state was giving in its ranking sheets to the reduction of sediment and nutrient pollution and to areas of geographic importance. For example, many ranking factors do not specify the particular source of natural resource or environmental problems, such as sediment or nutrient loss from cropland. Instead the ranking factors refer to more generic sources of problems, such as nonpoint source pollution.

In those cases where more specific types of pollutants like sediments or nutrients were cited, they were usually included in a longer list of pollutants, such as pathogens, pesticides, or excess salinity, making determination of the priorities implicit in the ranking criteria difficult. A similar lack of specificity hampered our ability to determine the emphasis placed on location of an application within a priority watershed or other geographic unit.

Despite these difficulties, it is clear that the factors used in ranking criteria and the priority assigned those factors through point allocations and multipliers are critical determinants of effectiveness of EQIP in reducing sediment and nutrient pollution.

Regarding emphasis on geographic priorities, a review of the FY2008 General EQIP Ranking Criteria document (see Appendix) indicates that Illinois does not appear to give much emphasis to geographic priorities. Illinois does ask National Priorities Question 1 which includes a reference to impaired watersheds:

> "Will the treatment you intend to implement using EQIP result in considerable reductions of non-point source pollution, such as nutrients, sediment, pesticides, excess salinity in impaired watersheds, groundwater contamination or point source contamination from confined animal feeding operations?"

This question does give some priority to an application located in an impaired watershed as part of a larger priority for addressing nonpoint and point source pollution.

In the State Issues section of the General EQIP sheet, Illinois gives applications priority for being located in important areas but only 10 of the 175 total possible points (6 percent) in the State section are awarded for these geographic priorities:

> "The EQIP application area is located in a watershed of a 303d stream segments(s) impaired agriculture as identified on Map 2 of the "EQIP '08 map references", or a watershed with an active, locally-led committee with a resource plan as identified on Map 3 of the "EQIP '08 Map references"." (See the Appendix for these maps)

Regarding emphasis on reducing nutrient and sediment pollution, a review of the General EQIP Ranking Criteria document provides unclear answers about how much priority Illinois places on these two types of water pollutants. For example, the National Priority Question 1 does mention the words "nutrients" and "sediment" but the question lacks sufficient specificity for us to distinguish between points awarded for treatment of nutrients and sediments versus points awarded for reducing excess salinity or pesticides.

The National Priorities Question 4 does allocate 10 points (25 percent of the 40 total points available from the National Priorities section of the ranking system) for applications that specifically address soil erosion and sedimentation.

> "Will the treatment you intend to implement using EQIP result in a considerable reduction in soil erosion and sedimentation from unacceptable levels on agricultural land?"

In the State Issues section, a sub-group of questions entitled "Soil Erosion Questions" provides 20 more points (11 percent of the 175 points in the State section) for reducing the following types of erosion: streambank, ephemeral, classic gully or sheet and rill. However, there is no indication whether the erosion occurring on the applicant's cropland is causing a sedimentation problem in a body of water.

There is another sub-group of questions in the State Issues section entitled "Positive Effects of Practices on the Soil and Water Resource Concerns" that are likely to include reductions in sediment and nutrient pollution, among other types of water quality pollutants. These 3 questions award 10 points each if the applicant agrees to implement at least one of the selected practices that positively affects a) soil resource concerns, b) soil and/or water resource concerns, and c) water quality and/or water quantity.

Finally, there are 2 questions that award the largest and second largest numbers of points in Illinois' General EQIP Criteria. Applicants that agree to implement a Resource Management System (RMS) plan that address a) all or b) at least 2 resource concerns receive 70 and 35 points, respectively. The resource concerns listed are: soil erosion, soil condition, water quality, water quantity, fish and wildlife, or plant condition. Thus, assuming that nutrient pollution will be addressed by the "water quality" resource concern and that sediment pollution will be addressed by the "soil erosion" resource concern and assuming that the applicant chooses to address at least these 2 resource concerns, then it is likely that the applicant will reduce nutrient and sediment pollution. If an applicant agrees to address all resource concerns and use EQIP dollars to do it, then 20 more points are awarded. Thus, 90 more points may possibly result in a reduction of nutrient and sediment pollution.

Altogether, the 140 points that are implicitly related to nutrient and sediment pollution represent 80 percent of the points in the State Issues section of the ranking system.

For comparison purposes, we performed a cursory review of the Illinois Confined Livestock Operations Ranking Criteria and Comprehensive Nutrient Management Plan (CNMP) Ranking Criteria. Note that the Confined Livestock Operations funding pool received the second highest percentage of Illinois EQIP funds. Ten of the total 140 total points (7 percent) are provided if the application is in a watershed on the 303d list that is impaired by agriculture (see Map 2) or in a watershed with a locally led committee with a resource plan (see Map 3). There are two other geographically related criteria. Twenty-five points (18 percent) is given if the "livestock facility is within 500 feet of a water body and contaminated runoff is not now but will be controlled." And 10 points (7 percent) is given if "a positive change in management will result in manure application no closer than 1,320 feet from a water body."

Illinois' Comprehensive Nutrient Management Plan (CNMP) Ranking Criteria asks only three questions worth a total of 45 points. Twenty of the 45 points (44 percent) is provided if the applicant has been cited by a state or federal regulator agency for improper manure or mortality management.

Despite Illinois EQIP appearing to give a large number of unweighted points in the reviewed ranking criteria to the most pressing concerns – nutrient and sediment pollution reduction in high priority areas – only about 6 percent of points are given to applications from priority watersheds. Thus, it is unlikely that Illinois' ranking system can ensure that applications in the priority watersheds will rise to the top of the ranking list and get selected for funding.

EWG recommends that Illinois EQIP revise their ranking systems to increase the priority given to applications located in high priority watersheds that will reduce sediment and nutrient pollution. Sediment and nutrient pollution are the two most important pollutants of streams, lakes, and reservoirs in the 10 states bordering the Mississippi River, the main stem of the Mississippi River, and the Dead Zone in the Gulf of Mexico.

Conclusion

We find that EQIP has not been deployed as effectively as it could be in Illinois or any of the 9 states that border the Mississippi River. The methods used to decide how to spend EQIP dollars within the state and which farmers will get those dollars are more likely to result in diffuse and fragmented efforts to reduce pollution from farms rather than the focused and coordinated effort needed to solve both local and regional water pollution problems.

Watershed-based water quality clean-up projects are the best use of federal taxpayer resources and offer the greatest hope for cleaning up the unintended environmental

damage of agriculture. These projects entail setting goals to clean up specific bodies of water that are deemed the highest priorities, determining how many of the most cost effective practices are needed, and persuading key farmers to participate in the project.

To quickly ramp up the effectiveness of EQIP, Illinois NRCS should:

1. Set clear and specific goals for how much pollution needs to be reduced, which lakes, streams or tributaries are priorities for improvement, and a timetable to achieve those goals.

2. Use 60 percent of EQIP dollars by 2012 to fund watershed-based water quality clean-up projects that encourage multiple farmers within selected watersheds to reduce pollution to specific lakes, streams, or tributaries to the Mississippi River.

3. Use 40 percent of EQIP funds by 2012 in state-level funding pools to target the highest priority natural resource and environmental problems in each state.

4. Select farmers to participate in EQIP who can do the most to contribute to watershed-based clean-up projects or solve high priority problems.

APPENDIX—Illinois EQIP Ranking Criteria
Illinois FY2008 – General EQIP Ranking Criteria National Issues section

EQIP
Environmental Quality Incentives Program

NRCS Natural Resources Conservation Service

General EQIP Ranking Criteria

October 5, 2007

State Issues

SCREENING QUESTIONS	1. Will one or more of the resource concerns listed below (check all that apply) be addressed by the EQIP application? ☐ Soil Erosion ☐ Soil Condition ☐ Water Quality ☐ Water Quantity ☐ Fish and Wildlife ☐ Plant Condition **If no, stop ranking** application and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0
	2. The minimum EQIP application area is an entire field or series of fields. **If no, stop ranking** application and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0

Resource Planning Questions

A maximum of one question can be answered "Yes" for questions 3 and 4		
3. Applicant has been presented Resource Management System (RMS) level alternatives for all resource concerns for the tract(s) that encompass the application area (as defined in Attachment 1, items A and B), prior to applying for EQIP. **AND the applicant has agreed to:** • a plan that addresses **all** of the resource concerns. • implement at least one practice from the plan using EQIP dollars.	○ Yes ○ No	70
4. Applicant has been presented RMS level alternatives for all resource concerns for the tract(s) that encompass the application area (as defined in Attachment 1, items A and B), prior to applying for EQIP. **AND the applicant has agreed to:** • a plan that address at least 2 resource concerns (as identified in screening question #1) prior to applying for EQIP. • implement at least one practice from the conservation plan using EQIP dollars.	○ Yes ○ No	35
5. If question 3 was answered yes, will all remaining practices of the RMS plan be implemented using EQIP dollars? (Part of the RMS plan may already be in place and the remaining practices will be put in place using EQIP dollars or the entire RMS plan will be put in place using EQIP dollars.)	○ Yes ○ No	20

Location

6. The EQIP application area is located in a watershed of a 303d stream segment(s) impaired by agriculture as identified on Map 2 of the "EQIP '08 Map references", or in a watershed with an active, locally-led committee with a resource plan as identified on Map 3 of the "EQIP '08 Map references".	○ Yes ○ No	10

Soil Erosion Questions – Select all that apply

7. EQIP dollars will be used to reduce streambank erosion.	○ Yes ○ No	10
8. EQIP dollars will be used to reduce ephemeral or classic gully erosion.	○ Yes ○ No	5
9. EQIP dollars will be used to reduce sheet and rill erosion.	○ Yes ○ No	5

Positive Effects of Practices on the Soil and Water Resource Concerns

10. Application includes EQIP dollars for **at least one structural or vegetative practice that positively affects the soil** resource concerns (choose from the list below only). Terrace, WASCOB, Grassed Waterway, Grade Stabilization Structure, Critical Area Planting, Diversion, Streambank and Shoreline Protection, Tree and Shrub Establishment	○ Yes ○ No	10
11. Application includes EQIP dollars for **at least one management practice that positively affects the soil and/or water** resource concerns (choose from the list below only). Nutrient Management *(addressing one or more items listed on Attachment J, C)*, Residue and Tillage Management (No-Till/Strip-till), Drainage Water Management, Irrigation Water Management	○ Yes ○ No	10
12. Application includes EQIP dollars for **at least one structural or vegetative practice that positively affects water quality and/or water quantity** (choose from the list below only). Field Border, Streambank and Shoreline Protection, Filter strips, Riparian Forest Buffers, At least 3 acres of Constructed Wetland, At least 3 acres of Wetland Restoration, Structure for Water Control	○ Yes ○ No	10

Positive Effects of Practices on the Wildlife Habitat Resource Concern

A maximum of one question can be answered "Yes" for questions 13-15		
13. Application includes EQIP dollars for **one or more structural or management practice that positively affects wildlife habitat** on a total of 3-10 acres while meeting the minimum acreage requirement for a practice (choose a single practice or combination of practices from the list below only). At least 3 acres of Wetland Restoration, At least 3 acres of Shallow Water Development and Management, At least 3 acres of Restoration and Management of Declining Habitats, At least 3 acres of Prescribed Burning, At least 3 acres of Early Successional Habitat Development/Management	○ Yes ○ No	10

14. Application includes EQIP dollars for **one or more structural or management practice that positively affects wildlife habitat** on a total of more than 10 acres meeting the minimum acreage requirement for a practice (choose a single practice or combination of practices from the list below only). At least 3 acres of Wetland Restoration, At least 3 acres of Shallow Water Development and Management, At least 3 acres of Restoration and Management of Declining Habitats, At least 3 acres of Prescribed Burning, At least 3 acres of Early Successional Habitat Development/Management	○ Yes ○ No	20
15. The application includes EQIP dollars for a **Stream Habitat Improvement and Management project.**	○ Yes ○ No	20

Providing Habitat for Pollinators

16. Application will provide habitat for pollinators using EQIP dollars by: • establishing or enhancing a border practice or block of perennial vegetation at least ½ acre in size • including in the practice, at least 15 native flowering forbs and/or shrubs with flowering periods that span the growing season. • Applying no insecticide to the area or within a 30 foot buffer of the area. • Allowing not more than 1/3 of the site to be disturbed for early successional management of the vegetation, according to the NRCS 643 standard. (See Attachment 1, item D)	○ Yes ○ No	5

National Issues *(reference "**EQIP '08 National Issues Definitions and scoring**" for more explanation; if the state screening questions1-2 are answered no, the applicant will receive no points on the National Issues.)*

		Points
1. Will the treatment you intend to implement using EQIP result in considerable reductions of non-point source pollution, such as nutrients, sediment, pesticides, excess salinity in impaired watersheds, groundwater contamination or point source contamination from confined animal feeding operations?	○ Yes ○ No	10
2. Will the treatment you intend to implement using EQIP result in a considerable amount of ground or surface water conservation?	○ Yes ○ No	5
3. Will the treatment you intend to implement using EQIP result in a considerable reduction of emissions, such as particulate matter, nitrogen oxides (NOx), volatile organic compounds, and ozone precursors and depleters that contribute to air quality impairment violations of National Ambient Air Quality Standards?	○ Yes ○ No	5
4. Will the treatment you intend to implement using EQIP result in a considerable reduction in soil erosion and sedimentation from unacceptable levels on agricultural land?	○ Yes ○ No	10
5. Will the treatment you intend to implement using EQIP result in a considerable increase in the promotion of at-risk species habitat conservation?	○ Yes ○ No	10

Skipped pages 4, 5, & 7 of the Illinois General EQIP Ranking Criteria document but included page 6 which details the "Positive Environmental Change" increased per acre payments for advanced nutrient management practices:

Attachment 1
Definitions and Guidance for General EQIP Applications

A) Resource Management System (RMS) Plan

The RMS plan must accurately reflect the practices in the EQIP application, and must be signed as approved by NRCS. At a minimum, the RMS plan is to include a combination of conservation practices and resource management, identified by land or water uses, for the treatment of all resource concerns for soil, water, air, plants, and animals that meets or exceeds the quality criteria in the Field Office Technical Guide (FOTG) for resource sustainability, as outlined in the National Planning Procedures Handbook **(NPPH),** section **600.11 (a) Resource Management System (RMS).**

B) Planning prior to an EQIP Application

The applicant may garner points for having an RMS plan (as described in part A, above), or a conservation plan, in place prior to applying for EQIP financial assistance. If an RMS plan is developed after the original application date the ranking score cannot be upgraded until a subsequent batching period.

C) Achieving "Positive Environmental Change" *(to be documented in a Nutrient Management Plan)*

1) To receive the $10 per acre incentive (flat rate payment)

In order for the applicant to qualify for the $10 incentive their **Nutrient Management Plan must include the basic requirements of the NRCS 590 standard) plus one or more of the following management changes**:

Rate of nitrogen or phosphorus application

a. The rate of nitrogen or phosphorus will be reduced by at least 11 lbs./acre from the current level of application. Do not add nitrogen and phosphorus reductions together to determine total reduction in application rate.

Timing of nitrogen application

b. When Nitrogen is currently being applied in the fall, applicant agrees to apply the majority of the nitrogen in the spring. Nitrogen being applied in the fall will now be delayed and/or a nitrification inhibitor will be used according to University of Illinois recommendation.

c. Nitrogen application will be changed from fall application to spring preplant and/or sidedress on corn or sorghum.

Phosphorus placement

d. Phosphorus is currently being broadcast on the soil surface and future phosphorus applications will be injected, or placed, at least 2 inches deep.

Note: The 590 standard requires soil samples on a 2.5 acre grid or the industry standard (not to exceed 5 acre grid soil samples). If industry standard is used Area ASTC approval must be obtained.

2) To receive the $15 per acre incentive (flat rate payment)

In order for the applicant to qualify for the $15 incentive the requirements of item 1 above must be met **plus one or more of the following management changes**:

a. Applicant will *change management* to apply phosphorus fertilizer using Variable Rate Technology (VRT) based on current soil tests (less than or equal to 4 years old) and will not apply any phosphorus fertilizer in areas of the field where the soil test phosphorus exceeds 70 lbs./acre *(i.e., applicant has not been already been applying phosphorus using VRT: a uniform rate across the whole field is currently being applied, OR applicant has been applying phosphorus fertilizer using VRT but phosphorus was being applied in areas with soil tests greater than 70 lbs./acre.)*

b. All Nutrients are applied using VRT based on current soil tests (less than or equal to 4 years old). **Note: Starter fertilizer containing phosphorus is allowed in locations not receiving maintenance phosphorus. Phosphorus applied in the starter will not exceed 35 lbs. P_2O_5/acre.**

3) To receive the $ 5 per acre incentive (flat rate payment)

In order for the applicant to qualify for the $5 incentive the requirements outlined in item 1 above are already in place and the applicant is only applying the requirements outlined in item 2 above.

IL-EQIP FY2008 - Confined Livestock Operations Ranking Criteria (Attached are the first 3 of 10 pages only)

EQIP
Environmental Quality Incentives Program

NRCS Natural Resources Conservation Service

Confined Livestock Operations Ranking Criteria

October 5, 2007

State Issues

			Points
----SCREENING QUESTIONS----	1. The applicant currently has livestock that are used to produce food and/or fiber on the land where EQIP treatment is proposed (subject to exception as described in Attachment 1, item A). **If no, stop ranking** application and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0
	2. The planned project is on an existing facility, as defined in Attachment 1, item B, and all practices in the contract will address an existing livestock-related resource concern. **If no, stop ranking** application and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0
	3. The applicant has or can obtain access to the amount of acres needed to spread manure from the operation (see documentation requirement in Attachment 1, item C). **If no, stop ranking** application and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0
	4. The applicant will include measures necessary to bring soil erosion to the quality criteria level in eFOTG section III (subject to exception per, Map 1) on all land where manure is applied *(land must be owned or controlled by the applicant, or on which the applicant has a contract to apply manure)*. **If no, stop ranking** application and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0
	5. The applicant will implement a Waste Utilization Plan that meets the requirements of the NRCS-IL Standard 633, for the operation receiving EQIP funding, by the end of the EQIP contract. *Note: if animals will be moved from confinement to grazing, a prescribed grazing plan is also required.* **If no, stop ranking** application and the applicant will receive no points on the entire ranking criteria. (See attachment 3 for requirements)	○ Yes ○ No	0
	6. A CNMP completed by a qualified TSP or written and approved by NRCS will be developed prior to installation of waste storage or treatment facilities, and the CNMP will be implemented no later than 3 years after the installation of waste storage or treatment facilities. **If no, stop ranking** application and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0

Ranking Questions		
7. A CNMP completed by a qualified TSP or written and approved by NRCS (as described in Attachment 1, item D) was developed prior to the time the EQIP application was submitted.	○ Yes ○ No	40

8. Part of the EQIP application will be located in a watershed of a 303d stream segment(s) impaired by agriculture as identified on Map 2 of the "EQIP '08 Map references", or in a watershed with an active, locally-led committee with a resource plan as identified on Map 3 of the "EQIP '08 Map references".	○ Yes ○ No	10
9. The applicant has completed a nationally recognized third party environmental assessment of the confined livestock operation, as described in Attachment 1, item E.	○ Yes ○ No	10
10. The applicant is a Certified Livestock Manager, according to Illinois Department of Agriculture Specifications, at the time the EQIP application is submitted.	○ Yes ○ No	10
A maximum of one question can be answered "Yes" for questions 11 and 12		
11. Waste storage utilization will be improved by more frequent manure application using EQIP dollars, instead of increasing waste storage capacity, as described in Attachment 1, item G.	○ Yes ○ No	20
12. Waste Storage Capacity for the existing number of animals will be increased to at least six months but no more than 12 months using EQIP dollars, as described in Attachment 1, item F.	○ Yes ○ No	15
13. A new practice (such as a composting facility) will be installed using EQIP dollars to improve an existing mortality management area.	○ Yes ○ No	5
14. Waste impoundment(s) will be closed using EQIP dollars, as described in Attachment 1, item I.	○ Yes ○ No	5
15. Abandoned water well(s) will be sealed using EQIP dollars, on land owned or controlled by the applicant.	○ Yes ○ No	5
16. Livestock facility is within 500 feet of a water body (as defined in Attachment 1, item J) and contaminated runoff is not now but will be controlled, as identified in Attachment 1, item H, using EQIP dollars.	○ Yes ○ No	25
A maximum of one question can be answered "Yes" for questions 17 and 18		
17. A positive change in management will result in manure application no closer than 200 feet but less than 1320 feet from a water body (as described in Attachment 1, items J and K). Waste Utilization (633) will be implemented using EQIP dollars. *Note: Positive environmental change must be documented on Attachment 3.*	○ Yes ○ No	5
18. A positive change in management will result in manure application no closer than 1320 feet from a water body (as described in Attachment 1, items J and K). Waste Utilization (633) will be implemented using EQIP dollars. *Note: Positive environmental change must be documented on Attachment 3.*	○ Yes ○ No	10

National Issues *(reference "**EQIP '08 National Issues Definitions and scoring**" for more explanation; if the state screening questions 1-6 are answered no, the applicant will receive no points on the National Issues.)*

		Points
1. Will the treatment you intend to implement using EQIP result in considerable reductions of non-point source pollution, such as nutrients, sediment, pesticides, excess salinity in impaired watersheds, groundwater contamination or point source contamination from confined animal feeding operations?	○ Yes ○ No	10
2. Will the treatment you intend to implement using EQIP result in a considerable amount of ground or surface water conservation?	○ Yes ○ No	5
3. Will the treatment you intend to implement using EQIP result in a considerable reduction of emissions, such as particulate matter, nitrogen oxides (NOx), volatile organic compounds, and ozone precursors and depleters that contribute to air quality impairment violations of National Ambient Air Quality Standards?	○ Yes ○ No	10
4. Will the treatment you intend to implement using EQIP result in a considerable reduction in soil erosion and sedimentation from unacceptable levels on agricultural land?	○ Yes ○ No	10
5. Will the treatment you intend to implement using EQIP result in a considerable increase in the promotion of at-risk species habitat conservation?	○ Yes ○ No	15

IL-EQIP FY2008 – Comprehensive Nutrient Management Plan (CNMP) Ranking Criteria (Attached 1 of 2 pages only)

EQIP
Environmental Quality Incentives Program

NRCS Natural Resources Conservation Service

Comprehensive Nutrient Management Plan (CNMP) Ranking Criteria

October 5, 2007

State Issues

SCREENING QUESTIONS	1. Is the applicant requesting the CNMP incentive only for a site that does not already have a CNMP? **If no, stop ranking** and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0
	2. Does the applicant currently have more than 15 animal units (that are used to produce food and/or fiber), or have they requested a waiver from the NRCS State Conservationist? **If no, stop ranking** and the applicant will receive no points on the entire ranking criteria.	○ Yes ○ No	0

Ranking Questions		
3. Applicant had an "eligible" CNMP application in ProTracts in FY 2007 that was not selected for funding.	○ Yes ○ No	20
4. Applicant has been cited by a state or federal regulator agency for improper manure or mortality management. *(Documentation from applicant is required)*	○ Yes ○ No	20
5. Applicant has 15 or more animal units *(or a waiver from the NRCS State Conservationist)* and no previously written CNMP for the application area (site)?	○ Yes ○ No	5

National Issues: The **development of a** Comprehensive Nutrient Management **Plan does not improve the resource concerns** until implemented; therefore, all National questions must be answered "No".

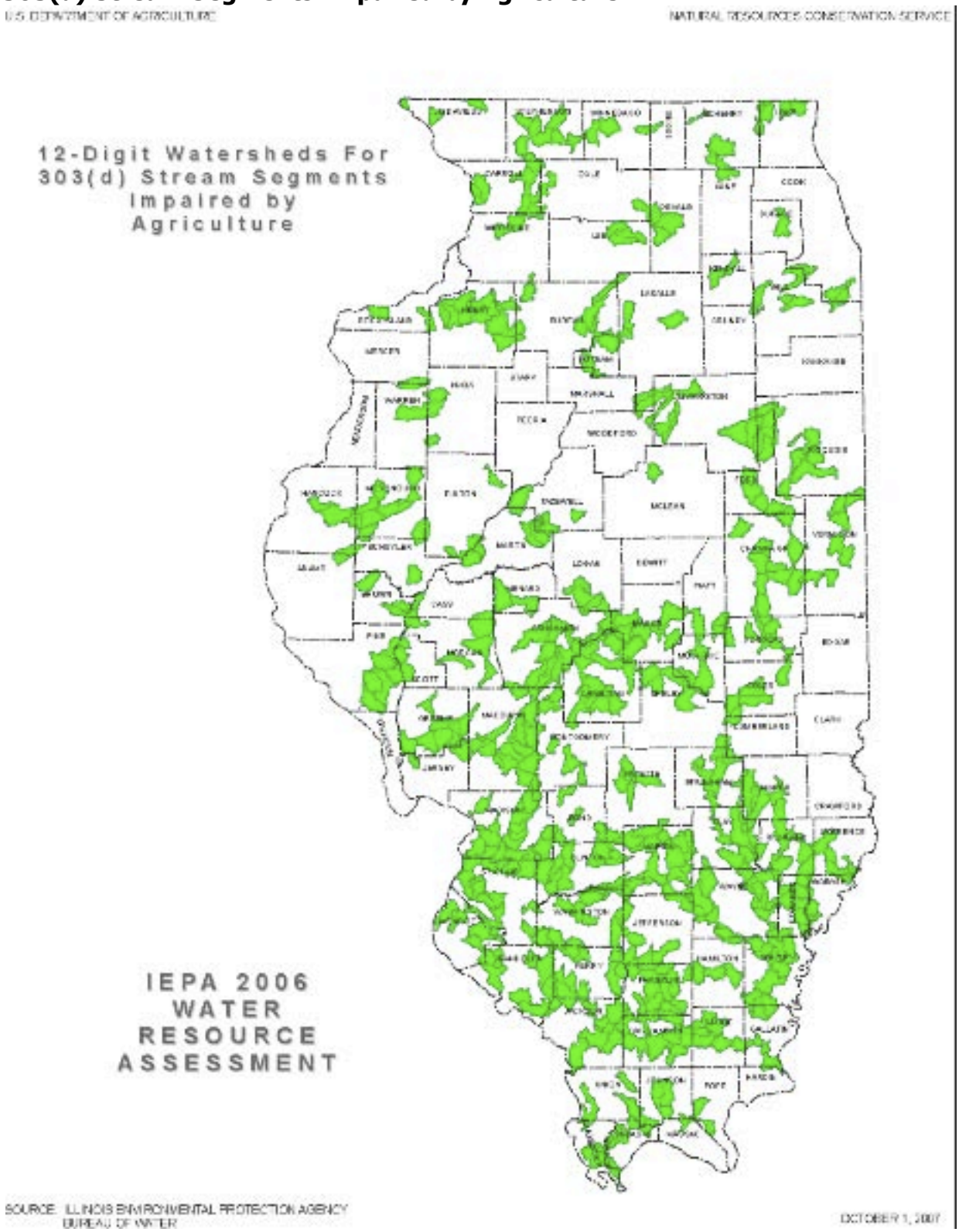
		Points
1. Will the treatment you intend to implement using EQIP result in considerable reductions of non-point source pollution, such as nutrients, sediment, pesticides, excess salinity in impaired watersheds, groundwater contamination or point source contamination from confined animal feeding operations?	○ Yes ● No	0
2. Will the treatment you intend to implement using EQIP result in a considerable amount of ground or surface water conservation?	○ Yes ● No	0
3. Will the treatment you intend to implement using EQIP result in a considerable reduction of emissions, such as particulate matter, nitrogen oxides (NOx), volatile organic compounds, and ozone precursors and depleters that contribute to air quality impairment violations of National Ambient Air Quality Standards?	○ Yes ● No	0
4. Will the treatment you intend to implement using EQIP result in a considerable reduction in soil erosion and sedimentation from unacceptable levels on agricultural land?	○ Yes ● No	0
5. Will the treatment you intend to implement using EQIP result in a considerable increase in the promotion of at-risk species habitat conservation?	○ Yes ● No	0

Map 1 –Soil Erosion Quality Criteria Exceptions

U.S. DEPARTMENT OF AGRICULTURE NATURAL RESOURCES CONSERVATION SERVICE

OCTOBER 1, 2007

Map 2 – IEPA 2006 Water Resource Assessment – 12-Digit Watersheds for 303(d) Stream Segments Impaired by Agriculture



Map 3 – EQIP Locally Led Resource Planning Projects (November 2007)