SEIZING A WATERSHED MOMENT

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

Environmental Quality Incentives Program
State Report 3 of 10

ENVIRONMENTAL WORKING GROUP

APPENDIX – STATE REPORTS

IOWA
ENVIRONMENTAL QUALITY INCENTIVES PROGRAM

OVERVIEW

Iowa received an average of $23 million in EQIP funds per year for technical and financial assistance from 2003 to 2007, ranking it second out of the 10 states that border the Mississippi River for EQIP funds. Ninety percent of Iowa EQIP funds are distributed to the 100 county Natural Resources Conservation Service (NRCS) offices.

Applications to participate in the county EQIP program are evaluated using a ranking sheet that includes: (1) national ranking factors, (2) state ranking factors, (3) county ranking factors, and (4) cost-efficiency factors. Iowa uses separate ranking sheets for its Comprehensive Nutrient Management Plan (CNMP) and Forestry resource concerns that include only (1) national ranking factors, (2) state ranking factors, and (3) cost-efficiency factors.

The Iowa State Technical Committee provides input on resource concerns, practices needed to treat the resource concerns, financial incentives and EQIP implementation. The Local Work Groups have the same duties at the local level but also are involved in developing local ranking criteria.

IOWA EQIP WEBSITE

http://www.ia.nrcs.usda.gov/programs/stateeqip.html

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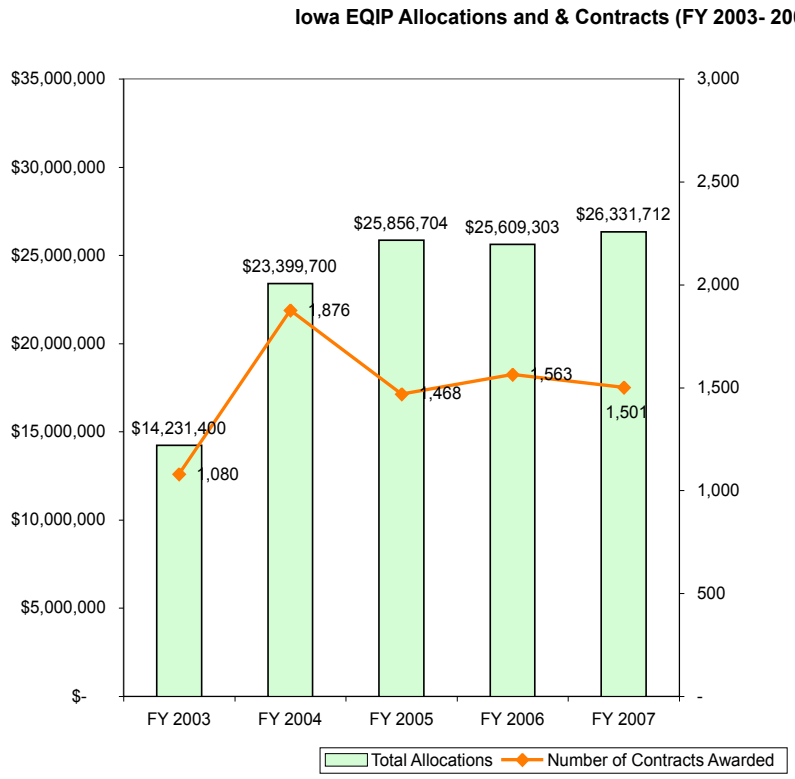
FUNDING AND REACH OF EQIP

EQIP funding is allocated to states using a national formula. The chart below shows the amount of financial and technical assistance Iowa has received from FY 2003 to 2007 and the number of contracts awarded each fiscal year. A total of 7,488 contracts have been entered into with producers between 2003 and 2007 providing $115.4 million addressing 968,966 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 Iowa 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 the NRCS website to complete this analysis and followed up on our investigation with interviews of the state EQIP program manager.

Goals

Iowa EQIP has implemented 2 watershed-based water quality projects in the Lake Rathbun watershed and the Whitebreast Creek watershed that have received 1.3 percent of the state EQIP funds in the last 3 years.

Other than these 2 projects, EWG did not find evidence to suggest that Iowa 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. Iowa's 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 Iowa 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 Iowa EQIP develop systems to track, evaluate, and report on the environmental performance of EQIP.

Fund Allocation

Iowa EQIP distributes about 90 percent of its funds to the state's 100 county-based soil and water conservation districts using the funding allocation formula below. In addition, each of the 4 factors has a specific weight assigned.

1. The percent of agricultural land in the county with impaired waters due to agricultural concerns (as identified by Section 303(d) of Clean Water Act) – 40 percent.
2. The number of livestock in each district (county) – 30 percent.
3. The extent of land with Land Capability Class rating of IIe or greater[1] – 20 percent.
4. The number of acres needing wildlife habitat conservation systems – 10 percent.

EWG commends Iowa for using a funding allocation formulas based primarily on natural resource and environmental factors (rather than generic production factors) to channel more funding to localities with significant environmental problems associated with agriculture.

[1] A Land Capability Class rating of II is defined as "soils (that) have moderate limitations that reduce the choice of plants or require moderate conservation practices while Subclass e "is made up of soils for which the susceptibility to erosion is the dominant problem or hazard affecting their use. Erosion susceptibility and past erosion damage are the major soil factors that affect soils in this subclass." Thus, Class ratings of greater than IIe have greater limitations and greater susceptibility to erosion and other environmental hazards.

The remaining 10 percent of EQIP funds are used for special projects funded on a statewide basis. There are currently three types of special projects: Comprehensive Nutrient Management Plan (CNMP)-only projects, forestry resource concern projects, and "Supershed" projects.

According to David Brommel, IA-EQIP/WHIP Coordinator, the so-called "Supershed" projects are those overseen by the State Technical Committee that provides Requests for Proposals (RFP) to the Soil and Water Conservation Districts to develop watershed-based projects. These projects propose to treat resource concerns through multiple sources of assistance. Funding is often culled from state sources, private sources, technical assistance, and various Farm Bill programs such as the Wetlands Reserve Program (WRP) and EQIP.

There have been two such Supershed Projects in Lake Rathbun in Wayne County and the Whitebreast Creek Watershed (Clarke, Lucas, Marion & Warren Counties). The Lake Rathbun Supershed Project has received over $760,000 or 1.1 percent of Iowa's EQIP funds from FY 2006 to 2008 while the Whitebreast Creek Supershed Project received over $470,000 or 2.3 percent of Iowa's FY 2006 funds. In all, EQIP funds have provided $1.2 million for these Supershed Projects or 1.3 percent of the EQIP funds it has spent in 3 years. (See tables below.)

Lake Rathbun Supershed Project			
Fiscal Year	**Supershed Project**	**All EQIP Funds**	**Percent of EQIP Funds for Supershed Projects**
2008	$98,900	$31,235,873	0.3%
2007	$288,300	$20,817,801	1.4%
2006	$375,300	$20,327,205	1.8%
Total	$762,500	$72,380,879	1.1%

Whitebreast Creek Watershed Supershed Project			
Fiscal Year	**Supershed Project**	**All EQIP Funds**	**Percent of EQIP Funds for Supershed Projects**
2006	$474,200	$20,327,205	2.3%

Source: David P. Brommel, EQIP/WHIP Coordinator, provided this information upon request.

EWG commends Iowa EQIP for carrying out these two Supershed Projects. EWG recommends that Iowa EQIP's best opportunity for improving water quality is to fund well-designed, watershed-based clean-up projects. This approach encourages multiple farmers within a watershed to reduce pollution to a specific lake, stream, or tributary to the Mississippi River.

The problem-solving advantages of this approach are well understood. They include focusing resources in specific locations to solve well-defined problems using a strategy that directs funding to those farmers within the watershed who can do the most to

reduce pollution. Ideally, such water quality improvement projects include developing monitoring and evaluation systems to adjust the strategy and resource allocations based on the results that are being realized. Ramping up the emphasis in EQIP on such watershed-based clean-up projects would dramatically increase the effectiveness of the program.

EWG recommends that Iowa EQIP allocate 60 percent of its EQIP funds to watershed-based clean-up projects by 2012. Iowa 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 the county EQIP program are evaluated using a ranking document called the "Application Ranking Summary" which includes: (1) national ranking factors, (2) state ranking factors, (3) county ranking factors, and (4) cost-efficiency factors. There are 100 "County Application Ranking Summaries" that supply the county ranking factors. (See the Appendices for the Ranking Summaries) To evaluate applications to the special projects, Iowa uses separate Comprehensive Nutrient Management Plan (CNMP) and Forestry resource concerns ranking sheets. Iowa's ranking criteria documents provide a specified number of positive or negative points for each question in each of the ranking section.

To generate a final ranking score, Iowa assigns 15 percent of the total ranking points to the national ranking factors, 25 percent to the state factors, 45 percent to the county factors, and 15 percent to the cost-efficiency factor. In order to achieve this desired percentage weighting system for each of the 4 sections of the ranking sheet, Iowa EQIP uses the following multipliers (planned for 2009) which it multiplies by the total points summed in each of the 4 sections: National - .08, State - .53, Efficiency - 100.0, and Local - Varies by county depending on total points of questions in each county. After, each section's total points has been added up and has been adjusted by the weighting system, applications that receive a greater total point score get a higher priority for participation in EQIP. 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.

To determine how much emphasis Iowa EQIP places on the reduction of nutrient and sediment pollution and on geographic priority areas, we attempted a rough estimate of the percentage of raw, un-weighted 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 multipliers and 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.

Regarding emphasis on geographic priorities, a review of the FY 2008 General Application Ranking Summary (see Appendix) indicates that Iowa does not appear to give much emphasis to geographic priorities. In the National Ranking Factors section, Iowa asks 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.

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 FY 2008 General Application Ranking Summary (see Appendix) indicates that Iowa does not appear to give much emphasis to geographic priorities. In the National Ranking Factors section, Iowa asks 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 Iowa's State Ranking Factors section, there are clearer indications of a priority for applications located in geographic priority areas. Two questions are awarded 5 and 20 points for reduction of non-point source pollution in geographic priority areas:

> "Is the application within a watershed listed in 'Iowa Section 303(d) Impaired Waters Listing' or one of the following water quality approved projects: Watershed Protection Program Fund (WSPF), Water Protection Fund (WPF), EPA 319 Project, or Iowa Watershed Improvement Review Board (IWIRB) Fund)?" (5 points)
>
> "Do the practice(s) in the application address the identified Ag related nonpoint source impairment within a TMDL, a watershed listed in 'Iowa Section 303(d) Impaired Waters Listing' or one of the following water quality approved projects: Watershed Protection Program Fund (WSPF), Water Protection Fund (WPF), EPA 319 Project, or Iowa Watershed Improvement Review Board (IWIRB) Fund)?" (20 points)

Lee County's FY2008 Application Ranking Summary was chosen for review as a county ranking criteria because Lee is the southeastern-most county in Iowa and borders the Mississippi River. Lee County asked one question about geographic priorities and identified 5 watersheds by name. Applications located within the "East Sugar Creek Watershed" received the greatest number of points (10) while applications in the "Cedar Creek Watershed" received the least number of points (7). However, applications located in all other watersheds (other than the 5 named watersheds) received 6 points. Thus, the difference emphasized by Lee County's ranking criteria between its highest priority watershed and a non-priority watershed was just 4 points.

The 35 total possible points for these three geographic priority factors represent 11 percent of the 305 points in the entire ranking system.

Regarding emphasis on reducing nutrient and sediment pollution, a review of Iowa's General Application Ranking Summary does not provide clear answers about how much priority Iowa EQIP places on these two specific water quality impairments. 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 18 points (18 percent of the 100 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?"

The State Ranking Factors section awards 20 points (21 percent of 95 total points in the State Ranking section) for applications that treat livestock waste—an important source of nutrient pollution.

> "NON-POINT REDUCTION /EMISSIONS REDUCTION: Will practice(s) in the application treat livestock waste for an existing livestock operation with a resource concern problem identified?"

The State Ranking Factors section awards 35 points (37 percent of 95 total points in the State Ranking section) for applications that answer affirmatively to 5 questions under the heading: "SOIL EROSION & SEDIMENTATION REDUCTION."

Lee County awarded the greatest number of points, 40 or 36 percent of the 110 total Local Issues section points, to a factor tangentially related to sediment pollution. Priority is given to applications that offer to treat soil resource concerns through a "resource management system" per the NRCS Field Office Technical Guide standards on cropland. Five points— 5 percent of the 110 total points—are awarded for applications that address water quality resource concerns through wetland restoration, enhancement, or creation.

Despite Iowa EQIP appearing to give about half its unweighted points in the reviewed ranking factors to the most pressing concerns – nutrient and sediment pollution reduction in high priority areas – only about 11 percent of points are given to applications from priority watersheds. Thus, it is unlikely that Iowa's 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 Iowa 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 Iowa 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, Iowa 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—Iowa EQIP Ranking Criteria

Iowa FY2008 – EQIP National Ranking Factors

Number	Question	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?	18
2	Will the treatment you intend to implement using EQIP result in a considerable amount of ground or surface water conservation?	18
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?	18
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?	18
5	Will the treatment you intend to implement using EQIP result in a considerable increase in the promotion of at-risk species habitat conservation?	28
	Total Points	100

Iowa FY2008 – EQIP State Ranking Factors

Question Number	Question	Points
1	NON-POINT REDUCTION/EMISSIONS REDUCTION: Will practice(s) in application treat livestock waste for an existing livestock operation with a resource concern problem identified? (Can only answer Yes to one of questions 1-5.)	20
2	NON-POINT REDUCTION/EMISSIONS REDUCTION: Will practice(s) in application treat livestock waste for an existing livestock operation with a resource concern problem identified, where the entire facility is relocated to a new less environmentally sensitive location? (Can only answer Yes to one of questions 1-5.)	20
3	NON-POINT REDUCTION/EMISSIONS REDUCTION: Will practice(s) in the application treat livestock waste for an existing livestock operation with resource concern problem identified where expansion of the livestock operation is planned? (Can only answer Yes to one of questions 1-5.)	5
4	NON-POINT REDUCTION/EMISSIONS REDUCTION: Will practice(s) in the application treat livestock waste for a new livestock operation? (Can only answer Yes to one of questions 1-5. If both questions 4 & 5 can be answered yes, only answer yes to question 5.)	-5
5	NON-POINT REDUCTION/EMISSIONS REDUCTION: Will practice(s) in the application treat livestock waste for a new livestock operation located in a watershed listed in "Iowa Section 303(d) Impaired Waters Listings" or one of the following water quality approved projects: Watershed Protection Program Fund (WSPF), Water Protection Fund (WPF), EPA 319 Project, or Iowa Watershed Improvement Review Board (IWIRB) Fund? (Can only answer Yes to one of questions 1-5. If both questions 4 & 5 can be answered yes, only answer yes to question 5.)	-10
6	NON-POINT REDUCTION: Is the application within a watershed listed in "Iowa Section 303(d) Impaired Waters Listings" or one of the following water quality approved projects: Watershed Protection Program Fund (WSPF), Water Protection Fund (WPF), EPA 319 Project, or Iowa Watershed Improvement Review Board (IWIRB) Fund?	5
7	NON-POINT REDUCTION: Do the practice(s) in the application address the identified Ag related nonpoint source impairment within a TMDL, a watershed listed in "Iowa Section 303(d) Impaired Waters Listings" or one of the following water quality approved projects: Watershed Protection Program Fund (WSPF), Water	20

	Protection Fund (WPF), EPA 319 Project, or Iowa Watershed Improvement Review Board (IWIRB) Fund?	
8	SOIL EROSION & SEDIMENTATION REDUCTION: Does the application address an invasive species problem with pasture management or forest management?	5
9	SOIL EROSION & SEDIMENTATION REDUCTION: Will the implementation of practices in this application convert row crop acres to hayland, pastureland, forestland or wildlife acres on at least 5% of the application acres? (Must be new acres converted, not part of normal rotation.)	5
10	SOIL EROSION & SEDIMENTATION REDUCTION: Are all expiring CRP acres and all pasture and hayland acres within all tracts included in this EQIP application maintained as hayland, pastureland, forestland or wildlife acres? (Maintenance of these acres as hayland, pastureland, forestland or wildlife acres must be covered in the EQIP contract.)	10
11	SOIL EROSION & SEDIMENTATION REDUCTION: Is Soil Conditioning Index improved at least 0.3 points by applying the practices in this application? (Use predominant soil map unit.)	7
12	SOIL EROSION & SEDIMENTATION REDUCTION: Is STIR rating improved at least 30 points by applying the practices in this application? (Use predominant soil map unit.)	8
13	AT-RISK SPECIES HABITAT PROMOTION: Does the application of practice(s) in this EQIP application result in land being converted to wildlife habitat on at least 3 acres?	5
14	Is the contract participant a Limited Resource Producer?	10
	Maximum Points: Total Points	105

Application Ranking Summary – Lee County FY08 EQIP

Application Ranking Summary
Lee FY08 EQIP

Local Issues Addressed

Issue Questions	Points
1. Soil Resource: Application is for practice(s) that, when combined with other practices in the conservation plan, completes a resource management system that treats the resource concerns for the row cropping acres in the application area per the NRCS eFOTG	40 Point(s)
2. Soil Resource: Application is for practice(s) that, when combined with other practices in the conservation plan, completes a resource management system that treats the resource concerns for grazing lands for the application area per the NRCS eFOTG	30 Point(s)
3. Water Quality: Application is located within the East Sugar Creek Watershed	10 Point(s)
4. Water Quality: Application is located within the West Sugar Creek Watershed	9 Point(s)
5. Water Quality: Application is located within the Lost Creek Watershed	8 Point(s)
6. Water Quality: Application is located within the Cedar Creek Watershed	7 Point(s)
7. Water Quality: Application is located in all other watersheds	6 Point(s)
8. Water Quality: Application will apply wetland restoration/enhancement/creation (> or = 2 acres)	5 Point(s)
9. Domestic Animal/Livestock Resource: Application will install a grazing system containing more than 7 new paddocks	25 Point(s)
10. Domestic Animal/Livestock Resource: Application will install a grazing system containing 5-6 new paddocks	20 Point(s)
11. Domestic Animal/Livestock Resource: Application will install a grazing system containing 3-4 new paddocks	15 Point(s)
12. Plants/Wildlife: Applicant will seed short native grasses for quail habitat or plant trees on 5 or more acres.	25 Point(s)
13. Plants/Wildlife: Applicant will seed short native grasses for quail habitat or plant trees on 4 - 4.9 acres.	20 Point(s)
14. Plants/Wildlife: Applicant will seed short native grasses for quail habitat or plant trees on 3 - 3.9 acres.	15 Point(s)
15. Plants/Wildlife: Applicant will seed short native grasses for quail habitat or plant trees on 2 - 2.9 acres.	10 Point(s)
16. Plants/Wildlife: Applicant will seed short native grasses for quail habitat or plant trees on 1 - 1.9 acre.	5 Point(s)
17. Plants/Wildlife: Applicant will complete Timber Stand Improvement (TSI) on at least 5 acres on application tract.	5 Point(s)

Application Ranking Summary
Iowa – State FY08 Comprehensive Nutrient Management Plan

State Issues Addressed

Issue Questions	Points
1. NON-POINT REDUCTION/EMISSIONS REDUCTION: Is the Comprehensive Nutrient Management Plan (CNMP) associated with the treatment of livestock waste for an existing livestock operation with a resource concern problem identified? (Can only answer Yes to one of questions 1-5.)	20 Point(s)
2. NON-POINT REDUCTION/EMISSIONS REDUCTION: Is the Comprehensive Nutrient Management Plan (CNMP) associated with the treatment of livestock waste for an existing livestock operation with a resource concern problem identified, where the entire facility is relocated to a new less environmentally sensitive location? (Can only answer Yes to one of questions 1-5.)	20 Point(s)
3. NON-POINT REDUCTION/EMISSIONS REDUCTION: Is the Comprehensive Nutrient Management Plan (CNMP) associated with the treatment of livestock waste for an existing livestock operation with resource concern problem identified where expansion of the livestock operation is planned? (Can only answer Yes to one of questions 1-5.)	5 Point(s)
4. NON-POINT REDUCTION/EMISSIONS REDUCTION: Is the Comprehensive Nutrient Management Plan (CNMP) associated with the treatment of livestock waste for a new livestock operation? (Can only answer Yes to one of questions 1-5.)	-5 Point(s)
5. NON-POINT REDUCTION/EMISSIONS REDUCTION: Is the Comprehensive Nutrient Management Plan (CNMP) associated with the treatment of livestock waste for a new livestock operation located in a watershed listed in "Iowa Section 303(d) Impaired Waters Listings" or one of the following water quality approved projects: Watershed Protection Program Fund (WSPF), Water Protection Fund (WPF), EPA 319 Project, or Iowa Watershed Improvement Review Board (IWIRB) Fund? (Can only answer Yes to one of questions 1-5.)	-10 Point(s)
6. NON-POINT REDUCTION: Is the application within a watershed listed in "Iowa Section 303(d) NON-POINT REDUCTION: Is the application within a watershed listed in "Iowa Section 303(d) Impaired Waters Listings" or one of the following water quality approved projects: Watershed Protection Program Fund (WSPF), Water Protection Fund (WPF), EPA 319 Project, or Iowa Watershed Improvement Review Board (IWIRB) Fund?	5 Point(s)
7. NON-POINT REDUCTION: Is the Comprehensive Nutrient Management Plan (CNMP) associated with the treatment of practice(s) that address the identified Ag related nonpoint source impairment within a TMDL, a watershed listed in "Iowa Section 303(d) Impaired Waters Listings" or one of the following water quality approved projects: Watershed Protection Program Fund (WSPF), Water Protection Fund (WPF), EPA 319 Project, or Iowa Watershed Improvement Review Board (IWIRB) Fund?	20 Point(s)
8. Is the contract participant a Limited Resource Producer?	10 Point(s)
9. Is the Comprehensive Nutrient Management Plan (CNMP) in this application associated with an EQIP funded Waste Storage or Treatment Facility that has not began construction? (Can only answer Yes to one of questions 9-12.)	100 Point(s)
10. Is the Comprehensive Nutrient Management Plan (CNMP) in this application associated with an EQIP funded Waste Storage or Treatment Facility that has either began or completed construction?(Can only answer Yes to one of questions 9-12.)	65 Point(s)
11. Is the Comprehensive Nutrient Management Plan (CNMP) in this application NOT associated with an EQIP funded Waste Storage or Treatment Facility that has not began construction? (Can only answer Yes to one of questions 9-12.)	30 Point(s)
12. Is the Comprehensive Nutrient Management Plan (CNMP) in this application NOT associated with an EQIP funded Waste Storage or Treatment Facility that has either began or completed construction?(Can only answer Yes to one of questions 9-12.)	-10 Point(s)