Dear Secretary Vilsack:

We write to express concern about the U.S. Department of Agriculture’s (USDA) recent decision to make several industrial animal agriculture practices eligible for conservation funding in the Inflation Reduction Act. We oppose the inclusion of these practices, which further entrench the unsustainable, inhumane industrial model by funneling a significant portion of conservation dollars to a handful of large producers instead of supporting more small and mid-sized producers employing meaningful conservation practices. Incentivizing resource intensive industrial practices that disproportionately harm disadvantaged communities runs counter to the purpose of the Inflation Reduction Act (IRA) to meaningfully lower greenhouse gas emissions and address environmental injustice.

Specifically, we are concerned about Natural Resource Conservation Service (NRCS)’s decision to include waste storage facilities (313), roofs and covers for biogas capture facilities (367), feed management for livestock (592), and waste separation facilities (632) as approved uses of conservation program funding. These are all practices that will be used primarily or entirely by large, industrial concentrated animal feeding operations (CAFOs) and which do not meaningfully reduce the environmental impacts of these facilities. Prior to the recent addition of these practices, CAFOs were already able to get conservation funding for anaerobic digesters (366).

Practices like the above, which prop up infrastructure currently utilized by industrial animal agriculture systems, have a myriad of local environmental harms that disproportionately impact low-income communities and people of color. The storage of hundreds of thousands of gallons of liquid manure in manure lagoons pollutes the air and water of surrounding communities and this inherently unsustainable manure storage system is only further entrenched by the adoption of anaerobic digesters. Further, inclusion of these practices will further consolidate the agricultural sector by rewarding the largest firms and incentivizing farmers to increase herd size in order to generate more manure. Small farms already struggle to get funding from oversubscribed conservation programs, and this decision will make more conservation funding flow to the largest farms.

In the Inflation Reduction Act, Congress invested billions in the Environmental Quality Incentives Program (EQIP) and the Conservation Stewardship Program (CSP), to support
farmers who implement practices that have demonstrable climate resilience and adaptation benefits. However, these newly added practices are an inefficient use of taxpayer dollars and ineffective way to advance climate goals. There are a number of other practices, including regenerative prescribed grazing, cover cropping, and increased riparian buffers, that are far more effective at mitigating climate change and which can be employed by far more producers at lower cost per project.

In light of these concerns, we request that the NRCS remove industrial agriculture-centric practices from the list of eligible conservation practices. We request a briefing on the decision to make these activities eligible and how this decision will affect the allocation of IRA conservation funding through 2031. We appreciate your efforts to address these concerns and look forward to your response.

Sincerely,

Cory A. Booker
United States Senator

Alma S. Adams, Ph.D.
Member of Congress

Elizabeth Warren
United States Senator

James P. McGovern
Member of Congress

Shri Thanedar
Member of Congress

Ro Khanna
Member of Congress