

**Citizens League Comments on
Livestock Environmental Quality Assurance (LEQA) Program Report to Legislature
December 10, 2010**

The LEQA program is a key opportunity to begin testing an approach that has great promise to move Minnesota beyond the dynamic of the regulator vs. the regulated toward our common goals of cleaner water and economic sustainability. The Citizens League believes this model should be refined and expanded as we develop the capacity to do so.

Minnesota has been a part of the regulatory approach to clean water over the last several decades that has been fairly effective in confronting “point” sources of pollution. The Citizens League believes that a stronger regulatory approach to address “non-point” sources of pollution has severe limitations. An approach is needed that includes new ways to govern our water resources along with market-based tools to provide incentives, information and behavior changes that will be more effective and efficient than regulation alone.

The water quality score model of the LEQA program is just such an approach and has the potential to set up environments in which farms and agribusinesses take on the challenge of clean water, because they meet their own interests by doing so. The water quality score opens up a way for the many people and entities working on a farm to communicate and helps them coordinate their efforts towards the goal of clean water.

We can set up conditions in which it is in everybody's interest to increase the score. For example:

- A business purchasing farm products can require these suppliers to meet a certain minimum score in order to be recognized as a "sustainable" business.
- Conservation districts, with cost-share and other funding available for farmers who volunteer to implement certain best management practices, can get a better idea of how to most effectively target these limited funds. Rather than distributing funding somewhat randomly to whomever volunteers, they can compile the assessments of multiple operations within their districts to understand where funds will have the greatest impact to raise water quality scores, and hence to increase water quality.
- The MN Pollution Control Agency can compile assessments on a watershed-by-watershed basis to better understand what needs to be done to accomplish TMDL plan goals.
- These assessments arm farmers with a lot of information. Farmers make the decision to have their operation assessed, and they own the data generated as a result. Assessments can leave them with a greater understanding of the effects of their practices and increased options to work with private and government partners.