

Financial Assistance Programs Division
U.S. Department of Agriculture
Natural Resources Conservation Service
1400 Independence Avenue, SW.
Room 5237S
Washington, DC 20250-2890

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4/17/09

Re: Docket Number NRCS- IFR-08005" Environmental Quality Incentives Program (EQIP) Final Rules

Dear Secretary Vilsack,

In these hard economic times and with concerns over food safety, water quality and conservation at an all-time high, it's important to not only stand up for family farmers but to encourage best agricultural practices.

As a result of these factors, I think it's important that the USDA stop using taxpayer dollars to bailout factory farms and help support sustainable and organic farmers that protect the environment and build strong rural communities.

The USDA needs to ensure that the EQIP rule be clarified, in accordance with the 2008 Farm Bill, and that EQIP assistance is available to all farmers and ranchers for comprehensive whole farm conservation planning.

The final EQIP rule must also require NRCS State Conservationists to rank and process applications for organic conversion assistance in a separate funding pool that makes clear that the limit of \$80,000 over a 4-year period applies only to organic conversion payments and not all EQIP payments made to organic farmers and ranchers.

I recommend that the NRCS amend the EQIP rule to prohibit the use of EQIP funding for animal waste storage, treatment or transportation for new or expanding CAFOs and that the EQIP rule does not allow waivers to increase assistance to CAFOs above the \$300,000 payment limit.

Numerous studies have proven conclusively that corporate CAFOs have negative impacts on water quality, decrease the value of their neighbor's property, and harbor antibiotic-resistant bacteria that threatens human health.

It's time that organic farmers and ranchers stand on an equal footing with conventional producers in funding amounts they receive from EQIP. This can easily be done if the USDA follows the rules of protecting the people and our collective resources over the interests of giant corporate agribusinesses.

Please stand up for independent family farmers and ranchers and swiftly enact these recommendations.

Language especially of concern:

§ 1466.24 EQIP Payments

- (b) The Chief may waive the \$300,000 payment limitation, allowing up to \$450,000 per person or legal entity for projects of special environmental significance, as defined in § 1466.21(d).
- (c) Payments for conservation practices related to organic production to a person or legal entity, directly or indirectly, may not exceed in aggregate \$20,000 per year or \$80,000 during any 6-year period.

Sincerely,



Denyce Rusch
2597 New Glasgow Road
Fairfield, IA 52556