

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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4/20/09

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 any EQIP funding for factory farms or animal waste storage. These practices are devastating to the environment, including human health, and are cruel to the animals raised and slaughtered in this process.

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 the USDA starts favoring organic farmers and ranchers, especially family farms, relative to 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.

Sincerely,
Jerry Helberman 805 E Passyunk Ave Phild PA19147