

# Ms. Cecelia Smith

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



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

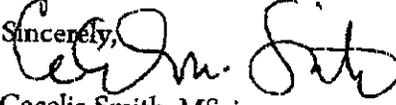
Dear Secretary Vilsack,

I live in the San Luis Valley, CO - one of the most important agricultural regions of Colorado. Our agriculturally based economy is struggling in these hard economic times and our multigenerational small family farms are at risk. At the same time, our ecosystems - the foundation of agriculture in the SLV, are stressed. We urge the USDA to support programs that help us become more sustainable, ensure local and regional food safety, maintain our water quality and aquifers and conserve of our basic ecosystems.

The SLV is a region of innovation and cutting edge practices in farming. Our growing organic farming sector is our most vibrant despite inequalities in USDA agricultural policies. I urge the USDA to prioritize support for sustainable and organic farmers that protect the environment and strengthen our rural communities.

I urge you to clarify the EQIP rule in accordance with the 2008 Farm Bill to ensure that EQIP assistance is available to all farmers and ranchers for comprehensive whole farm conservation planning and see that the final EQIP rule requires 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, amend the EQIP rule to prohibit the use of EQIP funding for animal waste storage, treatment or transportation for new or expanding CAFOs and ensure that the EQIP rule does not allow waivers to increase assistance to CAFOs above the \$300,000 payment limit. These 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.

Sincerely,  
  
Cecelia Smith, MSci.