

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,

**And he gave it for his opinion, that whoever could make two ears of corn,  
or two blades of grass, to grow upon a spot of ground where only one grew  
before, would deserve better of mankind, and do more essential service  
to his country, than the whole race of politicians put together.**

- Jonathan Swift, *Gulliver's Travels*

Mr. Swift is referring to the individual farmer, not the factory farm executive I assure you. That such a monstrosity as a factory farm could exist would never have occurred to him. The lack of balance found on a large food production site is contrary to nature and logic. Large scale production endangers food safety, water quality and the conservation of fuels and topsoil.

It is imperative that the USDA stop using taxpayer dollars to bailout factory farms. Instead the USDA must support sustainable and organic farmers that protect the environment, build strong rural communities, and provide safe food.

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.

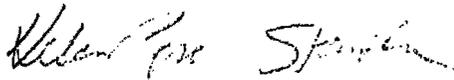
I recommend that the NRCS amend the EQIP rule to prohibit the use of EQIP funding for animal waste storage, treatment or transportation for new or expanding CAFOs and that the EQIP rule does not allow waivers to increase assistance to CAFOs above the \$300,000 payment limit.

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. It is the right thing to do.

Sincerely,  
Helen Standen

A handwritten signature in cursive script, appearing to read "Helen Standen".