

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

306  
Rec'd  
4/17/09

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

Dear Secretary Vilsack,

Thank you for giving the public the opportunity to comment on the Department's plans to provide bail out funds to Farm Factories.

I believe a bailout of Farm Factories would only produce a further breakdown of our family farms that are already at an economic disadvantage to Farm Factories because they have not been receiving government subsidies. The EQIP's current subsidy program has already given the Factory Farms an unfair competitive advantage, causing many family farms to fail.

Why when we have been given good reason to become aware of food safety and water quality issues would we want to encourage and support Factory Farms with bail out money when their operations not only put our environment at risk with pollution to the water system but also threaten human health?

It is the sustainable and organic farms that protect the environment and build strong rural communities and economies. Why would we want the USDA to continue to give and even increase public funding of Farm Factories?

The 2008 Farm Bill states that EQIP assistance be available to all farmers and ranchers for comprehensive whole farm conservation planning. Why hasn't this been implemented?

I understand that the final EQIP rule should 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.

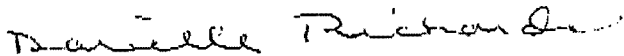
I add my recommendation that the NRCS amend the EQIP rule to prohibit the use of EQIP funding for animal waste storage, treatment or transportation for new or expanding CAFOs. I believe the most recent EQIP rule does not allow waivers to increase assistance to CAFOs above the \$300,000 payment limit. This rule does not allow for an out right bailout of the Farm Factories. Are we thinking of throwing out the EQIP rule altogether?

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 reconsider thoughts of "bailing out" Farm Factories." This is not a time to further enhance the unhealthy practice of Farm Factories, but it is a time to at least give independent family farmers and ranchers equal footing with these Factories.

Sincerely,

A handwritten signature in cursive script that reads "Danielle Richards".

Danielle Richards, Ph.D.

Salem, OR 97304