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

82 Arlington Ave.  
Hawthorne, New Jersey 07506-2512  
April 17, 2009

**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 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 finding pool that makes clear that the limit of \$80,000 over a 4year period applies only to organic conversion payments and all EQIP payments made to organic framers 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 farmers and ranchers and swiftly enact these recommendations.

Sincerely,

*Gerald J. Petrucelli, Ph.D.*