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**MURPHY, THOMPSON, ARNOLD, SKINNER & CASTLEBERRY**

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(1912-1987)  
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February 19, 2009

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Easements Programs Division  
Natural Resources Conservation Service  
Wetlands Reserve Program Comments  
P. O. Box 2890  
Room 6819-S  
Washington, D.C. 20013

RE: Docket No. NRCS-IFR-08013

To Whom It May Concern:

If the object of this program is to enroll as much eligible land as possible, I fail to understand why there is a change in land owning requirement from one year to seven years. I had previously placed three farms in the WRP Program, and have not tried to resell any of them.

I would speculate the purpose of this change is to keep speculators from participating in the program, but you are putting in a real disincentive for non-speculators to participate in the program as well, and after all I would assume the purpose is to enroll land not to deprive those who want to speculate out of making a profit. We are a capitalist country.

There is a farm I could buy right now, but I am hesitate to do so with a seven year requirement.

In another case, I had a client whose father defrauded her out of a farm that she should have inherited many years ago. As a result of the lawsuit, she just received a deed back for it in June, 2008. Even though she should have owned this farm all along, she would have to wait to try to enroll the farm in the program until June, 2015, rather than June, 2009. I doubt if she is inclined to wait that long, but she would otherwise place the farm in the program.

**MURPHY, THOMPSON, ARNOLD, SKINNER & CASTLEBERRY**  
P. O. Box 2595  
Batesville, Arkansas 72503-2595

Thank you for your consideration.

Yours very truly,

A handwritten signature in black ink, appearing to read "Blair Arnold". The signature is written in a cursive style with a large initial "B".

Blair Arnold

BA/cf