



## Pima Natural Resource Conservation District

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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

March 3, 2009

Dear Sirs:

This letter is to provide comment on the new 2008 EQIP Rule published in the Federal Register rules Vol. 74, No. 10, dated Thursday, January 15, 2009. As representatives of the Pima Natural Resource Conservation District located in eastern Pima County of southern Arizona, we support the EQIP program and the intent of the program in addressing resource concerns in our area.

The majority of the land within our district boundaries is government owned. The State of Arizona owns 36%; the Federal Lands comprise 27%. The largest ranching cooperator within our district is Pima County, which purchased numerous large ranches over the last several years as part of their Sonoran Desert Conservation Plan. Only 35% of our district is privately owned and includes the metro Tucson area. Many of our agriculture producers have leases for operations only on County, State School Trust, or Federal lands, but not private land. Also, due to the mixed ownership nature of nearly all of the ranches within our district, many of the ranches that include a mixture of State, Federal, County and private lands are managed as a single land unit under cooperative agreements between the District, the USDA, the State of Arizona, the federal land management agencies and the private agricultural producer.

We understand the EQIP rule has been modified so that the lands eligible in the new rule include:

- (1) Private land;
- (2) Publicly owned land where:
  - (i) the land is a working component of the participant's agricultural and forestry operation; and will contribute to an improvement in the identified resource concern that is on private land.

As representatives of the of the Pima Natural Resource Conservation District, we ask that the language in the Federal Register rules Vol 74, No. 10, Dated Thursday, January 15, 2009 on Page 2312, § 1466.8, (C) (2) (iii) be amended to read "The conservation practices to be implemented on the public land are necessary and will contribute to an improvement in the identified resource concern;" and

By deleting the phrase, "that is on private land" following "concern" as is currently published in the Federal Register.

Without this change, many of our agriculture produces would no longer have land eligible for the program; whereas the resource concerns that exist on Federal, State and County lands would increase without being addressed. By allowing inclusion of resource issues on government-owned or State Trust-owned lands, states with lesser amounts of privately owned land have a more equitable opportunity to participate in EQIP and realize the benefits that the program has to offer.

Sincerely,



Andrew McGibbon  
Chairman

CC: David McKay  
State Conservationist