Gila County Cattle Growers Association

P. O. Box 7 Globe, AZ 85501

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David Cook
President
(928) 425-2524
Dan Fenn
Vice President
(602) 377-7615
Therese Hicks
Secretary
(928) 812-2520
Bill Conway
Treasurer
(928) 472-7492
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March 9, 2009

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

RECEIVED MAR 17 2009

RE: Docket Number NRCS-IFR-08005 (EQIP)

These comments, on the interim final rule, are submitted on behalf of the Gila Cattle Growers' Association and the ranching families we represent.

In Gila County, over the passed 6 years the NRCS, Forest Service, University of Arizona and the Gila County Cattle Growers' Association have made great strides in bridging the gap between federal and State agencies and the private land owners in the county through Cooperative Conservations measures and CRMP's. This cooperation has allowed us to address resource concerns wherever they occur without going through the fight of agency boundaries and funding, but instead combining our resources to address watershed problems no matter the mixed land ownership. This cooperation has also allowed the ranchers to continue agriculture production while addressing those concerns.

As written now, the language in the Federal Register rules Vol. 74, No. 10, Dated Thursday, January 15, 2009 on Page 2312, § 1466.8, (C) (2) (iii), would disassemble the progress that has currently been made. Our county is 97% Federal Land. Our Salt and Gila Watersheds provide water for the Phoenix and Valley residents and communities.

Please change the language listed on Page 2312, § 1466.8, (C) (2) (iii) to read, **"The conservation practices contribute to an improvement in the identified resource concern and will benefit private land."** Rather than, "contribute to an improvement in the identified resource concern that is on private land."

This rule as written would have a negative economic impact of at least 2 Million Dollars a year on an over two million acres of working agricultural lands. Thank you, for allowing us to comment.

Sincerely,

David L. Cook
President

cc. David McKay, State Conservationist, NRCS