



# Arizona Cattlemen's Association

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

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

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

## **Historical Background**

Arizona and New Mexico were the last two of the 48 States to be accepted to the Union and that did not occur until 1914. This was long after the Forest Reserves were formed and many of the State School trust lands that were normally set aside by section number in each township were already reserved for Forest Reserves. In addition the Northern half of the State had the alternating sections of private land given to the railroads. This resulted in the State School Trust lands being scattered throughout the state in less than an orderly fashion and were not completely selected until 1952.

As a result of this there are almost no ranches in Arizona that do not contain a mixed ownership of Federal, State Trust and private land. This mixture makes it impossible for the NRCS to address resource concerns if it is limited to addressing only those on private land as is required in this Interim Final Rule.

## **Current Status**

In Arizona over the passed 6 years the NRCS, Forest Service, Bureau of Land Management, Arizona State Land Department, University of Arizona and the Arizona Cattle Growers' Association have made great strides in bridging the gap between federal and State agencies and the private land owners in the state 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.

**For the reasons above;**

We are asking 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; or"

By **deleting the words "that is on private land"** following "concern" as is currently published in the Federal Register we will still be able to continue the cooperation that is rapidly increasing in Arizona.

On the other hand if the interim final rule is not amended to remove the words "that is on private land" almost all of the NRCS conservation practices in Arizona will be compromised, and the cooperative work will be severely impacted if not lost completely.

Thank you for your attention to our Comments,

Sincerely,

A handwritten signature in cursive script that reads "Tom Chilton". The signature is written in black ink on a white background.

Tom Chilton  
President

Cc: Arizona Congressional Delegation  
David L. McKay – NRCS State Conservationist