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GEORGIA COTTON COMMISSION

March 19, 2009

Financial Assistance Programs Division
US Department of Agriculture
Natural Resources Conservation Service
1400 Independence Avenue SW Room 5237S
Washington, DC 20250

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RE: Docket Number NRCS-IFR-08005

Dear Sir or Madame:

On behalf of the Georgia Cotton Commission (GCC) and cotton growers in our state, I appreciate the opportunity to submit comments to you concerning Docket Number NRCS-IFR-08005, the Environmental Quality Incentives Program (EQIP). The Georgia Cotton Commission is a cotton producer-funded organization that invests growers' check-off dollars in programs of research, promotion, and education. Our program objectives are to help producers grow a premium quality crop with minimal input costs and optimal profits and to foster excellent stewardship of the land and its natural resources.

EQIP is a successful program that provides valuable cost sharing between the Natural Resources Conservation Service (NRCS) and producers to enhance conservation and environmental benefits on U.S. farms. Producers can improve production capacity and preserve their farmland with the use of these practices. The use of these practices on commercial scale agricultural operations is the best use of the conservation dollar as these practices can improve a much greater area.

The 2008 farm law made many modifications to the EQIP program and, overall, the GCC agrees with the interim final rule set forth by USDA-NRCS; however some concerns come to light, and we ask your consideration.

GCC agrees with the regulatory change regarding the length of time an area must be irrigated prior to application of a contract. By allowing land that has been irrigated two of the last five years to be eligible for EQIP many more producers will be able to improve their water conservation efforts. Many producers in the cotton belt have utilized EQIP for water conservation projects and this provision will assist even more producers to increase their conservation. We do believe it would be helpful for many producers to have more clarification on the definition of "irrigated," for use in applying this portion of the regulation. The GCC commends USDA-NRCS for this change and is supportive of it's inclusion in the final regulation.

The GCC appreciates USDA-NRCS for the implementation of Section 1466.11 regarding technical service provided by personnel not affiliated with USDA. Technical Service Providers (TSP) offer a tremendous service to today's producers. The ability to utilize TSP's for conservation planning, design, and installation will be a tremendous asset and help speed the delivery of the program.

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While we recognize that USDA-NRCS is bound by the statutory language, it was our hope that the rule would further define the payment limit waiver. Section 1466.21 subsection 4d outlines criteria for this waiver but does not give clear guidance on the types of projects that would be eligible to receive the up to \$450,000 waiver. Many projects on large production agriculture operations hold special environmental significance, especially when applied over a large area that is controlled by one operation. However, the criteria listed seem to be more urban leaning than rural and we believe it important to not limit the waiver to these types of projects.

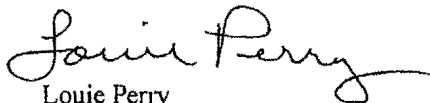
Ranking applications has worked very well for the program and for cotton producers. This ranking system allows for timely contract offers and places producers on a more level field when applying for contracts and we feel it should be continued. The changes made in the 2008 law will further improve the process as producers are able to compete against similar agricultural operations.

Section 1466.26 references termination of a contract when it would be "in the public interest." Many local conservation districts have instituted this type of restriction on contracts to ensure that projects are completed in a timely manner. This helps ensure that the funds allocated to a specific county are used wisely. We believe it would be helpful to have further clarification of other applications of the "public interest" as this language is very broad and could be interpreted many ways.

We recognize and support USDA-NRCS's ability to ensure this and other conservation programs are being implemented as defined in the contract as outlined in Section 1466.32 and recommend that the new language better define how and to what degree NRCS representatives must make contact with a producer before entering an operation or tract without the owner or lessees' knowledge.

EQIP is a very successful program for our cotton producers and we appreciate your consideration.

Sincerely,



Louie Perry
Chairman