



National Association of Conservation Districts

August 31, 2009

Strategic and Performance Planning Division, Room 4237S
Attn. RCA, Natural Resources Conservation Service,
P O Box 2890
Washington, DC 20013

Re: Soil and Water Resources Conservation Act Appraisal

The National Association of Conservation Districts (NACD) represents the nation's 3,000 conservation districts and 17,000 men and women who serve on their governing boards. Conservation districts are local units of government established under state law to carry out natural resource management programs at the local level. Conservation districts help state and federal partners work with landowners on a variety of conservation programs.

Conservation Districts across the country serve a changing clientele. Suburban developments are frequently overtaking former agricultural lands, and farms and woodlots are being subdivided into small acreage plots. While demands on the land change, many of the natural resource concerns remain the same.

Water Quality and Quantity: Communities of all sizes are facing challenges with water quality due to a host of issues including urban erosion, impermeable surface runoff, herbicide/pesticide overuse, and failing septic systems. Communities also must deal with water quantity, whether too much or too little. Farmers in the western United States often face issues with water availability, whether through regulatory restrictions or drought. Central and Eastern states can see too much water. Management of water is a critical issue all across the country. Maintaining the appropriate water availability and quality of water for healthy crops, habitat and drinking water are priority natural resource concerns across the U.S.

Soil Health & Soil Erosion: Conservation districts were founded, many over 70 years ago, to protect soil health and prevent erosion. And today, soil health and erosion remain natural resource concerns. In urban/suburban areas, much of the soil is overexposed, contaminated and/or seriously compacted causing serious issues with water quality, water infiltration, and plant growth. In agricultural areas, the concerns are maintaining soil productivity, erosion, changes in cropping practices to meet different crop rotations, or renewable fuel demands and bringing previously idled or marginal land into crop production (expired CRP contracts, grasslands, forestlands). Harvesting of cellulosic crops and plant materials may have adverse impacts on our conservation gains if not done properly. NACD recommends conservation/stewardship plans for acres to ensure harvesting of these crops is done without adverse impact to the environment.

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Prime Lands: Productive lands – agricultural, forested, open space, wetlands, floodplains – are continuously being lost to growth and/or degraded by overuse, invasive species, and other concerns. Landscapes that are destroyed by fire are frequently not restored properly, which impacts water quality and the spread of invasive species. The proper management of these lands (tillage, vegetation, cover crops) also impact air quality.

NACD and local conservation districts believe that delivery of conservation programs is most effectively done through the locally led system where individual communities, through their local conservation district, can set natural resource priorities. Conservation districts have helped landowners and communities to implement natural resource conservation practices for over seventy years. Conservation districts remain a vital, credible and trusted resource in their communities. In order to best meet the needs of the local communities in which we work, we believe that conservation programs should remain flexible to changing realities on the ground and to the specific and unique needs that each local community faces.

USDA must continue to work on the research agenda for conservation – to develop the next generation of practices and tools. Funding of basic research should also be done with an eye on conservation benefits.

NACD supports a variety of program approaches and tools to provide financial and technical assistance to landowners. These tools are critical to assist landowners in undertaking and maintaining conservation practices. Districts are seeing a move away from conservation planning to a practice by practice or program driven approach. NACD strongly believes that a conservation plan is an important first step in addressing natural resource issues on farm, ranch or non industrial private forest land. This comprehensive view of the natural resource issues will help guide the adoption of conservation practices and utilization of cost-share, easement and land retirement programs.

Insufficient capacity to deliver technical assistance is the main barrier to developing and maintaining conservation plans for all operations. We recognize there has been an increased investment of financial resources in conservation programs without a correlating increase in staff to deliver additional assistance. Increasing the capacity to deliver technical assistance must be addressed. Streamlining applications, reducing paperwork requirements and increasing computer program compatibility could ease burdens of field office staff while also benefiting producers during the application process. As landowners continue to be fragmented and the magnitude of the wildland/urban interface continues to grow, the number of clients to be served continues to increase. For example, private forest landowners alone now number over 10 million. Increasing the capacity to deliver this technical assistance will likely include new and broader partnerships that should be developed at the local level.

Across the country, landowners are seeking information on how to best manage their land. While many programs exist to help meet this need, many landowners are unable to access the information and assistance they seek. More technical dollars are needed as program funding increases. However, demand also exists for additional technical assistance to help all interested landowners develop appropriate conservation plans and practices regardless of the size of the tract of land, land use type, or use of financial assistance. Many landowners are ineligible for conservation programs, while others find the application process complicated, time consuming, and sometimes prohibitive to participation.

In addressing small acreage landowners, there is little to no technical assistance available for this group. Small acreage landowners frequently are not eligible for federal assistance programs, or rank low due to the scale of their operation. Conservation districts have identified small acreage resource issues through their locally led conservation efforts, but assistance remains limited.

In providing a variety of federal program approaches, we must stress the need to maximize efficiencies and reduce paperwork required in the implementation of technical assistance, conservation planning, and conservation programs. Streamlining processes and maximizing efficiency not only provides greater outcomes from the technical assistance dollars, it also improves customer service and eases the application process for producers and landowners. Streamlining should also include computer applications and coordination programs, process and information. The process for a producer to participate in a program, and for NRCS and FSA staff and partners to complete the application and documentation needs to be handled in an efficient, streamlined manner.

Natural resources vary widely across the nation and even across individual states. To best implement conservation programs and practices, the locally led process provides needed flexibility and adaptability to local conditions and resource needs. Locally led conservation should be a fundamental component of any federally implemented conservation initiative. The local work group model has proven successful in identifying local natural resource priorities. Through local work groups, conservation districts provide the ideal model of locally led conservation and can work with a variety of stakeholders and partners to ensure local natural resource priorities are addressed.

To best address natural resource concerns, more systematic attention should be given to conservation planning on a watershed or landscape scale. Conservation plans are an effective means of providing technical assistance to a variety of landowners. Conservation planning throughout a watershed helps to ensure that all private and public lands are managed in a conservation friendly manner that both promotes the production of food, fiber and fuel while also continuing to provide a variety of ecosystems services for the greater community. Plans can address a wide-range of natural resource concerns including soil erosion, water and air quality, water quantity, wildlife habitat creation, invasive species control, and forest management. Similar to conservation plans, greater benefits can also be accomplished with respect to nutrient management and sedimentation through greater utilization of comprehensive nutrient management plans

(CNMPs). CNMPs are useful for livestock operations and producers who field-apply nutrients to realize additional conservation benefits. By working together within the watershed through the locally led process, conservation districts can help craft plans that address resources at the landscape level. Furthermore, there are greater opportunities on a watershed scale to partner with other agencies to obtain additional funding

Delivery of conservation practices is strengthened by collaboration at all levels of government. Greater interagency collaboration is needed at the federal level between the Natural Resources Conservation Service, the Farm Service Agency, the Forest Service, and many other federal land management agencies. Collaboration across agencies could lead to greater landscape-scale conservation instead of focusing on specific land use types and practices. This collaboration should occur at the national, state and local level, and should have an accompanying information technology infrastructure to make it work. Delivery of conservation practices is also strengthened by collaboration across levels of government. Cooperation and partnerships between federal, state and local government, including conservation districts, has a proven track record of successful implementation of conservation at the local level.

NACD is supportive of new program approaches that include payments for carbon credits, water quality credit trading, habitat banking, tax incentives and initiatives that provide outreach, education and technical assistance to underserved landowners including those managing small acreage. Each of these approaches must include technical assistance to deliver the program and work with landowners on the implementation and maintenance of conservation practices.

We encourage NRCS to become more involved in resource management approaches such as low impact development, green infrastructure and smart growth. The technical standards NRCS develops as well as the soil survey are important tools for the implementation of any program and the adoption of appropriate conservation practices.

NACD believes that conservation practices should be scientifically based to reach sound conservation goals while allowing farmers, ranchers and forest landowners to maintain viable operations that continue to provide an abundant source of food, fiber and fuel. NACD appreciates the opportunity to provide feedback on the current status of the nation's natural resources and the tools that should be available to continue to conserve our natural resources for future generations.

Sincerely,

Steve Robinson
President