



## **National Association of Conservation Districts**

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April 17, 2009

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

RE: Docket Number NRCS-2009-0001, RIN 0578-AA49

To Whom It May Concern:

The National Association of Conservation Districts (NACD) appreciates the opportunity to comment on the USDA request for comments on the Wildlife Habitat Incentives Program (WHIP). NACD represents the nation's 3,000 conservation districts and their governing boards. Established under state law, conservation districts are local units of state government charged with carrying out programs for the protection and management of natural resources at the local level. Conservation districts work with federal, state, and other local agencies to provide programs and technical assistance to landowners and other partners to address natural resource issues.

The WHIP program has been and continues to be an important tool available to provide outreach and education as well as technical and financial assistance for wildlife habitat to producers and landowners. With this assistance, wildlife habitat improvements have been implemented on over 4 million acres of land.

NACD member districts provide a great deal of technical assistance and other assistance for the delivery of Farm Bill Conservation programs with a wide variety of customers. Many conservation districts conduct outreach efforts to socially disadvantaged farmers, including beginning farmers and ranchers, limited resource farmers or ranchers, Indian tribes and geographically disadvantaged farmers or ranchers. NACD is pleased with the new provisions that increase the potential participation by non industrial private forest landowners, but where practical and sustainable, encourages WHIP funds to be utilized on school sites for educational purposes.

NACD considers the local work group (LWG) as an important element of delivering WHIP. Local input and prioritization of resource needs, identification of eligible conservation practices and establishing payment rates is necessary to meeting the needs of local program participants. NACD looks forward to commenting specifically on the latest State Technical Committee and Local Work Group standard operating procedures released on April 7, 2009.

The technical services that are provided through WHIP aid in wildlife conservation practice understanding, design and adoption. The understanding by producers of the program

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requirements and options is an important part of program delivery. This information, education and training of producers to both undertake and maintain their conservation practice is necessary to ensure the long-term environmental and wildlife benefits of the practice.

The new Technical Service Provider provisions (Section 1242(g)(2)) have the potential to greatly expand the reach of Farm Bill programs through a new technical service contract. We know first hand that the limiting factor for some in the adoption of conservation practices on their operation is the technical knowledge and assistance in finding best management solutions. Providing WHIP participants with the option of a traditional financial assistance contract or a technical service contract is important to servicing a conservation program customer's needs and utilizing financial resources wisely.

NACD supports the provision of the regulation regarding environmental credits for conservation improvements. It is important the conservation program participants be able to participate in future ecosystem services markets regardless of whether they have or have not participated in federal conservation programs. WHIP and other conservation programs generally only cover a portion of the conservation practice costs and the producer/landowner must incur costs associated with the adoption and maintenance of the practice. Therefore it is only reasonable that producers/landowners be able to participate in both a federal program and a potential private ecosystem service trading market.

Thank you for the opportunity to comment on this regulation. NACD looks forward to working with NRCS on the implementation of WHIP.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Robinson".

Steve Robinson  
President