



National Association of Conservation Districts

February 4, 2015

Regulatory and Agency Policy Team
Strategic Planning and Accountability
U.S. Department of Agriculture
Natural Resources Conservation Service
5601 Sunnyside Avenue, Building 1-1112D
Beltsville, MD 20705

Docket No. NRCS-2014-0007

Re: Environmental Quality Incentives Program Interim Rule

On behalf of the National Association of Conservation Districts (NACD), thank you for all the Natural Resource Conservation Service (NRCS) has done to ensure that the Agriculture Act of 2014's conservation programs have been effectively implemented thus far. Our membership of 3,000 local soil and water conservation districts throughout the country heavily rely on NRCS conservation programs every day when working with private landowners and producers.

The Environmental Quality Incentives Program (EQIP) is essentially the foundation of voluntary conservation incentives for agriculture and forest producers on private lands conservation. Local soil and water conservation districts are poised to remain key partners of NRCS to efficiently and effectively enroll and help implement EQIP practices on the landscape. After carefully reviewing the language of the EQIP Interim Rule, we would like to make several recommendations.

We request that the importance of State Technical Committees and Local Working Groups be strengthened as you move forward in the rule writing process. NACD is willing to collaborate with NRCS to help strengthen or reinvigorate the Local Working Group process including a review of the NRCS directives. We're founded upon the locally-led process so we'd like to reinforce that State Technical Committee membership works closely with Local Working Groups to ensure locally-led concerns are adequately represented on the state level in both managing the allocation of funds and establishing state natural resource priorities.

NACD recommends that mandatory NRCS consultation with conservation districts for contract termination decisions remains intact. We feel that remaining part of contract decisions is vital for districts to maintain their partnerships with NRCS and any concerns about client privacy can be addressed in another manner. Many if not all states have agreements in place with conservation districts regarding confidential handling of client information. Further, any conservation district use of client data regarding contract terminations could be handled in the aggregate so that individual clients are not identifiable.

It is our policy that **we recommend NRCS include promotion of native plant communities as part of the changes to the EQIP rule.** Utilizing native plant communities not only boosts local

economies but provides increased ecosystem services and helps combat the growing number of invasive species.

NACD would also like to commend NRCS on the inclusion of several items in the EQIP Interim Rule.

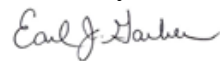
Underserved clients are now given the ability to have irrigation history waived at the Chief's discretion as well as the addition of military veteran to the definition of "historically underserved clients." EQIP is essential to beginning and socially disadvantaged farmers in establishing the conservation practices necessary to protect their land and create an enterprise that will sustain them and their families for future generations.

EQIP applications for contracts greater than \$150,000 are no longer required to be approved by the customer's NRCS Regional Conservationist. This change will help to streamline applications and may reduce any backlog of contracts waiting on approvals. NACD pushed for streamlining of conservation programs as one of our top priorities for the 2014 Farm Bill and we're happy to see it materializing.

Overall, most of the changes made in the EQIP Interim Rule make the program more customer-friendly. **EQIP's eligibility for the Regional Conservation Partnership Program** increases the overall effectiveness of the program and will help states to fully utilize all of their allocated funding. We look forward to working with conservation districts to promote EQIP as part of their future RCPP proposals.

We're appreciative of the opportunity to provide input as you move forward to help maintain the quality of NRCS conservation programs benefitting producers, landowners and natural resources. Please let us know if you have any questions about our comments or policies as you continue through the implementation process.

Sincerely,



Earl J. Garber
NACD President