



National Association of Conservation Districts

August 27, 2008

Chief Arlen Lancaster
Natural Resource Conservation Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Dear Chief Lancaster,

The National Association of Conservation Districts (NACD) represents the nation's 3000 conservation districts and their governing boards. Established under state law, conservation districts are local units of 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 technical assistance to landowners and other partners to address natural resource issues.

NACD is very interested in seeing the Cooperative Conservation Partnership Initiative implemented in a manner that allows for greater natural resource protection for locally identified priorities. We encourage this program to be operated initially under a request for proposal system to gather information on the types of projects and successes prior to writing a regulation governing long-term operation of the initiative.

As identified in the eligible parties, Conservation districts (local government) or the state association of conservation districts (NGO with history of working cooperatively with producers) must be eligible to participate; we can offer a trusted local resource in the community and with landowners, and are generally knowledgeable on a variety of natural resource issues in the local area.

Many of our members are interested in targeting new landowners/managers that are not experienced in understanding the natural resource concerns of their operations. They would focus on enrolling participants that have not been traditional conservation program customers. These may be smaller operations with similar resource concerns, or landowners that can affect natural resource protection over a greater landscape. Implementation must allow for this type of approach, allowing for innovative approaches, variety of production types and providing sufficient program assistance, including technical assistance. In the past, these efforts were hampered by software programs that would not allow for grouping applications.

The CCPI should be used in coordination with or to leverage state and local programs, such as cost-share initiatives, and local watershed programs. Conservation districts may be involved with additional state or local programs or community outreach and education

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programs, and a coordinated effort with CCPI should provide for greater environmental benefit and local participation.

With six percent of EQIP, CSP, and WHIP authorized for CCPI, this is an excellent opportunity to demonstrate how these programs can work together with technical assistance and compliment partner programs and tools to address priority resource concerns important to local work groups working together at a single county or multi-county scale. We urge states to prioritize CCPI applications based on resource needs identified by local work groups. State Technical Committee should reach out to help coordinate and broaden LWG participation to achieve and measure the desired environmental benefits. In project areas, CCPI should allow for more efficient use of time and resources to provide technical assistance. Technical service providers should be utilized to deliver the technical assistance through the proposal under CCPI, as is provided under the individual conservation programs.

The 2008 Farm Bill includes certain provisions on technical assistance and the use of technical service providers. We urge USDA to fully implement these provisions. Specifically Section 1242(g)(2) allows for technical assistance only contracts through the conservation programs such as EQIP. Conservation Districts know well that in many instances producers do not require the financial assistance, but do need the technical expertise to understand the natural resource issues on their operation, need assistance in designing an appropriate practice, or need help maintaining a practice. The full implementation of this provision of the 2008 bill will allow the conservation funding provided in Title II to go further, reaching more landowners and having a positive impact on the protection of natural resources. This option should be available for initiatives using the programs under the CCPI.

The 2008 bill also expanded the provisions on Technical Service Providers (TSPs). Acceptable TSP activities should include: planning, education, outreach, assistance with design, implementation and maintenance of conservation practices, and assistance with data entry and other routine functions to accelerate program delivery.

Conservation districts across the country are ready to assist with these activities and look forward to USDA's implementation of section 1242(d) Non-federal assistance. Cooperative agreements with individual conservation districts or with several conservation districts through their state association should be utilized to assist in conservation program delivery and provide technical assistance to conservation program customers.

The technical assistance definition provided in the 2008 Farm Bill should be fully considered and utilized in providing technical assistance under EQIP and other Farm Bill conservation programs. NACD does not believe that Congress intended this to be an exclusive list of all elements that comprise technical assistance, but includes "technical services provided directly to farmers, ranchers, and other eligible entities, such as

conservation planning, technical consultation and assistance with the design and implementation of conservation practices.” The term also includes “technical infrastructure, including activities, processes, tools and agency functions needed to support delivery of technical services, such as technical standards, resource inventories, training, data, technology, monitoring and effects analyses.”

Again, conservation districts across the country are ready, willing and able to assist NRCS to accelerate the delivery of conservation programs and provide a wide variety technical assistance a technical services to the conservation program landowner and producer customers.

Sincerely,

John Redding
President