



## National Association of Conservation Districts

July 31, 2009

John Glover  
Acting Director  
Easements Programs Division  
Department of Agriculture, Natural Resources Conservation Service  
Farm and Ranch Lands Protection Program Comments  
Post Office Box 2890  
Washington, DC 20013

Dear Mr. Glover:

The National Association of Conservation Districts appreciates the opportunity to comment on the Farm and Ranch Lands Protection Program (FRPP). 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.

Conservation Districts across the country are witnessing the conversion of farm, ranch and forest lands into non agricultural uses and rapid rate. The FRPP plays an important role in providing farmers and ranchers an opportunity to maintain their land in production and forgo selling their land for development of other purposes. Conservation Districts in many states are currently working on this program and we see an opportunity for others to become involved in the future. Section 1491.3, of the interim final rule as published in the July 2nd Federal Register states that local units of government cannot be classified as a landowner in the FRPP 'unless otherwise determined by the Chief'. We encourage the Chief to authorize conservation districts as landowners for the FRPP because Conservation Districts already serve as holders or managers of conservation easements.

NACD stresses the need for the proper management of the lands held under easement. We recognize the requirements of the program to have a conservation plan, but we are concerned that adhering to the plan and providing regular maintenance and management are necessary to meet the terms of the landowner's contract. We encourage NRCS to ensure that those managing the land under contract are meeting the requirements of their contract.

NACD and our members look forward to working the NRCS and our local partners on the implementation of this program.

Sincerely,

Steve Robinson  
President