

National Association of Conservation Districts

July 31, 2008

Mr. Dan Lawson
Branch Chief, Conservation and Watershed Planning, Room 6008
USDA-NRCS
1400 Independence Ave.
Washington, D.C. 20250-1600

Dear Mr. Lawson,

The National Association of Conservation Districts (NACD) represents the nation's 3000 locally-led 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 technical assistance landowners and other partners to address natural resource issues such as those in the Chesapeake Bay watershed.

Conservation districts have a long history of working with landowners to protect and maintain our natural resources through the locally-led conservation delivery system. Located in every state on a county-by-county basis, conservation districts are located throughout the Chesapeake Bay watershed and stand ready to assist with getting programs delivered to producers and landowners.

The Chesapeake Bay Program, as created in the 2008 Farm Bill identifies the goals of improved water quality and quantity and to reduce and preserve soil, air and related resources. We believe that USDA, working through Local Work Groups (LWGs) can further target practices and resource priorities to achieve these goals. LWGs, in most areas convened by conservation districts, can provide specific recommendations on resource needs in their area of the Bay. Conservation Districts are a trusted resource in the local area and work directly with producers to achieve the protection of resources. We support the changes made through the 2008 Farm Bill which expands the State Technical Committee requirements to include LWGs as subcommittees and provides the opportunity for broader local participation through relief from Federal Advisory Committee Act requirements. We look forward to working with USDA as these changes are implemented.

Many producers in the Bay watershed utilize USDA programs, benefit from EPA grant funds, or state and local programs. Building upon the past success of the Farmland Protection Program, the Environmental Quality Incentives Program, the Wildlife Habitat Incentives Program and the Conservation Reserve Program and Conservation Reserve

Enhancement Programs in the Bay, new provisions of the 2008 Farm Bill can expand natural resource protection. We would encourage the utilization new provisions in the 2008 Farm Bill that allow for conservation planning as an eligible practice. Conservation planning provides a "roadmap" for the adoption of conservation practices on specific operations in a more comprehensive manner and provides the ability to address several resource concerns – including water quality and quantity and soil and air health. Conservation Districts can also assist landowners to identify various sources of financial and technical assistance to implement the practices in their plan – either through USDA Farm Bill Programs or other federal, state or local programs that may be available in the Bay.

Successful implementation of the new Chesapeake Bay Program will require that landowners have access to the technical resources to ensure proper management decisions are made and will require an equally substantial investment in the ability of personnel to provide the technical assistance necessary to ensure effective delivery.

On behalf of the nation's conservation districts, NACD appreciates the opportunity to comment on implementation of Chesapeake Bay watershed program funding. We look forward to continuing our long tradition of locally-led natural resource conservation as USDA proceeds with implementation of this and other Farm Bill programs.

Sincerely,

John Redding President