



## **National Association of Conservation Districts**

November 7, 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 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 technical assistance to landowners and other partners to address natural resource issues.

NACD members across the country work with a wide variety of customers. We appreciate the recognition by Congress through the Farm Bill for the unique needs of socially disadvantaged farmers and ranchers. 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 members in the Pacific Region are especially interested in utilizing these new provisions in working with members of their communities on conservation practice adoption. In Guam, the Northern Marianas, Palau, American Samoa and the Federated States of Micronesia, the local crops and farming methods often do not fit the models of agriculture in the mainland of the U.S. Thus it is often difficult to plan and establish conservation measures. Because of the location, there are also a host of different environmental considerations that come into play. Unique invasive species, specialized crops and extreme weather conditions are but a few of the distinctive challenges for these nations and territories. Then there is the issue of available supplies of the proper equipment, plant materials and seed necessary for installing conservation systems. Shipping of appropriate materials is also often quite expensive. These provisions are also important to potential customers outside the U.S. mainland that may face geographic barriers or language barriers impacting participation in USDA conservation programs.

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NRCS should fully implement the provisions of the conservation programs dealing with socially disadvantaged farmers and ranchers. The provisions of the Environmental Quality Incentives Program and the Conservation Stewardship Program that allow for higher cost share rates are important to address the unique agricultural production and increased costs associated with the remote location (relative to the lower 48 states). The conservation access provisions relating to EQIP and CSP and the allocation of five percent of funding should be available for beginning farmers and ranchers and for socially disadvantaged farmers and ranchers. This allocation is important for reaching this customer base and providing the increased cost share and incentive assistance provided in the law.

The new Farm Bill provisions on EQIP provide for advanced payments for beginning, limited resource and socially disadvantaged farmers and ranchers. Utilization of this authority by NRCS is important for conservation practice adoption by customers that may not have the financial resources to incur costs up front before being reimbursed by the agency.

The 2008 Farm Bill also expands the authority of USDA to provide incentives for producers and landowners to participate in conservation programs, specifically to beginning farmers or ranchers, socially disadvantaged farmers or ranchers, limited resource farmers or ranchers and Indian tribes.

NACD believes that these provisions are important to reaching this unique customer base. Often cultural differences, language barriers or remoteness of the agricultural operation impact conservation program delivery. We believe that these provisions of the Farm Bill will aid in the delivery of programs to a wider population. Uncertain economic times may make the provisions for advanced payments and increased cost share rates a necessity for beginning operations that may not be able to make capital investments in conservation at this time.

We appreciate your review of these comments. NACD and our members look forward to working with NRCS to implement these provisions of the Farm Bill.

Sincerely,

John Redding  
President