

National Association of Conservation Districts

October 13, 2006

Honorable James L. Connaughton Chairman, President's Council on Environmental Quality

Honorable Carlos Gutierrez Secretary of Commerce

Honorable Mike Johanns Secretary of Agriculture

Honorable Dirk Kempthorne Secretary of Interior

Honorable Mike Leavitt Administrator, Environmental Protection Agency

Re: Comments on Cooperative Conservation

We are writing to express support for the efforts of the Department of Interior, Department of Agriculture, Environmental Protection Agency and National Oceanic and Atmospheric Administration to highlight the importance cooperative conservation in reaching our conservation and environmental goals.

For nearly 70 years, conservation districts have assisted a number of federal, state, tribal governments and local organizations to provide technical, financial and educational assistance to millions of landowners to help them manage and protect the nation's land, water and related resources. Conservation districts provide the linkage for delivering numerous federal, state and other local natural resource programs at the local level working directly with more than 2.3 million cooperating land managers nationwide, district efforts touch more than 778 million acres of private land.

NACD believes that every acre counts in the adoption of a conservation practice. We support voluntary, incentive based programs that provide a range of options, providing both financial and technical assistance to guide landowners in the adoption of conservation practices, improving soil, air and water quality providing habitat and enhanced land management.

NACD has encouraged its local districts to participate in the listening sessions and provide comments. Many of the listening sessions that were held around the country reinforced the need to bring about regulatory improvements to the Endangered Species Act. NACD specifically recommends that ESA regulations should include measures that:

- ➤ Encourage and facilitate the contribution of States and local governments to the conservation and recovery of species.
- ➤ Promote private stewardship through better coordination of existing federal grants and assistance programs for voluntary conservation activities, providing technical assistance to landowners seeking to protect species on their property through conservation practices.
- ➤ Improve the habitat conservation plan (HCP) program to reduce the cost and time involved in developing HCPs and provide for more consistency in the development of mitigation standards and required HCP elements.
- ➤ Provide for more transparency within the scientific review and decisionmaking processes under the ESA and facilitate the collection and use sound data to inform all decisions required under the Act.

NACD appreciates the leadership and vision demonstrated through the White House Conference on Cooperative Conservation as well the 25 listening sessions that were held in every region of the Country. We are hopeful that the Administration will continue to encourage collaborative conservation in a manner that benefits communities, citizens, and the environment. Thank you for the opportunity to comment.

Sincerely,

Bill Wilson President National Association of Conservation Districts