



National Association of Conservation Districts

October 14, 2008

Public Comments Processing
Attn: 1018-AT50
Division of Policy and Directives Management
U.S. Fish & Wildlife Service
4401 N. Fairfax Drive, Suite 222
Arlington VA 22203

Proposed Rule 50 CFR Part 402; Interagency Cooperation Under the Endangered Species Act

On behalf of the nation's 3,000 conservation districts, the National Association of Conservation Districts (NACD) submits the following comments in response to the U.S. Fish & Wildlife Service (FWS) and National Marine Fisheries Service (NMFS) proposed modifications to those regulations implementing Section 7 of the Endangered Species Act (ESA).

Fish and wildlife are important natural resources and are necessary elements in the ecological system. They contribute to the quality of the human environment and have both monetary and aesthetic values. In a balanced program of resource conservation and development, NACD supports efforts to provide adequate food, cover and water of suitable quantity and quality for fish and wildlife. Protecting and conserving the diversity of plant and animal species is essential to maintaining a balanced and healthy ecosystem. A comprehensive approach, emphasizing total resource management will ensure habitat protection for all species and minimize the need to list additional species. Protection measures for threatened and endangered species must consider the social and economic values of private enterprise, respect for private property rights and work in harmony with other environmental laws. NACD has long-standing policy supporting the streamlining of the Section 7 consultation process through a tiered programmatic consultation at the national, state and local level.

NACD supports the reasonable and permissible proposed modifications that clarify when and how federal agencies must consult with FWS and NMFS and concurs with those comments submitted by the National Endangered Species Act Reform Coalition of which NACD is a coalition member. The Proposed Rule is appropriate and should be adopted by quick issuance of a Final Rule implementing the proposed modifications.

Sincerely,

A handwritten signature in black ink that reads 'John H. Redding'. The signature is written in a cursive style with a large initial 'J'.

John Redding
President