



National Association of Conservation Districts

October 6, 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 3000 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 provides the following comments on the Agricultural Water Enhancement Program (AWEP) under the Environmental Quality Incentives Program (EQIP). NACD submitted specific comments on the EQIP program on August 8, 2008, and we believe that many of those comments apply to the overall management of the AWEP program and contracts under the new program – technical assistance, local and regional priorities and leveraging state and regional initiatives. Working on issues that have been identified as multi-county or regional resource priorities should aid in the success of the AWEP program.

It is important that the AWEP program be available to address water quality and water quantity issues as specified in the law. As you know drought conditions across the US have highlighted water quantity issues and it continues to be an area where many producers and conservation districts are pursuing new efforts to control water use and ensure efficiency.

Congress identified priority areas in the Managers notes and we believe that the intent of Congress should be followed utilizing these priority areas of the Eastern Snake Plain Aquifer region, Puget Sound, the Ogallala Aquifer, the Sacramento River watershed, the Upper Mississippi River Basin, the Red River of the North Basin and the Everglades. These priority areas cover large expanses, but conservation districts within those regions and elsewhere across the country look forward to being able to participate as partners in the AWEP program. As local units of government, we want to ensure that our conservation district members are eligible partners (as specified in the law) as the proposed regulations to implement this program are developed.

National Headquarters
509 Capitol Court, NE, Washington, DC 20002
Phone: (202) 547-6223 Fax: (202) 547-6450
www.nacdnet.org

We recommend that NRCS solicit project applications from partners for this program during the summer prior to the beginning of the fiscal year. Under this approach, NRCS will have the applications on-hand when funding for the fiscal year is approved and can quickly move forward on the approval of appropriate applications. Due to the various methods of participation in the program (group projects and individual landowner application) we recommend that NRCS should utilize the recommendations of the local work groups to as a guide as to the interest in the program. The state can make a determination on the allocation of funds based on the recommendations from the local work groups. Region Equity states should be credited for the funding that is directed to their state in reaching the annual \$15 million state minimum, however funds in this program should not be specifically allocated to those states at the beginning of the year if there is not a reasonable expectation that they will utilize the funds (no pending applications or priorities identified by the Local Work Groups and State Tech Committee).

NACD appreciates the opportunity to provide comments on this new program and we look forward to working with you on successful implementation.

Sincerely,

John Redding
President