

COMMENTS ON ENVIRONMENTAL QUALITY INCENTIVES PROGRAM

Docket Number NRCS-IFR-08005

Comments Must Be Submitted by: March 16, 2009

Submit by Mail: Financial Assistance Program Division; Environmental Quality Incentives Program Comments; USDA Natural Resources Conservation Service, 1400 Independence Ave., Washington, DC 20250-2890

Or

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- The Environmental Quality Incentives Program (EQIP) is an important tool to address fish and wildlife conservation. It provides agricultural producers with cost share and incentive payments to further the conservation of many species, and specifically targets at-risk species. There is often little economic incentive for agricultural producers to do this work without financial assistance. Therefore, fish and wildlife opportunities under EQIP should be maximized.
- NRCS is commended for continuing to allow the advent of ranking pools to focus on key conservation issues (Section 1466.20 B). This allows the State Conservationist, with advice from the State Technical Advisory Committee, to establish strategic geographical habitat initiatives to address fish and wildlife concerns. In prior years this has been an effective tool to further the conservation of species of greatest conservation need and we encourage NRCS to continue this approach.
- In Section 1466.23 Payment Rates (c) (iv); At-risk species should be listed as a conservation need, enabling the State Conservationist to give higher priority for compensating producers for income forgone. Specifically, declining species are an important focus of society and EQIP. However, landowners have little economic incentive to manage for these species because of costs which they can not afford. Cost share and incentive payments should be maximized to help agricultural producers further the conservation of these species. Higher payment rates are key to affecting the conservation of species in most need.
- The Interim Final Rule requests comments on the definition of at-risk species that USDA has been using for implementing EQIP. We recommend that at-risk species should be determined at the state level in consultation with the state fish and wildlife agency and U.S. Fish and Wildlife Service.
- The EQIP program has been used on federal and state lands that are part of a landowner's agricultural operations. The EQIP funds, in conjunction with other Federal and State funding, has improved watershed health and fish and wildlife

habitat at the landscape scale. Therefore, we recommend that NRCS continue to allow this opportunity to persist.

- The Explanatory Statement of the Committee of Conference for the 2008 Farm Bill stated that fuel and forest management is added to the list of activities for which the Secretary will assist producers in making cost-effective changes. However, the interim rule does not mention fuels management. Therefore, the rule should be amended to include fuels management. This provides an opportunity to reduce losses through catastrophic wildfires while also improving fish and wildlife habitat.