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**From:** arnelson@iafwa.org  
**Sent:** Tuesday, October 05, 2004 2:36 PM  
**To:** FarmBillRules  
**Subject:** Attn: Conservation Security Program  
**Attachments:** ATTACHMENT.TXT; CSPCommentletter1004.DOC

Please see the attached letter from the International Association of Fish and Wildlife Agencies which includes comments on the Conservation Security Program.

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**International Association of Fish and Wildlife Agencies**  
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Washington, DC 20001  
Telephone 202-624-7890 \* Fax 202-624-7891 \* Website: [www.iafwa.org](http://www.iafwa.org)

October 5, 2005

Mr. Craig Derickson  
Conservation Security Program Manager  
Financial Assistance Programs Division  
Natural Resources Conservation Service  
P.O. Box 2890  
Washington, DC 20013-2890

Dear Mr. Derickson:

The International Association of Fish and Wildlife Agencies (Association) appreciates the opportunity to comment on the Interim Final Rule for the Conservation Security Program (CSP) published in the Federal Register on June 21, 2004 (Vol. 69, No. 118). The Association's governmental members include all 50 state fish and wildlife agencies. As public agencies charged with protection and management of the nation's fish and wildlife resources, our members recognize the critical role that Farm Bill conservation programs play in enhancing fish and wildlife habitats on private land and want to work closely with the Natural Resources Conservation Service (NRCS) as full resource management partners in the implementation of the new CSP.

The Association commends the Natural Resources Conservation Service (NRCS) for developing program eligibility provisions and assessment tools that have closely matched participation in CSP with available technical and financial resources. Using the watershed-based approach established in the Interim Final Rule also provides the flexibility necessary to respond to changes in funding availability. The Association's primary concern with administration of CSP into the future is how to fully integrate fish and wildlife resource considerations in a program that has not identified fish and wildlife conservation as a nationally significant resource concern.

The following comments are offered for your consideration in developing a final rule that addresses opportunities to enhance fish and wildlife resources wherever the program may be available. A unifying theme of the comments is the need to involve state and federal fish and wildlife managers throughout the implementation of CSP at both the national and state levels as resource management partners.

**Section 1469.4 Significant Resource Concerns.**

Although we are disappointed that conservation of fish and wildlife was not added to soil and water quality as a nationally significant resource concern in CSP, we appreciate the flexibility given to the Chief to "...determine additional nationally significant resource concerns for all land uses." The Chief also has the ability to "...approve other priority resource concerns for which

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enhancement payments will be offered for specific locations and land uses.” The Association encourages the Chief to use his authority to identify fish and wildlife as just such a priority resource concern in future CSP sign-ups.

#### **Section 1469.5 Eligibility Requirements**

The recognition that only those practices or activities that have an “ultimate conservation benefit” will be required for participation in the program is a step in the right direction to ensure that activities proposed to address one resource concern are not having adverse impacts on another resource concern. The determination of “ultimate conservation benefit” needs to include input from fish and wildlife professionals.

#### **Section 1469.6 Enrollment Criteria and Selection Process**

The Association is pleased that the watershed prioritization and identification process will consider state or national conservation and environmental issues such as wildlife/fisheries habitat. It is essential that the state and federal agencies with statutory responsibility for the nation’s fish and wildlife resources be involved in the watershed prioritization process. Conservation of fish and wildlife resources should also play an integral role in the establishment of enrollment categories and subcategories. The Interim Final Rule states that one of several factors that may be considered in development of subcategories is “...targeting program participation for locally important wildlife/fisheries habitat creation and protection...” The determination of locally important fish and wildlife habitat would clearly benefit from consultation with the agency responsible for management of the state’s fish and wildlife resources.

#### **Section 1469.7 Benchmark Condition Inventory and Conservation Stewardship Plan**

The Association supports the requirement for a benchmark condition inventory as well as making a description of the conservation and environmental benefits the contract will achieve a part of the Conservation Stewardship Plan. Evaluating the effectiveness of the Conservation Stewardship Plan in achieving its objectives should be made a part of every Plan, whether or not there is a schedule for transitioning to a higher tier within the program.

#### **Section 1469.8 Conservation Practices and Activities**

There were few wildlife-related stewardship practices or activities identified in the initial CSP enrollment categories. Wildlife practices and activities should be available in each CSP payment component, with a more comprehensive package available for enhancement payments. The need for adequate cost-share assistance for specific practices and activities to help producers achieve higher management levels or advance to higher tiers of eligibility is critical if CSP is to address fish and wildlife concerns. Since the Chief will have the authority to address unique resource conditions by making additional conservation practices, measures and enhancement activities eligible that are not included in the national list of eligible practices, he should also have the authority to raise the 50 percent cap on cost-share if necessary for successful application of practices designed to address those unique resource conditions.

#### **Section 1469.9 Technical Assistance**

The list of activities under technical assistance should specifically include monitoring and evaluation of conservation practice application. We recommend NRCS consider State agencies as partners in designing and implementing monitoring approaches to ensure a high level of accountability for CSP. The Association encourages collaborative efforts and suggests that a

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portion of the 15 percent program allocation for technical assistance be used for technical service provider type contribution and cooperative agreements as a way to fulfill the need for accountability and measurement of success for CSP.

Thank you for your consideration of the comments and recommendations submitted. If you have any questions or need additional information, please do not hesitate to contact Dave Walker, the Association's Farm Bill Coordinator at 202-624-7890 or [dwalker@iafwa.org](mailto:dwalker@iafwa.org). The Association and its member state fish and wildlife agencies look forward to working closely with NRCS to make CSP work for the benefit of the nation's fish and wildlife resources.

Sincerely,

A handwritten signature in black ink, appearing to read "John Baughman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Baughman  
Executive Vice-President