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State of Washington
Department of Fish and Wildlife

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Financial Assistance Programs Division
USDA Natural Resources Conservation Service
1400 Independence Avenue, SW
Room 5237 South Building
Washington, DC 20250-2890

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SUBJECT: Docket Number NRCS-IFR-08005; Environmental Quality Incentives Program (EQIP) Interim Final Rule Amendment Comments

Dear Sir or Madam:

Thank you for the opportunity to comment on the amendment to the interim final rule for Environmental Quality Incentives Program (EQIP) regarding conservation practices on public land. Public lands are a component of many private agriculture and forestry operations in the western United States and we commend the Natural Resources Conservation Service (NRCS) for recognizing the value of expanding EQIP's use on public lands.

The Washington Department of Fish and Wildlife (WDFW) owns or manages over 1-million acres of land in Washington State and in some cases utilizes agricultural leases and grazing permits to enhance habitat values on these lands. EQIP provides valuable assistance to our operators allowing improved stewardship of lands where grazing and agriculture occur.

We strongly support this amendment that allows EQIP contracts to include conservation practices that address identified resource concerns on public land where a participant manages such lands as a working component of their agricultural or forestry operation. The amendment mentions only long-term leases. Many public land agencies including WDFW, however, use permits to manage grazing rights. Therefore, to avoid any potential rule interpretation problems, we recommend that it be specifically clarified that both permits and leases be sufficient for a participant to prove "control" of the public land for the term of their EQIP contract.

Thank you for considering our comments. If you have any questions, please contact Don Larsen, Farm Bill Coordinator, by email at don.larsen@dfw.wa.gov or by phone at (509) 323-2967.

Sincerely,

Philip Anderson
Interim Director

cc: Mark Clark, Washington State Conservation Commission
Ken Mills, Washington State Conservation Commission
Jennifer Quan, WDFW
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