WILD FARM ALLIANCE

TO

Name: Financial Assist. Pro. Div, NRCS
Location:
Reason: Comments on Interim Rule
FAX #: 202-720-4265
Date: March 13, 2009
Number of Pages (including this one): 5

FROM

Wild Farm Alliance
FAX #: 831-761-8103
Phone #: 831-761-8408

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FAX MESSAGE

Hello,

Please see 4 attached pages

Best, [signature]

PO Box 2570, Watsonville, CA 95077 info@wildfarmalliance.org

WILD FARM ALLIANCE

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March 14, 2009

Financial Assistance Programs Division
Environmental Quality Incentives Program Comments
USDA Natural Resources Conservation Service
1400 Independence Ave.
Washington, DC 20250-2890
Fax: (202) 720-4265

RE: **COMMENTS ON ENVIRONMENTAL QUALITY INCENTIVES PROGRAM (EQIP)** Docket Number NRCS-IFR-08005

Dear NRCS Financial Assistance Programs Division,

Wild Farm Alliance promotes a healthy, viable agriculture that protects and restores wild Nature. Besides providing educational materials and addressing policy issues on a national level, we work with farmers installing conservation practices in California's Central Coast region. The following comments relate to EQIP as described in the Interim Final Rule:

- Fish and Wildlife Focus. EQIP) should maximize the opportunities for conservation of fish and wildlife, specifically targeting at-risk species.

- Section 1466.20 B Ranking Key Conservation Issues. We encourage NRCS to continue to allow State Conservationists, with advice from their State Technical Advisory Committees, to establish strategic geographical habitat initiatives to address fish and wildlife concerns. This strategy has been helpful in targeting the conservation of species of greatest conservation need.

- Section 1466.23 Payment Rates (c) (iv). Higher payment rates need to be incorporated for at-risk species because individual returns on investments made by landowners are small, but are large for the public trust.

- At-risk species Definition: 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.

- Use of EQIP Funds on Government Lands. We recommend that NRCS continue to allow these funds to be used on federal and state lands that are part of a landowner's agricultural operations.

- Fuel Management. The interim rule currently does not include fuels management even though the Explanatory Statement of the Committee of Conference for the 2008 Farm Bill stated that it be added to

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the list. By adding this activity, landowners will gain support in dealing with the aftermath of wildfires, which is important because sometimes inappropriate, underfunded quick fixes can jeopardize the conservation of native species.

Sincerely,

Jo Ann Baumgartner
Director