



MassWildlife

Commonwealth of Massachusetts

Division of Fisheries & Wildlife

Wayne F. MacCallum, Director

562

June 24, 2009

Financial Assistance Programs Division
U.S. Department of Agriculture
Natural Resources Conservation Service
1400 Independence Avenue SW
Room 5237 South Building
Washington, DC 20250-2890

**RE: 7 CFR Part 1466 RIN 0578-AA45 Environmental Quality Incentives Program; Amendment
Docket Number NRCS-IFR-08005 with request for comment**

To Whom It May Concern:

The Massachusetts Division of Fisheries and Wildlife (DFW) is submitting this comment letter to address the Environmental Quality Incentives Program; Amendment published in the Federal Register Vol. 74, No. 102 on Friday, May 29, 2009.

§ 1466.8 Program requirements (c)(2)(iii) The conservation practices to be implemented on the public land are necessary and will contribute to an improvement in the identified resource concern

The Massachusetts DFW would like to express support of the amendment to include conservation practices by eligible agricultural producers on public land under the Natural Resources Conservation Services (NRCS) Environmental Quality Incentives Program (EQIP). The DFW and NRCS work as part of a coordinated effort to accomplish the goals of the Massachusetts Comprehensive Wildlife Conservation Strategy (CWCS) and the NRCS has set as a priority under its Massachusetts EQIP to include wildlife and pollinator habitat as well as invasive species control. Amending the final rule to include practices implemented on public land will enable the DFW and NRCS to meet these goals on a greater number of acres. The DFW and NRCS have successfully entered into a Memorandum of Understanding resulting in the hiring of DFW staff person to provide wildlife technical assistance to implement the EQIP. The DFW has agricultural agreements with private producers on approximately 1,701 acres of state land. Practices on these acres include production of corn, cranberries, hay, maple sugar, native seed collection, salt marsh hay, vegetables, and grazing. This amendment would allow the DFW and NRCS to encourage private producers to apply for EQIP funds and receive technical assistance for conservation practices on the public lands they lease.

However, the Massachusetts DFW disagrees with limiting eligibility on public lands to private producers because it falls short of enabling the Commonwealth to implement its wildlife goals on state owned land. In the CWCS the DFW identified 257 species in greatest need of conservation. The strategies identified in the CWCS to ensure the conservation of populations of these species include habitat restoration and management. The DFW manages land as habitat for species in greatest need of conservation and implements nearly all allowable forestry practices under EQIP such as shrub/sapling management, existing forest road erosion control, construction of firebreaks, and oak regeneration. DFW owns about 140,000 acres of land (June 2009 data) of which approximately 120,000 acres are open to management for species of greatest conservation need. Of these 120,000 acres around 1,701 acres are managed by private producers and would be eligible for EQIP funding under the amendment. Leaving roughly 118,000 acres that is open to management by DFW as ineligible for EQIP does not sufficiently address management for at-risk species.

www.masswildlife.org

Division of Fisheries and Wildlife

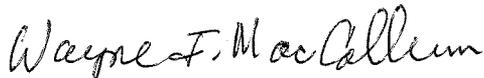
Field Headquarters, One Rabbit Hill Road, Westborough, MA 01581 (508) 389-6300 Fax (508) 389-7890

An Agency of the Department of Fisheries, Wildlife & Environmental Law Enforcement

From a landscape perspective DFW tends to manage larger parcels and from a habitat standpoint has a greater opportunity to meet the goals of the Comprehensive Wildlife Conservation Strategy than do private producers. Limiting eligibility to private producers continues to greatly decrease the number of acres on which habitat restoration, development, and enhancement for at-risk species can be directed and the ability of the DFW to meet the goals of the CWCS. With funding through EQIP, DFW managed projects on state land would have the potential to serve as models for the public and successful implementation of habitat management sets an example for private landowners who may be considering improving wildlife habitat by enrolling in EQIP. Private landowners who observe intensive management successfully completed on state land can be encouraged to participate in the process on their own private land. DFW engages in public outreach and education using sites on state land to inform the public about forest management practices and wildlife habitat conservation.

The amendment limits the ability of NRCS to address its EQIP national priority for promotion of at-risk species habitat conservation and restricts the number of acres on which necessary conservation practices will contribute to an improvement in resource concerns. It excludes funding for wildlife habitat management on the approximately 118,000 acres managed by DFW for species of greatest conservation need. In summary, limiting EQIP to private producers is too restrictive and would make it difficult for NRCS to deliver EQIP effectively in Massachusetts. Thank you for considering our comments on the Environmental Quality Incentives Program amendment.

Very truly yours,

A handwritten signature in cursive script that reads "Wayne F. MacCallum". The signature is written in dark ink and is positioned above the typed name.

Wayne MacCallum, Director