

**ROCKINGHAM COUNTY**

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February 6, 2009

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**UNH Cooperative  
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 Easements Programs Division  
 Wetlands Reserve Program  
 Comments, P.O. 2890  
 Room 6819-S  
 Washington, DC 20013

Docket # NRCS-IFR-08013

Dear Sirs:

My work involves helping private landowners, conservation organizations, communities and other groups conserve land. As such I have a great deal of contact and interaction with agencies such as NRCS and the various federal programs they administer that provide funding for land conservation including WRP and FRPP. This note is in response to the opportunity to provide written comment to the WRP Rules.

- **Template Conservation Easement** – To date the program has functioned with a “one size fits all” conservation easement coupled with stand alone Compatible Use Agreements between the landowner and NRCS. This is a troublesome arrangement at best and no doubt will present legal challenges that may well threaten the long term viability of easements completed under WRP. I urge NRCS to allow each region or, better yet, each state to develop template WRP conservation easements written by a team made up of NRCS staff, State Technical Committees and private conservation organizations. WRP template easements should incorporate all Compatible Uses that will be allowed by each NRCS State Director. Modifications to the template can be made to reflect property uniqueness and landowner interests.
- **7 Year Ownership Requirement** – This new rule will reduce enrollment in WRP radically in New Hampshire and many other states. Many of the landowners we deal with have recently inherited or purchased their property. This is because we are in a rapidly growing region and because of the long predicted generational transfer due to our aging landowner base. I would urge you to restore this and all programs to the former rule which required ownership to be at least one year.
- **Town Property Exclusion** – The new rule excludes towns and cities from enrolling in WRP and numerous other USDA programs. This rule change will negatively impact enrollment in much of New England and will exclude an exciting and rapidly growing segment of landownership. In virtually every New England state, communities have taken great steps to identify and ultimately purchase key parcels with significant natural resource features. New Hampshire communities alone have invested \$143 million over the last 7 years in conserving land. Much of this investment has been in fee acquisitions. Use of WRP funding to permanently conserve community owned properties provides long term conservation and helps leverage funding derived by resident taxpayers.

Sincerely,

Phil Auger

Land &amp; Water Conservation Educator, UNH Cooperative Extension



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