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North American Grouse Partnership

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FAX TRANSMISSION COVER SHEET

Date: March 10, 2009

To: Financial Assistance Program Division, Comments on EQIP Interim Final Rules

Fax: 202-720-4265

Re: Comment on Interim Final Rules for EQIP

Sender: Willard Heck

YOU SHOULD RECEIVE 3 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 575/273-4360.

"Our mission is to promote the conservation of grouse and the habitats necessary for their survival and reproduction."

March 10, 2009

TO: Financial Assistance Programs Division, USDA Natural Resources Conservation Service, Environmental Quality Incentives Program Comments, P O. Box 2890, Room 5237-S, Washington, DC 20013

SUBJECT: Comment on Interim Final Rules for EQIP

The North American Grouse Partnership (NAGP) is a national and international advocacy group for grouse, formed in 1999 in response to the clear conservation needs of several species.

North American grouse species, especially those occupying prairie and sage communities, have experienced serious population declines during the last 50 years. Most recently, petitions have been filed with the U. S. Fish & Wildlife Service requesting that sage grouse and Columbian sharp-tailed grouse be placed on the threatened and endangered species list. The lesser prairie-chicken is a candidate species for near-term ESA listing Some data suggest that within 10 years most prairie grouse could be endangered

Grouse habitat encompasses millions of acres of private and public land. These magnificent birds function as primary indicator species for the health of their particular habitats, and they are held in especially high esteem by sportspersons, birders, biologists and land managers

NAGP works to bring the plight of declining grouse species and their habitats to the attention of the public, provides oversight for the health of grouse populations implements solutions to the problems causing grouse declines and encourages public policies and management decisions that will enhance important habitats and grouse populations.

The Farm Bill programs are important tools for furthering the conservation of grouse and other wildlife habitat. Therefore we are providing you the following comments to help improve delivery of this important program

Sincerely,

Willard Heck
Board Chair

NAGP Officers
Willard Heck, Board Chairman; Dr. Rick Baydack, President; Mary Sealing, Secretary; Clive Sealing, Treasurer; Ralph Rogers, Executive Director

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- The Environmental Quality Incentives Program (EQIP) is an important tool to address fish and wildlife conservation. It provides agricultural producers with cost share and incentive payments to further the conservation of many species and specifically targets at-risk species. There is often little economic incentive for agricultural producers to do this work without financial assistance. Therefore, fish and wildlife opportunities under EQIP should be maximized.

- NRCS is commended for continuing to allow the advent of ranking pools to focus on key conservation issues (Section 1466.20 B). This allows the State Conservationist, with advice from the State Technical Advisory Committee, to establish strategic geographical habitat initiatives to address fish and wildlife concerns. In prior years this has been an effective tool to further the conservation of species of greatest conservation need and we encourage NRCS to continue this approach.

- In Section 1466.23 Payment Rates (c) (iv); At-risk species should be listed as a conservation priority, enabling the State Conservationist to give higher priority for compensating producers for income forgone. Specifically, declining species are an important focus of society and EQIP. However, landowners have no economic incentive to manage for these species because of costs they can not afford. Cost share and incentive payments should be maximized to help agricultural producers further the conservation of these species. Higher payment rates are key to affecting the conservation of species in most need.

- The Interim Final Rule requests comments on the definition of at-risk species that USFWS has been using for implementing EQIP. 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.

- The EQIP program has been used on federal and state lands that are part of a landowner's agricultural operations. The EQIP funds, in conjunction with other Federal and State funding, has improved watershed health and fish and wildlife habitat at the landscape scale. Therefore, we recommend that NRCS continue to allow this opportunity to persist.

- The Explanatory Statement of the Committee of Conference for the 2008 Farm Bill [illegible] and forest management is added to the list of activities for which the Secretary will assist producers in making cost-effective changes. However, the interim rule does not mention fuels management. The rule should be amended to include fuels management. This provides an opportunity to reduce losses through catastrophic wildfire [illegible] also improving fish and wildlife habitat.

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