



Natural Resources Conservation Service  
800 West Evergreen Avenue, Suite 100  
Palmer, AK 99645

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SUBJECT: ECS – Wetlands Conservation  
Compliance (WCC) & Highly  
Erodible Land (HELIC) “Separation of Duties”  
Action Plan

Date: September, 1 2012

**ACTION REQUIRED BY: October 1, 2012**

The Wetland Conservation Compliance (WCC) & Highly Erodible Land Plan (HELIC) plan for Alaska has been approved by the Regional Conservationist. The following approved plan is to be fully implemented no later than **October 1, 2012**.

**Goal:** Improve NRCS effectiveness and efficiency in carrying out the Conservation Compliance Provisions of the 1985 Food Security Act

- *Objective - Ensure separation between field conservationists and USDA program participants within their servicing unit in conducting determinations, reviews, and addressing appeals.*
  - Action Items (task, who, when):
    1. Implement NFSAM180\_514\_A Amendment AK03 for conducting certified wetland determinations and appropriate requirements for job approval authority, State Conservationist – October 1, 2012
    2. Implement NFSAM 180\_510\_B Amendment AK02 for conducting wetland determinations and maintain separation of duties, State Conservationist – October 1, 2012
    3. Make clear USDA agency responsibilities specifically Farm Service Agency and NRCS according to the NFSAM and 6-CP (Technical Notes, AK-Food Security Act Compliance, May 2012) – SRC, May 2012 - Ongoing
- *Objective – Maintain a high-valued relationship between NRCS field staff and customers*
  - Action Items (task, who, when):
    1. Ensure professional integrity of the NRCS field staff by improving knowledge, skills, and integration of the conservation planning process including HELIC/WCC, by offering planning workshops, one-on-one assistance, quality reviews, and spot checks as needed. – State Resource Conservationist, August 2012 - Ongoing
    2. Make clear USDA agency responsibilities specifically Farm Service Agency and NRCS according to the NFSAM and 6-CP (Technical Notes, AK-Food Security Act Compliance, May 2012) – SRC, May 2012 - Ongoing
- *Objective – Improve efficiencies in determinations and reviews*
  - Action Items (task, who, when):
    1. Develop and maintain an annual wetland training plan (Technical Notes, AK-Food Security Act Compliance, June 2012) required by all NRCS field staff to



maintain high quality technical skills – State Resource Ecologist, June 2012 - Ongoing

2. Implement NFSAM180\_514\_A Amendment AK03 for conducting certified wetland determinations and appropriate requirements for job approval authority, State Conservationist – October 1, 2012
3. Implement NFSAM 180\_510\_B Amendment AK02 for conducting wetland determinations and maintain separation of duties, State Conservationist – October 1, 2012
4. Ensure professional integrity of the NRCS field staff by improving knowledge, skills, and integration of the conservation planning process including HELC/WCC, by offering planning workshops, one-on-one assistance, quality reviews, and spot checks as needed. – State Resource Conservationist, August 2012 - Ongoing

➤ *Objective – Effect positive changes in NRCS HELC/WCC processes and procedures*

○ Action Items (task, who, when):

1. Provide training to effectively and efficiently implement NRCS HELC/WCC procedures – State Resource Conservationist and Staff, October 2012 - Ongoing
  2. Provide the technical skills required to make wetland determinations through guidance documents, training, and job aids – State Resource Ecologist, May 2012 - Ongoing
  3. Provide clear and understandable guidance documents including Alaska State Supplements to support the NFSAM – State Resource Conservationist and Staff, May 2012 - Ongoing
  4. Promote open communication between State Office Staff and Field Office Staff utilizing tools such as the Ecological Sciences Share Point Site, VTC (video teleconferencing), and one-on-one as needed – State Office Staff, May 2012 - Ongoing
  5. Provide alternative solutions to national guidance for Alaska if the result:
    - Improves delivery and efficiency (e.g. time and financial) in wetland determinations;
    - Provides higher quality customer service;
    - Supports superior level of professionalism;
    - Ensures impartiality in providing quality technical and financial assistance to NRCS program participants.
- State Office Staff, September 2012 - Ongoing

Alaska is data deficient in imagery, weather and climate, soil and vegetation inventories for site interpretations (i.e., resolution at the planning scale). With the limited resources in Alaska (i.e., personnel) and a limited time frame (i.e., short growing season) to conduct on-site wetland determinations, it would be impossible for a typical NRCS wetland evaluator to gain the understanding necessary to provide high quality determinations, *outside of their local service area*.

Alaska will implement NFSAM180\_514\_A Amendment AK03 to ensure impartiality in providing quality technical and financial assistance to NRCS program participants. For remote,

one person field offices, the HUB leader will ensure a separation of duties by reviewing the HEL and WC information and make the final decision on FSA compliance by signing the CPA-026.

Alaska NRCS supports the process to ensure impartiality when making any decision in implementation of sound conservation decisions. This can be achieved through a holistic and flexible plan including open communication, innovative training solutions, and a commitment to a strong technical and professional staff. We are confident the Alaska HELC/WCC Provision Improvement Action Plan will meet the National objectives.

Reference:

Alaska Bulletin AK 180-12-02 Personal Responsibilities of the NSFAM

Alaska Bulletin AK 180-12-03 Wetland Determination and Delineation of the NFSAM

Alaska Bulletin AK 180-12-04 WCC & HELC Separation of Duties