

Comments on the WRP Interim Final Rule: March 13, 2009

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FAX (2 pages)



My name is Carl Madsen, I live in Eastern South Dakota and have one of the earliest WRP contracts in our area on my land and I manage another WRP contract on land owned by friends. My family and my friends have enjoyed the many benefits of having protected wildlife habitat on our lands including hunting, bird watching, nature enjoyment, and providing sites for educational activities for groups from pre-school to college classes. I have recently retired from the U.S. Fish and Wildlife Service where I worked with USDA on the WRP and other conservation programs for more than 35 years. From this perspective, I offer the following comments on the Interim Final Rule on the Wetland Reserve Program as it appeared in the Federal Register on January 15, 2009.

•Seven Year Ownership:

I see no benefit to the WRP from restricting program participation to only those who have owned participating acres for more than 7 years. I realize that some individuals may buy wetlands and other eligible lands with an eye to enroll them in WRP in an effort to help finance the acquisition. I believe this will unnecessarily restrict program participation and will add nothing to wetland conservation. I know of no other USDA program participation that is restricted to only those who have owned affected lands for more than 7 years. Should we similarly restrict commodity price support payments, Federal Crop Insurance and other conservation programs? I think not. It would add no benefit to the programs and would defeat the purposes for which they were established, WRP included. A 7 year delay in ownership for WRP participation would do nothing for wetland conservation and should be stricken from the final rule.

•WREP: Reserved Grazing Rights:

This is a great idea, at least for our part of the country. WRP participation is sometimes criticized because it is mostly designed for people not actively engaged in farming and ranching. In most cases livestock grazing is a land use that does not diminish wetland conservation objectives and in many cases enhances wetland use by wildlife. I have several friends and neighbors who considered enrolling their land in WRP, but as they were in the business of raising cattle, they were reluctant to concede their grazing rights to the government and then have them given back at the discretion of the government; they felt they could not depend on a steady supply of forage, their management options would be gone and their business would suffer. Even though the USDA offered a fair price for the WRP contract, these people chose not to participate and the goals of wetland conservation were not achieved on their lands. A WRP program that would allow for retention of haying and grazing rights would, in my opinion, greatly enhance WRP participation in our area.

•Food Plots and Management Flexibility

I was pleased to find that the Interim Final Rule proposed no additional restrictions to the application of annual wildlife food plots on lands enrolled in WRP. In our part of the country, annual food plots are an important wildlife management practice that provides many benefits to wildlife including some migratory species. Many current WRP contract holders maintain their lands for hunting and other wildlife related activities. Their annual wildlife food plots are integral components of their wildlife management plans and provide essential elements in the life cycles of many kinds of native wildlife. Keep annual wildlife food plots as an integral part of wildlife management on WRP lands

•Hunting as a Reserved Right:

In my WRP contract and in the one I manage, hunting fishing and other quiet enjoyments were specifically excluded from the rights purchased from me by the USDA. This was very important to me and my friends as well as our families. One of the reasons we chose to participate, was to establish and maintain hunting opportunities for our families and friends. This was one of the main reasons for devoting our land to WRP. I notice in the Interim Final Rule that hunting is noted as a compatible use and not a retained right as it is in my contract. Does this mean that the USDA will get into the hunting rule making business? This would be a bad idea for USDA and NRCS as well as WRP program participation. It is my observation, that most WRP contract owners that I know, have committed their land to the program at least in part for hunting and hunting their land is very important to them. To further restrict hunting on WRP lands would restrict program participation, and not be beneficial to the wetland conservation goals of the program. Hunting and fishing are very well managed and regulated by state wildlife agencies and the U.S. Fish and Wildlife Service on all lands, WRP included. It ain't broke, so don't try to fix it. Concentrate your efforts on conserving wetlands and associated uplands and keep the WRP the strong tool it is and has been for wetland conservation

