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ASSOCIATION of
FISH & WILDLIFE
AGENCIES

The voice of fish and wildlife agencies

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To:	USDA-NRCS	From:	NABCI Committee
Fax:	202-720-4265	Pages:	4 (including this cover)
cc:		Date:	4/17/2009
Re:	WtIP Comments		

Urgent

For Review

Please Comment

Please Reply

Comments:

Please see the attached comments on WtIP. We appreciate the opportunity to comment.

Sent by Deb Hahn, AFWA
on behalf of the
U.S. NABCI Committee

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**U.S. NABCI Committee**

4506

4/19/09

April 17, 2009

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

Dear Sir or Madam:

The U.S. North American Bird Conservation Initiative (NABCI) Committee (Committee) appreciates the opportunity to comment on the Wildlife Habitat Incentives Program (WHIP). The NABCI Committee is a 22 member committee dedicated to helping partners across the continent meet their common bird conservation objectives by ensuring that organizations have the capacity to support and deliver integrated bird conservation on-the-ground. Over the past decade, the Committee's strategy has been to bring state and federal agencies, non-governmental organizations, and private landowners together to promote integrated bird conservation.

The Farm Bill is widely recognized as one of the keys to delivering landscape-scale bird conservation in the U.S. State wildlife agencies and non-governmental organizations have developed countless collaborative efforts with the Natural Resources Conservation Service (NRCS) to achieve their objectives in implementing the bird conservation objectives. Likewise, NRCS has sought out partnerships with the wildlife community to meet increasing demands related to the biological outcomes of their conservation programs. Opportunities for partnership-based Farm Bill delivery have been expanded with each successive Farm Bill and we encourage NRCS to continue this trend with the 2008 Farm Bill. The WHIP program has the opportunity to achieve meaningful changes to priority landscapes using the conservation targets and priority landscapes identified by the conservation community. The Committee has worked with NRCS over the past year and wishes to continue working with NRCS to advance these opportunities.

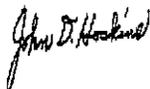
We offer the following specific comments on the WHIP Interim Rule based on our desire to see continued partnerships developed through the program:

- We commend NRCS' identified national priorities for WHIP as identified in the Interim Final Rule (i.e., promote the restoration of declining or important native fish and wildlife habitats; protect, restore, develop, or enhance fish and wildlife habitat to benefit at-risk species).

- We recommend that NRCS broaden the definition of agricultural lands to include areas other than those "on which agricultural and forest related produced or livestock are produced." Critical landscapes such as wetlands, riparian areas, and streams are often found within lands that are used for agricultural purposes and provide important conservation values (e.g. groundwater recharge) related to the agricultural operation.
- We recommend that NRCS provide as much financial incentive to an agricultural producer to participate in activities that do not, inherently, result in increased agricultural profitability. If NRCS and other partners can eliminate the cost of this habitat work the landowner may be willing to allow the habitat to be restored or enhanced.
- The Interim Rule allows for the NRCS State Conservationist, in consultation with the State Technical Committee, to give priority to WHIP practices that address unique habitats, or special geographic areas identified in a State. This will help focus resources and address the partnership opportunities that we referenced above.
- In some states, the stream bottom is often under jurisdiction of the state or federal government and, according to the interim rule, is not eligible for WHIP funding. However, these streams are integral parts of farming and ranching operations and provide critical habitat for many at-risk species. We recommend that NRCS allow these stream systems to be eligible for WHIP when the landowner who operates agricultural operations within these landscapes is willing to participate.

Thank you for the opportunity to comment on the WHIP Interim Rule. We sincerely appreciate your consideration of these comments and look forward to working together to successfully meet agricultural and wildlife conservation objectives in the implementation of the 2008 Farm Bill.

Sincerely,



John Hoskins
Chair, U.S. NABCI Committee
Director, Missouri Department of Conservation

NABCI vision: Populations and habitats of North America's birds are protected, restored, or enhanced through coordinated efforts at international, national, regional, state, and local levels, guided by sound science and effective management.

American Bird Conservancy
Association of Fish and Wildlife Agencies
Association of Joint Venture Management Boards
Bureau of Land Management
Department of Defense
Ducks Unlimited, Inc.
Farm Service Agency
Migratory Shore and Upland Game Bird Working Group
National Audubon Society
National Flyway Council
National Park Service
Natural Resources Conservation Service
North American Waterfowl Management Plan
Partners in Flight
Resident Game Bird Working Group
The Nature Conservancy
USDA Forest Service
U.S. Fish and Wildlife Service
U.S. Geological Survey
U.S. Shorebird Conservation Plan
Waterbird Conservation for the Americas
Wildlife Management Institute