

**Georgia Dept. of Natural Resources
Wildlife Resources Division
Comments on Regional Equity Rule (03 13 09)**

495

Page and section number categorizes the following comments:

Page 1588, 3rd column, second paragraph: “A Regional Equity State can request funds from the program-specific drawing accounts after the State has obligated at least 90 percent of its initial program allocation.”

We recommend adding that NRCS action and response to such reallocation requests will be made within 60 days after April 1. This ensures timely response by staff on both ends of the request and will assist the State in planning and implementing the program and obligating funds within timelines and help manage workloads in the field.

Specific Recommendations in the rule:

Page 1589 662.4 Regional Equity implementation procedure.

(a) Determine initial allocations.

We support a merit-based, natural resource focused allocation process. However, we believe that the initial allocation formula should include a component for monitoring and evaluation of state projects/programs regarding how they are meeting state and national program priorities, goals and objectives.

(c)(2)(i) We support consultation with the NRCS State Technical Committee in evaluating and determining respective program demands, and support the inclusion in subsection (c) of “State priority natural resource concerns.” We support this section as written.

(f) “...allocation of funds may be made at the discretion of the Chief.”

We feel this provision is important to maintain. It allows the vital and important flexibility for the Chief to act based on considerations such as differences between northern and southern states in planting dates and growing seasons as well as weather considerations and events.