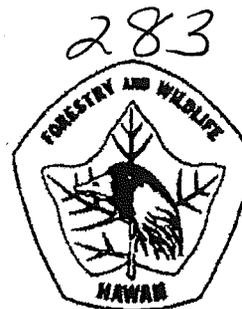




DIVISION OF FORESTRY AND WILDLIFE
 Department of Land and Natural Resources
 1151 Punchbowl Street
 Honolulu, Hawaii 96813
 FAX No. (808) 587-0160
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FAX'd TO:

Date: June 9, 2008
 To: Financial Assistance Programs Division
 Organization: USDA - NRCS
 FAX Number: (202) 720-4265
 Phone Number: _____

FAX'd FROM:

From: Missy Sprecher, Hawaii DLNR-DOFAW
 No. of Pages FAX'd (+cover): 3
 Original is to be Mailed: yes no

SPECIAL MESSAGE TO RECIPIENT:

Please find comments in association to the interim final rule for the Wildlife Habitat Incentive Program (WHIP). Originals will be mailed as well. Thanks for the opportunity to provide comments on this important conservation program.

Regards,
 Missy Sprecher
 State of Hawaii, DLNR
 Division of Forester and Wildlife
 (808) 587-4167 Melissa.I.Sprecher@hawaii.gov

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
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April 1, 2009

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LAND
STATE PARKS

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

To Whom It May Concern:

Please find comments pertaining to the interim final rule for the Wildlife Habitat Incentive Program (WHIP) due April 17, 2009. The State of Hawaii Division of Forestry and Wildlife has reviewed the proposed amendments to this Farm Bill program and has the following comments.

A relatively small amount of funding is available to aid in conservation and restoration work in the islands compare to the quantity of work that is needed to protect many of our natural resources. Hawaii, for instance, is home to the largest number of threatened and endangered species in the nation and deals with the constant struggle with invasive species spreading through the island's environment as well as the continued introduction of new potentially invasive species. Therefore in Hawaii, access to landowner assistance programs is essential for both private entities as well as for State agencies.

Partnerships between federal, state, and local landowners and institutions can stretch small amounts of funding much further, enabling landscape level/cross-boundary projects. Many of these projects are essential in achieving threatened and endangered species preservation goals, as well as controlling invasive species which have no boundaries. The State has unitized funding through the WHIP program in the past and would like to expand this type of partnership wherever possible. State land in Hawaii has some of the greatest potential to improve wildlife habitat and control threats to rare and declining native species. Reducing the access of public lands in WHIP greatly impacts the State's ability to address these resource needs.

Furthermore, land held by the State but leased out to private individuals or entities should be eligible for WHIP. In the State of Hawaii, approximately 600,000 acres are held by the State and actively leased out under long-term agreements to private individuals or entities. These lands are under agreement to both large and small scale agricultural producers that may have their entire operation on State leased lands. This is a significant portion of land area in Hawaii that would benefit from WHIP. Additionally, the State holds land for the betterment of the Hawaiian people. The Department of Hawaiian Homelands, for example, provides long term leases (ie: 99 year lease transferable to future generations) of public land to people of native Hawaiian lineage.

Division of Forestry and Wildlife
WHIP Comments
April 7, 2009

These lands and land managers would greatly benefit from conservation assistance funding to help in reaching their stewardship goals.

Hawaii landowners are further limited by the new Adjusted Gross Income (AGI) limitation. Many of Hawaii's producers have had to diversify their operations to account for the extremely high price of doing business in the State. Although operators have diversified their business, this does not guarantee that funding to install conservation practice on their property is available, which in many cases can be an extremely large cost to operations. In a state greatly impacted by invasive species and struggling to keep and maintain over 350 federally listed threatened and endangered species, a case-by-case exemption for AGI is an important and justified consideration.

The State of Hawaii has one the highest number of "at risk species" in the nation. Beyond the federally listed threatened and endangered species, the State also generates an additional list of species of concern that are not included in the federal list. The Global species of concern generated by The Nature Conservancy and similar list generated by International Union of Conservation of Nature are a creditable source of identified rare and at risk species. Consideration should also be extend to "ecosystem at risk" as well as species; for Hawaii this includes the tropical dry forest ecosystem that is extremely rare and threatened throughout the world. A broad source of evidence from creditable experts pertaining to both plant and animal "at risk species" should be considered in the current definition of "at risk species" under WHIP.

The Division of Forestry and Wildlife value the inclusion of the allowed exceptions to the private land focus where significant wildlife habitat gains would be achieved and anticipates utilizing this exceptions to further the recovery of the State's many federally listed threatened and endangered species and at risk species. The Division of Forestry and Wildlife appreciates the opportunity to comment on the proposed interim final rule for EQIP and hopes they are taken under consideration where appropriate.

Sincerely,



Paul J. Conry, Administrator
Division of Forestry and Wildlife
Department of Land and Natural Resources
State of Hawaii