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Kershaw Conservation District

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February 25, 2009

Financial Assistance Programs Division
Natural Resources Conservation Service
Wildlife Habitat Incentive Program Committee
P.O. Box 2890, Room 5237-S
Washington, D.C. 20013

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Re: Comments regarding Wildlife Habitat Incentive Program proposed changes

NRCS has developed the Plan of Operation for the Wildlife Habitat Incentive Program (WHIP) since its inception. This has resulted in improved wildlife habitat for at-risk species and benefited many other species. There has been ample and determined support of the WHIP program by many cooperators throughout South Carolina as well as other states.

The Kershaw Conservation District objects to adding another layer to an already extensive list of requirements to WHIP applications. Specifically, the Operation and Maintenance Agreement, (O&M) being required **prior to funding** a contract developed by a NRCS Conservationist (unless the O&M is a generalized statement) could be a form that is signed during the signing of the initial contract to insure that all parties understand the purpose and goal of this plan.

Today, WHIP plans require the following: Application (1200) and Appendix, AGI (926), AD 1026-Highly Erodible/Wetland ID, CPA 026, Direct Deposit 1199, Entity 901, Habitat Type Index-HTI, Environmental Evaluation 52, Win-PST, RUSLE, Ranking sheet, Pesticide labels, Wildlife Habitat Job sheets, Agronomy Job sheets, Prescribed burning plans, Soils Map, Soils Description, Aerial Photography, Proof of Ownership, Annual Status Review 13, Assistance Notes, Conservation Plan of Operation, WHIP Contract **prior to funding**.

A detailed individualized O&M that has to address the installation and maintenance of each conservation practice in each field, and approved by specialist in that area of expertise (Wildlife Biologist, Fisheries Biologist, Forester, Agronomist, Endangered Species, Cultural Resources, Engineer, Soil Scientist, etc.) will result in at least 1 year and as much as 4 years for approval. Such delays will frustrate the cooperators who are initially enthusiastic about the good program that has successfully made an impact on the various species targeted. We believe that the WHIP program sufficiently addresses these various areas of concern and encourages maximum use of the program.

What is the cost benefit ratio? The cost of administration to get one acre of native grass established far exceeds the actual expense at the farm. The Kershaw Conservation District objects to the addition of more bureaucracy that will only serve negatively to thwart the cooperator interest in a very positive and workable program. The additional frustration to our partners in protecting and enhancing wildlife habitat will, in our experienced opinion, significantly reduce the number of willing participants. We believe that we have management requirements presently in place to assure a quality program in the field and that the oversight in the present program is sufficient.



Jeff L. Clark, Jr.

Chairman

Kershaw Conservation District