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INTERMOUNTAIN WEST JOINT VENTURE

FAX

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To: Financial Assistance Program Division
USDA Natural Resources Conservation Serv
Wildlife Habitat Incentives Program

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REMARKS:

Please include and consider these comments as part of the public record for this USDA Program.

Thank you.



INTERMOUNTAIN WEST JOINT VENTURE

April 9, 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 NRCS:

The Intermountain West Joint Venture (IWJV) is a coalition of 15 conservation agencies, non-profit conservation organizations, and non-governmental entities representing industry and agriculture that are collectively dedicated to the conservation of birds and their habitats across parts of eleven states in the Intermountain West. We are actively engaged with the Natural Resources Conservation Service (NRCS), Farm Services Agency, and agricultural producers to integrate wildlife with agricultural objectives and build local partnerships necessary to conserve avian habitats across the vast Intermountain West landscape.

We are currently assisting NRCS with Farm Bill program implementation by providing IWJV funding to help NRCS establish new Biologist or Range Conservationist positions in NRCS Field Offices. This increased Farm Bill delivery capacity is helping NRCS provide the technical assistance needed to assist producers in achieving their wildlife conservation objectives consistent with the IWJV's ecoregional bird conservation planning.

Our partnership has developed an IWJV Farm Bill Initiative and has employed a Farm Bill Coordinator to work with a wide range of conservation interests to facilitate effective Farm Bill conservation delivery. The following comments are a product of our analysis of the Interim Rule.

COMMENTS ON WILDLIFE HABITAT INCENTIVES PROGRAM

We offer the following comments on the WHIP Interim Rule:

- 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).

- The Interim Final Rule emphasizes the need to use the WHIP for the conservation of pollinators. We commend this emphasis but stress that the focus should be on "native" pollinators and not "managed" pollinators which are non-native (thus do not meet the rules correct definition of wildlife) and often require non-native habitats to sustain them. Other programs such as EQIP could be used to further managed pollinators. In addition, WHIP should continue its emphasis on native habitats which will support pollinators.
- The Interim Rule's definition of agricultural lands should be broadened to include areas other than just those "on which agricultural and forest related produced or livestock are produced." Many critical landscapes such as wetlands, riparian areas, streams, and aspen groves should also be eligible for cost share payments. These important wildlife habitats are often within lands that are used for agricultural purposes and provide important conservation values (e.g. groundwater recharge) related to the agricultural operation.
- Section 636.7 Cost-share Payments states that "The cost-share payment to a participant shall be reduced proportionately below 75 percent to the extent that direct Federal financial assistance is provided to the participant from sources other than NRCS, except for certain cases that merit additional cost-share assistance to achieve the intended goals of the program...." We recommend that NRCS readily grant this waiver, particularly as it relates to declining or at-risk species, because there is often little financial incentive for 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 type of habitat work the landowner may be willing to allow the habitat to be restored or enhanced. This can help recover declining species and prevent Endangered Species Act listings.
- 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, both staffing and funding, to maximize benefits where most needed. We are willing to work with you to achieve this end result.
- In some states, the stream bottom is often under jurisdiction of the state or federal government and, according to the 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. Private landowners have taken responsibility for management of these stream systems which are critical to their agricultural operations. Instream habitat practices can often both benefit at-risk fish and other aquatic species and help protect the viability of the land for food and fiber production. 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.