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General Comment

On behalf of the 153,000 member families of the Iowa Farm Bureau Federation, please accept these comments on Wildlife Habitat Incentive Program (WHIP) and its interim final rule. Iowa's largest general farm organization wants to express its suggestions to improve the final rule and to communicate Farm Bureau policy to the USDA on conservation programs. Farm Bureau supports farm programs that compensate farmers for their positive impact on habitat, wildlife and the environment.

Farm Bureau supports a formula for WHIP funding that recognizes game damage which may occur on agricultural lands as a result of increased wildlife populations on non-WHIP agricultural lands. However, controlling wildlife damage is a critical

factor in maintaining the success of American agriculture. Property owners should have the right to control wildlife in any way possible when these animals cause damage to their property or agricultural enterprises or threaten personal safety.

Wildlife utilizes private lands for habitat and landowners should be compensated for damage. We favor quantification of game animals as an essential step in determining the contribution private landowners are making to the public recreation. In addition, there is an increased need to safeguard farmers and ranchers from crop and livestock damage caused by game animals, migratory fowl, certain species of birds and predatory animals. The spread of noxious weeds from game preserves is a problem in some areas.

Therefore, with this policy in mind, the IFBF suggests the follow modifications to the interim final rule.

Program Requirements & Plan of Operations

In Subsections 636.4, Program Requirements, and 636.8 - WHIP Plan of Operations, the USDA proposes a number of changes and clarifications to definitions for program requirements and for plans of operation under a WHIP contract. Given Farm Bureau policy, we ask that these sections recognize the right of contract holders to control wildlife in any way possible when these animals cause damage to their property or agricultural enterprises or threaten personal safety.

We also ask that these sections specifically recognize the need for contract holders to manage their property in a way the effective minimizes wildlife damage to adjacent property. WHIP should not be used to generate wildlife refuges or preserves that result in crop and property damage to adjoining landowners. USDA has a responsibility to inform landowners, some of whom may not be familiar with this concern, of the need to be mindful of this issue and the options available to them to help them manage their wildlife habitat in responsible manner.

Also, the final rule should include language in these subsections that recognizes the lawful ability of landowners in these plans and agreements to remove trees, brush and wildlife that may be jeopardizing other agricultural or livestock enterprises.

Market-Based Conservation Initiatives

Subsection 636.21 - Environmental Credits For Conservation Improvements - is added to clarify that the NRCS does not assert any interest in the generation of environmental credits such as carbon, water quality, biodiversity, or wetlands preservation on land enrolled in the program other than to ensure that activities performed by the participant to obtain these credits are not contradictory to the purposes of the program.

Farm Bureau supports the USDA's recognition that these credits are the property of the farmer, landowner, or the person who applied the conservation practices on the land, regardless of the federal funds invested. This is a critical issue for the success of this program and any future private or government carbon credit programs. The IFBF supports inclusion of this language in the final rule. Farm Bureau further suggests making this language consistent among all conservation programs. We also suggest coordinating this activity with the new Office of Ecosystem Services and Markets.

The IFBF thanks you for your serious consideration of these issues and trusts that they will be fully addressed in the final rule.

Sincerely,

Rick Robinson
Environmental Policy Advisor

