

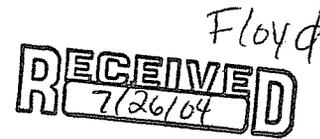


# STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
JEFFREY R. VONK, DIRECTOR

July 20, 2004



**Richard Swenson**  
**Easement Division NRCS**  
**P.O. Box 2890**  
**Washington, D.C. 20013-2890**

**Dear Mr. Swenson:**

***I would like to thank you for this opportunity to comment on the Grassland Reserve Program, notice 7 CFR Part 1415 of the federal register. The Iowa Department of Natural Resources (DNR) and the NRCS have many common goals within Iowa and the DNR has always had a good working relationship with the Iowa NRCS.***

***Please accept the following comments on the Grassland Reserve Program. I believe the suggested changes would improve the program for Iowa, while maximizing the return for the dollar expended by USDA.***

***Please contact Lyle Asell (515) 281-8656 if you have any questions regarding the attached comments.***

**Sincerely,**

A handwritten signature in cursive script, appearing to read "Liz Christiansen".

**Liz Christiansen, Deputy Director**  
**Iowa Department of Natural Resources**

## Comments on Grassland Reserve Program, Interim Final Rule

1. **Program Purpose** - At several points throughout the interim rule (pages, 29175, 29178, 29180, 29181) it states the USDA is placing a priority on protecting native or natural grass/shrub lands in the ranking process, to the extent practical, with the goal of securing the maximum conservation benefits for the federal dollar expended. The purpose of the program is most clearly stated on page 29181 of the notice where § 1415.1b reads "(1) Emphasize preservation of native and natural grasslands and shrublands, first and foremost". The interim rule also states in several places (pages 29176, 29180) the Secretary is "to emphasize the support for grazing operations, plant and animal biodiversity, and the threat of conversion in project selection". However, under both § 1415.1 and 1415.8 preservation of native and natural systems is listed as the first objective in both the program purpose and ranking criteria. It seems very clear in the rule "first and foremost" that native/natural grasslands should receive the highest consideration when states develop selection criteria for the program. **Recommendation:** The first priority in any state's ranking should be whether the offer is predominately native or natural grassland (i.e., these offers should be consider for funding before any non-native/non-natural grasslands). This could be as simple as requiring each state to designate on each offer whether it is predominately native or natural grassland. This would also allow NRCS to better track program results, benefits for dollar expended. Because of differences in vegetation and climate, states in consultation with the STC's should retain the ability to determine what qualifies as a "predominately native or natural grassland". Regardless of whether the grassland is native or non-native the ranking criteria should give priority to managed grazing systems and those with greater species diversity. We fully support the ability of states to develop their own criteria, but NRCS needs to ensure state criteria reflect the intent of the law.

2. **Criteria Used to Allocate Funds to States** - USDA requests comments on criteria used to distribute funding to the states.

"In particular, USDA asks that respondents provide information on credible data that is national in scope related to grassland plant and animal biodiversity. The current allocation formula, developed by USDA at the national level, includes data from the NRI regarding pasture and rangeland conversion, prime farmland used as range or pasture, and total range and pastureland acreage. From agriculture statistics USDA uses data regarding agriculture operations. USDA also includes information from the U.S. Fish and Wildlife Service about threatened and endangered plant and animal species. The data was categorized as either being a biodiversity, conversion, or grazing operation factor. In addition, now that USDA has collected program demand data from the 2003 signup, there will be a demand factor included in the State allocation formula."

USDA proposes to give equal weight to all factors, including the demand factor, in future sign-ups. **Recommendation:** USDA should not use a demand factor to allocated funding. Demand is in a large part driven by how well farmers/landowners are made aware of the program and previous funding levels. Certainly the states are not all equal in their promotion of this program. It would also penalize small states or states with fewer agricultural operations as fewer USDA staff in these states undoubtedly would lead to less promotion. Following the intent of the law, USDA should look at the proportion of a state's native/natural grasslands that have been lost or converted, from historic levels, as an allocation factor. NASS has data on acres of native hay and pasture/rangeland acreage through time. NASS data on wild (native) hay traces back to the early 1900's in Iowa as does pasture/rangeland

information. The 2002 Ag Census from NASS shows Iowa lost over 7,500 acres of wild hay between 1997 and 2002, and land in pasture declined by over 700,000 acres in the same time. Since threat of conversion and native/natural grasslands are 2 major purposes of the program it would seem logical for USDA to use this information to allocate funds to states. The program should target states that have had a significant decline in these grasslands over the last half century, as these states face the greatest threat of conversion of their remaining grasslands.

**3. GRP Project Management - USDA requests comments on management of GRP acreage.**

"Under this rule, USDA is requiring participants to manage the GRP acreage to move toward a certain natural resource condition without requiring that certain species of grasses, shrubs, or forbs be planted. This policy makes sense considering the general purpose of the authorizing statute on land eligibility and the high cost of reestablishing native grasses in some settings. Management requirements may change over the life of the easement or rental agreement based on the natural resource response to such activities. Since the GRP statute is not specific about the types of land that should be enrolled in the program, once land has been accepted into the program. USDA seeks input on whether a participant should be able to maintain the current cover even if it contains a monoculture of a less desirable species, or whether a participant should be required to manage the property to move toward a certain natural resource condition. "

The notice clearly states that native/natural systems are the first and foremost priority of the program. If changes suggested under comment 1 above were made, there should be few if any offers accepted for non-native/natural monocultures accepted. **Recommendation:** Implement changes referred to in comment 1. Suggest NRCS provide national guidance that if a primarily monoculture offer is accepted that it be improved to the condition required of restored grasslands accepted into the program.

**4. Industrial Windmills - Notice indicates USDA will prohibit industrial windmills on GRP contracts. Recommendation:** Until more research is conducted to fully determine the impact of windmills on animal diversity, especially birds, windmills and wind power generation should be prohibited on GRP.