

## **Comments on Interim final rule for administration of the Grassland Reserve Program:**

As noted in the Background section of the Interim final rule with request for comments, page 29175, Congress recommended that the CRP enrollment process be modeled after the Conservation Reserve Program (CRP), 16 U.S.C. 3835A and the Wetlands Reserve Program (WRP), 16 U.S.C.3837 *et seq*,

The Secretary has delegated authority to NRCS to have the lead responsibility on technical issues and easement administration, and FSA the lead responsibility for rental agreement administration and financial activities (see page 29176).

Based on the above noted recommendation from Congress and the Secretary's assignment of lead responsibilities, it would seem logical and practical to follow through with these intentions and have NRCS be responsible for the administration of easements (where they have the expertise) and FSA be responsible for administration of rental agreements (where they have the expertise). This process would avoid the duplication of administration that initially existed with EQIP and will be perpetuated under the interim final rule for GRP. It would also provide a fair distribution of work under the program and take advantage of currently existing software used by the two agencies to administer CRP and WRP.

*Received via email from posting on [FarmBillRules@usda.gov](mailto:FarmBillRules@usda.gov) sent June 29, 2004 from Richard Mickelson, Salt Lake City, Utah*