

Decker, Denise - Washington, DC

From: Barth Crouch [barth.crouch@pljv.org]
Sent: Thursday, March 12, 2009 3:18 PM
To: RA.dcwashing2.grp
Subject: GRP Rule Comments

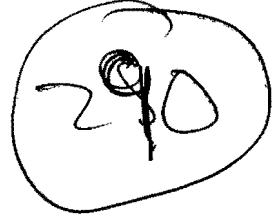
Attachments: GRPcomments.doc; barth_crouch.vcf



GRPcomments.doc
(40 KB)



barth_crouch.vcf
(327 B)



GRASSLAND RESERVE PROGRAM
Comments by Playa Lakes Joint Venture
Barth Crouch, Conservation Policy Director

- We commend NRCS for limiting wind power development on GRP easements to on farm use only. Though wind power is a valuable alternative energy source its footprint can have adverse effects on biological diversity, a purpose of the program. The Fish and Wildlife Service guidelines should be used to site on farm wind energy developments.
- We commend NRCS for continuing to recognize the value of *native* grasslands in the Interim Final Rule. We recommend that NRCS give priority to native grasslands for program eligibility with an exception in our region to allow expiring CRP grasslands that are part of an existing grassland/cropland/CRP complex that supports Lesser or Greater Prairie-Chickens to be eligible.
- Each State, at the request of Congress, has developed a Comprehensive Wildlife Strategy. These plans are important tools for focusing attention to important and declining sites of biological diversity. We recommend that NRCS use them in establishing priorities for the Grassland Reserve Program.
- We recommend that NRCS use the following definition for biological diversity:
The variety and variability among living organisms native to the ecological subregion and ecological complex.

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