

Decker, Denise - Washington, DC

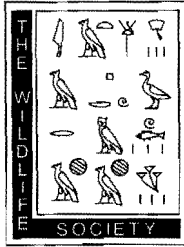
From: Laura Bies [laura@wildlife.org]
Sent: Wednesday, March 25, 2009 12:52 PM
To: RA.dcwashing2.grp
Subject: comments on GRP rule
Attachments: TWS GRP comments.3.25.09.doc

284

Attached please find comments from The Wildlife Society on the GRP rule. Although these comments are late, I hope you can still consider them.

Sincerely,

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25 March 2009

Easements Programs Division
Natural Resources Conservation Service
Grassland Reserve Program Comments
P.O. 2890
Room 6819-S
Washington, DC 20013

The Wildlife Society appreciates the opportunity to provide comments on the interim final rule for the Grassland Reserve Program. Although the comment deadline was 23 March, we hope you will still consider these comments. The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association representing over 8,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

The Grassland Reserve Program (GRP) is a very important program for the conservation of fish and wildlife resources, with the potential to provide substantial benefits to declining species associated with grassland ecosystems in the United States.

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. The Fish and Wildlife Service guidelines should be used to site on-farm wind energy developments.

We also commend NRCS for continuing to recognize the value of native grasslands in the Interim Final Rule. We recommend that that NRCS give priority to native grasslands for program eligibility. Such lands are critical to conserving biodiversity, including threatened, endangered, and at-risk species.

We note that each state, at the request of Congress, has developed a State Wildlife Action Plan. 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.

Section 1415.1 – Purpose

Thank you for including “maintaining and improving plant and animal biodiversity” and “protecting native grasslands from the threat of conversion” as program purposes.