



# Nebraska Game and Parks Commission

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Richard Swenson Director  
Easement Division  
Natural Resources Conservation Service  
P.O. Box 2890  
U.S. Department of Agriculture  
Washington, D.C. 20013-2890

Dear Mr Swenson:

The Nebraska Game and Parks Commission appreciates the opportunity to provide comments on the Grassland Reserve Program (GRP) Interim Final Rule. The Commission has responsibility for the wise use and management of Nebraska's Fish and Wildlife Resources and also has primary responsibility for managing outdoor recreation opportunities in the state. The Commission is also a partner with the NRCS in the implementation of several conservation programs provided in the 2002 Farm Bill.

In response to NRCS' request for comments and in an effort to ensure the potential benefits of the program to Nebraska and the nation's wildlife resources are realized, the Commission offers the following recommendations for your consideration.

- A. Selected Option** – The Selected Option allocates State funding as a function of the following four criteria (29174): 1) number of grazing operations; 2) acres of grassland under threat of conversion; 3) bio-diversity considerations; and 4) State demand for funds, as measured by the number of offers. We recommend that the NRCS be very careful in the use of the first criteria, or number of grazing operations. The actual number of operations may be misleading. Grazing operations tend to be much larger as individual units in the western states. We feel that the acres of grassland in a state are more important than the number of operations for purposes of fund allocation
- B. Native and Natural Grasslands** – As required by statute, emphasis will be placed on:
- 1) Supporting grazing operations;
  - 2) Plant and animal biodiversity; and grassland and land containing shrubs or forbs under the greatest threat of conversion (p 29176). On page 29177 it states "USDA intends to provide equal weight to each area of emphasis (grazing operations, threat of conversion, and biodiversity of plants and animals) and the demand category in the allocation formula." We feel that this intent on the part of USDA is right and proper for allocation of the limited dollar resources available.

The NRCS later adds an objective to the three mandated by statute and places special emphasis on it in section 1415.1 when it states that the objectives of GRP are to:

- (1) Emphasize the preservation of native and natural grasslands and shrublands, first and foremost. We feel that use of the term "natural," is incorrect and confusing even though a definition is provided later (29183). The new definition offered applies to either native or

introduced species. It becomes redundant when used in the same sentence with native. For example, the NRCS makes frequent reference to native and natural plant communities. We feel that the term should be either naturalized plants or introduced plants. Natural and naturalize share the same root but they do not mean the same thing. Webster defines natural as: "in a state provided by nature, without man made changes; wild; uncultivated." Naturalize is defined as: "to adapt (a plant or animal) to an environment not native. The NRCS could eliminate a great deal of confusion by using commonly accepted terminology instead of creating new definitions.

We agree with the authors that the statute does not identify whether the program should emphasize native species, nor does it exclude certain types of grassland or shrublands from being enrolled in the program (page 21978). However, since USDA correctly recognizes that grasslands and shrublands that are native support an abundant diversity of plant and animal species along with other attributes, we recommend that native communities receive greater consideration in the allocation process. Maintaining and improving plant and animal biodiversity is an objective of both the statute and these regulations.

**C. Monocultures** – On page 29179, USDA requests 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. From our perspective a monoculture of either native or introduced species provides only limited biodiversity and therefore, should not score high enough to be accepted in the program. Biodiversity is one of the three statutory objectives of the program.

**D. Include a definition of biodiversity in the GRP rule** – We recommend that the USDA include a definition of biodiversity in the rule to clarify the meaning of the Word. We would further recommend a definition similar to the following:

*Biodiversity for the sake of the Grassland Reserve Program means grasslands or shrublands composed of many plant species, particularly native plants, that support a diverse wildlife community. The benefits of biodiversity are greatest where plant and animal species diversity is highest.*

**E. Industrial Windmills** – We support USDA's decision to prohibit industrial windmills on GRP acreage.

Thank you again for the opportunity to comment on the Grassland Reserve Program.

Sincerely,



Rex Amack, Director  
Nebraska Game and Parks Commission