USDA United States Department of Agriculture

Farm and Foreign Agricultural Services

Farm Service Agency

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To: Juan Garcia
Deputy Administrator for Farm Programs

From: Adrian J. Polansky
State Executive Director

Adrian J. Polansky

Subject: Grazing on CRP Practice CP25, Rare and Declining Habitat

Kansas has 686,616 acres currently enrolled in Conservation Reserve Program (CRP) practice CP25 - Rare and Declining Habitat. The practice was developed to allow each State the ability to identify and restore endangered and threatened habitat ecosystems through the CRP. In Kansas, these threatened and endangered ecosystems represent our native prairies and plant communities that dominated the landscape prior to conversion to cropland and evolved over the centuries under regular fire management by Native Americans and grazing buffalo.

Although prairie ecosystems developed under grazing pressures, National policy in handbook 2-CRP, paragraphs 663, 692 and 715 eliminates the ability to use grazing as a management tool to establish and maintain these grassland communities. The National policy should not be applied to all Rare and Declining Habitat acres unilaterally. The decision to permit GRAZING under managed, emergency and routine provisions for this practice needs to be based upon the management needs of the threatened and endangered ecosystem the practice is designed to protect. The decision should be the responsibility of each State Committee with concurrence from our partners on the State Technical Committee.

This position is supported by our partners in the attached documents and the following quotes from these documents. The Kansas Department of Wildlife and Parks writes:

"This policy should apply to new and existing contracts. It is further recommended that FSA reconsider the policy prohibiting grazing activities on CP25 contracts established to grass/shrub complexes. Grazing, along with fire, are the driving ecological forces that maintain and improve our grassland resources, which CP25 is intended to restore. The long-term sustainability of all grasslands is highly dependent on the success and viability of the ranching industry. Enhancing the ability to properly maintain CRP with the use of grazing and other appropriate management activities may help slow the future rate of conversion of established grasslands to cropland, protecting the public investment in CRP's environmental achievements."

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Kansas NRCS State Conservationist, Eric Banks writes:

"Another issue related to management of CP25 is the national restriction to grazing of CP25 acres. CP25 acres in Kansas are all native prairie plant communities that evolved under large animal grazing impacts. When reestablishing a plant community that evolved under grazing pressures, it becomes difficult to establish and maintain that community when grazing has been eliminated from management options. The decision to graze CP25 acres should be based on the type of ecosystem desired to be established and the conditions related to that system. This should not be applied unilaterally to the practice. NRCS recommends FSA advise their national office that the decision whether or not to allow managed grazing CP25 acres should be left to local states with concurrence from partners."

I strongly encourage you to consider revising our FSA National Policy on this matter to permit each State Committee, in consultation with their State Technical Committee to determine whether to permit grazing on practice CP25.

Thank you for your consideration on this matter.

cc: Bruce Nelson, FSA Administrator
Misty Jones, Acting Director, CEPD