

United States Department of Agriculture



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June 6, 2011

Mr. Adrian J. Polanksy  
State Executive Director  
Farm Service Agency  
3600 Anderson Avenue  
Manhattan, Kansas 66503-2511

Dear Adrian:

Due to escalating concerns regarding prescribed burning of Conservation Reserve Program (CRP) acres in western Kansas; specifically CP25, Restoration of Rare and Declining Habitat, members of the Kansas Natural Resources Conservation Service (NRCS) State Office (SO) Staff toured CRP acres in this area on May 5, 2011.

This team met with additional NRCS, Farm Service Agency (FSA), and Kansas Department of Wildlife and Parks (KDWP) employees, and a number of conservation district (CD) board members to discuss burning of CRP acres along with touring burned and unburned fields. As a result of this trip and subsequent discussion, we are providing the attached summary of thoughts and recommendations related to implementation of prescribed burning and other concerns on CP25 acres in this area.

I would also like to express the appreciation the Kansas NRCS has for your staff and the effort put into making CRP a partnership within the state. Their hard work is a major contributor in making CRP a true team effort. This commitment and support provides Kansas U.S. Department of Agriculture (USDA) field staff a strong background for promoting and implementing CRP in the state. Thank you.

If you have any questions or would like further discussion related to this information, please contact Jon L. Ungerer at 785-823-4547 or [jon.ungerer@ks.usda.gov](mailto:jon.ungerer@ks.usda.gov).

Sincerely,

*(signed)*

ERIC B. BANKS  
State Conservationist

Attachment

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ec:

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# Conservation Reserve Program Management in Western Kansas

## Background

The western two to three tiers of counties in Kansas present some unique challenges to management of Conservation Reserve Program (CRP) acres. This region has some of the highest enrollment of cropland acres into CRP, with the majority of the acres enrolled into CP25 Rare and Declining Habitat. This region is characterized by low rainfall, 20 inches or less over most of the area, and soils that are conducive to blowing, especially in the late winter/early spring time period. Enrolled CRP acres are typically large cropland fields, with somewhat flatter terrain and only a few scattered trees or shrubs present. These conditions make establishment of the herbaceous cover a challenge and require a cautious approach when implementing management practices that disturb or totally remove existing cover prior to the start of nesting season.

CP25 acres enrolled into Short Grass Prairie are required to perform a maintenance burn one time during the contract period.

All CRP acres are required to have a mid-contract management practice completed during the contract period. The management practice must be completed before year 6 of a 10-year contract and year 9 of a 15-year contract.

The following mid-contract management practices are available to contract holders at this time:

- Light disking—available on all herbaceous cover types
  - This practice may be completed once the cover is fully established.
  - Only 50 percent of the contract acreage may be light disked each year.
- Prescribed burning
  - May be completed when cover is fully established.
- Interseeding
  - May be completed prior to stand becoming fully established.
  - May need to be preceded or followed by light disking or prescribed burning as part of seedbed preparation.

Mid-contract management practices may not be completed during the upland bird nesting season.

## Issues/Concerns

**Blowing soils:** Many soils, even those with an I factor as low as 48, can blow when the surface is exposed or bare. This makes burning and even light disking a challenge to complete prior to the April 15 date which is the beginning of the nesting season.

Exposing soils on these fields prior to when the grass has started growth leaves soils vulnerable to blowing at a time period when they are most susceptible to movement. Blowing soil creates numerous local concerns including but not limited to drifting or deposition in road right-of-ways and neighboring fields, damage to neighboring crops, and air quality or visibility issues.

When considering a prescribed burn on CRP or any rangeland area, the reason or objective for the burn needs to be considered and documented. A determination must then be made if conditions will allow for accomplishment of that objective. Burning presents a number of hazards, none of which should be taken lightly or ignored.

Reasons to burn CRP include:

- Improve grass stand density—in order to get the best response from the grass and the greatest benefit the burn should be completed after the warm-season grasses have initiated growth. Burning later promotes tillering of warm-season grasses.
- Remove mulch—on older established stands, a burn to remove excessive mulch may be accomplished anytime late winter to the start of warm-season grass growth. Earlier burns promote forb growth by exposing patches of bare ground. But, in areas prone to wind erosion, burns should not be considered until grass has started growth in order to allow for quick cover of the burned area.

Issues arise when stands are slow to establish pushing back the possible opportunities to complete the burn. Further difficulties in completing the required burn can arise from local climatic conditions creating concerns, under which prescribed burns are not recommended to be completed. These circumstances have caused a resistance to completing the maintenance burn from both contract participants and partners. NRCS offers the following to address these concerns without removing the burn requirement:

- Burn later—up until April 30 when burning for maintenance or management. Due to the later initiation of grass growth this date was extended to April 30 in the western part of the state with concurrence from wildlife partners. If this date could be extended even further to May 15, with partner concurrence, it would provide a longer window to complete maintenance or management prescribed burns.
- Burn to upgrade stand—on new enrollments when burning is needed to prepare for interseeding to bring the stand up to what was bid. These burns may be completed any time prior to seeding, May 15 or even extended two weeks by the local district conservationist when conditions are appropriate.
- Delay the scheduled burn—if/when conditions are not right or the grass is not adequately established to accomplish the burn objectives a burn should not be completed. Prior to completion of any burn there must be a reason to complete the burn. If a benefit will not be achieved from the prescribed burn it should not be completed.
- Burn exemption—the Farm Service Agency (FSA) has provided criteria under which exemptions may be allowed and a substitute practice to the burn be implemented when conditions are not conducive to burning. Poor stand establishment and lack of a benefit from completion of a burn should be considered under these conditions.

## **Conclusions**

NRCS recognizes the use of burning as a tool to accomplish certain benefits but does not recommend burning when conditions are not present which are conducive to providing an identified benefit. NRCS recommends utilization of all available options and alternatives, as indicated above, to continued completion of the required maintenance burn. If there is a continued desire to remove the required maintenance burn, NRCS recommends FSA take this issue to the Kansas State Technical Committee for their input and recommendations.

One issue that presents itself with determination of adequate stand establishment and what can be accomplished with a prescribed burn is the inability of NRCS to complete annual field reviews of every CRP contract. To alleviate some of this concern, NRCS recommends that FSA include in all correspondence to participants language advising contract participants to request NRCS assistance via a field review the year prior to anticipated/scheduled completion of a maintenance or management burn. This will allow documentation of stand establishment and conditions relative to accomplishment of a recognized goal for completion of a burn.

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.