



March 23, 2009

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

Submitted via rulemaking website at <http://www.regulations.gov>

RE: Grassland Reserve Program Interim Final Rule request for comment.

Dear Sir or Madam:

The Izaak Walton League of America is a private, non-profit conservation organization that for more than 85 years has supported strong federal conservation policies on private lands, especially agricultural lands. Our nationwide membership lives, works and recreates in rural communities. We have a decades-long record of support for farm families and collaborative efforts to achieve conservation that sustains agriculture, habitat, and all natural resources.

IWLA comments:

§ 1415.1 Purpose.

The Interim Final Rule preamble describes changes to Section 1415.1, specifically noting the removal of “the preservation of native and naturalized grasslands and shrublands” to reflect the purposes “established by the 2008 Act.” The description of this change further stipulates that USDA “recognizes the conservation value of native and naturalized grasslands” and provides “States the authority to prioritize such lands in program ranking criteria.”

We request that the provision of this authority be more explicitly stated in order to best support USDA's recognition of native grassland and shrubland's conservation value. This would be achieved by having 1415.1(b)(2) read as follows:

(2) Maintaining and improving plant and animal biodiversity, including but not limited to the preservation of native and naturalized grassland and shrubland; and

§ 1415.3 Definitions.

The IFR lists "Domestic animal productivity" as an ecosystem service under *Functions and values of grasslands and shrublands*. We believe that the productivity of domestic livestock is an important economic value of grasslands and shrublands, but we do not agree that it is also an ecosystem service unless the productivity is dependent upon and derived from a site-specific, conservation-based, resource enhancing and protecting managed grazing system.

To most succinctly achieve this distinction, we recommend the definition should read as follows:

Functions and values of grasslands and shrublands means domestic animal productivity and ecosystem services provided, including: Biological productivity, plant and animal richness and diversity, and abundance, fish and wildlife habitat (including habitat for pollinators and native insects), water quality and quantity benefits, aesthetics, open space, and recreation.

Additionally, in defining *Restoration*, the IFR does not mention the specific conservation value of native and naturalized grassland and shrubland as recognized by USDA. In particular, we believe defining "restoration" must contain reference to including native species of grasses, grass-like plants, forbs or shrubs suitable for grazing and browsing.

This important clarification would be achieved by having the definition read as follows:

Restoration means implementing any conservation practice, system of practices or activities to restore functions and values of grasslands and shrublands. The restoration may reestablish grassland functions and values on degraded land, or on land that has been converted to another use. The restoration should prioritize use of native grasses, grass-like plants, forbs or shrubs suitable for grazing and browsing.

§ 1415.8 Establishing priority for enrollment of properties.

Where the IFR stipulates in 1415.8(e) that separate ranking pools may be established by the NRCS State Conservationist and FSA State Executive Director, we recommend that the congressionally mandated Comprehensive Wildlife Conservation Strategy be specifically referenced. This would be achieved by having 1415.8(e) read as follows:

(e) NRCS State Conservationists and FSA State Executive Directors may establish separate ranking pools to address, for example, specific conservation issues raised by State, regional, and national conservation priorities, in particular each State's Comprehensive Wildlife Conservation Strategy.

Additionally, in Sections 1415.8(c)(2) and 1415.8(i)(2), we want to emphasize that the IFR appropriately stipulates that prioritization criteria specifically include the threat of conversion to uses other than grazing. We strongly encourage USDA to emphasize that conversion to agricultural uses other than grazing is perhaps the greatest threat to much of the existing rangeland and pastureland in the U.S., and certainly to land in expiring CRP enrollments. Conversion to annual crops must be a compelling threat for establishing priority for GRP enrollment of properties.

Conclusion:

The Izaak Walton League of America supports the IFR with the changes and clarifications we have detailed above. We thank you for your consideration of these comments. Please direct any inquiries regarding this submission to Brad Redlin, IWLA Agricultural Program Director, bredlin@iwla.org, (651) 649-1446 ext. 13.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Redlin', with a long horizontal line extending to the right.

Brad Redlin
Izaak Walton League of America
Agricultural Program Director
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St. Paul, MN 55104