

To: Easement Division, Natural Resources Conservation Service  
P.O. Box 2890  
Washington, D.C. 20013-2890

From: David K. Billingsley  
1841 Palisades Rd  
Palisades, WA 98845

Re: Grassland Reserve Program (GRP)

As a rancher in Douglas and Grant Counties of Central Washington State, I wish to comment on the GRP final rules. We are located in the center of a shrub-steppe area that was home to the listed Columbia Basin Pygmy Rabbit and that is still the base area for the threatened Sage Grouse.

#### Benefits of GRP

A well-funded GRP will provide a good transition for land coming out of the Conservation Reserve Program (CRP) into a productive use while maintaining the benefits of perennial grasses and shrubs. Secondly, it would provide an opportunity to restore historic grasslands that are currently only marginal farmland.

I serve on the watershed planning committee for the Moses Coulee and Foster Creek watersheds in Douglas County, and both of these instances would be of great benefit to the water and soil resources of the county along with providing significant habitat for sage grouse and other wild life.

#### Suggested Change

My greatest concern with the interim rule is there is no provision for inclusion of state-owned land. In the Moses Coulee watershed in particular, and Central Washington in general, a major part of the dry land cropland is state trust land that is dedicated to the funding of school and institutional construction projects.

To not include state land enrollment is a reversal of current CRP provisions. Without a change, much of the state land will be returned to farming. It also penalizes the private farmers that operate state leases. We lease about 2500 acres interspersed with private land that would be much better in perennial grass. This land is in a critical area for sage grouse and pygmy rabbits. It also seems inconsistent and inequitable that Tribal Lands can be included while school trust lands are denied.

We also rent grazing land from the Bureau of Land Management, and I am chairman of the Resource Advisory Council for Eastern Washington. BLM is shouldering a lot of responsibility for sage grouse recovery in the West. A viable GRP, including state lands, would provide a larger and more contiguous area for sage grouse restoration along with providing better grazing management options for ranchers.

Thank you for your attention!