



KANSAS

KATHLEEN SEBELIUS, GOVERNOR

July 19, 2004

NRCS Easement Division
P.O. Box 2890
Washington, DC 20013-2890

Dear Mr. Swenson:

The Kansas Department of Wildlife and Parks appreciates the opportunity to comment on the Grassland Reserve Program (GRP) interim final rule. Grasslands are a critical part of the Kansas ecosystem and economy. The GRP is a valuable tool that can be used to preserve and improve this valuable resource. We feel that GRP could be just as successful as the Conservation Reserve Program (CRP) in Kansas if administrated aggressively.

We offer the following comments on the GRP interim rule:

- We support the purpose and function of the program as implemented in 2003 to include:
 - Method used to allocate funding to states
 - Options to offer both easements (30 year and permanent) and rental agreements of 10, 15, 20 and 30 years
 - Flexibility to allow states to develop their own ranking criteria under broad national guidelines, including the ability to make permanent easements a priority

- We ask that the following considerations be made for the program in the future:
 - Allow a competitive bid process for the selection of both 30 year and permanent easements
 - Reduce annual rental rates from 75% of the grazing value of the land to 50% for 10, 15, 20, and 30-year rental agreement contracts
 - Aggressively promote permanent easements
 - Insure that support of grazing operations, plant and animal biodiversity and threat of conversion are co-equal in ranking GRP offers
 - Restrict the program to only native never broken grassland
 - Maintain a waiver system to allow for enrollment of tracts less than 40 acres in size when they are native (never broken) prairie remnants with good biodiversity and are under the threat of conversion. In some areas these small tracts are the only remaining natural prairie existing.
 - Allow grazing only with a plan that will maintain or improve the grass stand to, at minimum, good condition
 - Restrict haying to times outside of the primary nesting season
 - Concentrate on rural (non-urban) grasslands to increase benefit per environmental dollar spent
 - Recognize invasive species (including trees), converting diverse native grass to single species monocultures, and wind power fields as threats of conversion in addition to development and tillage.

Thank you for considering these comments and please don't hesitate to contact me for if you have questions or need more information.

Sincerely,

A handwritten signature in black ink that reads "J. Michael Hayden". The signature is written in a cursive style with a large, prominent initial "J".

J. Michael Hayden, Secretary, Kansas Dept of Wildlife & Parks

c: Harold L. Klaege, State Conservationist
Keith Sexson, Asst. Secretary of Operations, KDWP
Troy Schroeder, State Agriculture Liaison, KDWP