

Easement Division
Natural Resources Conservation Service
P.O. Box 2890
Washington, DC 20013-2890

Rec'd 7/7/04
to Martha 7/8
wedavis

Re: Comments on Grassland Easement Interim Rule

July 2, 2004

Sirs,

I am writing to comment on the Interim Rule for the Grassland Easement Program of the 2002 Farm Bill.

My family has been ranching in the Wessington Hills of Aurora County, South Dakota for close to 100 years. We have seen tremendous and unprecedented conversion of native grass to tillable cropland over the last 10 years due to incentives from Federal Crop insurance and other price and incentive distorting federal crop support programs. Literally ten's of thousands of acres of grass have been lost in the North/South region bordering the east side of the Missouri River in South Dakota.

This conversion is primarily an economic issue, it is about dollars and the question how can I get the most for each acre of land? The Grassland Easement program is a worthy attempt to address the dollar issue by providing cash incentives to keep land in grass, to reduce the dollar incentive to convert native grass, untouched for thousands of years, into row crop commodity.

What is deeply disturbing to me is the proposed prohibition on industrial windmills on GRP acreage. If dollars are the primary driver, if a rancher can get \$2000-4000 per windmill, and there is a prohibition of GRP and windmills, no sane common sense rancher is going to write that off and want to participate in GRP easements. The GRP easement dollars cannot possibly compete with windmill dollars. Tearing up the grass, putting in row crops which are eligible for still other Federal incentives, and putting in windmills will be the result in many, many cases.

The prohibition on industrial windmills on GRP acreage seems like a stingy, short sighted rule that will not result in more grass under protection but just the opposite. Millions of dollars goes to commodity producers every year which does absolutely nothing to preserve species associated with grass. Grass owners could have a chance to cash in by BOTH getting dollars from windmills AND associating the same land with a GRP easement to preserve the grass, but this proposed rule wipes that combination incentive out!

While there is some concern about how GRP benefits might be threatened by windmills there must be some way to allow for this in the final rule by:

1. limiting the numbers to say 1 tower per 160 acres
2. reducing my some % the acreage under easement if towers are present
3. some method to account for the modest impact of towers on grassland values

We currently have several thousand acres of native grass, native species such as Greater Prairie Chickens, Sharptail Grouse, Black Tailed Prairie Dogs, high numbers of native waterfowl in wet years and several towers for different purposes with very little, if any, negative effect.

Without allowing to some degree BOTH windmills and GRP easements, the conversion of priceless ecologically valuable native grass will continue unabated. Incentives must be additive, as the easement payments proposed will not be enough to compete alone with windmill payments. The biggest threat to grassland values is not windtowers but continued conversion out of grass into crops.

In summary, I strongly urge a rule modification that allows BOTH windmills and GRP easements with some factors written in to consider the very modest impact primarily during construction of windmill installation and even lower impact of their ongoing operation.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan W. Bjorkman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alan W. Bjorkman Ph. D.

2470 Briarwood Drive
Burlington, WI 53105
abjorkman@northpark.edu
262-248-0602