

Easement Division
Natural Resources Conservation Service
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I write to provide comments on the interim rule for the Grasslands Reserve Program (GRP) which was published in the Federal Register on May 21, 2004. GRP adds a much-needed new program to preserve grassland tracts throughout the United States. While this program represents a new step forward for conservation, our agency would like USDA to consider the following comments that we feel will assist with future program implementation.

1. **Method of Calculation GRP Easement Values** – the interim rule states that the value of easement payments will be determined based on the land's current market value less the grazing value of the land. The rule is not entirely clear on how the grazing value will be determined. **I suggest that USDA define how the grazing value will be determined in the final rule.**

Currently, the US Fish and Wildlife Service and Ducks Unlimited have very successful grassland easement programs in the Prairie Pothole Region of the Northern Great Plains. **I would strongly suggest that USDA work with US Fish and Wildlife Service and Ducks Unlimited to make sure that GRP easements are comparable with easements purchased under these other programs.**

2. **Balance of GRP Funding** – currently, GRP state allocated based on a formula based on the number of grazing operations, acres of grasslands under the threat of conversion, bio-diversity, and state demand for funds during the last GRP sign-up. States are then allowed to rank lands within state based on state resource concerns. **Our agency supports these allocation approaches.**
3. **Restoration and Ongoing Management** – The interim rule prioritizes on lands that have never been cultivating. **Our agency supports this.**
4. **Conservation Compliance** – **Our agency supports conservation compliance for every USDA commodity and conservation program.**

We appreciate this opportunity to comment on the interim rule for GRP and look forward to further implementation of this program for grassland stewardship.

Sincerely,

William Smith
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