

Kansas CP25 Maintenance and Management White Paper

Overview:

CP25 Rare and Declining Habitat is a national CRP practice established with the passage of the 1998 Farm Bill. The purpose of CP25 is to restore the functions and values of critically endangered, endangered and threatened habitats. Five such habitats were identified in Kansas: the Shortgrass Prairie, Mixed Grass Prairie, Tallgrass Prairie, Sand Prairie and Sand Sage Prairie. Restoration and maintenance specifications were developed by Kansas NRCS in consultation with the State Technical Committee and input from other Federal and State agencies.

Prior to the passage of the 2002 Farm Bill, CRP policy did not require management of the established cover beyond controlling noxious weeds. There was at this time a \$5.00 per acre payment incentive for cover maintenance on all general CRP practices. When developing CP25 practice specifications, Kansas stipulated a required *maintenance prescribed burn* to be applied on all CP25 acres established into the Short Grass, Mixed Grass and Tallgrass habitats. This decision supported the important ecological role fire plays in maintaining grassland habitats. No other maintenance or management was required on CP25 or any other CP practice at this time.

After passage of the 2002 Farm Bill and beginning with Sign-Up #26 in 2003, a mid-contract *management* practice was required on all CRP practices. Participants enrolled in CP25 were now required to complete a management practice in addition to the required maintenance prescribed burn. Approved CP25 management practices included light-disking, interseeding and prescribed burning. The \$5.00 maintenance incentive payment has now been eliminated on all general CRP practices. Participants are eligible to receive cost share assistance for completing required *management* practices, but there is no cost share or incentive payments for the required *maintenance* prescribed burn.

Issues:

Experience has now shown that requiring a prescribed burn on CRP in the short-grass prairie region of Kansas can be problematic. During prolonged periods of drought, it may take six to eight years for CRP cover to become fully established, making it very difficult to schedule a maintenance burn and an additional management practice during the life of the contract. Burning before cover establishment can leave the soil susceptible to highly erosive winds, burning after establishment during periods of low moisture has recently resulted in wind erosion. Improperly timed fire has resulted in unintended changes to plant structure unfavorable to wildlife. Fire, when properly prescribed, is a proven management tool used to improve grassland structure and function and enhance wildlife habitat. Requiring the use of fire to solely meet contract requirements, rather than prescribing fire based on site specific needs and objectives, has resulted in undermining the programmatic purposes of the CRP which are to conserve and improve soil, water, wildlife and other natural resources.

Recommendations:

With advent of the now required management activities and unfavorable responses to fire without adequate prescription, it seems clear the required *maintenance* burn on CP25 is no longer appropriate Kansas policy. Practice *maintenance* is the participant's responsibility to be preformed without additional cost share. The required *maintenance* burn places greater financial burden on those establishing CP25 cover over all other CP practices. CRP participants are willing to perform management activities to improve the cover but need the flexibility and adequate financial assistance to apply a suit of activities based on site specific conditions.

The Environmental Benefits Index is used to rank environmental benefits of the land being offered in CRP. The decision to choose which cover practice to establish plays a major role in the ranking process and environmental benefits the offer provides. CP25 scores high in the EBI ranking process, not for the additional maintenance burn requirement, but rather for the beneficial seeding requirements designed to improve wildlife habitat. The burning requirement has resulted in limiting producer interest in establishing CP25 cover, which has the potential to provide environmental benefits up to 15 years as opposed to 10 years for other CP practices. CP25 acres seeded to diverse mixes including shrubs are also more likely to endure after the contract has expired.

It is therefore recommended the CP25 *maintenance* burn requirement be removed from Kansas CP25 policy and a greater emphasis be placed on prescribing management activities based on site specific conditions in order to insure the statutory purposes of CRP are being met. This policy should apply to new and existing contracts. It is further recommended that FSA reconsider the policy prohibiting grazing activities on CP25 contracts established to grass/shrub complexes. Grazing, along with fire, are the driving ecological forces that maintain and improve our grassland resources, which CP25 is intended to restore. The long-term sustainability of all grasslands is highly dependent on the success and viability of the ranching industry. Enhancing the ability to properly maintain CRP with the use of grazing and other appropriate management activities may help slow the future rate of conversion of established grasslands to cropland, protecting the public investment in CRP's environmental achievements.