



INTERMOUNTAIN WEST JOINT VENTURE

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FAX

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To: USDA Natural Conservation
Service
Easement Program Division

From: Larry L. Kruckenberg
Phone: 307-777-4569
Fax: 307-777-4699

Phone:

Fax:

REMARKS:

Please accept these comments from IWJV as part of the public record for the Grassland Reserve Program.

Thank you.



INTERMOUNTAIN WEST JOINT VENTURE

March 23, 2009

USDA Natural Resources Conservation Service
Easement Programs Division
Grassland Reserve Program Comments
P.O. Box 2890, Room 6819-S
Washington, DC 20013

Dear NRCS:

The Intermountain West Joint Venture (IWJV) is a coalition of 15 conservation agencies, non-profit conservation organizations, and non-governmental entities representing industry and agriculture that are collectively dedicated to the conservation of birds and their habitats across parts of eleven states in the Intermountain West. We are actively engaged with the Natural Resources Conservation Service (NRCS), Farm Services Agency, and agricultural producers to integrate wildlife with agricultural objectives and build local partnerships necessary to conserve avian habitats across the vast Intermountain West landscape.

We are currently assisting NRCS with Farm Bill program implementation by providing IWJV funding to help NRCS establish new Biologist or Range Conservationist positions in NRCS Field Offices. This increased Farm Bill delivery capacity is helping NRCS provide the technical assistance needed to assist producers in achieving their wildlife conservation objectives consistent with the IWJV's ecoregional bird conservation planning.

Our partnership has developed an IWJV Farm Bill Initiative and has employed a Farm Bill Coordinator to work with a wide range of conservation interests to facilitate effective Farm Bill conservation delivery. The following comments are a product of our analysis of the Interim Rule.

COMMENTS ON GRASSLAND RESERVE PROGRAM

We offer the following comments on the GRP Interim Rule:

- We commend NRCS for limiting wind power development on GRP easements to on farm use only. Though wind power is a valuable alternative energy source its footprint can have adverse effects on biological diversity, a purpose of the program. We

recommend that existing or future state and/or federal regulatory siting documents be used for wind energy developments proposed on GRP easements to minimize adverse effects on biological diversity.

- We commend NRCS for continuing to recognize the value of native grasslands in the Interim Final Rule. We recommend that that NRCS give priority to native grasslands for program eligibility
- Each State, at the request of Congress, has developed a Comprehensive Wildlife Conservation Strategy. These plans are important tools for focusing attention to important the highest priorities for wildlife conservation and sites of high biological diversity. We recommend that NRCS use them in establishing priorities for the Grassland Reserve Program.
- We recommend that NRCS use the following definition for biological diversity: The variety and variability among living organisms native to the ecological subregion and ecological complex.

Thank you for the opportunity to comment on the GRP Interim Rule. We sincerely appreciate your consideration of this request and in working to coalesce agricultural and wildlife conservation objectives in the implementation of the 2008 Farm Bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Kruckenberg", is written over a large, loopy scribble that also forms the shape of the signature.

Larry Kruckenberg, Chairman

Note: The Intermountain West Joint Venture is a regional coalition of organizations, agencies, and corporations committed to bird conservation in the Intermountain West. The group includes representatives of Ducks Unlimited, Inc., National Audubon Society, Mule Deer Foundation, Montana Fish, Wildlife & Parks, Wyoming Game & Fish Department, Idaho Department of Fish and Game, Utah Division of Wildlife Resources, Nevada Division of Wildlife, Arizona Game and Fish Department, Colorado Division of Wildlife, ConocoPhillips, PacifiCorp, Flying A Ranch, and representatives of the U.S. Fish and Wildlife Service and Natural Resources Conservation Service who provide wildlife and habitat resource data and consultation relative to Farm Bill statutes, regulations, and programs. The views and positions of the Intermountain West Joint Venture group may not represent the official policy of individual organizations and agencies. For more information, please see the Intermountain West Joint Venture website at www.iwiv.org.