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To: Technical Service Provider Team
USDA Natural Resources Conservation Service
Technical Service Provider Assistance Comments
P.O. 2890, Room 5234-S
Washington, DC 20013

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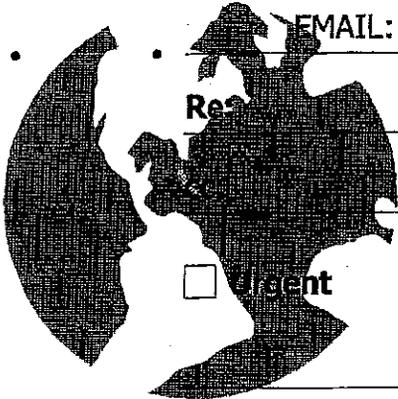
From: Nanette Baker, Administrative Assistant
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Phone: 360-902-2361

Date: March 16, 2009

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Pages: 2 with cover



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State of Washington
Department of Fish and Wildlife

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March 16, 2009

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

SUBJECT: Grassland Reserve Program (GRP) Interim Final Rule Comments

Dear Sir or Madam:

Thank you for the opportunity to comment on the Interim Final Rule for the GRP. We commend USDA for continuing to recognize the value of native and naturalized grasslands as these landscapes are critical for the conservation of biodiversity and at-risk species.

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.

Biodiversity should be considered in all planning process and management required for lands enrolled in GRP.

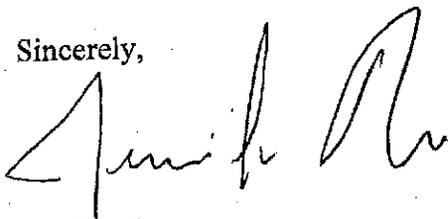
We commend NRCS for limiting wind power development on GRP easements to on-farm use only. Though wind power is a valuable alternative energy source its footprint can have adverse effects on biological diversity, a purpose of the program. The Fish and Wildlife Service guidelines should be used to site on farm wind energy developments.

We commend NRCS for continuing to recognize the value of native grasslands in the Interim Final Rule. However, we also commend NRCS for allowing expiring Conservation Reserve Program (CRP) lands to be enrolled in GRP. In Washington, certain CRP lands are providing important habitat for sage-grouse, sharp-tailed grouse and other at-risk species. With the uncertainties surrounding future general CRP signups and issues with some of our counties being over the county CRP acreage cap, our state's sage-grouse stakeholder group is counting on GRP to provide an option for expiring CRP lands.

Easement Programs Division
USDA Natural Conservation Service
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Thank you for considering our comments. Please contact Don Larsen, the Washington State Department of Fish and Wildlife (WDFW), Private Land Coordinator by email at don.larsen@dfw.wa.gov or by phone at (509) 323-2967.

Sincerely,



Jennifer Quan
Lands Division Manager

cc: Don Larson, WDFW
Mark Clark, WSCC
John Larsen, WACD
Nate Pamplin, WDFW