

North American Grouse Partnership

Rec'd 3/10/09

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FAX TRANSMISSION COVER SHEET

Date: March 10, 2009
To: Easements Program Division, Comments on GRP Interim Final Rules
Fax: 202-720-9689
Re: Comment on Interim Final Rules for GRP
Sender: Willard Heck

YOU SHOULD RECEIVE 3 PAGE(S), INCLUDING THIS COVER SHEET IF YOU DO NOT RECEIVE ALL THE PAGES. PLEASE CALL 575/273-4360.

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to Denise
3/10/09



"Our mission is to promote the conservation of grouse and the habitats necessary for their survival and reproduction."

March 10, 2009

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

SUBJECT: Comment on Interim Final Rules for GRP

The North American Grouse Partnership (NAGP) is a national and international advocacy group for grouse, formed in 1999 in response to the clear conservation needs of several species.

North American grouse species, especially those occupying prairie and sage communities have experienced serious population declines during the last 50 years. Most recently, petitions have been filed with the U. S. Fish & Wildlife Service requesting that sage grouse and Columbian sharp-tailed grouse be placed on the threatened and endangered species list. The lesser prairie-chicken is a candidate species for near-term ESA listing. Some data suggest that within 10 years most prairie grouse could be endangered.

Grouse habitat encompasses millions of acres of private and public land. These magnificent birds function as primary indicator species for the health of their particular habitats, and they are held in especially high esteem by sportspersons, birders, biologists and land managers.

NAGP works to bring the plight of declining grouse species and their habitats to the attention of the public, provides oversight for the health of grouse populations, implements solutions to the problems causing grouse declines and encourages public policies and management decisions that will enhance important habitats and grouse populations.

The Farm Bill programs are important tools for furthering the conservation of grouse and other wildlife habitat. Therefore we are providing you the following comments to help improve delivery of this important program.

Sincerely,

Willard Heck
Board Chair

NAGP Officers

Willard Heck, Board Chairman; Dr. Rick Baydack, President; Mary Sealing, Secretary; Cleo Sealing, Treasurer; Ralph Rogers, Executive Director

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GRP Interim Final Rules Comments

- 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, which puts it at odds with the purposes 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. 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 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.