

March 6, 2015

Val Dolcini
Administrator
Farm Service Agency
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Administrator Dolcini,

The 2014 Farm Bill created a new two million acre grassland enrollment option within the Conservation Reserve Program (CRP), providing a great opportunity for the Farm Service Agency (FSA) to support both working grasslands and sound conservation. The undersigned groups, representing millions of conservationists and sportsmen and women across the country, urge FSA to act quickly to implement this “CRP Working Grasslands” provision in a way that maximizes benefits for conservation and grass-based agriculture. We offer the following recommendations for implementation of this key provision:

Timing and Enrollment: We strongly urge FSA to act quickly to implement this provision in a way that makes the best use of this limited acreage and maximizes the environmental benefits. Further, due to the currently strong livestock market and ongoing conversion risks and CRP expirations, enrollments should be maximized in the early years of program implementation. We also strongly recommend that FSA work towards full enrollment of the authorized two million acres for CRP Working Grasslands.

Prioritization of Limited Acreage: To make best use of the limited acreage in CRP Working Grasslands, we recommend the program be targeted to address specific resource concerns. In particular, we recommend the following national criteria be used to prioritize acreage for enrollment:

- **Maintaining perennial cover** - Prioritize enrollments that retain grass cover of high ecological value on the landscape, in particular:
 - **Native grasslands** - Prioritize conservation of existing grasslands over restoration of grasslands. Native grassland without a cropping history should receive high priority.
 - **Existing CRP** - Prioritize expiring CRP acres, particularly those acres that also meet some of the below criteria.
- **Conversion risk** - Prioritize acres located in counties or regions of the country with the highest rates of grassland conversion or land that is at high risk of conversion.
- **Wildlife benefits** - Prioritize enrollment of grassland that provides quality habitat for priority wildlife, including but not limited to declining, candidate, threatened, or endangered species. Legislation requires grassland with forbs or shrubs or that will provide habitat for species of “significant ecological value”- and so FSA should take care to avoid monoculture enrollments, and to prioritize diverse, native vegetation. Additionally, since many species of wildlife depend on large tracts of land, we recommend that patch size be considered as well.

- **Proximity to wetlands-** Prioritize enrollment of grasslands around wetlands or in geographic regions with high wetland densities. Doing so provides multiple benefits by protecting both grassland and wetland values.

Conservation Value: As a component of the overall Conservation Reserve Program, land enrolled in the CRP Working Grasslands portion must, of course, meet the statutory conservation purposes of soil, water, and wildlife – providing conservation benefits to taxpayers as well as financial incentives to producers. In order to maximize these benefits, it is critical that not only acreage be prioritized so that only the highest quality lands be enrolled, but also that all CRP Working Grasslands enrollments be required to have a comprehensive conservation plans that adequately address soil, water, and wildlife concerns, as well as grazing, haying, and other authorized uses. Additionally, we strongly urge the agency to require that the land be managed to achieve diverse native grasses and forbs to benefit wildlife and pollinators.

Overall Implementation: We recommend that FSA implement the CRP Working Grasslands using a collaborative, stakeholder-based model. The existing State Acres for Wildlife Enhancement (SAFE) model provides an effective and proven design that we recommend be applied as an option for enrollment as part of the CRP Working Grasslands program. As with the SAFE program, federal, state, or local agencies or private conservation or agriculture organizations should be eligible to propose CRP Working Grassland projects, but unlike CREP, partners should not be required to contribute financial assistance. All states and regions would be eligible to submit proposals; however, we recommend that specific focus should be given to regional and national priority areas, based on above suggested criteria. Additionally, we recommend that the up to 2 million acres of CRP Working Grasslands enrollments should be exempt from the CRP County Acreage Caps since these lands will be in active agricultural production.

We thank you for your consideration, and hope to meet with you to discuss these recommendations further.

Sincerely,

Association of Fish and Wildlife Agencies
Center for Rural Affairs
Ducks Unlimited
Izaak Walton League of America
National Sustainable Agriculture Coalition
National Wildlife Federation
Pheasants Forever
Theodore Roosevelt Conservation Partnership