

September, 2022

USDA, NRCS, Office of the Chief  
1400 Independence Ave., SW, Room 4081-S  
Washington, DC 20250

Dear Chief Cosby, Associate Chief Aspey, and FSA Administrator Ducheneaux:

On behalf of the [Central Grasslands Roadmap](#) effort, we would like to elevate our perspective regarding the importance of conserving our Nation's grasslands through potential appropriations and policy changes involving the 2023 Farm Bill. As stated in a previous letter (March 2022; regarding conserving our grasslands), the Central Grasslands Roadmap is a **collaborative effort** to increase conservation of North America's Central Grasslands, which span more than 600 million acres across Canada, the United States, and Mexico including more than 20 million acres of Indigenous lands. By bringing together people from these three countries, multiple Indigenous nations, and seven diverse sectors (Federal agencies, provincial and state-level agencies, private sector and industry, ranchers and producers, academia, NGOs, and funders), *the Roadmap has identified collaborative priorities with a clear destination for the next 10 years and a commitment to these goals while measuring our collaborative progress to ensure resilient grasslands for the future.*

The diverse community that makes up the Central Grasslands Roadmap believes policies should be informed by science (social, biological, and traditional knowledge), promote outcome-based conservation and local flexibility, and engage community stakeholders (including owners and stewards of land and water) in designing strategies and programs to secure the wildlife, natural resources and agricultural production of the Great Plains for future generations. Moreover, in a region with a long history and where lands are predominantly First Nations or privately managed, policies should honor and reflect First Nations sovereignty; traditional knowledge and cultural values; self-determination and food sovereignty; private property rights; and the history and resilience of multi-generational land steward families and agricultural and rural communities.

The Central Grasslands are core to our natural and cultural heritage. Eighty percent is privately owned and two-thirds of this region is considered in a cultivated or degraded state. Communities are running out of water. One in four of our North America's three billion birds lost over the last 50 years are grassland birds and native pollinators are experiencing similar population trajectories. However, the remaining intact one-third of this region hosts grassland habitats that support a myriad of endangered, imperiled, and culturally significant wildlife and plant species. This region provides critical outdoor recreation activities, including camping, hiking, hunting, fishing, birding, and wildlife-watching, generating billions in revenue for the region. It is also part of our agricultural backbone supporting 64+ million cattle and 100+ types of crops providing food, fiber, fuel, and economic opportunities. The region also stores vast amounts of carbon beneath untilled grasslands that contributes to climate change mitigation; and it provides homes for 79+ million people, the majority being concentrated in large urban areas while sparsely populated rural communities inhabit much of the landscape.

The top priority for our nation's grasslands and rangelands is its conservation and restoration while building resiliency to manage through climate change, expanded drought cycles, and the expansion of invasive species including annual grasses, forbs, trees and shrubs. The key to conserving these vital landscapes for the wildlife and people that depend on them is appropriate and adequate funding. Increased investment in climate smart agriculture through the Inflation Reduction Act of 2022 provides an opportunity to direct significant financial resources toward building and supporting climate-resilient grasslands. However, over the many years, it has been the Farm Bill that has provided *"the support for many of the USDA programs, including the conservation*

*programs that provide farmers, ranchers and forest landowners with technical and financial assistance to address natural resource concerns on their land”* (USDA website: Farm Bill facts). As such, it is vital that Farm Bill funding be allocated through an informed, deliberate and strategic framework that maximizes ecological uplift to the grasslands. Doing this would help these ecosystems recover from conversion, drought, invasive plants and diseases, and support local communities and culture. Funding also needs to be accessible and honor diverse cultural values. In addition, current paperwork is daunting and creating barriers to program access across all communities.

In May 2022, the Central Grassland Roadmap Summit was held in Fort Collins, Colorado. This second summit focused on defining the Roadmap’s vision and defining high-level priorities that elevated grasslands across the three countries (Mexico, United States and Canada) and seven sectors. Over 250 attendees representing private landowners, government and state agencies, First Nations/Indigenous, non-profit organizations, Joint Ventures, as well as foundations came together to meaningfully engage, build trust and collaborative will, and construct a shared understanding through story circles, roundtable conversations, and diverse opportunities for networking and dialogue that will propel the collective work forward. To that end, the following thoughts regarding potential changes/recommendations to the Farm Bill were developed through the collective voice of the Central Grassland Roadmap effort.

### **Farm Bill Recommendations/Considerations:**

**Recommendation 1:** Private landowners/ranchers/producers unanimously cited the removal of the crop insurance subsidy *on marginal crop-land acres* (i.e. Farm the Best, Conserve the Rest).

**Recommendation 2:** In connection with crop insurance, incorporate livestock (cattle) into the definition of a farming operation, which would help diversify farming operations and provide a safety net for cow/calf operators.

**Recommendation 3:** Retain and expand Conservation Reserve Program (CRP) lands in grass, target new and re-enrolled acres in areas that buffer core and at-risk grasslands.

- Incentivize and assist with transitioning expiring CRP lands to managed rangelands instead of cropland. Assist with infrastructure needs to keep CRP grass in grass including livestock watering and fencing.
- Allow “stacking” of CRP and NRCS programs (e.g., EQIP) to help with retention of CRP (support/promote increased benefits of on the ground actions) in the landscape and to improve stand health.
- Expand local flexibility and opportunities to use grazing as a tool to help establish and maintain continuous CRP grasslands.
- Increase cost-share on native forbs and seeds to encourage native mixes that are site and climate adapted. Incentivize restoration of old CRP stands that are non-native monocultures to more diverse native cover including grasses and forbs.
- Given the complexity of the CRP grasslands, we would like the opportunity to engage and assist in identifying how we may better retain high priority intact grasslands. (i.e. on a national level, utilize Central Grassland Core Map).

**Recommendation 4:** Define ecosystem services and prioritize funded federal Farm Bill to projects that retain, restore, and enhance ecosystem services (i.e. prioritize programs to defend and expand cores as defined by the Central Grassland Core Map).

- Invest in the Great Plains Framework to direct EQIP, ACEP, and RCPP funding to address the highest

priority threats of conversion of native grasslands to cropland and conifer encroachment.

- Invest in land protection through ACEP, RCPP and other Farm Bill programs and work with partner community including local land trusts to streamline policy and get more acres protected.

**Recommendation 5:** Form a Farm Bill policy committee representing the diversity of the grasslands including all seven sectors and Sovereign Nations, which will work to insert Grassland Roadmap Priorities in the next Farm Bill. FSA and NRCS adopt the Central Grassland Core Map as the foundational document to guide and track acre metrics.

**Recommendation 6:** Streamline the processes for application and implementation of Farm Bill programs, acknowledging requirements to comply with federal laws, e.g., NEPA, ESA. The processes are complicated, and the time needed to move from the application, acceptance and the implementation of the conservation programs greatly inhibits program participation from private landowners and Indigenous communities. The excessive "red tape" of the processes, lack of incorporation of Indigenous cultural needs and values, has created large barriers to participation from landowners to Tribal communities.

**Recommendation 7:** Finally, acknowledgement, support, and incorporation of traditional knowledge and values within the Farm Bill programs are greatly needed, so that programing resonates and incorporates First Nation/Indigenous needs and values. Further, focused education and promotion to increase access by the First Nation Indigenous community to Farm Bill programs is also needed to improve grassland health and function across tribal lands.

- Develop and promote incentives to build large, connected blocks of habitat across eased, public, tribal and working lands on the landscape while supporting property rights and Tribal Sovereignty through well developed, county, federal, land trust, municipality and state partnerships with local communities.
- Develop an interagency USDA/USDI team to foster collaboration across programs, land ownership types that includes NRCS, FSA, USFS, USFWS, BLM, BIA.

The Roadmap's overarching goal through this collaborative effort is to save what we have left, restore and improve what's degraded, convert/restore native prairie and enhance biodiversity and resiliency across the landscape. During the Summit, we heard very clearly that highly organized, intentional conversations and action plans are needed across and involving First Nations and all sectors in order to achieve unified policy change in the Farm Bill. Therefore, Representatives of the Roadmap would like to continue to discuss and collaborate with the USDA officials responsible for planning and disbursing Farm Bill funding, to help guide investments to conserve our grasslands/rangelands and wildlife.

We thank you for your consideration of these Farm Bill recommendations. We are at a moment in history when we have the opportunity to effect real change for the betterment of our ecosystems and communities throughout the Great Plains. We greatly value and appreciate your time and consideration on these matters, and we look forward to working together.

We respectfully request an opportunity to communicate further via zoom or other communication platforms to discuss these recommendations and applying them across the landscape and partners.

Sincerely,

The Central Grassland Roadmap Planning Team

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**Cc:**

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