



# Wyoming Department of Agriculture

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January 10, 2006

National Association of Conservation Districts  
509 Capitol Ct. NE  
Washington, D.C. 20002

Dear Sir or Madam:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the eight Farm Bill Conservation programs; Conservation Reserve Program (CRP), Conservation Security Program (CSP), Environmental Quality Incentives Program (EQIP), Wildlife Habitat Incentives Program, (WHIP), Farm and Ranch Lands Protection Program (FRPP), Watershed Rehabilitation Program, Grassland Reserve Program (GRP), and Wetlands Reserve Program (WRP).

Our comments are specific to our mission within state government which is to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal will have major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

Wyoming's agricultural producers are appreciative of the assistance they receive from Natural Resource Conservation Services (NRCS) to implement the Farm Bill Conservation programs. The WDA does not work directly with landowners to implement these programs, but we have been actively involved in discussions throughout the state in regards to the 2007 Farm Bill revision. We will provide our suggestions on the eight programs individually below.

### **Conservation Reserve Program**

- Continue and expand the future CRP program. There are currently 285,516 acres in Wyoming CRP. There are 197,319 acres planned for expiration in 2007.

- Include additional areas in the CRP program such as ditches, riparian areas, borders between fields, etc. These areas create habitat for upland game birds, other wildlife and will help landowners' eligibility in the CSP program.
- Permit grazing on CRP without penalty. Grazing can benefit wildlife, which need open spaces next to dense cover. Grazing should occur every 3 – 5 years.

#### **Conservation Security Program**

- The Farm Bill should list approved watersheds at least five years in advance. The five years will allow enough time for landowners to prepare their operation as well as their records.
- Reduce the three-tier system to a two-tier system. This will speed up and simplify procedures.
- Provide additional funding for the program and include additional funding to provide technical assistance.
- Create a clear and concise process. The existing process is too complicated and deters landowners from participating. Others may go through the process to only find out they are not eligible.
- Many watersheds lack the digitized soil surveys to make them eligible for CSP. Provide funding to get all watersheds surveyed.

#### **Environmental Quality Incentives Program**

- EQIP is the most used and applicable program in Wyoming.
- Combine other cost share programs like WHIP with EQIP. Separate rankings at the local level to include a certain percentage of programs for wildlife. Other areas in the ranking system should include local needs and not be limited to a national scale. Broaden the project eligibility. Utilize all money after initial project selections. For example, if there is no submitted project specifically for wildlife, the money "earmarked" for wildlife projects could be shifted to pay for an irrigation improvement project or small water project.
- Continue to keep projects voluntary.

#### **Wildlife Habitat Incentives Program**

- There is no current incentive payment available through WHIP. We recommend the creation of an incentives payment to assist landowners who want to, for example, defer grazing on a percentage of land to create habitat for sage grouse. The payment would pay for this percentage and would be temporary in a given area.
- Combine WHIP with EQIP to eliminate confusion between programs. The selection or ranking at the local level could prioritize a certain percentage of wildlife projects to assure the creation of wildlife habitat.

### **Farm and Ranch Lands Protection Program**

- Continue the cost share percentage for land trust.
- There is a high interest, but funding is significantly limited. Funding is limiting an operation from entering into an easement agreement. Find alternative funding to meet high demand.
- FRPP is limited to a local land trust to match funding requirements. Some land trusts lack the financial resources to meet demand.
- Continue to use easement templates of local land trust companies, which make the process more effective.
- Combine GRP with FRPP and other easement programs to streamline the process.

### **Watershed Rehabilitation Program**

- There are 13 dams under the original Watershed Rehabilitation Program.
- Assessments are complete, but the rehabilitation work needs completed. We request funding to complete this work before these dams are too far beyond repair.

### **Grasslands Reserve Program**

- Combine with FRPP and the easement section of WRP.
- GRP lacks the cost share component of FRPP.
- The template GRP program offers, limits the easements too narrowly. The combination with FRPP and the ability to adopt the easement templates of the land trust companies will allow for more flexibility.
- GRP is limited in scope to the rural landscape. A broader spectrum of options should be included to subdivisions. For example, use an easement to keep 20-acre tracts intact and not turned into a 5-acre home sites subdivision.
- The lack of funds from the land trust companies continues to jeopardize the program from expanding.
- The management plan in GRP does not consider future changes in farming practices, weather or grazing strategies.
- Avoid government management on private lands.

### **Wetlands Reserve Program**

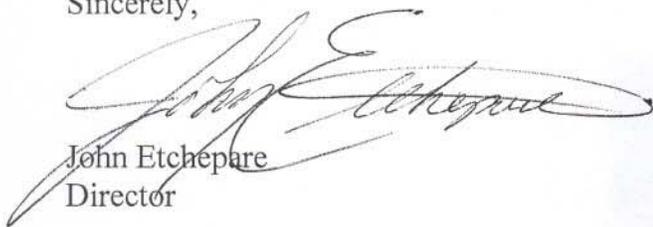
- Combine easement portion of WRP with other easement programs such as GRP and FRPP.
- Wyoming readily uses WRP to restore wetlands. We suggest WRP to include the creation of wetlands, as well. Coal bed methane produces an excessive amount of water discharge. Some landowners may have an interest in using this water to create wetlands. WRP funding can apply to create these wetlands.

The WDA supports the above recommendation of the 2007 Farm Bill. We urge the Farm Bill to emphasize the programs that make improvements to the land. We recommend keeping

these programs voluntary and ask for flexibility of funding on current projects. When programs require additional support to administer, increase funding for technical assistance. We encourage the local working groups have the ability to consider a wide range of projects as well as the landowner's need for assistance. We look forward to hearing about the changes of the 2007 Farm Bill.

Thank you for the opportunity to comment.

Sincerely,



John Etchepare  
Director

JE/jw

Cc: Governor's Planning Office  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Rocky Mountain Farmers Union  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board