

# Wyoming Department of Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.



Dave Freudenthal, Governor  
Jason Fearnelyhough Director

May 11, 2009

National Agricultural Engineer  
Natural Resources Conservation Service  
Post Office Box 2890  
Washington, D.C. 20013-2890

Dear NRCS:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the proposed changes to the Natural Resources Conservation Service's (NRCS) National Handbook (Handbook) of Conservation Practices.

Our comments are specific to our mission within state government: dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal has major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

We believe the NRCS has the best interest of private landowners in mind when proposing the changes in the Handbook. After reviewing these changes to the Handbook, the WDA's primary concern falls under Code 314: Brush Management. The NRCS has removed prescribed burning as a brush management treatment. The WDA supports the use of prescribed burning as a tool for brush management in Wyoming. Fire is both a biological and mechanical treatment creating a mosaic in sagebrush habitat, benefiting wildlife habitat and improving grazing, among other benefits.

We understand fire is not always the best treatment in all brush species. For example, landowners may want to avoid burning Wyoming big sagebrush, (*Artemisia tridentata var. wyomingensis*) due to low precipitation, slow re-growth and a high potential for cheat grass invasion post burning. Prescribed fire in these sagebrush stands may actually be more detrimental to wildlife including sage grouse. However, other species of sagebrush such as Subalpine big sagebrush (*Artemisia tridentata var. vaseyana*), juniper and many conifers encroach meadows and reduce available forage for both livestock and wildlife. These brush species will tolerate burning and we encourage NRCS to utilize prescribed fire as an acceptable treatment.

The WDA will support this change to the Handbook if NRCS is removing prescribed burning from Code 314: Brush Management simply because of duplication. However, we do not support the entire removal or de-emphasis of prescribed burning as a vegetation treatment. Additionally, we do not believe NRCS should reduce Farm Bill funding on projects or lower the project ranking due to the inclusion of prescribed fire as a method to manipulate vegetation on private lands.

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Another change NRCS proposes to the Brush Management section is the inclusion and requirement of Ecological Site Descriptions (ESD). The WDA believes in and supports the use of ESDs. Anytime a major decision to remove vegetation, such as woody vegetation, is implemented, the NRCS should utilize ESDs and guide landowners on how to manage for desired vegetation.

A final change proposed in the Brush Management section includes addressing wildlife. Many landowners manage their private lands for multiple wildlife species. We encourage the NRCS use ESDs not only for livestock, but for the benefit of wildlife as well.

Overall, we support the NRCS's changes to the Handbook. We look forward to working with our state's NRCS employees as these changes are implemented. The WDA thanks the NRCS for receiving our comments.

Sincerely,



Jason Fearneyhough  
Acting Director

JF/jw

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