



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

August 24, 2010

Director
Conservation and Environmental Programs Division
U.S. Department of Agriculture, FSA CEPD, Stop 0513
1400 Independence Ave. SW,
Washington, DC 20250-0513

Dear Director:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Interim Rule establishing the Commodity Credit Corporation (CCC) regulations for the Voluntary Public Access and Habitat Incentive Program (VPA-HIP).

Our comments are specific to our mission within state government: dedication 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.

The WDA has a number of concerns regarding the VPA-HIP as currently written. The Federal Register states the purpose of the VPA-HIP is *"to provide grants to State and tribal governments to encourage owners and operators of privately-held farm, ranch, and forest land to voluntarily make that land available for access by the public for wildlife-dependent recreation, including hunting, fishing, and other compatible recreation and to improve fish and wildlife on their land, under programs administered by State or tribal governments."*

In general, the WDA has concerns regarding the direction the Farm Bill has taken, including the 2008 Farm Bill. The original intent of the Farm Bill was for farmers and ranchers to conserve natural resources, such as water, soil and vegetation. Wildlife was and should always be a secondary benefit to the program. The introduction of programs such as VPA-HIP and the Wildlife Habitat Incentives Program (WHIP) are examples of how Farm Bill funding has deviated from the original intent of helping agricultural production. We encourage producers to participate in programs which help their bottom line, but are discouraged to see how the Farm Bill is veering off course. The WDA does not support using Farm Bill funding for the VPA-HIP.

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WDA has concern with the VPA-HIP top down approach and increased involvement of government on private lands. Private landowners are already skeptical of too much government oversight. We believe the VPA-HIP grant money has unforeseen strings attached, including additional agency staff oversight and access for monitoring projects funded by VPA-HIP.

CCC summarizes the Economic Impacts of the VPA-HIP and includes values for increased access, savings from reduced transaction costs, enhanced wildlife populations and expanded economic activity for equipment sales, motel and restaurant. We believe the VPA-HIP program fails to quantify any economic benefits to the landowner or agriculture industry.

Wildlife undoubtedly can have an economic value to landowners as can increased public access. Landowners can use the hunting season as part of their overall business plan by charging access fees, outfitting fees and collecting landowner coupons. The WDA recognizes and supports hunting on private lands when private landowners choose this endeavor at their discretion.

Some Wyoming landowners are already working cooperatively with the Wyoming Game and Fish Department (WGFD) by implementing Private Land, Public Wildlife Programs. Three programs address this issue: 1) Walk-in Areas, 2) Hunter Landowner Assistance and 3) Hunter Management Areas. We will continue to support the WGFD's current efforts, but do not encourage their involvement or implementation of the VPA-HIP.

We believe access is earned through trust and establishment of a positive working relationship between the sportsman and the landowner. Access can and often does bring negative impacts and economic hardships to the landowner. Disrespectful hunters cut fences, leave gates open, litter, shoot stock tanks and harass livestock or wildlife. While some hunters are more respectful than others, it is the unknown of what may happen when access is granted to hunters who have not established a positive working relationship with the landowner. VPA-HIP funds will not offset the expense incurred due to disrespectful hunters.

Wyoming is an expansive and beautiful state; geographically diverse with vast open spaces, teeming with wildlife. We value these resources statewide, and credit the farmers and ranchers who own and operate the private lands while keeping these spaces intact and undeveloped. Additionally, these same landowners diversify vegetative species by grazing livestock, which benefits their operation, their livestock and wildlife. Livestock producers regularly develop water wells to disperse their livestock across large pastures, while also providing a reliable water source for wildlife in these same areas. In our opinion, Wyoming farmers and ranchers are already utilizing existing programs to improve their operation and wildlife habitat, while maintaining control of who accesses their property without government intervention.

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The WDA appreciates the CCC for accepting our comments regarding the VPA-HIP. We believe the CCC should reconsider the program as it fails to meet the original intent of the Farm Bill or provide a monetary incentive for improving agricultural business practices. WDA does not support the proposed VPA-HIP.

Sincerely,



Jason Fearneyhough
Director

JF/jw

Cc: Governor's Planning Office
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