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State Forester



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COMMONWEALTH of VIRGINIA

DEPARTMENT OF FORESTRY

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January 26, 2009

Ms. Lillian Woods, Acting Director
Conservation Technical Assistance Programs Division
U. S. Department of Agriculture
Natural Resource Conservation Service
1400 Independence Avenue, SW
Room 6015 S
Washington, D. C. 20250-2890

Dear Ms. Woods:

Ref: Comment on proposed rules for State Technical Committees
Docket # NRCS- IFR-08010
7 CFR Part 610 RIN 0578 – AA51
Federal Register Vol. 73 No. 228, Tuesday, Nov. 25, 2008

The Virginia office of the NRCS recently sent a notice of the proposed rules regarding State Technical Committees. I would like to make the following comments on behalf of the Virginia Department of Forestry:

1. Section 610.22 addresses the membership of the State Technical Committee and adds *owners of non-industrial private forest land* to the Committee. We fully support this addition and believe that it will add strength to the Committee. Nearly 80 percent of forestland in Virginia is held almost 400,000 owners. These owners are beneficiaries of NRCS programs and assistance, and should be represented on the Committee.
2. We would recommend an addition to the members mentioned in this section. While adding one or more forest landowners is very positive, because of the large number of owners, we feel it would be appropriate to include a group or organization that represents forest owners on a larger level. We suggest including "*the state forestry association*" as a member to the Committee. In Virginia, the Virginia Forestry Association is made up of many landowners and other forestry interests, and would add significantly to the representation of forestry issues.

Mission: We Protect and Develop Healthy, Sustainable Forest Resources for Virginians.

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Thank you for your consideration of these comments and suggestions. Please feel free to contact me if you have any questions.

Sincerely,



Carl E. Garrison, III
State Forester

c: Mr. Jack Bricker
State Conservationist

Mr. Ken Carter
Assistant State Conservationist, Programs