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4/17/09

Greg Johnson

Director, Financial Assistance Programs Divisions, USDA Natural Resources Conservation Service
Room 5237, P.O. Box 2890
Washington, DC 20013

Re: Family Forest Owner Comments on New EQIP Rules

Dear Mr. Johnson:

Dear Mr. Johnson:

Thank you for the opportunity to provide comments on the Interim Final Rule for the Environmental Quality Incentives Program (EQIP), as published in the Federal Register on January 15, 2009 (Docket Number NRCS-IFR-08005). I'm a family forest owner with a strong interest and passion for conserving and managing my forest for both environmental and economic goals. I'm one of millions of family forest owners who own the majority of private forest land in the U.S. EQIP has the potential to help me and other family forest owners implement conservation practices that will benefit the millions of people that rely on the clean air and water, wildlife habitat, and forest products our forests provide.

I would like to applaud NRCS for clearly including family forest land (non industrial private forests) in the rule, and making changes to improve program implementation for family forest owners.

I would however like to raise three concerns that I believe will deter family forest owner participation.

First, while in some places throughout the rule, there are clear references to family forest owners and eligibility, in others, the reference is absent. In particular, the sections pertaining to beginning farmers and ranchers and socially disadvantaged farmers and ranchers should be clarified to also include forest owners. A major challenge with past EQIP implementation for family forest owners was an uncertainty among State Conservationists regarding our eligibility. It is essential that these new rules leave no doubt regarding our eligibility in the program, especially given the clear direction provided by Congress.

Second, I believe it is important that the rules automatically recognize existing, nationally recognized forest management plans such as plans created using the U.S. Forest Service Forest Stewardship Program or plans created for American Tree Farm System® certification. Plans completed under these programs should not need additional approval by each State Conservationist. This will streamline program participation for forest owners who already have acceptable, credible forest plans in place and avoid duplicative planning burdens placed on family forest owners.

Third, I would like you to make an effort to simplify the application process and speed up the payment process when a project has been completed. I completed an equip forestry project and I have been waiting 8 months for the reimbursment. Seems like a long time.

Again, thank you for your strong commitment to family forest conservation. I look forward to working with NRCS in my state to further implement the program to help conserve and manage family forests.

Sincerely,



Walter H. Lange
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